

PLANNING STATEMENT

Land West of Willowbrook Drive, St Mellons

October 2024



Summary

Proposal:

Proposed development of 35no. dwellings, with associated works.

Location:

Land west of Willowbrook Drive, St Mellons

Date:

October 2024

Project Reference:

19.189

Client:

Wates Residential

Product of:

Asbri Planning Limited
Unit 9 Oak Tree Court
Mulberry Drive
Cardiff Gate Business Park
Cardiff CF23 8RS

Prepared by:

George Milburn | Planner

Approved by:

Liam Griffiths | Senior Planner

Disclaimer:

This report has been prepared for the sole and exclusive use of Wates Residential for whom it was commissioned and has been prepared in response to their particular requirements and brief. This report may not be relied upon by any other party.

The Contracts (Rights of Third Parties) Act 1999 shall not apply to this report and the provisions of the said Act are expressly excluded from this report. This report may not be used for any purpose other than that for which it was commissioned. This report may not be reproduced and/or made public by print, photocopy, microfilm or any other means without the prior written permission of Asbri Planning Ltd. The conclusions resulting from this study and contained in this report are not necessarily indicative of future conditions or operating practices at or adjacent to the Site. Much of the information presented in this report is based on information provided by others. That information has neither been checked nor verified by Asbri Planning Ltd.

Contents

Section 1	
Introduction	4
Section 2	
Site description and context	7
Section 3	
Planning Context	9
Section 4	
Proposals	15
Section 5	
Planning policy context	18
Section 6	
Appraisal	29
Section 7	
Conclusion	35

DRAFT

Introduction

- 1.1 This Planning Statement has been prepared by Asbri Planning Ltd on behalf of Wates Residential in relation to the proposed full planning application for the development of 35no. dwellings and associated works on land west of Willowbrook Drive, St Mellons, Cardiff.
- 1.2 The application site is located to the west of Willowbrook Drive, and comprises an irregular shaped vacant field parcel measuring approximately 1.1 Ha in size, which adjoins Willowbrook Drive, Crickhowell Road, and Trefaser Crescent, The site is centred on grid coordinates X: 323421, Y: 180675.
- 1.3 This proposal seeks to deliver much needed affordable and open market homes on land located within a residential context, within the defined settlement boundary for Cardiff, and with opportunities to link to the existing highway network.
- 1.4 The planning application comprises the following set of drawings:

Drawing name (with reference)	Prepared By
Site Location Plan (2485-00(03)100)	Spring Design
Proposed Site Layout (2485-00(02)101-M)	Spring Design
Proposed 2P1B Floorplans (2485-211(02)200-A)	Spring Design
Proposed 2P1B Elevations (2485-211-(02)300-A)	Spring Design
Proposed 2P1B & 3P2B Floorplans (2485-321-(02)200-A)	Spring Design
Proposed 2P1B & 3P2B Elevations (2485-321-(02)300)	Spring Design
Proposed 4P2B Floorplans (2485-HTA-(02)200-A)	Spring Design
Proposed 4P2B Elevations (2485-HTA(02)300-A)	Spring Design
Proposed FOG & HT K Floor Floorplans Ground & First Floor (2485-FOG-(02)200-A)	Spring Design
Proposed FOG & HT K Floorplans Second Floor (2485-FOG-(02)201-A)	Spring Design
Proposed FOG & HT K Elevations (2485-FOG(02)300-A)	Spring Design
Proposed HT B (AS) Floorplans (2485-HTB-(02)200-A)	Spring Design

