

CARDIFF HENDRE LAKES

Planning Statement

Full Planning Applications to Newport City Council



August 2020

Cardiff Parkway Developments Limited

Cardiff Hendre Lakes

Planning Statement

4-50

Pre-application Consultation | 5 August 2020

This report takes into account the particular instructions and requirements of our client.

It is not intended for and should not be relied upon by any third party and no responsibility is undertaken to any third party.

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Ove Arup & Partners Ltd
4 Pierhead Street
Capital Waterside
Cardiff CF10 4QP
United Kingdom
www.arup.com

ARUP

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1 Introduction

1.1 Background to the Proposed Development

This Planning Statement has been prepared by Ove Arup and Partners Ltd. (Arup) and accompanies three full planning applications for land to the south of St Mellons Business Park and east of Heol Las, Newport. The applications are submitted to Newport City Council (NCC) as Local Planning Authority on behalf of Cardiff Parkway Developments Limited as the Applicant.

The applications seek consent for new temporary and permanent access arrangements associated with a proposed business district of up to 90,000sqm of campus style employment floor space, together with the construction of a new transport interchange and ancillary development on land to the south of St Mellons Business Park, Cardiff hereafter referred to as ‘the Cardiff site’. The full description of the development located within Cardiff reads as follows:

“Outline planning permission, with all matters reserved, is being sought for: the construction of a business park (up to 90,000m² - Use Classes B1, B2 and B8), ancillary uses and infrastructure associated with; biodiversity; landscape; drainage; walking, cycling and other transport modes.

Together with the construction of a new transport hub facility, comprising railway station buildings (up to 2,500m² – Use Class Sui Generis) including ancillary uses), 4 no. platforms, surface car park (up to 650 no. spaces), and associated infrastructure works at land to the south of St Mellons Business Park.”

The proposed development at Cardiff Hendre Lakes is cross boundary with the majority of the proposed development located within Cardiff, however small parts of the site are located within Newport. Therefore, three separate full planning applications dealing with access arrangements from Heol Las are being submitted to NCC for which this Planning Statement has been prepared. The principal technical assessments including the Environmental Statement (ES) and the Transport Assessment (TA) have been prepared to assess the proposed development in its totality and will be submitted to support all applications within Newport and Cardiff. NCC has also been consulted during preparation of the proposals for all sites and formation of the assessments.

The full descriptions of the development located within Newport reads as follows:

1.1.1 Application 1: Public Right of Way

“Full planning permission is sought for the installation of a new pedestrian/cycleway bridge for Public Right of Way St Mellons No.4A, at the junction with Heol Las and St Mellons Road, to provide a new shared use active travel route across the widened Green Lane Reen from Heol Las into the proposed Cardiff Hendre Lakes development.”

1.1.2 Application 2: Gas Pressure Reduction Station

“Full planning permission is sought for the installation of a new warping course surface, fencing, bollards and road markings north of the Gas Pressure Reduction Station, Heol Las, at the location of an existing agricultural access, to provide a new shared use active travel route across the Green Lane Reen from Heol Las into the proposed Cardiff Hendre Lakes development.”

1.1.3 Application 3: South of the Railway Line

“Full planning permission is sought for the installation of kerbing, fencing and road markings associated with a new permanent access road and junction to the south of the Green Lane Overbridge, Heol Las, to provide a new railway maintenance access road across the Green Lane Reen from Heol Las into the proposed Cardiff Parkway Station. Plus the installation of an earthwork structure tie-in associated with a new penstock within the Green Lane Reen to control water flows.”

1.2 Principle of Development

The application sites within Newport are located both within the Newport Green Belt and Countryside. Active travel routes and access to sustainable transport are actively promoted through the Newport Local Development Plan (NLDP) and specifically **Policy SP14** which states that *“Transport proposals will be supported where they provide for traffic-free walking and cycling facilities and expansion of the network and relieve traffic congestion in the long term.”*

The requirement for the three NCC planning applications are to facilitate active travel routes into the Cardiff site and the construction and maintenance of the Cardiff site.

Applications 1 and 2 open up the potential for improved active travel linkages for residents to the east of the site to the station environs.

The delivery of the improvements to the crossings of Green Lane Reen at St Mellons Road and the gas pressure reduction station are dependent on the acquisition of interests in land which are not currently within the Applicant's control.

The ES has therefore been prepared to describe and assess two forms of development proposal; one which includes the core elements of the development described in Chapter 3 of the ES but does not include the improvements (to the crossings of Green Lane Reen and the pressure reduction station), and a second "optimal" form which does include those elements.

The improvements are proposed to enhance active travel connections between the proposed development and the Newport Council administrative area. Where there are impacts of the development proposal which only occur (or are only mitigated by) through those active travel connections, the term "optimal proposed development" is used to indicate that the development including those active travel connections is being referred to.

In the case of Application 3 the implementation of the wider proposals on the Cardiff site are dependent upon planning permission being obtained for the new construction access point and crossing on the southside of the railway. It is therefore considered that without planning permission being granted for this access point the wider benefits of the Cardiff site, a strategic allocation within the Cardiff Local Development Plan (CLDP) would not be able to be fully realised.

PPW10 actively promotes co-ordinated decision making, which maximises the planning processes contribution to the well-being of Wales and its communities and seeks to avoid issues being dealt with in isolation. It is therefore right that the benefits associated with the strategic allocation for the Cardiff site are factored into the determination of the Newport planning applications and the developments whilst submitted to different Local Planning Authorities are not viewed in isolation.

The improvement works to the Public Right of Way (PRoW) access would also comply with **Policy T6** of the NLDP which supports improvements and extensions to PRoW. It is further considered that the benefits associated with the three proposed minor developments within Newport outweigh any harm associated with development within the Green Belt and countryside. Their development would enable access to Newport residents into the Cardiff site and the various benefits associated with a new transport interchange and high quality business park on the border between Cardiff and Newport.

The proposed developments within Application 1 and 2 are also considered appropriate development within the countryside and the proposals for Application 3 would not harm the openness of the Green Belt. It is therefore considered that the principle of development for the three applications is on balance, acceptable in these locations.

Subsequently, the material considerations informing the planning applications' determination concern the potential impacts that may be generated by the proposals within the context of the prevailing site constraints.

Impacts are identified, assessed and mitigated where necessary, or balanced against the opportunities presented by the development, such as facilitating the provision of accessible employment opportunities in an area experiencing socio-economic deprivation enhancing regional connectivity to generate significant socio-economic benefits.

The scheme location comprises agricultural land located within the Gwent Levels, which is an area of low-lying estuarine alluvial wetland and intertidal mudflats adjoining the north bank of the Severn Estuary. The area is characterised by an extensive network of watercourses (reens and ditches) which drain the surrounding wetlands and were established by Roman settlers in the 3rd century BC.

It is considered a remarkable example of manmade landscape reflecting many centuries of drainage and reclamation from coastal mud flats during the Roman period and onwards. This historical context has led to the area's designation as a Registered Landscape of Outstanding Historic Interest.

In addition to their historical significance, the reens, ditches and wider wetlands are an identified feature within the Site of Special Scientific Interest (SSSI) because of their rich ecological value.¹

The development proposals submitted both to NCC and CC seek to integrate with this natural and historic environment to preserve and enhance important assets whilst creating access to a high quality employment development and transport interchange.

1.3 The Statement

This Statement sets out the context for three planning applications and assesses the proposed developments against relevant policies and material planning considerations in order to justify granting consent. The Statement is ordered as follows:

- Chapter 1 provides the introduction and overview of the applications;
- Chapter 2 describes the sites locations, relevant designations and site context;
- Chapter 3 outlines the detailed pre-application process that has been undertaken for the scheme;
- Chapter 4 provides a detailed description of the proposed developments for each application;
- Chapter 5 outlines the relevant planning policy context;
- Chapter 6 provides the planning assessment for each application within the context of relevant policies and material planning considerations; and
- Chapter 7 summarises the findings of the Statement and justifies the grant of planning permission for each application.

The following documents have been prepared to support all of the planning applications to Cardiff Council (CC) and Newport. As such, they apply to and are submitted in support of the three full planning applications as well as the outline application to CC and in doing so, address the entire development proposal as one whole:

- Environmental Statement and its Non-Technical Summary;
- Design and Access Statement;
- Pre-application Consultation Report;
- Flood Consequences Assessment and Drainage Strategy; and
- Transport Assessment.

¹ <https://naturalresources.wales/media/682619/nlca34-gwent-levels-description.pdf>
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2 The Sites

2.1 Site Locations

2.1.1 Application 1: Public Right of Way

The site for Application 1 covers an area of approximately 0.02 ha as shown as inset 'A' in Figure 1 Master Site Boundary and NCC Application Locations Plan and currently comprises an existing reen crossing structure associated with PRoW St Mellons No.4A. The site is located to the north of Heol Las at the junction with St Mellons Road and immediately east of the Green Lane Reen.

2.1.2 Application 2: Gas Pressure Reduction Station

The site for Application 2 covers an area of approximately 0.08ha as shown as inset 'B' in Figure 1 Master Site Boundary and NCC Application Locations Plan and currently comprises an existing reen crossing structure associated with an agricultural access. The site is located to the north of the Gas Pressure Reduction Station and the South Wales Mainline (SWML) on Heol Las and immediately east of the Green Lane Reen.

2.1.3 Application 3: South of the Railway Line

The site for Application 3 covers an area of approximately 0.15ha as shown as inset 'C' in Figure 1 Master Site Boundary and NCC Application Locations Plan and currently comprises an area of agricultural land and highway verge. The site is located to the south of the Green Lane Overbridge which crosses the railway and immediately east of the Green Lane Reen. The land includes an existing bridge over the reen and this will provide CPDL with vehicular access into the southern lands. This bridge has the capacity to continue to be used for agricultural access to the southern lands in advance of the approval of reserved matters planning permission in Cardiff. The bridge is not being considered an option for construction purposes.

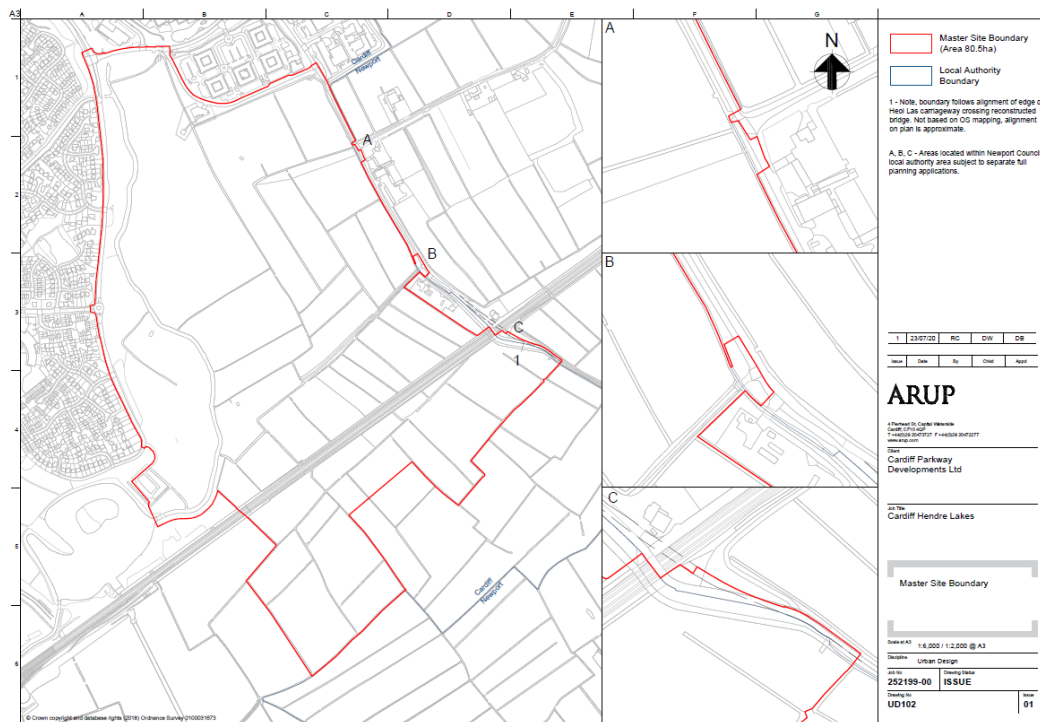


Figure 1: Master Site Boundary and NCC Application Locations

2.2 Site Context

2.2.1 Scheme Location

All three sites within NCC, plus the Cardiff site, are located approximately 8kilometres (km) east of Cardiff and 9km west of Newport with the SWML bisecting the site locations. The three NCC sites are located on the western edge of NCC and therefore the eastern edge respectively of CC's administrative boundary.

The existing character of the sites reflect the historic Gwent Levels landscape, consisting of undeveloped farmland reclaimed from the sea, incrementally over the past 2,000 years. The Levels forms a strip of flat land between the Bristol Channel and the hills to the north. A topographical survey shows a maximum range of between 4.7metres and 6.3metres Above Ordnance Datum (AOD), with no distinctive patterns of gradient across the site.

The process of land reclamation has created a distinctive patchwork of rectilinear fields subdivided by reed filled drainage channels, known locally as reens and smaller field ditches giving a strong wetland feel. Historic surface ridging is also present and well preserved.

Faendre Reen, lying adjacent to the western edge of the Cardiff site, is distinctive locally for its width and more naturalised, meandering course. Interior field boundaries also include native hedgerows and areas of dense vegetation which visually break up the site and restrict wider views, especially to the south. The

larger and more open fields in the north-western area of the sites are an exception to this.

In addition to the distinctive field boundary, overhead pylons (275kV National Grid Transmission Lines) are a dominant feature of the Cardiff site. Other utilities which cross the Cardiff site include a high-pressure gas main, two intermediate pressure gas mains (roughly parallel with each other) and a foul rising main (Dŵr Cymru Welsh Water (DCWW)).

The sites lie between St Mellons to the west and the village of Marshfield to the east. The SWML runs south west to north east across the lower section of the Cardiff site and between Applications 2 and 3. St Mellons Business Park lies immediately north of the sites. The A48(M) lies to the north of the sites which is connected via Cypress Drive which runs along the west of the site and leads to Hendre Lake. A corridor of dense wooded vegetation exists on the western side of Faendre Reen and Heol Las is located on the eastern side of the Green Lane Reen.

2.2.2 Access

Vehicular access to the three Newport sites is provided via Heol Las, a single carriage road providing access to St Mellons Business Park and onto the A48(M) and to the M4 via Cyprus Drive. Cyprus Drive, a dual carriageway, provides access to the Cardiff site.

The Cardiff site is also currently served by the 45B bus route which has a limited timetable. Routes 44, 45, X45, 64 and 65 also serve St Mellons and are within walking distance of the sites.

The sites are all walkable on foot from St Mellons and Hendre Lake Park. Movement between the site is currently restricted by Cypress Drive and Faendre Reen. PRow St Mellons No.4A crosses the site from east to west (Cyprus Drive to Heol Las) but is currently unpassable.

The Cardiff Cycling Strategy (2016-2026) proposes a Primary Route to run north from the Cardiff site along Cypress Drive, providing a link to Cardiff city centre. National Cycle Network (NCN) 88 runs along Fortran Road, close to the northern edges of the site, heading eastward to Newport along St Mellons Road, joining traffic-free routes further east.

The SWML runs through the sites. The sites are located approximately 8km from Cardiff Central Station to the west and 9km from Newport Station to the east.

The proposed development of the 'South Wales Metro' includes possible provision of Light Rail Transit as part of local rail service. Cardiff Parkway is identified as "*St Mellons Station*" on the South Wales Metro plan. These proposals therefore assist in facilitating the wider Metro aspirations.

2.2.3 Designations

The three Newport sites are wholly located within the Gwent Levels – Rumney and Peterstone SSSI, the Wentlooge Special Landscape Area (SLA), the Gwent

Levels Landscape of Outstanding Historic Interest, the Wentloog Levels Archaeologically Sensitive Area and the Newport Green Belt.

Application 1 is also located along the route of a Long Distance Walk / Cycleway (St Mellons No.4A PRoW) and Application 3 is wholly located within Newport's Undeveloped Coastal Zone.

2.2.4 Surrounding Land Uses

The sites are surrounded by land in agricultural use, transport infrastructure and urban settlements. The Cardiff site marks the transition point between the urban extent of Cardiff and the more rural Gwent Levels.

The St Mellons suburb of Cardiff is located to the Cardiff site's immediate west. St Mellons comprises a late twentieth century low density residential community served by several primary schools, a district centre with an established community hub and open spaces including Hendre Lake - a wetland habitat connected to the reën network.

To the immediate north of the sites is the St Mellons Business Park which comprises an early 1980-1990s office based business park typified by low density two storey buildings and car dependency. With the exception of the Heron Marsh pub this is mono-use development.

To the east of the sites is Heol Las and beyond this open agricultural land within the Gwent Levels and slightly further east the village of Marshfield both within NCC's administrative area. Marshfield is an established village community of approximately 2,500 residents. The village has a historic core, including St Mary's church, a post office and convenience store. The wider village includes areas of more modern suburban housing.

South of the sites is further agricultural land within the Gwent Levels and intertidal mud flats adjoining the north bank of the Severn Estuary.

The SWML crosses through the sites in a south-west to north-east direction, providing a direct transport connection for mainline trains from London to Swansea via Cardiff Central. The sites are also within close proximity to the A48(M) which provides a direct road link between Cardiff and Newport city centres.

2.2.5 Topography

The sites sit on the edge of the Gwent Levels, marking the transition between the expansive flat, lowland areas to the south and east, the undulating topography of St Mellons to the east and north and hills rising to the north.

As previously stated, the sites are largely flat with small localised level changes associated with reens. The railway is on an embankment and as a result is typically higher than adjacent land.

2.2.6 Ecosystems

The sites and surrounding habitats support populations of protected species including grass snake, barn owl, water vole, otter, bats and hazel dormice. The ecological interest is predominantly limited to the mature continuous hedgerows, primary reens and semi-improved neutral grassland particularly the area designated as a Site of Importance for Nature Conservation (SINC) north of the railway line within Cardiff.

2.2.7 Cultural Heritage and Landscape

The sites are located within The Gwent Levels Landscape of Outstanding Historic Interest in Wales. The Gwent Levels have been designated an Outstanding Landscape and a SSSI, as they are the largest and most significant example of a 'hand crafted' landscape in Wales.

The Glamorgan Gwent Archaeological Trust (GGAT) characterisation study identifies the sites as being within the 'Trowbridge' character area, on the northern edge of the designated historic landscape. The landscape is identified as being of Medieval origin, forming part of the lower-lying 'back-fen'. The area to the south and west of the sites is identified within the Peterstone character area, which is likely to be of Roman origin.

GGAT considers the sites to be within a less significant area of the levels, where piecemeal development has caused some fragmentation and its integrity and coherence as a historic landscape has been damaged, but which nonetheless has an important character and forms a buffer to the more sensitive and better preserved Roman landscape to the south.

The landscape study area for the sites is primarily made up of the Wentloog Levels, a composite part of the larger Gwent Levels. The Levels form a strip of flat land between the Bristol Channel and the hills to the north. To the south and south-west lie the Severn Estuary and the Somerset Coast beyond. The exposed tidal mudflats and salt marshes of the Estuary with its high tidal range have valued views inland to Wales, across the Estuary itself, and to the English coastline.

The Wentloog Levels are flanked by the settlements of Newport to the northeast and of Cardiff to the southeast. To the north, the land rises into the Caerphilly Ridge. Of particular note are the peaks of (from west to east) Craig Llysfaen, Craig Ruperra, Coed Mawr, and Maes Arthur.