Proposed HT B (AS) Elevations (2485-(02)300)	Spring Design
Proposed HT C (AS) Floorplans (2485-HTC-(02)200)	Spring Design
Proposed HT C (AS) Elevations (2485-HTC-(02)300)	Spring Design
Proposed HT D (AS) Floorplans (2485-HTD-(02)200-A)	Spring Design
Proposed HT D Elevations (2485-HTD-(02)300-A)	Spring Design
Drainage Catchment Plan (10156-GRY-XX-XX-DR-C-001)	Grays Consulting Engineering
Engineering Layout Strategy (10156-GRY-XX-XX-DR-C-004)	Grays Consulting Engineering
Drainage Strategy (10156-GRY-XX-XX-DR-C-002)	Grays Consulting Engineering
Landscape Strategy (TC22017 WBS.LA100-104[A])	Tir Collective
Detailed Planting Plan 1 (TC22017 WBS.LA100-104[A])	Tir Collective
Detailed Planting Plan 2 (TC22017 WBS.LA100-104[A])	Tir Collective
Soil Volume for Proposed Trees (TC22017 WBS.LA100-104[A])	Tir Collective
Landscape Specifications (TC22017 WBS.LA100-104)	Tir Collective
Topographical Survey	Senior Surveys Land Survey Consultants
Tree Constraints Plan (24-052)	Steve Ambler & Sons Tree Specialist Ltd
Tree Retention, Removal, and Protection Plan (24-052)	Steve Ambler & Sons Tree Specialist Ltd

1.4 In addition, the following supporting documents are submitted.

Document	Prepared by
Planning application forms (1APP)	Asbri Planning
Planning Statement	Asbri Planning
Design & Access Statement	Spring Design

Arboricultural Impact Assessment	Steve Ambler & Sons Tree Specialists Ltd
Tree Survey Report	Steve Ambler & Sons Tree Specialists Ltd
Geotechnical and Geoenvironmental Report (13601)	Terra Firma
Green Infrastructure Statement (TC22017)	Tir Collective
Topsoil Resource Survey and Soil Resource Plan (TOHA/20/6184/RH)	Tim O'Hare Associates
Transport Statement (T24.110.TS.PAC)	Asbri Transport
Travel Plan (T24.110.TP.PAC)	Asbri Transport

1.6 This Planning Statement presents the planning case for the proposed development having regard to the site and its surroundings, the planning history, and policy context. It considers the key policy issues and planning merits of the proposed development. The statement is structured as follows:

- **Section 2:** provides a description of the site and its surroundings
- **Section 3:** includes a review of the site's planning history and a summary of the pre-application discussions
- **Section 4:** summarises the development proposals;
- **Section 5:** outlines the relevant planning policy context, at both the national and local level;
- **Section 6:** addresses the key planning considerations associated with the development proposal; and
- **Section 7:** provides a conclusion regarding the overall acceptability of the application.

Site Description

General location

- 2.1 The application site is located to the south of Willowbrook Drive, in St Mellons, Cardiff. The site is centred on grid coordinates X: 323421, Y: 180675.
- 2.2 The site's surrounding context is predominantly residential, with properties located adjacent to the west (Trefaser Crescent), south (Crickhowell Road and the newly developed properties on Rhodfa Crughywel), and east (Crickhowell Road).
- 2.3 St Mellons is a suburban area located within the east of Cardiff. It is located approximately 5 miles to the east of Cardiff's city centre, and located approximately 2 miles from access onto the A48, one of Cardiff's major transport routes.

Site Description

- 2.3 The site comprises an irregular parcel of land which adjoins both Willowbrook Drive and Crickhowell Road, measuring approximately 1.6 Ha in size. The site comprises vacant greenfield land and brownfield land, and contains a several trees and shrubs, particularly at the north and west of the site.
- 2.4 The site is divided into a northern and southern parcel by a band of trees located to the west of the Willowbrook Drive/Crickhowell Road roundabout.
- 2.4 At present, the south of the site is occupied by a temporary construction compound, which supports the final stages of the wider Willowbrook/Silvervale Park residential development to the north of the site. This was permitted under planning permissions 22/01096/MNR and 24/00913/FUL.
- 2.6 A review of the historic environment database and historic OS mapping shows there are no listed structures or Scheduled Ancient Monuments on the site. The nearest identified heritage asset is the Grade II Listed Bethania Evangelical Church, located approximately 1 mile from the application site and separated by the heavy residential context.
- 2.7 A review of the TAN:15 flood maps for planning produced by NRW identifies the site is wholly located within Flood Zone A, as such, it is considered to be at little or no risk of fluvial or coastal/tidal flooding. The Flood Map for Planning shows a similar flood risk, identified as Zone 1 for river & sea flooding whilst the peripheries fall within Zone 2/3 for surface water and small watercourse flooding.
- 2.8 A band of trees located to the western boundary of the site comprise a wider Tree Preservation Order (TPO reference A01) along Trefaser