The Gwent Levels landscape includes a number of key features which are present on the sites which are integral to both the historic landscape and SSSI designation:

Hedgerows

Hedgerows are the main form of mature vegetation within the Gwent Levels, forming linear connected habitats around the boundary of fields. They are typically 10m or more in width and 5m or more in height. They are of varying quality, with most being in poor condition. The network of hedgerows is essential to creating connected corridors for local wildlife, particularly dormice, alongside

other European Protected Species such as bats and barn owls. The hedgerows also help to create a visual break, screening views of buildings and reducing views of the neighbouring urban area.

Trees

Most trees within the Gwent Levels are within hedgerows and on the banks to the reens, with a few located in the middle of open fields.

Some trees are present at the sites of Applications 2 and 3. The trees across the sites can be grouped into 'seasonal wet woodland' with Goat Willow, Crack Willow and Alder, found mainly to the immediate south of the railway line, and close to reen edges.

Species-Rich Grassland

Areas of species rich grassland, consisting of native grasses and wild flowers, typically located in areas of the sites which have not been intensively grazed or improved. The fields in the south-eastern corner of the Cardiff site are particularly rich and identified as a SINC in the CLDP.

Reens

Reens are a network of historic, man-made water channels which drain the Gwent Levels. They play a role in transmitting flows around the wider network, whilst field ditches help to drain water from each field into the reens. The three NCC sites cross the Green Lane Reen which is located on the eastern boundary of the Cardiff site and immediately west of Heol Las.

The network of reens within the Gwent Levels is central to the historic landscape character and play an important role in the hydrological function of the area.

The sites are also situated in close proximity to Hendre Lake Park and a corridor of dense wooded vegetation on the western side of the Feandre Reen which is distinctive locally for its width and more naturalised, meandering course.

2.2.8 Hydrology

The Welsh Government Technical Advice Note 15 (TAN15) and Natural Resources Wales (NRW) Flood Maps show that the sites are located entirely within Zone C1 and within Flood Zone 3 respectively.

Baseline tidal flood modelling has been carried out to check the extent of flooding during 1 in 200 and 1 in 1,000 year tidal flood events, taking into account 75 years of climate change. The modelling demonstrates that for the 75 year climate change scenario, the 0.1% event flood level is approximately 5.25m AOD.

Consideration has also been given to the risk of flooding from pluvial sources. During high rainfall events, water held and transmitted in the reen system may overtop and spill onto the sites. Baseline pluvial modelling has also been completed for the 1 in 1,000 year pluvial event. The modelling demonstrates some shallow flooding in places, particularly in the northeast.

The proposed developments are located on a greenfield site with a proportion of the water falling on the site during rainfall events lost through natural processes such as infiltration, interception and evapotranspiration. The remainder ultimately discharges into the existing reën network including Green Lane Reën which crosses the site.

2.2.9 Ground Conditions

The majority of the site areas have not been subject to any major previous development. The exceptions are the main railway line which was built in the mid 19th century and the overhead electrical cables/pylons and gas governors which were formed between 1964 and 2002. The Green Lane overbridge which crosses the railway on the western boundary of the Cardiff site, immediately north of Application 3, has recently been reconstructed, with both bridge and approach embankments supported on piled foundations.

The preliminary ground investigation confirms that the sites are underlain by very soft alluvium with peat bands, resting on glacial till, which in turn rests on either Mercia Mudstone or St Maughan's Group mudstone. The depth of soft alluvium and peat vary between 1m and 7m, potentially greater in areas of buried channels.

2.2.10 Services and Utilities

None of the Newport sites are crossed by services or utilities (refer to Section 2.8 of the DAS for a visual representation). However, Application 2 is surrounded by overhead, pylons and associated advisory buffer zone, a 30m wide Wales and West Utilities easement and a rising main and associated 6m easement which is intended to be diverted in the Cardiff site.

2.2.11 Site Ownership

The application sites are currently in a number of different ownerships:

- **Cardiff Parkway Development Limited** have an option over the majority of the Cardiff site, including the full extent of the areas where new buildings and associated development is proposed, and areas which are required for essential environmental mitigation measures.
- **Newport City Council** owns land along Heol Las (adopted highway).
- **Wales & West Utilities** own land associated with the gas pressurising station.
- **Network Rail** own the existing railway line, embankments and associated infrastructure within the rail corridor.
- **Other land owners:** there are a series of agricultural holdings on land to the south of the railway line which are not required for the development.

2.3 Planning History

There is no relevant planning history for the sites associated with Application 1 and Application 2.

The Heol Las Overbridge located at the site of Application 3 has been subject to two Prior Approval Applications as outlined below.

2.3.1 Planning Application History

Table 1: Planning Application History

Application Ref	Description	Decision
16/0094	Prior approval for the reconstruction and realignment of the Heol Las Overbridge	Prior approval granted 3 March 2016
17/0137	Prior approval for amendment to bridge parapet granted by planning permission 16/0094 for reconstruction and realignment of the Heol Las Overbridge	Prior approval granted 10 March 2017

2.3.2 Planning Policy History

The land is not allocated for any use within the NLDP. However, the Cardiff site is allocated within the CLDP as a growth area under **Policy KP2(H)** which allocates land to the south of St Mellons Business Park as a strategic employment site. The strategic allocation is also supported by **Policy T3** which outlines that new rail stations which can be easily accessed by walking, cycling and local bus services, facilitate rail park and ride, where appropriate, and meet the access needs of all users, will be supported. The proposed Cardiff Parkway station is also identified as strategic transportation infrastructure under **Policy T7**. It is within this context that the concept and rationale for the Cardiff site has been developed alongside the Newport sites which will provide direct access into the wider development from the east.

3 Pre-application

3.1 The Pre-application Process

From the outset, a collaborative approach has been adopted for the pre-application process, engaging with both key stakeholders and the local community as set out below.

3.1.1 Newport City Council and Technical Consultees

A Planning Performance Agreement is in place for the Cardiff outline application to CC and regular pre-application meetings have been held to seek input on scope and direction from the LPA and their specialist officers on design, environmental and other technical studies. A series of briefing meetings have also taken place with officers to share progress as the proposals have developed. Similar briefings have also been held with officers of NCC on public engagement, the vision for the scheme and planning/consenting strategy.

An Environmental Impact Assessment (EIA) Scoping report covering the Cardiff site and the three Newport sites was submitted to CC on the 5 July 2018. CC subsequently issued its Scoping Opinion on the 25 September 2018. CC consulted a list of consultees in the process of forming its Scoping Opinion. The ES has been prepared based on the responses received. Full details of the scoping responses along with how these have been responded to in the EIA are included in Appendix A-2 of the ES.

In addition to engagement with CC, various other technical consultees including officers from NCC, NRW, Glamorgan Gwent Archaeological Trust Ltd. and utility providers have been consulted during the pre-application process. Their input and guidance has helped inform the planning application and ES. This has been particularly important given the site's sensitive location.

3.1.2 Public Consultation

In recognition of the development's significance in the local area, a four week long period of early engagement was undertaken in November and December 2019 in order to ensure that the local community and stakeholders had an opportunity to understand the potential benefits of the project and comment on the proposals at an early stage in the design process. That engagement activity included:

- A community newsletter issued to more than 10,000 residents in the St Mellons and Marshfield areas;
- Emails sent to stakeholder, community and business groups to promote the public engagement activity;
- Media activity to promote engagement activity, securing press coverage in South Wales Echo, Western Mail, Wales Online, BBC Wales breakfast, Cardiff Local TV and Wales Business Insider;

- Political briefings with key ward councillors, community councillors, MPs and AMs;
- Social media activity to promote the events and how people could get involved;
- Posters placed in key areas in St Mellons and Marshfield and shared with businesses to promote engagement activity;
- Launch of a dedicated bilingual project website with information on the proposals and a dedicated feedback questionnaire (www.cardiffhendrelakes.com);
- Launch of community contact centre with freephone, freepost and community email address for local people to ask questions directly to the CPDL project team;
- Two public engagement events, one in St Mellons and the other in Marshfield, attended by more than 250 people; and
- Bilingual materials to support public engagement activity, including a booklet detailing the proposals, an online and hard copy feedback form and event materials.

Around 150 people completed hard copy or online feedback forms.

The scale of the proposed development on the Cardiff site means that it must comply with the Pre-Application Consultation requirements of the Town and Country Planning (Development Management Procedure) (Wales) Order 2012. Consequently, stakeholders and the public will be able to view and comment on the draft planning application documentation and plans in advance of formal submission of the Cardiff site application. CPDL has decided to include the three full applications within the PAC, and the draft submission will therefore also include details of the three full planning applications to be submitted to NCC, as well as the details of the outline planning application to be submitted to CC.

Full details of the pre-application consultation activities undertaken will be presented in the Pre-application Consultation Report which will be submitted in support of all of the applications.

4 Proposed Development

4.1 NCC Full Planning Applications

The three planning applications submitted to NCC are being made in full.

Whilst this Planning Statement covers the developments proposed in all three planning applications, three separate applications will be submitted to NCC. In addition to the three planning applications having a combined Planning Statement, all other supporting documentation including the ES and TA have been prepared to assess the impacts of the proposals in Newport alongside the proposals at the Cardiff site which are subject to the outline planning application submitted to CC.

A detailed description of the proposed development within Newport is outlined below and split between the three planning applications.

4.1.1 Application 1: Public Right of Way

Application 1 (please see plans referenced: HDL-ARP-HW-SW-DRG-ECV-000111 and HDL-ARP-HW-SW-DRG-ECV-000097) seeks full planning permission for the installation of a new shared pedestrian and cycleway bridge at the route of PRoW St Mellons No.4A, via a ramped access to enable the PRoW to be useable once more and provide an upgraded shared use pedestrian and cycle access across the widened Green Lane Reen from Heol Las into the Cardiff Hendre Lakes development.

The bridge would be 3m in width by 10m in length and would cross the Green Lane Reen from Heol Las which is proposed to be widened along its western bank as part of the flood mitigation proposals associated with the Cardiff site.

The new bridge would comprise a recycled plastic structure manufactured by *Bison Bridges*. In consultation with NCC's Access Development and Rights of Way Officer, we have had approval in principle to the installation of a Bison Bridge. The Officer confirmed that there was not a requirement for lighting of the structure.

The outline planning application being submitted to CC for the Cardiff site establishes the principle of the PRoW (which is currently unpassable into the site due to a missing reen crossing) being useable once more and upgraded as a shared use access as part of localised widening works to Green Lane Reen.

The construction and use of the structure is dependent upon NCC granting planning permission for the works and the use of it as an active travel access point. Implementation by the Applicant will depend upon securing rights to undertake these works both within Newport and Cardiff.

4.1.2 Application 2: Gas Pressure Reduction Station

Application 2 (please see plans referenced HDL-ARP-HW-SW-DRG-ECV-000112 and HDL-ARP-HW-SW-DRG-ECV-000098) seeks full planning

permission for the installation of a new shared pedestrian and cycleway re-en crossing to the north of the Gas Pressure Reduction Station, to provide a new active travel route across the Green Lane Re-en from Heol Las into the Cardiff Hendre Lakes development.

The route would be 4m in width and would cross Green Lane Re-en from Heol Las where an existing agricultural access and junction exists. The route would cross the re-en using the existing re-en crossing, which would be resurfaced (and have associated road marking) and an edge restraint barrier system to improve user safety would also be installed across the existing re-en crossing as well.

The implementation of any full planning permission will rely upon the outline planning application providing planning permission for the upgrade works within Cardiff. Implementation by the applicant will also depend upon securing rights to undertake these works both within Newport and Cardiff.

4.1.3 Application 3: South of the Green Lane Overbridge

Application 3 (please see plans referenced HDL-ARP-HW-SW-DRG-ECV-00113 and HDL-ARP-HW-SW-DRG-ECV-000099) seeks full planning permission for the installation of a new junction to serve a new maintenance access road located to the south of the Green Lane Overbridge. This is to allow access to private land via a bridge to provide a new maintenance access for Cardiff Parkway Station.

The access would be 8m in width and would extend from Heol Las into the Cardiff Hendre Lakes development to the south of the railway line.

The junction is sized to accommodate for potential construction access. Works within Newport are minimal and are related to the mouth of junction i.e. kerbing, fencing and road markings. The junction would comprise of a precast concrete kerb edge to define the mouth of the junction with a 2m high steel palisade fence for security measures. The surface finish of the junction is to be asphalt concrete.

The access road would require a bridge structure to allow vehicles to cross Green Lane Re-en.

During construction the permanent maintenance access would be used as a construction access to the south of the Cardiff Hendre Lakes development. The construction access would form a temporary use which would cease following the construction of the Cardiff site. Following construction, the road, bridge and junction would form the permanent access for maintenance.

In addition to the installation of the permanent maintenance access, Application 3 seeks full planning permission for the installation of an earthwork structure. The earthworks structure would include a proposed flow control device within the Green Lane Re-en and to the south of the Green Lane Overbridge. The flow control device and earthwork structure forms part of the flood mitigation strategy for the proposed development.

The earthworks structure would comprise of cohesive material and its surface laid with grass.

The outline planning application for the Cardiff site includes the construction of the new access point to the two new flow control devices – one of which is partially within Newport.

In relation to the consenting of Application 3, it is intended that the associated access and flow control device works within Cardiff (south of the railway line) would be consented through the discharge of condition(s) attached to the outline planning permission which would be submitted concurrently with the submission of the applications to discharge related conditions within Newport.

4.2 CC Outline Planning Application

4.2.1 Proposed Development

All three planning applications submitted to NCC are required to either facilitate the construction of the wider Cardiff Hendre Lakes development on the Cardiff site or provide active travel routes or maintenance access from Newport.

To provide context of the wider development submitted to CC, a detailed description of the proposed development at the Cardiff site is outlined below. In summary the development within Cardiff comprises the following:

Table 2: Summary of CC Outline Planning Application Development Proposals

Development Proposals	
Employment	Employment floorspace would comprise a total of 90,000sqm GFA across the site.
Railway station	The railway station building would be up to 2,500sqm and would be situated along the existing mainline railway, adding four additional platforms.
Transport interchange	A 650 space station Park and Ride facility, bike storage facilities (cycle parking for up to 100 bikes), taxi rank and bus stops within 100m of the railway station and of each other, connected via a high-quality public realm.
Car parking	A Park and Ride car park at the station for up to 650 cars would be provided and there would be a limited number of on street parking provision (not yet defined). This is referred to as 'Station park and ride'. Parking would be provided for other land uses, but this will be on a plot basis and/or in shared parking areas. These parking allowances will be based on Cardiff parking standards.
Building heights	A range of building heights are proposed as shown on the Parameter Plan. Building heights would be greatest around the station potentially being up to 15 storeys (+ 1 for building plant). Heights would reduce with distance from the station; the

Development Proposals	
	central area buildings would be up to 12 storeys, with buildings up to six storeys in the north east corner of the site. It is important to note that these represent maximum heights within the defined areas and that they are not average heights. Some buildings within these areas will be lower.
Building densities	There would be higher density development around the proposed station and public transport interchange. Details on density is not yet defined.
Landscaping	A landscape would be created which responds to the rich and sensitive heritage and ecology of the existing site. The landscape has been designed to have a number of functions including active travel, meeting space, play space, wildlife, waterways, recreation and trails.
Biodiversity	The ecological strategy for the development is to retain as much habitat as possible, creating more habitat than is removed and work towards net biodiversity gain.
Energy	A robust assumption is made that the energy from the site will be 'business as usual' being a mixture of electricity and gas. This would be reviewed at detailed design stage.
Foul drainage	Foul water generated by the development would be transmitted via a new foul sewer network to the existing DCWW sewers. Strategically located foul pumping stations would be required to pump foul water to the DCWW sewers.
Surface water drainage	Sustainable drainage is at the heart of the development character with drainage reens being part of a long history of land management over this coastal flood plain.
Site levels	<p>The proposed development areas would include provision for a raised plateau to ensure that developed areas are flood free during a 1 in 200 year tidal flood event and a 1 in 100 year pluvial event. Depth of flooding would not exceed 0.6m during 1 in 1,000 year flood events.</p> <p>To ensure the site meets the requirements of TAN15, existing site levels of access, buildings and public realm need to be raised. Proposed development areas would include provision of raised plateaux. Existing topography shows a maximum range of between 4.7m and 6.3m AOD; levels would need to be raised to 6.0m AOD.</p>
Access and movement	<p>Walking and cycling would be prioritised throughout the site. Access routes for pedestrians and cyclists would be created at various points around the site perimeter as well as throughout, connecting areas of the site to each other and to the communities surrounding it.</p> <p>Vehicle access into the site would primarily be from a new junction on Cypress Drive in the north-eastern corner of the site. A secondary access point would be provided from the west with an enhanced junction of Cypress Drive/Sandbrook Road. Tertiary access to the two development parcels north of the power lines would be via two new priority junctions on Cobol Road. The internal highway network has been designed to limit the proportion of traffic routing through the site.</p>

Development Proposals	
Lighting	An overarching lighting hierarchy would be applied to the site suited to the different areas and uses. A detailed lighting strategy would be prepared at reserved matters stage.
Main park	A new, accessible public park would be created to connect the existing Hendre Lake park into the site's wildlife corridor on the west of the site and to the wider St Mellons area.

4.2.2 Design Principles

The key elements of the concept masterplan have been developed following the identification of constraints at the site and feedback from early engagement sessions with key stakeholders. The key elements of the concept masterplan include:

- Retaining the primary reen network within and surrounding the site;
- The retention of the utility corridor, creation of an inverted 'v' landscape area, and co-location of the habitat mitigation;
- The creation of 3 'areas' of development set around the primary reens and wildlife corridor;
- Development blocks orientated to maximise solar gain and views to the Faendre Reen corridor;
- A focal public space around the transport interchange; and
- Primary access from the north via Cypress Drive to allow for a largely car-free core with the main station parking and vehicle access located to the east of station.

The masterplan proposes four distinct character areas that reflect and respond to the context of the site, proximity to the new transport interchange and its relationship with surrounding areas.

- 1. Business District** - The heart of the development, focussed around a high quality, vibrant public realm spine which helps pedestrians and cyclists move through the site and integrates the development with surrounding areas. The business district would be a key address for new businesses, framed by new buildings. Its character is framed around a central linear water feature that creates a distinctive and attractive environment for people to spend time.
- 2. Station Square** - The main point of arrival and departure for people coming to the site by rail and bus, focussed around the new interchange. Surrounding development would be concentrated here with taller buildings and a more urban character reflecting the importance of this area. The heart of this would be a bustling square framed with active ground floors and amenities to support life beyond the workplace and to animate this key space.
- 3. Main Park** - A significant new open space for the local residents, visitors and business community, connecting people with the natural environment of the Gwent Levels. The park contrasts the Station Square area by creating an open,

green landscape. It would provide a vital recreational resource for people to meet, walk over lunch, for children to play and for events, as well as contributing to habitat creation and sustainable water management.

4. **Wildlife Corridors** - Green corridors following the Faendre Reen and the existing utilities corridor. These areas would create a series of connected habitat rich spaces. New paths to create recreational routes for walking and cycling would allow people to experience nature as they move through the site. Lower scale buildings would be set within this landscape, sensitively integrated with the green character of the surroundings.

4.2.3 Employment

The employment floorspace at the site would be located within the business district and would comprise a total of 90,000sqm in Use Classes B1, B2 and B8 providing employment opportunities for approximately 6,000 people.

Employment areas would be across all the developable areas of the site alongside ancillary uses. However, the higher density development and taller buildings would be concentrated around the station square to create a focus for workplaces in the most connected part of the proposed development.

Mixed employment types and floorspace would help start-up and small and medium sized enterprises to thrive, as well as supporting established larger companies. Targeted employment sectors would include those identified in the Cardiff Capital Region Industrial and Economic Plan which includes technology, financial and engineering sectors.

4.2.4 Transport Interchange

The interchange would be the main point of arrival. It would be a space that provides opportunities to change between different modes of public transport, designed around a central plaza which would have ancillary uses such as food and beverage outlets. The interchange will also provide links to the wider cycle and pedestrian network.

Railway Station

The new railway station to be known as 'Cardiff Parkway' would be located along the existing rail mainline which consists of two lines (four tracks); the main line and the relief line. The relief line would be slued to the south of the existing alignment to allow for the provision of four platforms which would have a footbridge between the platforms. A service yard would be provided to the west of the main station building.

The station building would be up to 18m AOD (approximately 12m high) and consists of a main concourse and a mezzanine level. Around the building a public square is proposed to create an immediate first and last impression. Water features and planting would be carefully incorporated into the public square to manage surface water using the same techniques that have sustained the Gwent Levels.

Park and Ride

A Park and Ride facility of up to 650 spaces would be provided to the east of the railway station (north of the rail line), which would include wheelchair accessible car parking. Bike storage facilities (cycle parking for up to 100 bikes), taxi rank and bus stops would be within 100m of the railway station and of each other, connected via a high-quality public realm. There is potential for cycle hire providers such as Next Bike to install docking stations in the area (and throughout the development) subject to commercial agreement.

4.2.5 Car Parking

In addition to the station Park and Ride that would be integral to the transport interchange, car parking for other land-uses would be provided on individual plots and/or in shared car parking areas, subject to the requirements of each development parcel and CC guidance. It is anticipated that these parking areas across the site could accommodate up to 1,800 cars. Electric Vehicle (EV) charging points would be provided in line with guidance (10%) across all car parking areas, with passive provision provided for future upgrade.

4.2.6 Public Open Space

The public open space strategy for the site would be broadly categorised into three types: green open spaces, civic open spaces and permeable plots for drainage/attenuation.

Green Open Spaces

As part of the green open spaces the Main Park would form a cherished park framing the gateway to the Gwent Levels. The park would be a dynamic landscape that promotes niche ecological areas, water sensitive design solutions and an active community programme.

The Faendre Reen edge would form a natural buffer to the west side of the site. A new footpath would be created along the edge, allowing people to walk the full perimeter, close to nature, and creating an extended walk to Hendre Lake. Three new crossing points would be created over the reen, connecting St Mellons through the wooded land to the west. Pedestrian and cycle routes from Cypress Drive to the station would be greatly enhanced by creation of these access points.

The Wildlife Corridor would run along the east side of the site, providing an ecologically rich buffer to the development zone. This area would be abundant with new habitats created for dormice: a continuous canopy of trees and shrubs of specific species including the staple Hazel. Part of this area would also hold ground level water attenuation and trees would be planted such as willow and alder that are suitable for wet woodland. A public footpath would run across the corridor allowing a scenic route to and from site.

Civic Open Spaces

The Station Square would be a significant civic plaza and public realm forming the gateway to the Gwent Levels, with integrated environmental design solutions to reinforce the sustainability and ecological profile of the new district. The Station Square would be alive with verdant planting and the sounds of water to welcome people and encourage them to explore the area or simply sit back and relax in the peaceful setting.

Further public squares and pocket parks would be distributed throughout the site and would vary in character, each offering a distinct sense of place. These plazas and parks offer opportunities for gathering, play and connection with nature.

The public realm spine would be at the core of the development. Running north to south, it is a continuous multi-modal route, accessible to vehicles, pedestrians and cycles. The route would have blue and green infrastructure at its heart. A water feature would run along the length of the route, providing opportunities to dwell, rest and meet. Densely planted with trees and other vegetation it would exemplify the integration of nature, well-being and urban use that characterises this development.

A network of green streets would also extend from the civic heart out towards surrounding natural areas. The streets would act as a living infrastructure featuring rain gardens, swales, tree planting and green frontages, making the streets a pleasant place to walk, encouraging active travel for those on site and the adjoining community of St Mellons, whilst contributing to green connectivity and the microclimate.

Permeable Plots

Car parking plots would feature vegetated swales and a high proportion of planting amongst the bays. There is potential for parking plots to have a transitional nature. Plots reserved for parking in the near future could be designed to have a meanwhile use: serving as tree nurseries for the site for example. Parking spaces can be freed up over time and trees can be relocated on site.

The smallest and least accessible of plots and spaces on site could contain valuable micro habitats. These spaces could include bat and bird nesting boxes, insect hotels, and extensive (brown) roofs which could provide for invertebrates. Log piles, bird perches and areas allowing for natural plant colonisation and succession would be encouraged.

4.2.7 Building Heights

Taller buildings would be located around the station with areas of reduced height towards the north of the site. The exact location of buildings has not developed at the outline planning stage, so these locations have not yet been fixed. The location of tall structures on site will need to be tested as part of the detailed design stage to make sure that shading of reens is minimised to protect reen habitats and wildlife.

The heights of the buildings would be zoned with the tallest buildings located along sight lines and public spaces to assist with wayfinding and within the following ranges:

- Station Zone: up to 15 storeys;
- Main area: up to 12 storeys;
- Northern parcels: up to 6 storeys.

It is important to note that these heights represent the maximum heights and not average heights. The net total size of buildings would be limited by the total amount of proposed floor area within the proposed development. Not all buildings within each of these zones would be at these shown heights.

4.2.8 Building Densities

Section 3.3 of the DAS presents the ‘anatomy’ of the masterplan and (as elsewhere in that document), illustrates that within the overall 90,000sqm floorspace limit, density will vary across the site, there will be a cluster of higher density development around the proposed station and public transport interchange. This business district would be the main concentration of activity within the proposed development which would reduce in density moving north across the site. Details of building densities would be determined at the reserved matters stage.

4.2.9 Landscaping

Across the site, the landscape strategy is focused on ensuring that surface water run-off is managed through Sustainable Drainage Systems (SuDS) as part of an integrated public realm.

A landscape strategy and parameter plan have been developed based on eight principles that have been established for the development (as described in Section 5.1.2 of the DAS) and reproduced over:

CONNECTED HABITAT

The development will provide a continuous and connected series of natural green areas. This large wildlife corridor preserves the existing rich habitats and enhances the quality and quantity of planting, providing opportunities for habitat mitigation as well.



CO-EXISTENCE

People and wildlife will share the site in mutually beneficial ways. By expanding development beyond a built environment exclusively for human consumption and comfort. The green network of the area is home to unique native flora and fauna including some UK priority species. From the smallest vascular plant in the world to predators including otters and the little egret.



SUSTAINABILITY

The site aims to re-use materials as much as possible, for example re-using soil, water, energy, and ensuring a local supply chain.



HEALTH AND WELL-BEING

The proposed development aims to improve public health and community well-being by increasing opportunities for recreation, play, active travel, improving air quality and minimising noise pollution among other things.



VARIETY OF LANDSCAPES

The wider development will include a variety of landscape typologies that fall within a hierarchy of scales, from large wildlife corridors, to medium sized parks and plazas, and micro habitats within buildings. These will have different programmes and functions that respond to the users and adjacent plots.



PRESERVING HERITAGE

The development is within a site of rich heritage value and man-made systems that date back to Roman era. The design of the public realm will celebrate the memory and narrative of the place. This can be through wayfinding, public art or the use of landscape materials.



VIEWS

The public realm will optimize attractive views throughout the site, by offering a variety of views to the west and south where there are large natural areas and fewer visual obstructions.



THRESHOLDS AND EDGES

To navigate the different levels and edge conditions on site, the landscape will connect raised platforms with the lower green-level in accessible, diverse and interesting ways. Terraces, stepped promenades, bridges and playful crossing points will optimise the level changes for different users of the space.



The landscape strategy would be advanced at the detailed design stage but would maintain these principles to develop an approach that would be implemented across the whole site in a consistent way. In general, the site can be divided into three planting character areas which align with the levels of management and maintenance that each area will require:

- **Natural areas to include trees, hedgerows and grassland:** the aim of these areas would be to achieve biodiversity net gains. Each area would have the characteristics of the habitat they are seeking to enhance and whilst not accessible, would have routes passing through them.
- **Civic areas including parks, squares and the community ‘spine’ of the development:** landscaping of the civic areas would include planting to promote well-being for employees and public using the space. Standard and semi-mature trees would be used to frame these spaces to provide a sense of

place and continuity which would add to amenity whilst also providing additional biodiversity.

- **Plots (permeable and connective):** across the whole site there would be opportunities for landscaping/planting to enhance the public realm and biodiversity. This includes roadside wildflower planting, rain gardens and swales, permeable paving, multi-purpose parking areas, roofs, living walls, micro-habitats and biodiverse native tree planting.

Integration with the existing landscape has been key in the design development process and would continue to be central as the scheme evolves.

Landscape character areas have been defined for the proposed development, based on the existing site's environmental characteristics aligned with the stated development vision. Figure 2 identifies these landscape character areas.



Figure 2: Landscape Character Areas

4.2.10 Biodiversity

The masterplan for the site has been developed around a strategy of integrated green and blue infrastructure which mitigates ecological loss and enhances overall biodiversity across the site.

The ecological strategy for the development is to retain as much habitat as possible, create more habitat than is removed and work towards net biodiversity gain. This is based on a full understanding of the habitats and species within the site boundary (and beyond) which has been obtained through extensive survey work undertaken over the last 2 years.

Notable ecological strategy components include:

- The 'Wildlife Corridor', running north west to south east, comprising a line of double hedgerows, enclosed by a swathe of wet woodland along one edge, and hazel-dominated woodland and a scrub/species-rich grassland mosaic along the other edge;
- A 12.5m wildlife buffer around the Ty Ffynnon Reen, running north east to south west, comprising 1-2m verges of vegetation suitable for water vole foraging on the reen banks, alongside a hedgerow set back from the reen (to avoid shading), providing further connectivity across the site for dormice;
- A network of 4.2km of new species-rich intact hedgerows, planted strategically throughout the proposed development to maintain connectivity for dormice and foraging/commuting bats;
- Maintenance and enhancement of all primary reens, and the introduction of 3.72km of new secondary reens and ditches to replace those secondary reens and ditches that will be lost;
- New woodland strip planting in the south, which when combined with the new woodland planting within the Wildlife Corridor, totals approximately 2.6ha (of 1.8ha dry woodland and 0.8ha wet woodland); and
- 3.2ha of new species-rich wet grassland planting and 8.9ha of new species-rich dry grassland planting.

4.2.11 Energy

It is assumed that energy usage on the site would be electricity sourced from the main electricity network along with gas boilers for heating. Consultation with energy companies has confirmed that there is sufficient capacity within the network to provide the additional load.

In addition, it is envisaged that building developers/occupiers would seek to integrate renewable energy generation where possible, on a building by building basis. They would also be constructed to be energy efficient across their lifetime to minimise energy demand.

4.2.12 Foul Drainage

Onsite buildings would generate foul flows and as such dedicated new foul drainage networks would be needed to serve the proposed development to transmit the waste to the nearest DCWW sewer. As no heavy industrial premises are proposed it is considered unlikely that non-domestic foul flows would be generated.

The new foul sewer networks proposed to transmit foul flows generated from the new development would follow the proposed road network with spurs located at each development plot to receive foul flows. Due to the topography of the site and existing location of DCWW sewers, foul pumping stations would be required.

4.2.13 Storm Water Drainage

The proposed development is located on a greenfield site with a proportion of the water falling on the site during rainfall events lost through natural processes such as infiltration, interception and evapotranspiration. The remainder ultimately discharges into the existing reën network. Developing the site will create impermeable areas, preventing these natural processes and therefore increasing the run-off rate and volume from the site.

SuDS would be implemented across the site which aim to manage rainfall on site using methods that mimic natural processes, by making use of the landscape and vegetation to control the flow, volume and quality of the surface water runoff. In addition to this, SuDS also provide amenity benefits by providing aesthetically pleasing and natural landscapes, and biodiversity benefits by creating habitats for wildlife and vegetated areas.

The proposed development is not foreseen to have sufficient demand for non-potable water to make rainwater harvesting a viable option. Ground investigation results have shown that the ground conditions have insufficient infiltration capability to discharge through infiltration. It is therefore proposed to discharge at an agreed run-off rate to the existing reën network which are located around the development. It should be noted that the detailed design of the drainage will be approved under a separate consenting process by the SuDS Approving Body (SAB).

4.2.14 Flood Management

As a result of the proposed development introducing hard surfaces to an area of existing green field, there is a need to provide an area of land that would be able to accommodate the water displaced from these previously permeable areas. A flood compensation area to the south of the existing railway, would be created to act as the primary storage area for excess surface water, with smaller secondary areas integrated into the north of the site. The primary area has been designed to fit within the existing field patterns, so as to avoid removal of hedgerow. As part of the flood mitigation works it is necessary to widen Green Lane Reën by 3m to the west, for a distance of 500m north of the Gas Pressure Reduction site. The works would also include two new sluice gates south of the railway line controlling flow along Railway Reën and Green Lane Reën.

4.2.15 Site Levels

The site sits on the edge of the Gwent Levels, marking the transition between the expansive flat, lowland areas to the south and east, the undulating topography of St Mellons to the east and north, and hills rising to the north. The site is largely flat with small localised level changes associated with reëns, field ditches, and hedgerows. A topographical survey shows a maximum range of between 4.7m and 6.3m AOD, with no clear patterns of gradient across the site.

Access, buildings and public realm areas would be placed on a raised plateaux which would raise site levels to 6m AOD and above. This would ensure that

developed areas are flood free during a 1 in 200-year tidal flood event and a 1 in 100-year pluvial event. Depth of flooding would not exceed 0.6m during 1 in 1,000-year flood events.

4.2.16 Access and Movement

Section 2.9 of the DAS describes and identifies the location of the vehicle and pedestrian access points on Cypress Drive, Cobol Road and Heol Las. Primary vehicle access would be from a new junction on Cypress Drive in the north eastern corner of the site. Cypress Drive would be reconfigured to provide priority to vehicles entering the site.

A secondary vehicle access point would be provided from the west, from an enhanced junction with Cypress Drive/Sandbrook Road. This would be reserved for emergency access and public transport.

The two development parcels in the north east of the site would be accessed separately via a new priority junction on Cobol Road.

Access routes for pedestrians and cyclists would be provided to create connections to:

- Cypress Drive in the north-east corner of the site, and onward connections via the proposed Primary Cycle Route 'C2', linking paths into St Mellons;
- Sandbrook Road, and onward footpath routes linking to St Mellons;
- Hendre Lake Park in the south western corner of the site;
- St Mellons and business parks to the north of the site, via the street network;
- St Mellons Road to the east of the site, and onward connections via the PRow National Cycle Network route NCN88; and
- Heol Las, above the Gas Pressure Reduction Station in the eastern part of the site, and onward access to the rural lane network.

The latter two of the above are potential connection opportunities from Applications 1 and 2 submitted to NCC. The development is not reliant upon them, but they open up the potential for improved active travel linkages for residents to the east of the site to the station environs.

The delivery of the improvements to the crossings of Green Lane Reen at St Mellons Road and the Gas Pressure Reduction Station are dependent on the acquisition of interests in land which are not currently within the Applicant's control.

The ES has therefore been prepared to describe and assess two forms of development proposal; one which includes the core elements of the development described in Chapter 3 of the ES but does not include the improvements (to the crossings of Green Lane Reen and the pressure reduction station), and a second "optimal" form which does include those elements.

The improvements are proposed to enhance active travel connections between the proposed development and the Newport Council administrative area. Where there

are impacts of the development proposal which only occur (or are only mitigated by) through those active travel connections, the term "optimal proposed development" is used to indicate that the development including those active travel connections is being referred to.

The ES reports the environmental effects of the proposed development, as described above (and referred to as the proposed development throughout the ES), which includes two distinct areas; the business district and the railway station.

Within the site, the street hierarchy would include the primary vehicle access road running from Cypress Drive to the station park and ride which would avoid the main central areas of development. Secondary streets would provide additional vehicle routes into the main body of the site and the north eastern parcels of the site providing resilience for gaining access into the site in the event the primary route was impeded. Tertiary streets would provide an interconnected network of smaller streets providing permeability to all plots and supporting pedestrian movement away from vehicles.

A main spine route would be provided passing through the key public realm of the site and providing vehicle access for these areas. This would be lightly trafficked and of non-standard carriageway design to encourage low traffic speeds and cycling and walking priority.

The existing PRow would be realigned within the development but would maintain the existing access points at similar locations. The layout of the site aims to prioritise walking and cycling with traffic speeds of 20mph or lower throughout the site. Wayfinding would be provided across the site to facilitate active travel by promoting the key active travel routes as the primary means of moving about the site.

4.2.17 Lighting

Lighting would need to balance the requirements of night-time activity, access and safety requirements as well as ecological sensitivities and the need to minimise light pollution. Lighting would be tailored to the needs of the different areas of the site which would have distinctive characters and lighting requirements:

- **Transport interchange and station square:** this would be an urban environment requiring higher lighting levels to promote safety and to create a vibrant evening economy;
- **Public realm spine and access routes:** the aim of lighting here is to aid site legibility, particularly around key public spaces, and to provide safe environments for access (both footpaths/cycleways and trafficked routes); and
- **Waterways and habitats:** lighting would drop in areas of waterways and ecological habitats, only being included for public wayfinding and safety.

In order to control levels of lighting across the site, measures may include curfew periods (to reduce light levels during periods when less light is needed – typically

between 11pm and 6am), control systems which may use dimming or timing and careful selection of the design and positioning of lighting.

4.2.18 Construction Access

There are a number of existing and proposed accesses onto the development site north of the railway line which could be utilised for site construction activities including surveys, clearance, import of materials, workforce travel and export of materials. A combination of locations is likely to be used during the construction programme, with these reflecting different access requirements, constraints, and phasing of activities.

North of the railway line access into and out of the site for construction will vary over time, reflecting the different phases, safety considerations and ecological constraints. The assessment has considered the effects of two options for access into and out of the site for construction:

1. All construction traffic movements north of the railway line, gains access into and out of the site from the proposed secondary access at the Cypress Drive/Sandbrook Road roundabout on the western boundary of the site. This is the preferred option.
2. All construction traffic north of the railway line, gains access into and out of the site from an access route north of the gas reduction station access on Heol Las on the eastern boundary of the site. This access is subject to a separate planning application to Newport City Council. While the assessment allows for HGV access it is proposed that this route is only used for initial activities and will not be used by HGVs.

By assessing these two scenarios a robust assessment of all receptors along the eastern, northern and western boundaries of the site has been undertaken, allowing flexibility in the final selection of construction accesses during delivery of the project.

For both options there continues to be construction traffic movements associated with railway and station building works south of the railway line, with this access taken from Heol Las.

An Outline Construction Traffic Management Plan (CTMP) has been prepared in support of the applications to describe the ways in which vehicles will enter and leave the site during construction. The Outline CTMP and full CTMP would ensure the impacts of construction traffic are effectively controlled.

4.2.19 Construction Phasing

Construction of the proposed development includes a number of phases to include some areas wholly associated with mitigation works. Considerations which fed into the development of the phasing includes the requirements and constraints resulting from:

- Planning, permit and licenses requirements;

- Ecology and landscaping which needs to take account of different protected species across the site and habitat capacity where this is important in terms of relocation of species and habitat creation. The need to clear habitat also results in phasing implications in terms of seasonal constraints;
- Flood mitigation works which require the flood compensation works to the south of the site to be completed prior to land raising,

A period of five years is anticipated for completion of earthworks, utilities, buried services, main highways, flood compensation and ecological works. Within the five years, the site would be brought forward in a number of phases in response to market conditions.

Ecological and flood mitigation would be undertaken, as required, in the initial phase, with it anticipated that these works will be undertaken during 2021 and 2022. Within the redline, new tree and hedgerow planting will be undertaken in 2021 within the Wildlife Corridor and areas to the south of the railway. This will allow new habitat as much time as possible to mature prior to removal of any hedgerow in later phases of the earthworks programme. In areas north of Ty Ffynnon Reen, flood compensation areas and new reens will be created south of the railway with it anticipated that these works will be undertaken in 2021/2022.

The first phase of infrastructure works would be associated with development in and around the proposed station – in particular the creation of a new railway embankment and a development platform enabling construction of the station building, station car park, transport interchange, station square and initial commercial buildings.

These works are, by necessity, adjacent to the SWML and will result in construction in the area north of the railway line and south of Ty Ffynnon Reen. This area contains a significant proportion of dormice habitat in the form of mature hedgerows. The construction programme and ecological mitigation strategy proposes translocation of dormice over the 2021 season and the subsequent removal of hedgerow in April 2022. The station is included within the initial construction phase as a core component of the allocation, securing sustainable travel to and from the site and facilitating development. The station construction programme will be subject to agreements with a number of parties including Network Rail, Transport for Wales and Train Operating Companies as well as commercial agreements. Construction on the SWML will be subject to “possessions” which will need to be scheduled to minimise disruption to passenger and freight services, with long possessions generally confined to the Easter and Christmas periods.

Dormice translocation proposals have been informed by site-specific surveys, the extent and timing of construction activities and the capacity of adjacent habitat. This strategy has been developed with reference to the Dormouse Conservation Handbook (2nd Ed) English Nature, Bright et al (2014), Peterborough. The translocation of dormice would be undertaken under NRW licence issued under Regulation 55 of the Habitats Regulations.

The primary access road including the junction with Cypress Drive will be constructed so as to facilitate public access to the station and transport interchange on first opening. Preparatory work on this route is expected to begin in 2021, with habitat clearance for the new junction with Cypress Drive scheduled to begin in April 2022 allowing for dormice seasonal clearance.

Building phasing would be in response to market conditions and for the purposes of assessment, an eight-year development programme is assumed for construction. This is based on anticipated take-up of employment at the site informed by local and regional market conditions. It is anticipated that the first buildings constructed would be in and around the station.

5 Planning Policy

5.1 The Development Plan

This Chapter sets out the national and local planning policy to be considered in the determination of the three NCC applications.

Section 70(2) of the Town and Country Planning Act 1990 and requires that *“in dealing with an application for planning permission” a local planning authority “shall have regard to the provisions of the development plan, so far as material to the application”*. Section 38(6) of the Planning and Compulsory Purchase Act 2004 adds *“if regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise.”*

The Development Plan is defined by Section 38(3) of the Planning and Compulsory Purchase Act 2004 (in Wales) as *“the regional strategy for the region in which the area is situated (if there is a regional strategy for that region) and the development plan documents (taken as a whole) which have been adopted or approved in relation to that area”*.

The Development Plan for the three Newport planning applications comprises the following:

- Newport Local Development Plan 2011-2026 (2015);
- Newport Local Development Plan Proposals Map 2011-2026 (2015); and
- Newport Local Development Plan Constraints Map 2011-2026 (2015).

Of note the Development Plan for the Cardiff site which has been submitted separately to CC, comprises the following:

- Cardiff Local Development Plan 2006-2026 (2016);
- Cardiff Local Development Plan Proposals Map 2006-2026 (2016); and
- Cardiff Local Development Plan Constraints Map 2006-2026 (2016).

5.1.1 Newport Local Development Plan 2011-2026

The NLDP was adopted in 2015 and has an end date of 2026. It comprises a Written Statement, Proposals Map and Constraints Map.

The Written Statement sets out the vision for development in Newport over the plan period and sets out a number of Strategic Policies, General Policies and topic specific Policies which determine and guide how development should be approached within Newport.

The NLDP is supplemented by more detailed guidance in Supplementary Planning Guidance documents.

Proposals Map

The Proposals Map from the adopted NLDP indicates following for the three application sites within NCC

- All three sites are wholly located within the Green Belt protected under **Policy SP6**;
- All three sites are wholly located within the Wentlooge Levels Special Landscape Area protected under **Policy SP8**;
- All three sites are wholly located within the Countryside protected under **Policy SP5**;
- All three sites are wholly located within The Levels Archaeologically Sensitive Area protected under **Policy CE6**;
- Application 1 is located along the route of a Long Distance Walk / Cycleway; and
- Application 3 is wholly located within the Undeveloped Coastal Zone protected under **Policy CE9**.

The Proposals Map also indicates that all three sites are located on the border with NCC and CC.

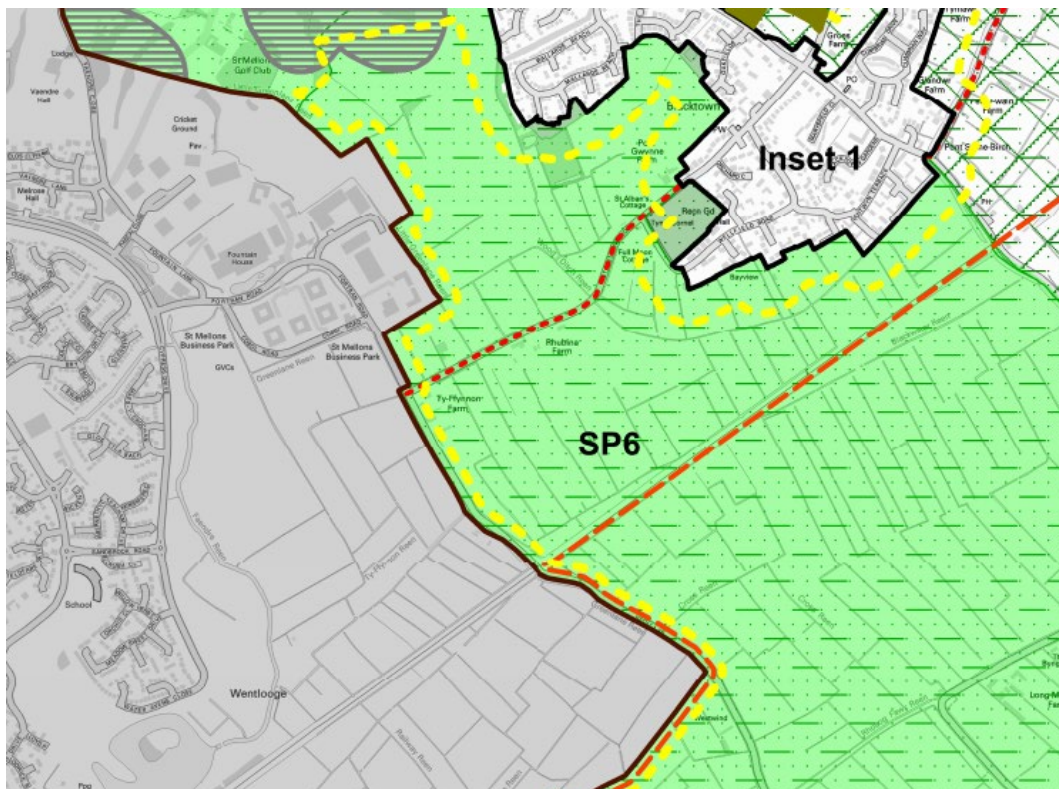


Figure 3: NLDP Proposals Map Extract

Constraints Map

The Constraints Map for the NLDP indicates the following for the site:

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- All three sites are wholly located within the Gwent Levels SSSI;
- All three sites are wholly located within a Landscape of Outstanding Historic Interest; and
- A small portion of Application 3 is located within TAN 15 Flood Zone C1.

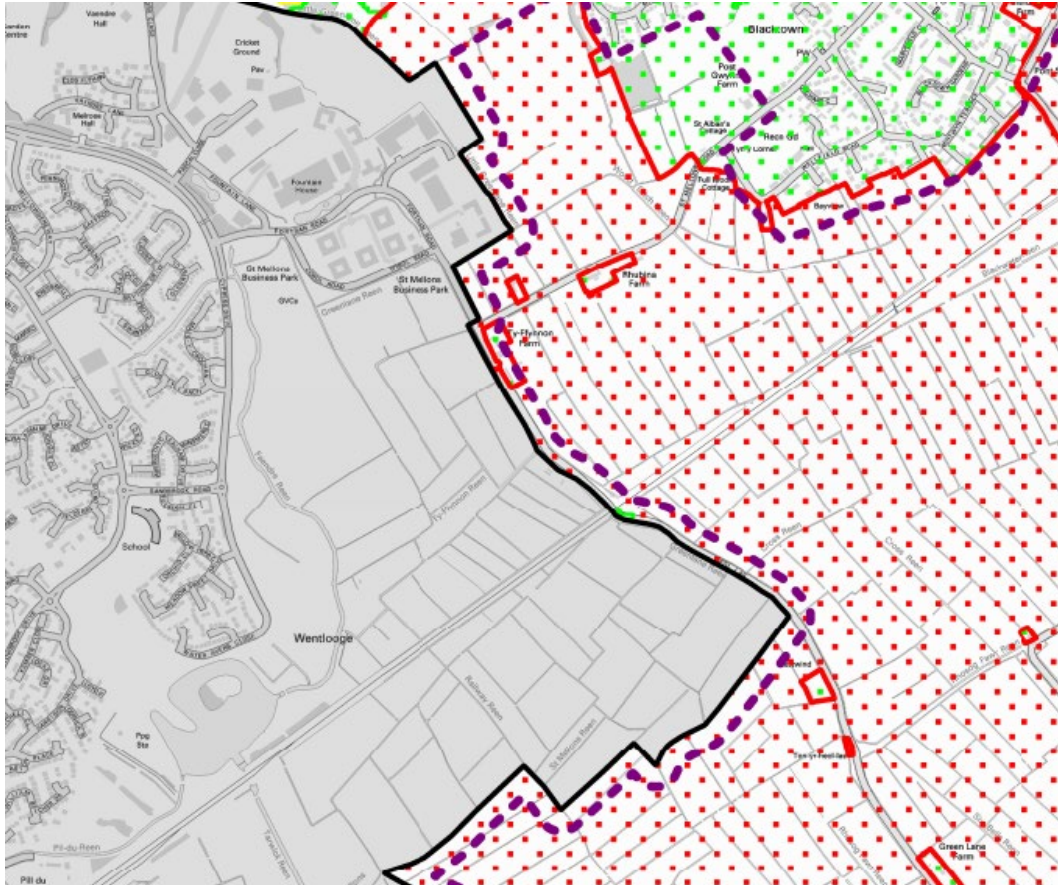


Figure 4: NLDP Constraints Map Extract

5.1.2 Cardiff Local Development Plan 2006-2026

The CLDP was adopted in 2016 and has an end date of 2026. It comprises a Written Statement, Proposals Map and Constraints Map.

The Written Statement sets out the vision for development in Cardiff over the plan period and sets out a number of Strategic Policies and Key Policies which determine and guide how development should be approached within Cardiff.

The CLDP is supplemented by more detailed guidance in Supplementary Planning Guidance documents.

Proposals Map

The Proposals Map from the adopted CLDP indicates that the Cardiff site is allocated under Key **Policy KP2(H)** for the following:

Policy KP2(H): South of St Mellons Business Park

“Land is allocated South of St Mellons Business Park, as defined on the Proposals Map, for a strategic employment site together with essential, enabling and necessary supporting infrastructure which will be delivered in a phased manner with specific details formally tied into planning consents including:

Essential/ Enabling Infrastructure

- *Transport & Highways:*
 - *Provision of transport hub including new rail station served by relief line rail services connecting to the city centre and services to Cardiff Airport and London via Cardiff Central;*
 - *Provision of park and ride facility;*
 - *Off-site infrastructure including bus priority measures to develop bus-based Rapid Transit Corridors integrating with the site, the Eastern Bus Corridors and other routes within the North Eastern/Eastern Rapid Transit Corridor including services linked to the City Centre and Strategic Sites G and F;*
- *Walking and Cycling:*
 - *Provide high quality on-site and off-site walking and cycling links and facilities to maximise walking and cycling access to the site from neighbouring communities including Trowbridge and St Mellons.*
- *Flood mitigation/ defences:*
 - *Flood mitigation works including raising the development plateaus and providing compensatory flood storage areas south of the rail line.*

Necessary Infrastructure

- *Retain the area of land to the east of Cypress Drive and Faendre Reen as green space linked with Hendre Lake Park;*
- *If the infilling of any reen or field ditch proves to be unavoidable at the application stage it should be realigned (with at least an equal capacity) around the perimeter of the development or a compensatory length of ditch should be provided elsewhere within the site.*

Development shall be undertaken in a comprehensive manner and accord with the following key masterplanning requirements (as depicted, where appropriate, on the Schematic Framework):

- *Provide 44 ha of business land capable of accommodating up to 90,000 square metres campus style high quality development similar to existing business park at St Mellons in a location which benefits from Assisted Area Status;*
- *Integrate the site with local facilities in the surrounding area;*

- *Effectively respond to landscape and biodiversity assets by:*
 - *Protecting the value of the Gwent Levels SSSI with development being a minimum of 12.5 metres from main reens and 7 metres from field ditches;*
 - *Ensuring that all development accords with the Natural Resources Wales (formerly Countryside Council for Wales) Wentloog Levels guidelines “Nature Conservation and Physical Developments on the Gwent Levels – the current and future implications”;*
 - *Integrating any landscape natural features, such as existing reens and hedgerows into the design including provision of suitable buffers;*
 - *Protecting the Marshfield SINC;*
 - *Respecting the intricate reen network and exiting hedgerows;*
 - *Linking retained habitats through the provision of a series of open space corridors providing ecological connectivity, sustainable access routes and opportunities for sustainable drainage including:*
 - *Links between retained reens and hedgerows;*
 - *Green links to Hendre Lake Park which respond to the natural landscape value of the area;*
 - *Ensuring that there is no detriment to the maintenance of the favourable conservation status of the Shrill Carder Bee by carrying out a survey, and if found, provide appropriate compensatory measures;*
 - *Ensuring that there is no detriment to the maintenance of the favourable conservation status of European Protected Species including bats, otters and reptiles including provision of suitable compensatory planting to supplement existing retained habitats.*
- *Effectively respond to heritage assets by:*
 - *Assessing and effectively addressing potential impacts on known assets including the Wentloog Levels Archaeologically Sensitive Area and registered Landscape of Outstanding Historic Interest.”*

Land to the north of the site is allocated as an existing employment site under **Policy EC1.5** St Mellons Business Park, land to the south east a Special Landscape Area and the site is located in the settlement boundary of Cardiff.

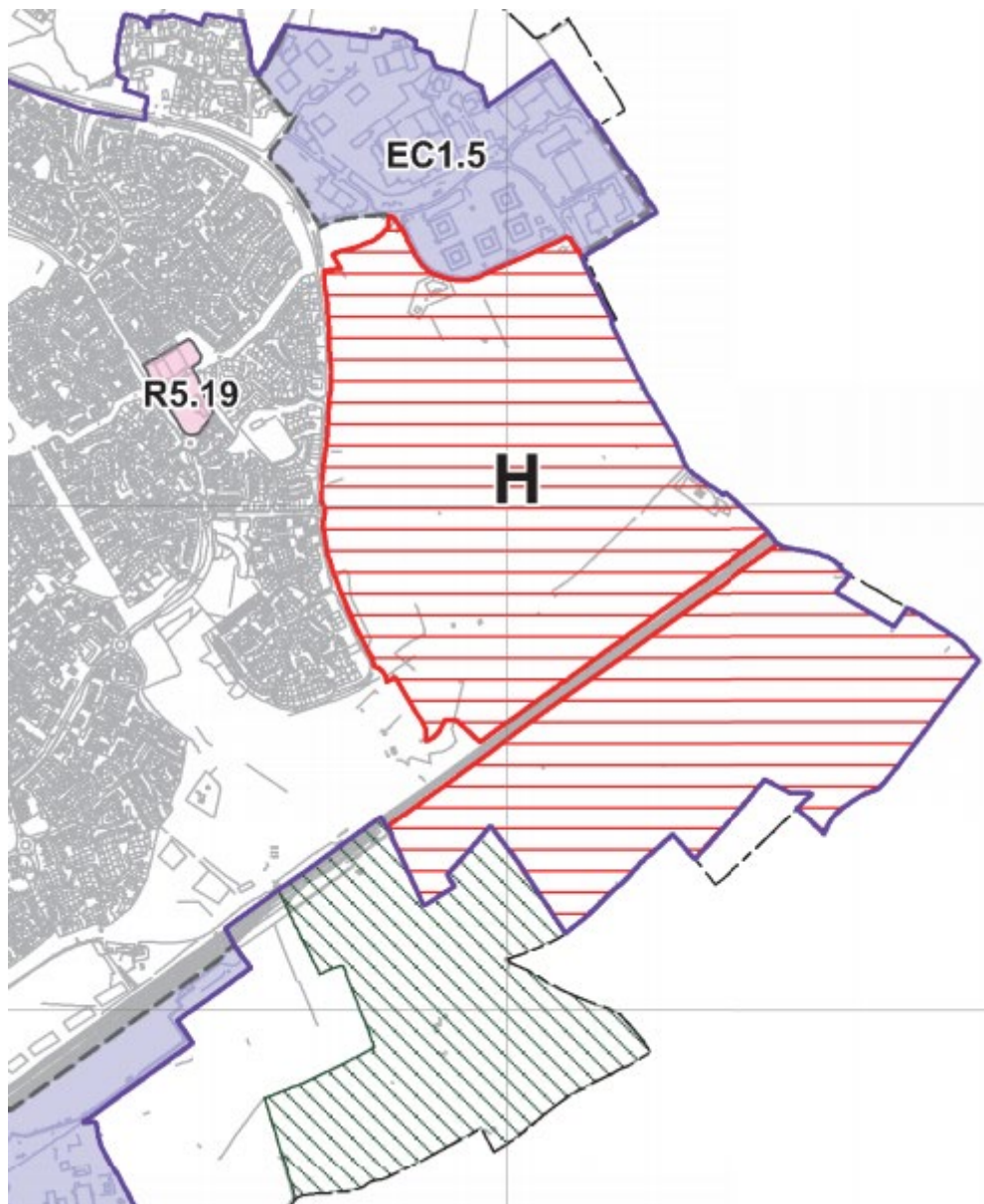


Figure 5: CLDP Proposals Map extract

Constraints Map

The Constraints Map for the CLDP indicates the following for the Cardiff site. The majority of the constraints identified for the Cardiff site are the same as those for the three planning applications submitted to NCC.

- The site is wholly located within the Gwent Levels – Rumney and Peterstone SSSI (9);
- The site is wholly located within the Gwent Levels Historic Landscape (1);
- The site is partly located within The Wentloog Levels Archaeologically Sensitive Area (4); and
- Part of the site forms the Marshfield SINC. (106).

The Constraints Map also indicates that there is a Rapid Transit Corridor crossing the site and running along its western boundary, with a Proposed Rail Station and Park and Ride at its centre.

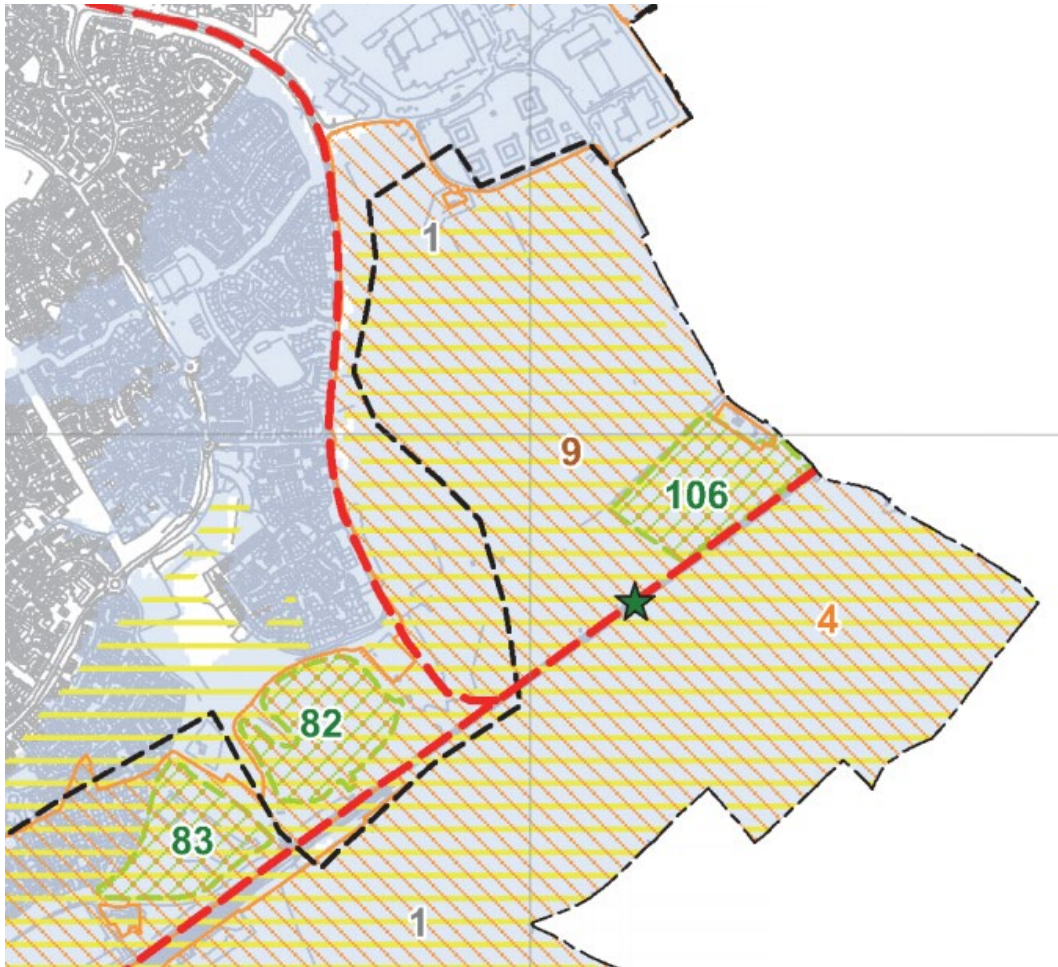


Figure 6: CLDP Constraints Map extract

5.2 Material Planning Considerations

As required by Section 70(2) of the Town and Country Planning Act 1990 and Section 38(6) of the Planning and Compulsory Purchase Act 2004 applications are to be determined in accordance with the Development Plan unless material considerations indicate otherwise.

The other policy and guidance documents that form material considerations in the determination of this planning application are:

- Planning Policy Wales (Edition 10);
- National Development Framework (2020-2040): Consultation Draft (2019)
- The Wales Spatial Plan (2008);
- Technical Advice Notes (TAN):
 - TAN 5 – Nature Conservation and Planning;

- TAN 11 – Noise;
- TAN 12 – Design;
- TAN 14 – Coastal Planning;
- TAN 15 – Development and Flood Risk;
- TAN 18 – Transport; and
- TAN 24 – The Historic Environment.
- NCC’s adopted Supplementary Practice Guidance:
 - Planning Obligations;
 - Archaeology and Archaeologically Sensitive Areas;
 - Wildlife and Development; and
 - Trees, Woodland, Hedgerows and Development Sites.

5.2.1 Planning Policy Wales Edition 10 (2018)

Published in December 2018, the tenth edition of Planning Policy Wales (PPW10) sets out the land use planning policies of the Welsh Government. Within the latest edition a new emphasis is given to the concept of placemaking, in conjunction with the aspiration for **PPW10** to align more closely with the Well-being of Future Generations (Wales) Act 2015.

PPW10 reaffirms the presumption in favour of sustainable development and defines sustainable development as “*the process of improving the economic, social, environmental and cultural well-being of Wales by taking action, in accordance with the sustainable development principle, aimed at achieving the Well-being Goals*”.

PPW10 highlights the importance of proposals taking a placemaking approach, specifically, guiding proposals to take a holistic approach when planning and designing development and spaces, focusing on positive outcomes. The concept of placemaking should be considered at all levels including at a global scale through paying key consideration to climate change; and also, at a more local scale, considering the amenity impact on neighbouring properties and people.

In line with the principles of the Well-being Act, **PPW10** is organised around four key themes; ‘*Strategic and Spatial Choices*’, ‘*Active and Social Places*’, ‘*Productive and Enterprising Places*’ and ‘*Distinctive and Natural Places*’. The elements of most relevance to the proposed development in this case are outlined further below.

Chapter 3 ‘Strategic and Spatial Choices’ focuses on placemaking and strategic development. Paragraphs 3.3 - 3.313 of the **PPW10** set out five key objectives to achieving good design: access and inclusivity; environmental sustainability; character; community safety; movement. Figure 5 illustrates these objectives.



Figure 7: PPW10 – Objectives of Good Design

Paragraph 3.7 sets out that *“developments should seek to maximise energy efficiency and the efficient use of other resources (including land), maximise sustainable movement, minimise the use of non-renewable resources, encourage decarbonisation and prevent the generation of waste and pollution.”*

Paragraph 3.9 sets out that *“the special characteristics of an area should be central to the design of a development. The layout, form, scale and visual appearance of a proposed development and its relationship to its surroundings are important planning considerations.”*

Paragraph 3.30 sets out the Sustainable Management of Natural Resources (SMNR) framework as outlined within The Environment (Wales) Act 2016. PPW10 states that, *“amongst other considerations, the planning system can contribute to the SMNR approach through ensuring resilient locational choice for infrastructure and built development, taking actions to move towards a circular economy and facilitate the transition towards economic decarbonisation”.*

Paragraph 3.54 sets out that the best and most versatile agricultural land (grades 1, 2 and 3a) should be conserved as a finite resource for the future. It further states that *“Land in grades 1, 2 and 3a should only be developed if there is an overriding need for the development and either previously developed land or land in lower agricultural grades is unavailable, or available lower grade land has an*

environmental value recognised by a landscape, wildlife, historic or archaeological designation which outweighs the agricultural considerations.”

In terms of the provision of new infrastructure, Paragraph 3.58 states that, *“planning authorities should, in conjunction with key providers, take a strategic and long-term approach towards the provision of infrastructure as part of plan making. This may involve collaboration between planning authorities and key infrastructure providers to ensure infrastructure provision is sustainable”*.

Chapter 4 ‘Active and Social Places’ outlines components of placemaking required to create well connected and cohesive communities covering the following:

- Transport;
- Housing;
- Retail & commercial development;
- Community facilities; and
- Recreational spaces.

With regards to transport, it states that people should have access to jobs and services through more efficient and sustainable journeys, by walking, cycling and public transport. It further states that *“new development should prevent problems from occurring or getting worse such as ...the reliance on the private car and the generation of carbon emissions.”*

It is also noted that land use and transport planning should be integrated to *“minimise the need to travel, reduce dependency on the private car and enable sustainable access to employment, local services and community facilities”*.

It is a priority of Welsh Government to reduce reliance on the private car and support a modal shift to walking, cycling and public transport. **PPW10** states that *“Delivering this objective will make an important contribution to decarbonisation, improving air quality, increasing physical activity, improving the health of the nation and realising the goals of the Well-being of Future Generations Act.”* The Sustainable Transport Hierarchy for Planning illustrates how development proposals must seek to prioritise walking, cycling and public transport ahead of the private motor vehicles. The Sustainable Transport Hierarchy for Planning, as presented within **PPW10**, is illustrated within Figure 6.

Within paragraph 4.1.35, the role of public transport in the sustainability of places is underlined, stating that *“it enables people to undertake medium and long journeys without being dependent on having access to a car.”* In addition to this, paragraph 4.1.37 states that *“Planning authorities must ensure the layout, density and mix of uses of new development support the use of public transport and maximises accessibility potential.”*

PPW10 also encourages the use of Ultra Low Emission Vehicles (ULEVs) and the provision of ULEV charging points as part of new development. Paragraph 4.1.39 states that *“Where car parking is provided for new non-residential*

development, planning authorities should seek a minimum of 10% of car parking spaces to have ULEV charging points”.

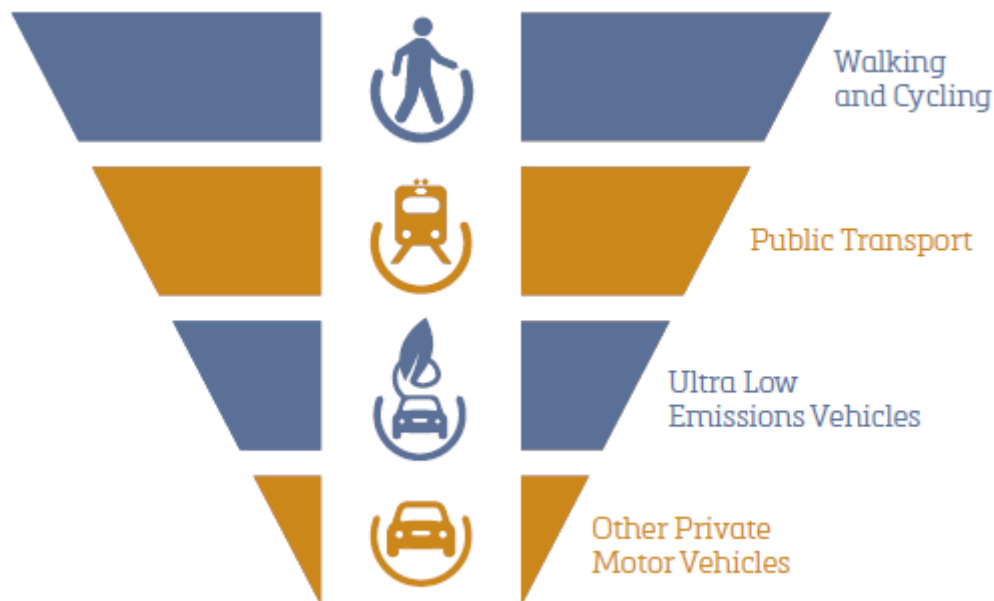


Figure 8: PPW10 – The Sustainable Transport Hierarchy for Planning

Chapter 5 Productive and Enterprising Places covers the economic components of placemaking and states that *“a more Equal Wales can be achieved through promoting sufficient employment and enterprise opportunities for people to realise their potential and by recognising and building on the existing economic strengths of places to assist in delivering prosperity for all.”*

PPW10 states that *“the potential of new/improved transportation infrastructure to create new or renew hubs of economic activity should be realised with careful master-planning around sustainable transport nodes and interchanges to create places which can be easily accessed by sustainable transport and which capitalise on their location and the opportunities which this presents.”*

Paragraph 5.3.1 states that *“the provision of sustainable transport infrastructure is essential in order to build prosperity, tackle climate change, reduce airborne pollution and to improve the social, economic, environmental and cultural well-being of Wales”* and that *“the planning system should facilitate the delivery, decarbonisation and improvement of transport infrastructure in a way which reduces the need to travel, particularly by private vehicles, and facilitates and increases the use of active and sustainable transport”.*

PPW10 sets out that *“Planning authorities should support necessary transport infrastructure improvements, where it can be demonstrated that such measures are consistent with Welsh Government policy to encourage and increase use of sustainable transport and reduce reliance on the private car for daily journeys.”*

In relation to transport and employment, paragraph 5.4.13 states that planning authorities should “*align jobs and services with housing and sustainable transport infrastructure, to reduce the need for travel, and dependency on travel by car*”.

Chapter 6 Distinctive and Natural Places covers environmental and cultural components of placemaking. **PPW10** sets out how development should protect the special characteristics of the natural built environment including the historic environment, green infrastructure, landscape biodiversity and ecological networks.

Green infrastructure is considered core to the creation and management of distinctive and natural places. **PPW10** states that green infrastructure assets and networks should be protected owing to their multi-functional roles such as providing benefits for the health and well-being of communities as well as the environment.

Paragraph **6.4.3** gives focus to biodiversity and ecological networks and sets out a number of considerations for development proposals to consider. This includes that development proposals must consider the need to “*support the conservation of biodiversity, in particular the conservation of wildlife and habitats*”.

5.2.2 Building Better Places (2020)

In July 2020 Welsh Government published its policy position on how the planning system can assist in the COVID-19 recovery period. ‘Building Better Places’ is intended to sit alongside PPW and is a key consideration in both plan preparation and development management. ‘Building Better Places’ expands on the recent letter issued to Chief Planning Officers from Julie James (Minister for Housing and Local Government) in July 2020 which acknowledges that the economic consequences of the COVID-19 pandemic are predicted to be severe and felt across all sectors, including those in construction and the built environment. ‘Building Better Places’ emphasises both the primacy of the plan led system in Wales but also the need to have places and place-making at the heart of the recovery process. The policy agenda seeking to deliver better places and placemaking develops the principles already enshrined in PPW. The pandemic has highlighted the importance of the need for good quality places for people to live, work and relax. ‘Building Better Places’ seeks to ensure that the economic hardship owing to the pandemic does not outweigh the above principles and policies.

It is clear that an immediate supply of development land is essential if we are to build the better places envisaged by Welsh Government and lead the recovery that is desperately required. New development delivering positive social and economic outcomes as well as addressing climate change concerns needs to be happening on the ground in the short term and can’t simply await the completion of the LDP review process in five years time.

Welsh Government has recognised this issue and in respect of development management, ‘Building Better Places’ states “PPW and the NDF can be used directly in the decision making process. The WG will support decisions taken in

this context, particularly in the short-term until an LDP is adopted”. This is a very important concession and allows for new development in the short term that truly embrace the principles and policies of delivering better places and placemaking. The guidance includes a Welsh Government commitment to follow through on infrastructure obligations which will go a long way in ensuring that the developments envisioned are delivered and the wider public benefits are maximised.

It also emphasises that development management decisions should focus on creating healthy, thriving active places with a focus on a positive, sustainable future for our communities. The planning system has an important role in supporting healthier lifestyles and reducing inequalities. This includes both direct and indirect opportunities such as the allocation of land for health facilities, ensuring good design and barrier free development, jobs and skills among other considerations.

5.2.3 The Wales Spatial Plan (2008)

This sets out the planning agenda for Wales at the spatial level. Its main principle is that development should be sustainable, by improving the well-being and quality of life for Wales.

The plan recognises that in the context of responding to and mitigating the effects of climate change, the WSP encourages measures to reduce the need to travel by co-locating jobs, housing and services and changing behaviour in favour of ‘greener’ modes of travel, such as car sharing, public transport, walking and cycling. The site is located within the South-East Wales Capital Region. The objectives for this area include making better use of the existing transport infrastructure and delivering more sustainable access to jobs and services. The proposed development assists in achieving these objectives.

5.2.4 The National Development Framework – Consultation Draft (2019)

The new National Development Framework (NDF) is set to replace the Wales Spatial Plan, providing a framework for development between 2020 and 2040. The NDF’s aim is to address key national priorities through providing the direction for where we should invest in infrastructure and development for the greater good of Wales and its people.

Chapter 3 NDF Outcomes The draft NDF is outcome-led and aims to develop a Wales where people live ...

- “1. and work in connected, inclusive and healthy places*
- 2. in vibrant rural places with access to homes, jobs and services*
- 3. in distinctive regions that tackle health and socio-economic inequality through sustainable growth*
- 4. in places with a thriving Welsh Language*

- 5. and work in towns and cities which are a focus and springboard for sustainable growth*
- 6. in places where prosperity, innovation and culture are promoted*
- 7. in places where travel is sustainable*
- 8. in places with world-class digital infrastructure*
- 9. in places that sustainably manage their natural resources and reduce pollution*
- 10. in places with biodiverse, resilient and connected ecosystems.”*

The following Strategic and Spatial Choices policies are considered to be of relevance to the proposed development:

Policy 1 – Sustainable Urban Growth: *“Urban growth should support towns and cities that are compact and orientated around urban centres and integrated public transport and active travel networks. Higher density and mixed use development on sites with good access to urban centres and public transport hubs, including new and improved Metro stations, will be promoted and supported.”*

Policy 7 – Ultra Low Emission Vehicles: *“The Welsh Government supports the increasing use of ultra low emission vehicles. We will work with the UK Government, local authorities, the energy sector and businesses to plan for and implement the roll out of electric vehicle charging infrastructure, including the creation of a network of rapid charging points to enable longer distance travel by electric vehicles throughout Wales.”*

Policy 8 – Strategic framework for biodiversity enhancement and ecosystem resilience: *“To ensure the enhancement of biodiversity and the resilience of ecosystems, the Welsh Government and its key partners will identify:*

- areas which could be safeguarded as ecological networks for their potential importance for adaptation to climate change or other pressures, for habitat restoration or creation, or which provide key ecosystems services, to ensure they are not unduly compromised by future development; and*
- opportunities where strategic green infrastructure could be maximised as part of development proposals, requiring the use of nature based solutions as a key mechanism for securing sustainable growth, ecological connectivity, social equality and public well-being.*

Planning authorities should include these sites in their development plan strategies and policies in order to promote and safeguard the functions and opportunities they provide. In all cases, cumulative action towards securing the enhancement of biodiversity and the resilience of ecosystems should be demonstrated as part of development proposals through innovative, nature-based approaches to site planning and the design of the built environment.”

Policy 27 – Cardiff: *“Cardiff will retain and extend its role as the primary national centre for culture, sport, leisure, media, the night time economy and finance. The Welsh Government supports regional development which addresses the opportunities and challenges arising from Cardiff’s geographic location and its functions as a Capital City. The Welsh Government supports Cardiff’s status as an internationally competitive city and a core city on the UK stage.”*

Policy 28 – Newport: *“The Welsh Government supports Newport as the focus for regional growth and investment and wants to see the City play an increased strategic role in the region. The strategic emphasis should be focussed on achieving growth in the city. Strategic and Local Development Plans across the region should recognise Newport as a focus for strategic housing and economic growth; essential services and facilities; transport and digital infrastructure; and consider how they can support and benefit from Newport’s increased strategic regional role. Development in the wider region should be carefully managed to support Newport’s growth and to provide a focus for regional planning. The Welsh Government will work with authorities within the region and in England to promote Newport’s strategic role and ensure key investment decisions in Wales and England support Newport and the wider region.”*

Policy 32 – Growth in sustainable transit orientated settlements:

“Development and growth in the region should be focussed in places with good active travel and public transport connectivity. Land in close proximity to existing and committed new mainline railway and Metro stations should be the focus for development. Strategic and Local Development Plans should plan growth to maximise the potential opportunities arising from better regional connectivity. The Welsh Government supports the development of the South Wales Metro and will work with agencies to enable its delivery.”

5.2.5 Technical Advice Notes

PPW10 is supported by a suite of Technical Advice Notes (TANs) which provide further guidance in relation to specific aspects of development. The TANs considered to be of most relevance to the proposed development are set out as follows.

TAN 5: Nature Conservation and Planning (2009) provides advice on how planning proposals should contribute to protecting and enhancing biodiversity and geological conservation. In cases of EIA development, TAN 5 sets out that it is essential to carry out the following:

- a) *“Screening of all Schedule 2 developments;*
- b) *Ensure all potentially significant nature conservation interests and effects on them are considered at the outset and particularly at the scoping stage;*
- c) *Encourage applicants to apply for a scoping opinion and engage as early as possible with relevant stakeholders;*
- d) *Agree on the effects to be assessed and information required including proposed assessment, methodology and timescales;*

- e) *Agree the scope for avoiding, mitigating or compensating for any adverse effects on nature conservation and ensure that these are included within the ES;*
- f) *Ensure that opportunities for enhancements are explored through the EIA process.”*

TAN 11: Noise (1997) contains guidance related to assessing the noise impacts of proposed development and outlines mitigation measures which can be introduced to control noise.

TAN 12: Design (2016) contains the design principles that should be considered for any new development. It sets five considerations which must be included within the design of new buildings listed below:

- a) *“Accessibility: Including ease of access for all into the development and to all elements within the site;*
- b) *Character: Including sustaining or enhancing local character.*
- c) *Community Safety: Including securing through natural surveillance.*
- d) *Environmental Sustainability: Including achieving efficient use and protection of natural resources; and*
- e) *Movement: Promoting sustainable means of travel.”*

TAN 14: Coastal Planning (1998) contains guidance relating to development proposals within coastal areas and includes advice on recreation development, heritage coats and non-statutory groupings, and shoreline management plans.

TAN 15: Development and Flood Risk (2004) provides technical guidance in relation to development and flooding and sets out a precautionary framework to guide planning decisions in respect of development in areas at high risk of flooding. It provides guidance on how to fully assess flood consequences and how to design and implement SuDS.

An update to **TAN 15** has recently been consulted on. The updated **TAN 15** aims to:

- *“replace the development advice map with a new Wales flood map*
- *place a greater emphasis on the development plan and the value of strategic flood consequences assessments*
- *integrate guidance on coastal erosion with flood risk issues in TAN 15*
- *provide guidance for regeneration initiatives affecting communities in flood risk areas”*

However, given the draft stage of preparation, the draft TAN is not a consideration in the determination of planning applications.

TAN 18 : Transport (2007) offers guidance on the integration between the planning system and transport. It contains detailed guidance on parking, active

travel, public transport and major transport infrastructure as well as information on how transport impacts should be assessed within Environmental Statements, Transport Assessments/Statement and Travel Plans. The TAN also sets out that planning authorities should allocate land for rail infrastructure. The guidance states that where major development has been permitted in phases, reasonable public transport provision should be in place before occupation of each phase to ensure travel by car is not necessary at the outset.

TAN 24: The Historic Environment (2017) aims to provide guidance as to how the planning system should consider the historic environment during plan-making and decision-making. It provides guidance on all aspects of the historic environment including World Heritage Sites, Archaeological Remains, Listed Buildings, Conservation Areas, Historic Parks and Garden and Historic Landscapes and Historic Assets of Local Interest.

5.2.6 Newport Supplementary Planning Guidance

In support of the NLDP, NCC has published a series of Supplementary Planning Guidance (SPG) documents to guide development in Newport. A number of these are relevant to the proposed development and have been taken into consideration in the development of the application.

Archaeology and Archaeologically Sensitive Areas SPG (2015) provides guidance on the city's archaeological heritage within the planning process.

Planning Obligations SPG (2020) sets out NCC's approach to planning obligations when considering applications for development in Newport. It identifies what, and when, the Local Planning Authority will expect from developers in terms of planning obligations, in order to assist the NCC in creating sustainable communities that provide social, economic, and environmental benefits.

Trees, Woodland, Hedgerows and Development Sites SPG (2017) sets the NCC's requirement for Trees, Woodland and Hedgerows affecting new development sites. This guidance is designed to help create high quality and sustainable urban and rural landscapes where trees, woodlands and hedges are a key element.

Wildlife and Development SPG (2015) provides specific direction on how biodiversity should be conserved and enhanced throughout the development control process, whilst drawing on national planning policy, and the policies contained in the NLDP.

6 Planning Assessment

6.1 The Planning Assessment

This assessment takes into consideration the application sites' constraints alongside the relevant topic specific policies from the NLDP as a whole. It also includes relevant policy considerations in the context of **PPW10** which forms a material planning consideration in the determination of the application.

Important policy considerations are summarised below into key themes and presented with an explanation as to how each of the NCC planning applications align with local and national adopted planning policy.

The applications are considered to accord with the relevant policies from the NLDP and given the nature of scale of the proposals and the Development Plan as a whole. It is further considered to accord with the relevant policies of **PPW10** which form material planning considerations.

6.2 Policy Considerations

6.2.1 Principle of Development

Policy SP5 of the NLDP outlines that *“Development in the countryside (that is, that area of land lying beyond the settlement boundaries shown on the proposal and inset maps) will only be permitted where the use is appropriate in the countryside, respects the landscape character and biodiversity of the immediate and surrounding area and is appropriate in scale and design.”*

Policy SP6 deals with the Green Belt and states that *“Within this area, development which prejudices the open nature of the land will not be permitted.”*

Policy SP14 states that *“Transport proposals will be supported where they:*

- i) Provide for traffic-free walking and cycling facilities and expansion of the network;*
- ii) Encourage the use of public transport and other modes which reduce energy consumption and pollution;*
- iii) Improve road safety;*
- iv) Improve the quality of life of residents;*
- v) Assist the local economy;*
- vi) Assist urban regeneration;*
- vii) Provide access to new development areas which incorporate sustainable transport modes;*
- viii) Relieve traffic congestion in the long term;*

- ix) *Result in other environmental improvements, including air quality, noise reduction, sustainable drainage and enhanced biodiversity.*

Policy SP15 states that *“Integrated transport will be pursued in line with the national and regional transport strategies. Such transport will comprise:*

- i) *A co-ordinated pedestrian network, including schemes such as “safe routes in communities”;*
- ii) *Implementation of the cycling strategy;*
- iii) *Innovative forms of public transport such as bus priority, safeguarding and enhancement of rail routes and identification of new stations;*
- iv) *Designation of transport interchanges for park and ride, park and share, and road to rail freight centres;*
- v) *A central area parking strategy;*
- vi) *Facilities for public transport, walking and cycling in major new development;*
- vii) *Interchange between bus, bicycle and car to enable sustainable use of the countryside. Significant development proposals shall be accompanied by travel plans.”*

The three planning applications subject to this Planning Statement comprise a mixture of active travel routes and temporary and permanent access routes associated with the development of *“Land to the South of St Mellons Business Park”* allocated under **Policy KP2(H)** of the CLDP.

Throughout **PPW10**, there is a clear emphasis towards the delivery of sustainable transport infrastructure and economic development, with reference given to the integration of land use and transport planning to *“minimise the need to travel, reduce dependency on the private car and enable sustainable access to employment, local services and community facilities”*. Furthermore, **PPW10** states that planning authorities should *“align jobs and services with housing and sustainable transport infrastructure”*.

PPW10 further states that *“the potential of new/improved transportation infrastructure to create new or renew hubs of economic activity should be realised with careful master-planning around sustainable transport nodes and interchanges to create places which can be easily accessed by sustainable transport and which capitalise on their location and the opportunities which this presents*

PPW10 also states that *“the provision of sustainable transport infrastructure is essential in order to build prosperity, tackle climate change, reduce airborne pollution and to improve the social, economic, environmental and cultural well-being of Wales”* and that *“the planning system should facilitate the delivery, decarbonisation and improvement of transport infrastructure in a way which reduces the need to travel, particularly by private vehicles, and facilitates and increases the use of active and sustainable transport”*.

PPW10 further “*promotes action at all levels of the planning process which is conducive to maximising its contribution to the well-being of Wales and its communities. It encourages a wider, sustainable and problem solving outlook which focuses on integrating and addressing multiple issues rather than on an approach which is fragmented, un-coordinated and deals with issues in isolation.*”

Policy 32 of the **draft NDF** sets out that development and growth in the region should be focussed in places with good active travel and public transport connectivity and that land in close proximity to existing mainline railway should be the focus for development.

The transport links proposed through the three Newport planning applications would provide traffic-free walking and cycling facilities and the expansion of the network to encourage the use of public transport in accordance with **Policy SP14**. The active travel routes proposed under Applications 1 and 2 would also actively provide access to new development within the area which incorporates sustainable transport modes and economic development. The proposed temporary construction access and permanent maintenance access would also ensure road safety by directing construction traffic to dedicated access points and relieve traffic congestion in the long term associated with the maintenance access.

The development on the Cardiff site would result in significant benefits to both Cardiff and Newport, through the provision of new high quality employment opportunities and a transport interchange. **PPW10** actively promotes co-ordinated decision making, which maximises the planning processes contribution to the well-being of Wales and its communities and seeks to avoid issues being dealt with in isolation. It is therefore right that the benefits associated with the strategic allocation for the Cardiff site are factored into the determination of the Newport planning applications and the developments whilst submitted to different Local Planning Authorities are not viewed in isolation.

The applications location within the countryside and Green Belt has also been considered, however given the minor nature of the proposals, the fact they would maintain the openness of the Green Belt and provide positive links to the Cardiff Hendre Lakes development, it is considered that their location within the Green Belt and countryside are acceptable in this instance.

All three planning applications would facilitate access to public transport, employment and walking and cycling networks associated with major development. Whilst Applications 1 and 2 are desirable, but not essential to the implementation of the Cardiff site, the works contained in Application 3 are required for the construction and operation of the Cardiff site and unlocking the significant benefits this strategic allocation will have for both residents of Cardiff and Newport.

It is therefore considered that the proposed development is acceptable in principle. Subsequently, the remainder of this planning assessment considers the topic specific policies from the adopted NLDP and demonstrates how the proposed developments accord with the Development Plan as a whole.

6.2.2 Design

Policy SP2 of the of the NLDP states that *“Development proposals should seek to maximise their positive contribution to health and well-being, and minimise any negative effects by being located in the most sustainable locations, close to public transport links and providing efficient walking and cycling routes and other green infrastructure as part of development schemes.”*

Policy GP6 deals with quality of design and outlines that *“Good quality design will be sought in all forms of development. The aim is to create a safe, accessible, attractive and convenient environment.”* It further outlines a set of design principles that should be addressed including: context of the site, access permeability and layout, preservation and enhancement, scale and form of development, materials and detailing and sustainability.

PPW10 sets out five key objectives to achieving good design. These include:

- *“Ensuring ease of access for all (Access);*
- *Sustaining or enhancing local character. Promoting legible development / a successful relationship between public and private space / quality, choice and variety / innovative design (Character);*
- *Ensuring attractive, safe public spaces / security through natural surveillance (Community Safety);*
- *Achieving efficient use and protection of natural resources / enhancing biodiversity / designing for change (Environmental Sustainability);*
- *Promoting sustainable means of travel (Movement).”*

The proposed development subject to the three planning applications has been designed in accordance with **PPW10** design objectives and **Policies SP2** and **GP6**.

The key features of the masterplan for the Cardiff site are outlined below and the three planning applications within NCC have been designed in accordance with this.

- The proposed development would create a catalyst for growth, contributing to the regeneration of East Cardiff and the wider Cardiff Capital Region by attracting high quality business and investment;
- Provide a development formed around sustainable travel with seamless access to rail, bus, walking and cycling routes from both Cardiff and Newport. Placing new and existing businesses and the existing community within walking distance of a mainline railway station with access to major cities including Cardiff, Newport, Bristol, London and Manchester;
- Retain the primary reen network across the site including the Faendre Reen, the Ty Ffynnon Reen and the Green Lane Reen;
- Create a new accessible public space known as the Main Park connecting with both St Mellons and Hendre Lakes;

- Provide a new north-south public realm spine to provide pedestrian focussed places to meet, dwell and gather, integrating high quality hard and soft landscape and sustainable urban drainage;
- Retain east-west green fingers across the site to create a green grid integrated with the new development plots and linking key habitat areas, managing water and defining new streets;
- Provide a wildlife corridor with protected habitats following the alignment of retained utilities;
- Create three distinct areas of development with a higher density cluster around the transport interchange;
- Orientate buildings to maximise solar gain and improve their energy efficiency and provide views to the Faendre Reen Corridor;
- Provide a primary point of vehicle access from Cypress Drive, with a primary vehicle route to the interchange to keep vehicular traffic away from the heart of the development; and
- Provide multiple points of access for walking and cycling to create a locally connected and permeable development.

The final key feature of the masterplan directly relates to the three planning applications within NCC. The developments have been proposed to utilise and improve the existing pedestrian and road network to provide active travel routes and a construction access and maintenance route into the site.

The design of the crossing points are simple in form and sympathetic/contextual and have limited impact on the Green Lane Reen.

The layout of the Cardiff site has also been designed to link with these access points providing active travel networks which have been designed to create an inclusive walkable place which prioritise walking and cycling. The network of streets within the Cardiff site are intended to be direct and legible, providing easy navigation within the site and connections to the surrounding area within both Newport and Cardiff.

The proposed developments have also been designed to directly respond to its sensitive ecological, landscape and archaeological setting. The proposed developments would respect the Green Lane Reen which crosses all three sites within Newport and Applications 1 and 2 would utilise existing breaks within landscape features such as hedgerows.

The DAS sets out in full detail, the design process and principles for the proposed developments including the Cardiff site and three planning applications submitted to NCC. It is however considered that the three applications within Newport positively respond to **Policies SP2** and **GP6** of the NLDP and the five key objectives of **PPW10** in achieving good design.

6.2.3 Sustainable Development

Policy SP1 states that *“Proposals will be required to make a positive contribution to sustainable development by concentrating development in sustainable locations on brownfield land within the settlement boundary. They will be assessed as to their potential contribution to:*

iii) Providing integrated transportation systems, as well as encouraging the co-location of housing and other uses, including employment, which together will minimise the overall need to travel, reduce car usage and encourage a modal shift to more sustainable modes of transport;”

PPW10 outlines the national presumption in favour of sustainable development and defines sustainable development as *“the process of improving the economic, social, environmental and cultural well-being of Wales by taking action, in accordance with the sustainable development principle, aimed at achieving the Well-being Goals”*. **PPW10** focuses upon the concept of placemaking and a positive outcome approach being taken within the planning and design of development. *“The concept of placemaking should be considered at all levels including at a global scale through paying key consideration to climate change; and also, at a more local scale, considering the amenity impact on neighbouring properties and people.”*

Sustainability is inextricably woven into the wider development proposals for Cardiff Hendre Lakes as explained within the DAS. Whilst the Well-being of Future Generations (Wales) Act 2015 (WFGA) is not specifically a material planning consideration, it has clear relevance in the planning arena, containing a blueprint that requires the delivery of sustainable development through the well-being goals and ways of working as illustrated in Figure 9. The proposal delivers strongly against the seven well-being goals, seeking to bring about positive change in local and wider economic prosperity, community cohesion through employment opportunities, sustainable travel, public space and other amenities and creating a strong, diverse and characterful sense of place; resilience through enhancing and creating a biodiverse and healthy eco-system; contributing to people’s physical and mental well-being on a number of levels through provision of services/amenities, spaces to dwell and for recreation; delivering on equality by bringing investment, jobs and travel choice to a socio-economically disadvantaged part of the city.

The proposal also delivers strongly against the five ways of working, having been prepared in an integrated and collaborative way, working with a diverse and broad range of local and statutory interest groups to understand the issues and the place and what the scheme can do in response to deliver a long term benefit to the locality and wider region.

It is therefore considered that the proposal represents sustainable development in accordance with the definition of the Act.

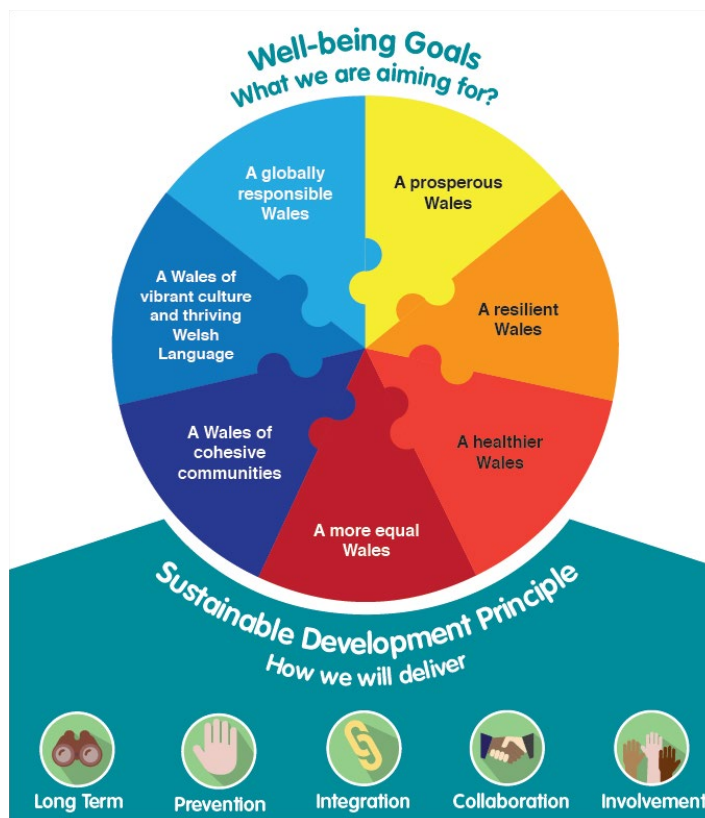


Figure 9: WFGA – The Well-being Goals and Ways of Working

The objective of environmental sustainability as prescribed in TAN 12 – Design, has been incorporated throughout the proposed development and is reflected throughout the Cardiff site and three proposed developments within Newport.

The proposed development at the Cardiff site represents a Transit Oriented Development model of growth, where development and infrastructure are shaped around public transport and active travel. This approach aims to provide people with attractive and viable alternatives to car based travel and capture value from public transport investment.

The illustrative masterplan for the Cardiff site proposes a network of streets and spaces that have been designed to support a modal hierarchy that prioritises pedestrians, cyclists and public transport through detailed design, following the principles set out in Manual for Streets and Manual for Streets 2.

Two out of the three proposed developments within Newport have been specifically designed to encourage accessibility and connectivity to the wider area, facilitating access to new jobs and skill opportunities for people within Newport. The access points in Application 1 and Application 2 are also located at the point of existing connections, namely the PRoW and the agricultural access to the north of the Gas Pressure Reduction Station. The proposals within Application 3 would also facilitate a temporary construction access point and permanent railway infrastructure maintenance point, demonstrating the critical role this application would play in the success of the Cardiff Hendre Lakes development.

The proposed developments also consider both the current risks presented by climate change and the longer term changes. In preparing the Cardiff site masterplan, the proposed development has responded to TAN 15 – Development and Flood Risk and Schedule 3 of the Flood and Water Management Act 2010, both which set clear direction for the approach to resilient development. The Green Lane Reen has been widened along its western bank as part of flood mitigation proposals and the new crossing point proposed under Application 1 accommodates this widening to enable the PRow to be useable once more. Application 3 also facilitates the installation of a flow control device within the Green Lane Reen to control the flow. The development area within Newport contains land for the earthworks which are required to form the flood protection measures associated with the flow control device and Green Lane overbridge.

The various elements of the proposed developments would ensure a high quality, sustainable design at the Cardiff site that would make a clear positive contribution to the creation of a distinctive community, place and space. Application 1 and Application 2 would be located at the location of existing access points. Application 3 whilst forming a new access would be critical to the sustainable development proposals at the same site as it would provide a permanent maintenance access for railway demonstrating accordance with **Policy SP1** and the sustainable development principle of the Well-being of Future Generations (Wales) Act 2015.

6.2.4 Healthy Environments

Policy SP2 deals with health and states “*Development proposals should seek to maximise their positive contribution to health and well-being, and minimise any negative effects by being located in the most sustainable locations, close to public transport links and providing efficient walking and cycling routes and other green infrastructure as part of development schemes.*”

PPW10 considers the priority of Welsh Government to reduce reliance on the private car and support a modal shift towards walking, cycling and public transport. It states that “*planning authorities should develop and maintain places that support healthy, active lifestyles across all age and socio-economic groups.*” PPW10 also sets out how in delivering a modal shift, important contributions will be made to “*improving air quality, increasing physical activity and improving the health of the nation and realising the goals of the Well-being of Future Generations Act*”.

PPW10 also considers how green infrastructure should be protected owing to the multi-functional role it plays in providing benefits for the health and well-being of communities as well as the environment.

The proposed developments within Newport would enable the provision of two active travel routes. The Cardiff site would also create new landscaped open spaces that are accessible to the public and within easy access of places of work, transport and existing residential communities. These would allow for work and play, encouraging people to engage with their surrounding environment whilst

improving their health and well-being through activity and increased social interactions.

Wales has increasing health challenges relating to obesity and an ageing population. Lowering rates of inactivity in deprived communities will help to reduce the burden that such issues place on our health care systems. For the proposed masterplan at Cardiff Hendre Lakes, this means prioritising active travel and encouraging physical activity through accessible walking and cycling networks for recreation, commuting and other travel for residents of both Newport and Cardiff.

Chapter 12 of the ES considers how the proposed development may impact a number of health determinants, which are aspects of the environment which influence a person's health. Health determinants considered include access to healthcare services, social infrastructure, open spaces and work and training; air quality, noise and neighbourhood quality; accessibility and active travel; climate change; and crime reduction and community safety.

No significant health effects were identified for the construction phase, although there would be some minor beneficial effects through increased employment opportunities. Once completed, improvements in local transport networks allowing the local population to access a wider range of services, infrastructure and opportunities would have a significant health benefit. The upgrades to, and the provision of, walking and cycling routes proposed through the Newport applications would promote activity and active travel in the local community, providing further beneficial effects. Finally, the high number of jobs directly generated through the operation of the proposed development, and provision of transport links to increase access to other employment opportunities, would provide significant beneficial effects to both residents of Newport and Cardiff.

The development would also be fully inclusive, ensuring that older people, people with disabilities and people from across the community are able to access and utilise new facilities in order to fully benefit the wider community, reduce existing health inequalities and encourage healthy and active lifestyles in accordance with **Policy SP2** as well as having a clear alignment beyond NLDP policy to the **PPW10** objective of facilitating accessible and healthy environments and the WFGA objective of 'a healthier Wales'.

6.2.5 Biodiversity and Nature Conservation

The application sites are located within the sensitive area of the Gwent Levels – Rumney and Peterstone SSSI. They are also within close proximity to the home of a number of protected species and habitats and therefore their existing biodiversity and nature conservation features have been key drivers in the design of the proposed developments.

Policy SP9 of the NLDP states that *"The conservation, enhancement and management of recognised sites within the natural, historic and built environment will be sought in all proposals."*

Policy GP5 further states that *“Development will be permitted where, as applicable:*

- i) the proposals are designed and managed to protect and encourage biodiversity and ecological connectivity, including through the incorporation of new features on or off site to further the UK, Welsh and/or Newport biodiversity action plans;*
- ii) the proposals demonstrate how they avoid, or mitigate and compensate negative impacts to biodiversity, ensuring that there are no significant adverse effects on areas of nature conservation interest including international, European, national, Welsh section 4232 and local protected habitats and species, and protecting features of importance for ecology”*

PPW10 states that development proposals must consider the need to *“support the conservation of biodiversity, in particular the conservation of wildlife and habitats”*.

A full programme of ecological surveys and monitoring has been undertaken at and surrounding the sites within both Cardiff and Newport to inform the proposed developments. Ecological surveys between 2017 and 2019 confirmed the presence/potential of a number of protected and/or notable species on the Cardiff site and within its peripheries. This included foraging and commuting bats, dormice, otter, water vole, European eel, foraging and commuting badgers, breeding and wintering birds, barn owl, grass snake, common lizard and common amphibians.

These surveys have been used to identify important ecological features and species and habitats requiring protection at the site. The ecological impacts of the proposed development and any required mitigation measures have been fully assessed in Chapter 10 (Biodiversity) of the ES.

Designated Sites

A Habitats Regulations Assessment (HRA) has been undertaken for the sites due to the presence of internationally designated sites located within 10km of the site, bat Special Areas of Conservation (SAC) located within 30km of the proposed development and three nationally designated sites within 2km of the site.

Seven International Sites were identified within the search area (10km and all SACs designated for the presence of Annex II bat and/or fish species within 10-30km of the project): Severn Estuary SAC, Special Protection Area (SPA) and Ramsar site, River Usk SAC, Mendip Limestone Grasslands SAC, North Somerset and Mendip Bats SAC, and the Wye Valley and Forest of Dean Bat Sites SAC.

The HRA Screening Assessment identified the potential pathways for effect for the Severn Estuary SAC, SPA and Ramsar site, and the River Usk SAC, via: habitat degradation, in the form of dust deposition, pollution events, sediment runoff, changes in air quality, and the spread of INNS; habitat loss/severance; physical disturbance/damage of habitats for which qualifying features rely on; disturbance/displacement to qualifying fauna and mortality/injury of individuals.

The information to inform the Appropriate Assessment considered these effects in relation to the conservation objectives for the qualifying features of the International Sites and identified suitable mitigation measures.

Potential effects from construction activities, such as from dust deposition, pollution events or sediment run-off, to designated sites which are within relatively close proximity and/or are hydrologically connected to the construction footprint would be mitigated through standard best-practice techniques and methods as described within Section 1.9 of Chapter 10 (Biodiversity) of the ES and within the Outline CEMP.

During operation, SuDS would be implemented across the site to manage rainfall using methods that mimic natural process, by using landscape and vegetation to control the flow, volume and quality of the surface water runoff. The storm water drainage strategy and flood mitigation proposals have been designed to ensure no de-watering of existing reens and the interconnectivity between the reen network is maintained. The three proposals within Newport due to their scale and location would not require their own SuDS proposals and would instead interface with the proposals at the Cardiff site or naturally drain into the reen network.

The HRA concluded that these measures along with the proposed monitoring are considered sufficient to ensure that the construction and operation of the proposed development do not, either alone or in-combination with other plans or projects, give rise to any adverse effects on the integrity of the International Sites.

Potential effects from construction activities, such as from dust deposition, pollution events or sediment run-off, to designated sites which are within relatively close proximity and/or are hydrologically connected to the construction footprint would be mitigated through standard best-practice techniques and methods as described within Section 1.9 of Chapter 10 (Biodiversity) of the ES and within the Outline Construction Environmental Management Plan (CEMP).

No permanent barriers to Special Protection Area (SPA) or Ramsar site fish species are proposed and the habitat loss to SPA and Ramsar site bird species is considered to not be significant.

As a result of the proposed developments within Newport no reens within the Gwent Levels – Rumney and Peterstone SSSI would be lost. The proposed structures, junctions and two active travel routes have all been designed to ensure they sufficiently span the reen and would not cause any impact to the free flow of water or species within the reen. Strips of land within the Cardiff site have also been retained which would be safeguarded from built development. 12.5m wide off sets would also be provided for the main reens including the Green Lane Reen.

As such the proposed developments during operation are considered to have a negligible impact on designated sites and would not cause permanent unacceptable harm to sites of international, national or local nature conservation importance in accordance with **Policies SP9 and GP5**.

Biodiversity Features and Protected Species

In terms of biodiversity features at the sites and protected species, Chapter 10 (Biodiversity) of the ES concludes that through the provision of wildlife crossings and enhancement of key foraging habitats, the operational effects on foraging and commuting protected species at the sites is considered to be positive, being a net gain.

Wildlife bridges and safe crossing locations would be provided across the site to enable protected species connections into existing and planted habitats without being restricted by built development.

Where it has not been possible to design the proposed developments to avoid, eliminate, or reduce the magnitude of some of the potential impacts and risks associated with the proposed developments, mitigation measures have been identified to achieve this. Mitigation measures seek to employ best-practice methods for dealing in particular with habitat loss, habitat severance, habitat damage, disturbance and species mortality. Enhancement measures have also been included, going above and beyond what is required to mitigate the adverse effects of the proposed development at the Cardiff site and three sites within Newport, resulting in some overall net biodiversity gains.

Overall the ES Biodiversity chapter concludes that with the relevant mitigation measures in place, the proposed development would have no significant effects on biodiversity features or protected species.

A high standard of environmental management during construction would also be adopted through the CEMP. An Outline CEMP is included in the ES and this would be developed and detailed by the appointed contractors and submitted to NCC should planning permission be granted.

It is therefore considered that the proposed development accords with **Policies SP9** and **GP5** of the NLDP.

6.2.6 Landscape

Policy SP8 identifies the three sites within the Wentlooge Levels Special Landscape Area and within these areas states that *“proposals will be required to contribute positively to the area through high quality design, materials and management schemes that demonstrate a clear appreciation of the area’s special features.”*

Policy GP5 further states that *“Development will be permitted where, as applicable:*

- v) there would be no unacceptable impact on landscape quality;*
- vi) the proposal includes an appropriate landscape scheme, which enhances the site and the wider context including green infrastructure and biodiversity networks;”*

PPW10 sets out that *“the special characteristics of an area should be central to the design of a development. The layout, form, scale and visual appearance of a proposed development and its relationship to its surroundings are important planning considerations”*.

Landscape

The proposed development includes aspects which are located within or in close proximity to the National Landscape Character Area (NCLA) 34: Gwent Levels and NLCA 35: Cardiff, Barry and Newport. The site is also included within the Gwent Levels Landscape of Outstanding Historic Interest in Wales HLW(GT) 2 and within close proximity to the Wales Coast Path.

The landscape strategy for the proposed development at the Cardiff site is defined by large scale connected green wildlife corridors that flow from west, north and east to form an ‘inverted v’ shape at the site. The history and ecological features of the site together with the surrounding reens and farmland have driven the strategy to ensure that it responds to its sensitive context.

The Landscape Parameter Plan submitted in support of the outline planning application to CC outlines four key parameters for the site: water, habitats, access and public realm.

The water strategy for the site aims to retain the primary reens at the site whilst removing and replacing some of the secondary reens. The development would also include a wider network of hydrological features aimed at mitigating flood risk and managing surface water including widening the Green Lane Reen on the NCC boundary.

The ecological strategy for the proposed development is to retain as much habitat as possible, create more habitat than is proposed and work to a biodiversity net gain. Every attempt to create habitat would be focussed on principal aspects of the habitat network and the land to the south of the railway which is also reserved for ecological habitat.

The landscape strategy for the Cardiff site also incorporates embedded mitigation such as reen offset areas for the Green Lane Reen which would be respected by the Newport applications. Applications 1 and 2 to Newport would also utilise existing breaks in landscape features by providing improvements to existing accesses rather than creating new breaks. Where vegetation clearance is required for the Newport applications this would be minimal and in localised locations to respect the wider landscape character.

Chapter 13 (Landscape and Visual Impact) of the ES concludes that mitigation for impacts arising during the operational phase of the development have been designed into the proposals, covered by a green infrastructure strategy while retaining many of the existing important landscape features. The development areas are set within a structure of green and blue infrastructure across the Cardiff site and three sites within Newport and with this and the embedded mitigation proposed the overall impact of the proposed developments is considered acceptable. It is therefore considered that the proposed development would not

cause any unacceptable harm to the character and quality of the landscape and setting of the area.

6.2.7 Cultural Heritage and Archaeology

Policy SP9 deals with the conservation of the natural, historic and built environment and outlines that *“The conservation, enhancement and management of recognised sites within the natural, historic and built environment will be sought in all proposals.”*

Policy CE6 further outlines that development proposals *“where groundworks and/or the installation of services are proposed within the archaeologically sensitive areas of Caerleon, the Levels, Lower Machen and the city centre”* will be required to undertake an Archaeological Impact Assessment.

PPW10 highlights the Welsh Government’s objectives to protect, conserve and enhance the significance of historic assets, including paying consideration for the setting of an historic asset, and states that the planning system must take into account these objectives.

The proposed developments are located entirely within the Gwent Levels Landscape of Outstanding Historic Interest in Wales HLW(GT) 2. Chapter 10 (Archaeology and Cultural Heritage) of the ES concludes that the proposed development is likely to have a direct effect on the Historic Landscape and the Wentloog Levels field system. The Gwent Levels have been entered on the Register of Landscapes, Parks and Gardens of Special Historic Interest in Wales and identified as being of ‘exceptional historic importance’. The area has considerable potential for discovery of previously unrecorded archaeological interests.

However, despite the proposed development’s location within the Historic Landscape the proposed developments within Newport would only directly impact on an extremely small proportion of the landscape overall. Application 1 and 2 would also be located at the point of existing accesses and Application 3 would be located in close proximity to the Green Lane Overbridge and SWML which will have already both disturbed the land in this location.

The ES Chapter does acknowledge that the effects of alteration to the pattern of reens and ditches may produce local changes in moisture content within the geology which may have an indirect and unintended effects upon previously unknown archaeological assets. However, the extent of any change is difficult to assess in areas for which there is no currently known archaeological information. The level of change associated with the Newport applications would also be very small.

In order to mitigate any minor effects that may arise as a result of the Newport applications, an assessment of potential unknown buried archaeological remains is recommended through a programme of geophysical survey followed by targeted trial trenching in areas appropriate for the perceived archaeological potential. The scope of the trial trenching would be set out in a Written Scheme of Investigation prepared following consultation with the necessary statutory authorities and

following assessment of the results of the geophysical survey. It is envisaged that an archaeological watching brief would be required during the construction phase on intrusive groundworks. The need for and scale of watching brief would be agreed through consultation with the statutory authorities.

Mitigation would consider the predicted impacts of the proposed development and aim to avoid adverse effects on archaeology and heritage assets within the study area. In the case of any archaeological remains, the mitigation would aim to avoid undisturbed archaeological remains and preserve them in situ. Where this is not possible, preservation by record would be proposed as mitigation.

The overall effect of the proposed development would be the permanent change to small areas within the Gwent Levels Historic Landscape Area. However, as outlined above only an extremely small portion of the of the overall Historic Landscape Area would be lost as a result of the proposed developments within Newport and mitigation measures would be adopted during construction to ensure that the impact on currently undisturbed archaeological remains is reduced. Where possible, historic and archaeological features would be protected and managed and the heritage significance of the wider area would not be harmed. It is therefore considered that the proposed development accords with **Policies SP9** and **CE6**.

6.2.8 Transport and Access

Policy SP14 states that “*Transport proposals will be supported where they:*

- x) Provide for traffic-free walking and cycling facilities and expansion of the network;*
- xi) Encourage the use of public transport and other modes which reduce energy consumption and pollution;*
- xii) Improve road safety;*
- xiii) Improve the quality of life of residents;*
- xiv) Assist the local economy;*
- xv) Assist urban regeneration;*
- xvi) Provide access to new development areas which incorporate sustainable transport modes;*
- xvii) Relieve traffic congestion in the long term;*
- xviii) Result in other environmental improvements, including air quality, noise reduction, sustainable drainage and enhanced biodiversity.”*

Policy SP15 states that “*Integrated transport will be pursued in line with the national and regional transport strategies. Such transport will comprise:*

- viii) A co-ordinated pedestrian network, including schemes such as “safe routes in communities”;*
- ix) Implementation of the cycling strategy;*

- x) *Innovative forms of public transport such as bus priority, safeguarding and enhancement of rail routes and identification of new stations;*
- xi) *Designation of transport interchanges for park and ride, park and share, and road to rail freight centres;*
- xii) *A central area parking strategy;*
- xiii) *Facilities for public transport, walking and cycling in major new development;*
- xiv) *Interchange between bus, bicycle and car to enable sustainable use of the countryside. Significant development proposals shall be accompanied by travel plans."*

Policy GP4 further states the development proposals should:

- i) *Provide appropriate access for pedestrians, cyclists and public transport in accordance with national guidance;*
- ii) *Be accessible by a choice of means of transport;*

Policy T6 specifically deals with Public Rights of Way and states “*Proposals to improve and extend the public rights of way network are encouraged with an emphasis on sustainability and access for all.*”

Two of the three planning applications submitted to NCC are proposed to provide active travel routes into the Cardiff site from Newport and the third is required to provide a permanent maintenance access for the railway and a temporary construction access. The two active travel routes would provide new and improved traffic-free walking and cycling facilities from Newport into the Cardiff site. Providing local residents with access to a sustainable transport hub and employment opportunities. Application 1 would also fully align with **Policy T6** which encourages the improvement and extension of the public right of way network with an emphasis on sustainability and access for all at the heart of the policy.

The routes would provide access to a new transport hub and interchange which would include a new railway station, new 650 space Park and Ride facility and an integrated network of traffic free paths for walking and cycling, providing access to all parts of the Cardiff site and onward connections to surrounding streets, footpaths and cycle routes. The Park and Ride facility and railway station would also be connected to numerous bus stops providing bus priority measures.

A TA and two Framework Travel Plans have been submitted in support of the applications. The TA confirms that the proposed access strategy for the Cardiff site and the associated developments within Newport has been developed with reference to the sustainable transport hierarchy set out in TAN 18 – Transport and prioritises pedestrians and cyclists over other transport modes.

The establishment of pedestrian and cycle links to the neighbouring communities in both Newport and Cardiff and the existing employment area of St Mellons and the provision of a sustainable transport interchange including a railway station,

Park and Ride and bus facilities forms a key component of the vision for the proposed development. These infrastructure proposals, alongside a masterplan that adheres to a sustainable transport hierarchy, will deliver a new sustainable development on the edge of Newport and Cardiff for which walking, cycling and public transport are often the most convenient and quickest forms of transport.

As stated within **PPW10**, it is a priority of Welsh Government to reduce reliance on the private car and support a modal shift to walking, cycling and public transport. **PPW10** states that “*planning authorities should support necessary transport infrastructure improvements, where it can be demonstrated that such measures are consistent with Welsh Government policy to encourage and increase use of sustainable transport and reduce reliance on the private car for daily journeys.*” **PPW10** also states that planning authorities should also “*align jobs and services with housing and sustainable transport infrastructure, to reduce the need for travel, and dependency on travel by car*”. The proposed railway station and the active travel links proposed through these applications are anticipated to result in a positive change in the travel behaviour of existing residents and employees, with some existing journeys made by car being transferred to rail.

To mitigate the traffic impacts associated with the proposed development, Application 3 also proposes a temporary construction access route and permanent Network Rail maintenance route to the south of the railway line. The provision of the temporary route during construction would take some of the pressure of Cypress Drive and help facilitate the development on the southern portion of the Cardiff site and transport hub. During operation the permanent maintenance access would be utilised by Network Rail and ensure the safe operation of the Cardiff Parkway Station.

Framework Travel Plans have been prepared for the business district and the railway station. These seek to maximise the proportion of journeys made to the site by sustainable modes of transport through a range of measures including Personalised Travel Planning for all employees of the existing business park and the proposed business district.

Furthermore, an Outline Construction Traffic Management Plan has been prepared in support of the applications and this document outlines the measures that would seek to minimise the impacts arising from construction traffic associated with the proposed developments.

In summary, the proposed development as a whole would contribute positively to relevant local and national policy regarding sustainable travel and transport. The proposed developments within Newport also have the potential to positively contribute to the sustainable travel and modal shift requirements for Newport and could provide transport improvements into the Cardiff site with access to both local employment and a transport hub. It is therefore considered that there are no traffic or transportation reasons why the proposed developments should not be granted planning permission.

6.2.9 Ground Conditions

Policy GP7 states that *“Development will not be permitted which would cause or result in unacceptable harm to health because of land contamination.”*

A number of ground condition investigations have been undertaken at the sites and their vicinity as detailed in Chapter 6 (Ground Conditions) of the ES. The investigations completed to date encountered limited and isolated areas of made ground and no evidence of significant contamination within the proposed development areas.

Known areas of made ground are associated with the Green Lane Overbridge, the railway line and access track to the gas governor. A review of the wider site's history including the location of Application 1 showed that the site has predominantly been agricultural fields since 1898. As a result, there could be contaminants associated with the use of fertiliser and pesticides, particularly in areas of storage or loading. However, the levels within the fields are unlikely to be significant and no storage areas have been identified on historical mapping or during site walkovers, therefore no significant levels of contaminants associated with agricultural uses are anticipated.

The Ground Conditions chapter concludes that the assessment of effects resulting from the construction activities are generally identified as neutral or slight adverse effects on either geology, hydrogeology or land contamination.

This is with the exception of a potential risk to construction workers encountering isolated pockets of methane during deep intrusive works like piling or band drain installation. This health and safety risk would be managed during construction with an appropriate method statement, which would set out procedures allowing for control and monitoring of exposure to ground-gas during any intrusive construction activities.

During operation, the proposed development has been identified to pose a potential risk with respect to land contamination with end users and controlled waters potentially being exposed to dust generated in areas of made ground exposed in areas of soft landscaping. In order to mitigate this effect any made ground exposed within soft landscaped areas would require validation through sampling and laboratory testing and assessment of results against criteria for an appropriate end use scenario or controlled water receptor. Should this indicate a potential risk, remediation measures would be required e.g. placement of clean materials at surface or removal of made ground.

The risk to maintenance workers with a slight to moderate significance of effect due to potential ground gas/VOC vapours accumulation in confined spaces would also require appropriate health and safety measures during maintenance works.

With the appropriate mitigation measures put in place, much of which translates across from the assessment into the Outline CEMP in terms of health and safety and pollution control measures for protection of the water environment and human receptors in terms of unexpected contamination, during operation it is

considered that the proposed development would be acceptable in terms of land contamination and accord with **Policy GP7**.

6.2.10 Water Quality, Flood Risk and Drainage

Policy SP3 deals with flood risk and states *“Newport’s coastal and riverside location necessitates that development be directed away from areas where flood risk is identified as a constraint and ensure that the risk of flooding is not increased elsewhere.”*

Policy SP4 relates to Water Resources and states that *“Development proposals should minimise water consumption, protect water quality during and after construction and result in no net increase in surface water run-off through the sustainable management of water resources by:*

- i) The use of sustainable drainage systems;*
- ii) The reuse of water and reduction of surface water run-off through high quality designed developments;”*

PPW10 states that *“development should reduce, and must not increase, flood risk arising from river and/or coastal flooding on and off the development itself.”*

Water Quality

As mentioned throughout this Statement, the sites and the area surrounding them are characterised by an extensive network of watercourses (reens and ditches) which drain the surrounding wetlands. The protection and consideration of these reens is therefore a key feature of the design for the proposed developments. Chapter 5 (Hydrology and Flooding) of the ES outlines that for drainage purposes, a portion of Green Lane Reen would be widened to provide storage that has been lost through removal of the reens and improve conveyance of flows through the reen system. The main named reens would be retained as part of the proposed development and culverts or bridges would be introduced to provide access routes over several of the main reens including the two active travel and permanent maintenance route proposed in Newport.

During operation, the impacts on surface water quality at the Cardiff site would be managed through SuDS which would include features such as dry ponds, wet ponds, swales and bioretention systems and potentially such features as rain gardens and green roofs among others. The proposed SuDS features would provide a level of buffering and an opportunity for containment between impermeable areas (where a spillage is most likely to occur) and the wider water environment.

Flood Risk

In terms of flood risk the sites are located within Flood Zone C1 which is defined as areas within the NRW flood outline, equal to or greater than 0.1% risk of flooding, which are developed and served by significant infrastructure, including flood defences.

The Rivers and Sea Flood mapping produced by NRW indicates that the whole proposed development site is within Flood Zone 3. Areas that are either within the extent of flooding from rivers with a 1% (1 in 100) chance or greater of happening in any given year or the extent of flood from sea with a 0.5% (1 in 200) benefiting from flood defences.

The Surface Water Flood Mapping produced by NRW indicates there are areas of Low Surface Water Flood Risk associated with the Gwent Levels reën system. Low surface water flood risk is defined as an area which has between 1 in 1,000-year and 1 in 100-year flood risk.

A Flood Consequences Assessment (FCA) has been undertaken for the proposed development and submitted in support of the application the methodology of which accords with TAN15 – Development and Flood Risk. A Drainage Strategy has also been provided in support of the application and this confirmed that SuDS would be installed across the Cardiff site which would ensure that the surface water runoff would be discharged at greenfield runoff rate (GRR). Given the SuDS would be designed to ensure a GRR, it is concluded that the magnitude of impacts of flooding on all surface water features would be negligible as they are designed to replicate the existing site conditions.

Baseline tidal flood modelling has been carried out for the site to check the extent of flooding during 1 in 200 and 1 in 1,000 year tidal flood events, taking into account 75 years of climate change. The modelling demonstrates that for the 75 year climate change scenario, the 0.1% event flood level is approximately 5.25m AOD.

Consideration has also been given to the risk of flooding from pluvial sources. During high rainfall events, water held and transmitted in the reën system may overtop and spill onto the site. As such, baseline pluvial modelling has also been completed for the 1 in 1,000 year pluvial event. The modelling demonstrates some shallow flooding in places, particularly in the north-east of the Cardiff site.

To enable the development to proceed in accordance with the requirements of TAN15 and as described in the FCA, the site and access roads including the Network Rail maintenance access road would need to be raised to ensure the site is flood free during a 0.5% tidal event and 1.0% pluvial event, whilst the depth of flooding cannot be more than 0.6m during 0.1% flood events. This has resulted in the need for a number of mitigation measures to ensure that the site can be developed in accordance with the requirements of TAN15. These include:

- Raising of existing ground levels to ensure that the site is flood free during a 0.5% tidal event and 1.0% pluvial event, whilst the depth of flooding cannot be more than 0.6m during 0.1% flood events;
- Introduction of two sluice gates, unidirectional culverts or non-return valves located along the existing primary reëns, namely the Railway and Green Lane Reëns. This would prevent tidal inundation from entering the site from the south during an extreme tidal event. Parts of the earthworks for one of the flow control devices is located within NCC land and therefore forms part of Application 3;

- Widening of the Green Lane Reen between Cobol Road / Heol Las junction down to the field access from Heol Las located north of the gas pressure reduction station, located near the south eastern corner of the site. This forms part of the pluvial flood mitigation measures and is the reason why the PRoW crossing subject of Application 1 has to be widened;
- Lowering of the land south of the railway to form flood compensation storage in an extreme pluvial event. An interconnecting reen would be required to convey flows from the Green Lane Reen to the flood compensation storage area in such an event;
- Lowering of the land on either side of the Ty Ffynnon Reen where it forms a confluence with the Faendre Reen to a maximum of 4.93m AOD between the development plateaus. A 4m wide channel, formed with its base set at 4.6m AOD would also need to be created between the Ty Ffynnon Reen and the Faendre Reen. The above measures are to ensure that flows are conveyed in an extreme pluvial event. A sluice gate may also be needed within the formed channel to prevent water held by existing sluices to maintain penning levels along the Faendre Reen.

The method of control and responsibility of management of any control devices such as sluice gates are subject to discussions with NRW and its internal drainage board and Network Rail.

With these features present, the FCA concludes that the tidal and pluvial flood modelling shows that the proposed built development will be flood free in all events, up to and including the 0.1% pluvial event and the 0.1% plus climate change tidal event. It further concludes that in the very unlikely scenario of multiple breaches in the significant NRW coastal defences between Newport and Cardiff, the residual flood risk to the site remains well below the acceptability criteria (ie. flood depths <600mm) set out in TAN15.

The site provides safe access and egress through the northern and western routes in all scenarios. Site occupants and business owners will be advised to sign up to NRW flood warnings.

Comprehensive flood modelling supports the conclusion that on the grounds of flood risk, the proposed development site shall be safe over its lifetime, meeting all of the requirements set out in TAN15 and the aims of **PPW10**.

It is therefore considered that with the installation of the proposed SuDS features at the Cardiff site and mitigation measures identified through the FCA, the proposed development would achieve a water sensitive urban drainage solution and appropriate flood risk mitigation in line with **Policies SP3 and SP4**.

6.3 The Planning Balance

With reference to the above planning assessment, it is considered that the proposed development accords with the relevant policies of the NLDP as summarised in Table 3 and the Development Plan as a whole.

The ES submitted in support of the planning application identifies various environmental effects associated with the proposed development. Some of the effects are permanent and irreversible by the very nature of introducing development on previously undeveloped land. However, the ES shows that with the adoption of appropriate mitigation measures during both construction and operation the severity and/or significance of those adverse effects as a result of the proposed development can be reduced. One example where this is demonstrated is in the Landscape and Visual Assessment chapter where a significant effect results from a high magnitude of change affecting high sensitivity receptors, resulting in a significant effect. That level of effect would at year 15, reduce to moderately adverse as the proposed mitigation takes effect.

Mitigation is both embedded (integrated into the proposal) in the scheme or is proposed in addition to either completely address or reduce an adverse effect. For details, please refer to the individual chapters of the ES, or for a summary of the mitigation please refer to Section 6.4 of the Planning Statement that supports the outline planning application for the Cardiff site. That presents and discusses the scope of mitigation and the role that planning conditions and obligations could play in securing it.

The approval of these full planning applications would facilitate active travel routes and a permanent maintenance route into an important social and sustainable infrastructure, not least a new business district with the potential for 6,000 new jobs in an area of socio-economic deprivation but also a new transport interchange which would fulfil a long-standing investment commitment established by the Regional Transport Plan.

The proposed development at the Cardiff site would provide significant improvements to the local community and create a new employment and transport hub which would contribute to the vibrancy and accessibility of Cardiff, Newport and the City Region and the three applications submitted to NCC would facilitate access to this hub from Newport as well as ensuring the long term maintenance of the future Cardiff Parkway Station. When accepting the principle of development for the Newport sites, it is right that the significant benefits associated with the strategic allocation within Cardiff are factored into the determination of the planning applications in Newport. This is particularly relevant for Application 3 where without the construction access the development and unlocking of the benefits of the Cardiff site would be significantly affected.

In addition to the proposed development's accordance with the adopted policies of the Development Plan it is further considered that the developments accord with the relevant policies of **PPW10** which is a material planning consideration and actively promotes coordinated decision making.

For these reasons it is considered that the positive benefits of the proposed developments outweigh any minimal harm and the application accords with the Development Plan, as summarised in Table 3.

Table 3: NLDP Policy Compliance

NLDP Policy	Proposed development response
Principle of Development Policy SP5 Policy SP6 Policy SP14 Policy SP15 Policy T6	<p>The proposed developments whilst located within the Newport Green Belt and Countryside would provide traffic free walking and cycling facilities and access to a new sustainable transport hub and employment site which are actively encouraged through the NLDP.</p> <p>None of the developments would harm the openness of the Green Belt and Applications 1 and 2 form appropriate uses within the countryside. Application 1 would also facilitate improvements and extension to an existing PRoW which is explicitly supported by NCC.</p> <p>Without Application 3 the development of the Cardiff site would be jeopardised which demonstrates the importance of this application to both Newport and Cardiff in unlocking the significant benefits of the Cardiff site for both communities.</p>
Design Policy KP4	<p>The key features of the Cardiff site masterplan intend to create a catalyst for growth in both Newport and Cardiff, provide a sustainable transport interchange, retain the primary reen network, create new accessible public open spaces, provide and retain green fingers to create a connected green grid that integrates buildings and development into the surrounding environment, provide a biodiversity net gain and provide a pedestrian focused environment creating a locally connected and permeable development.</p> <p>The three applications within Newport have been designed in accordance with the Cardiff site masterplan and would be of simple design to ensure they have limited impact on the Green Lane Reen.</p>
Sustainable Development Policy SP2	<p>The proposals have been guided by the Well-being of Future Generations (Wales) Act 2015 to ensure current and future generations benefit from lasting, positive change for the environment, economy and community. The proposed developments within Newport support a modal hierarchy that prioritises pedestrians, cyclists and public transport through detailed design. Furthermore, the proposed development within Application 3 would be critical to the development of the wider Cardiff Hendre Lakes development and unlocking the benefits this development would have for both Newport and Cardiff.</p>
Healthy Environments Policy SP2	<p>The proposed developments within Newport would enable the provision of two active travel routes and a permanent maintenance access to the Cardiff site. These means of access would provide links for residents of Newport to places of work, transport and new open spaces.</p> <p>The developments would also be fully inclusive, ensuring that older people, people with disabilities and people from across the community are able to access and utilise new facilities in order to fully benefit the wider community, reduce existing health inequalities and encourage healthy and active lifestyles.</p>
Biodiversity and Nature Conservation Policy SP9	<p>The proposed developments within Newport are located in location of existing gaps within hedgerows and vegetation along the Green Lane Reen or near to existing development.</p>

NLDP Policy	Proposed development response
Policy GP5	The development at the sites within Newport and at the Cardiff site incorporates a series of mitigation measures to be employed both during construction and in operation. Significant increases in biodiversity habitats would also be provided across the Cardiff site in wildlife zones and in the mitigation area to the south of the railway. With the relevant mitigation measures in place, the proposed development would have no significant effects on biodiversity features or protected species during operation and would provide net biodiversity gains.
Landscape Policy SP8 Policy GP5	The landscape strategy for the Cardiff site and developments within Newport has been driven by the historical and ecological features of the site together with the surrounding reens and farmland to ensure that it responds to its sensitive context. The landscape strategy for the Cardiff site also incorporates embedded mitigation such as reen offset areas for the Green Lane Reen which would be respected by the Newport applications. Applications 1 and 2 to Newport would also utilise existing breaks in landscape features by providing improvements to existing accesses rather than creating new breaks. Where vegetation clearance is required for the Newport applications this would be minimal and in localised locations to respect the wider landscape character.
Cultural Heritage and Archaeology Policy SP9 Policy CE6	The proposed development is located entirely within the Gwent Levels Historic Landscape of Outstanding Historic Interest and the Cardiff site would have a 'Major' effect on the Wentloog Levels field system 86852 including reens, sluices, and footbridges. However, the Newport applications in isolation would be minor and only form an extremely small part of much wider Gwent Levels Historic Landscape Area they would also utilise existing breaks within the landscape and overall effect is considered to be acceptable. In order to mitigate the effects of the proposed development a series of mitigation measures are proposed through the ES including geophysical surveys and archaeological watching briefs. Following the implementation of these measures the significance of direct effects of the development upon the unknown archaeological resource within the development area would be reduced.
Transport and Access Policy SP14 Policy SP15 Policy GP4 Policy T6	Two of the three planning applications submitted to NCC are proposed to provide active travel routes into the Cardiff site from Newport and the third is required to provide a permanent maintenance access and a temporary construction access. The TA concludes that the proposed developments would align with the overarching local and national policies for transport and the development would positively contribute to the sustainable travel and modal shift requirements for Newport and Cardiff and would provide transport improvements at the site and to the local area where necessary, in line with the Cardiff site allocation.
Ground Conditions Policy GP7	A number of ground condition investigations have been undertaken at the sites and in their vicinity. Investigations completed to date encountered limited and isolated areas of

NLDP Policy	Proposed development response
	<p>made ground and no evidence of significant contamination within the proposed development area.</p> <p>During operation the proposed development has been identified to pose a potential risk with respect to land contamination with end users and controlled waters potentially being exposed to dust generated in areas of made ground exposed in areas of soft landscaping. Risk mitigation measures are proposed within the ES and Outline CEMP and with these in place there would be no significant effects in terms of contamination.</p>
<p>Water Quality, Flood Risk and Drainage</p> <p>Policy KP2(H)</p> <p>Policy EN10</p> <p>Policy EN14</p>	<p>The Cardiff site and three sites within Newport are characterised by an extensive network of watercourses (reens and ditches) which drain the surrounding wetlands. The protection and consideration of these reens is therefore a key feature of the design for the proposed development. The main named reens including the Green Lane Reen would be retained as part of the proposed development and culverts or bridges would be introduced to provide access routes over several of them including the proposals within the Newport applications.</p> <p>In terms of flood risk and drainage, SuDS would be installed across the Cardiff site to ensure that surface water runoff would be discharged at a GRR. To enable the development to proceed in accordance with the requirements of TAN15, the site and access roads would also be raised to ensure the site is flood free during a 0.5% tidal event and 1.0% pluvial event. With the mitigation measures in place the FCA concludes that the proposed development would be flood free in all tidal and pluvial flood events.</p>

7 Conclusion

It is considered that the proposed developments within the three Newport planning applications ought to be granted planning permission in accordance with Section 70(2) of the Town and Country Planning Act 1990 and Section 38(6) of the Planning and Compulsory Purchase Act 2004. The proposed developments accord with the policies within the Development Plan for Newport.

The proposed developments form part of the implementation of the Cardiff site's allocation in the CLDP under **Policy KP2(H)** and would provide a strategic employment site that would be a catalyst for growth, providing 90,000sqm of high-quality employment floorspace and approximately 6,000 jobs. The proposals are also formed around the principles of sustainable travel providing a transport interchange that would allow seamless access for businesses and the local community to rail, bus, walking and cycling routes.

Furthermore, the proposed development has been designed to integrate into its surroundings. The proposed development would retain the primary green network which crosses the sites. It would also provide a range of open spaces including unbroken wildlife corridors of rich and diverse habitats, a large park for recreational purposes and encourage outdoor activity and well-being, and civic open spaces to promote social interaction. Permeable plots provide buildings and land uses that maximise SuDS in-situ and protect on-plot biodiversity features.

The proposed development also accords with national planning policy that provides a presumption in favour of sustainable development and which forms a material planning consideration in the determination of applications.

The benefits of the proposed development are clear, the proposals align with its site allocation and would provide a high-quality sustainable development that would benefit the local area and the Cardiff Capital Region.

A positive planning balance has been evidenced throughout this Statement. The proposed development is a sustainable form of development that accords with the relevant policies of the adopted NLDP and the Development Plan as a whole.

The development plan compliance and overall positive planning balance warrant the grant of planning permission for the proposed developments.