Crescent. The description for the TPO reads *"Mainly road-side hedgerow comprising oak, ash, willow, alder, thorn, holly, hazel, sycamore and elder"*.

Access

- 2.9 The northern parcel of the site does not currently have any means of vehicular access; notwithstanding this, it is located to the west of Willowbrook Drive, an adopted highway.
- 2.10 The southern parcel of the site benefits from temporary access permitted under 24/00913/FUL, associated with a construction compound.
- 2.11 At present, a footpath runs through the centre of the site from east to west, connecting Crickhowell Road/Willowbrook Drive with Trefaser Crescent. This facilitates pedestrian access onto the site, with the footpath travelling northwards towards the north-west of the site.
- 2.12 A review of OS mapping indicates that there are no formal rights of way traversing through the site.
- 2.13 The site sits within a highly sustainable location, close to a range of local services and facilities, and well positioned in terms of access to sustainable transport modes. Two bus stops are located in close proximity to the application site – both of which are located on Crickhowell Road to the south of the site, which are served by New Adventure Travel Route 815.
- 2.14 A review of Welsh Government data on Active Travel indicates that Willowbrook Drive is an identified Future Walking Route, while a Future Walking and Cycling Route travels from the north of the site eastward, through Cath Cobb Playing Fields, located to the north-east of the site.

Surrounding Context

- 2.15 As previously indicated, the surrounding context is largely residential, with residential properties adjoining the west, south, and east of the site. The residential setting surrounding the site reflects its suburban context within the east of Cardiff.
- 2.16 The nearest identified Local Centre is Llanrumney, located just over a mile to the west of the application site. This supports a range of local facilities and uses, including food & drink establishments, convenience stores, shops, and a community hub.

Planning Context

Planning History

- 3.1 A review of Cardiff Council's online planning register indicates that the site is subject to the following planning history:
- 16/01671/MJR – 'Outline application for residential development comprising of 31 dwellings, accessed from Trefaser Crescent and Crickhowell Road'. Approved January 2017.
 - 19/02843/MJR – 'Variation of Condition 1 of 16/01671.MJR to extend the period for submission of the reserved matters for a further 2 years'. Approved March 2021.
 - 22/01096/MNR – 'Retrospective temporary planning application for storage of materials, car parking, and temporary cabin/office setup and associated works'. Approved September 2022.
 - 24/00913/FUL – 'Extension of existing temporary compound, to allow for the storage of materials, car parking, and temporary cabin/office setup and associated works'. Approved July 2024.

Pre-Application Enquiry with LPA

- 3.4 In June 2022, a second pre-application (reference: PA/22/00047/MJR) was submitted by Asbri Planning to Cardiff Council on behalf of the applicant, for the development of 40no. residential dwellings, inclusive of flats and houses.

- 3.5 The response provided by Cardiff Council included the following comments:

Trees

- The development appears to achieve the aim of retaining the 'B' category trees.

Air Quality

- given the scale of the development, an Air Quality Assessment (AQA) is unlikely to be required at planning application stage, as daily traffic count would not exceed 500AADT and the site is not within close proximity of an Air Quality Management Area of an Area of Air Quality Concern. You are advised that dust mitigation measures will be sought through the Construction Environmental Management Plan (CEMP) during the application/post application stage.

Affordable Housing

- No comments on this as the proposal exceeds the policy requirement in Policy H3 of the LDP.
- S106 required to secure affordable housing in perpetuity.

Land contamination

- Planning permission was granted in retrospect (22/01096/MJR refers) for the storage of materials, car parking and temporary cabin/office setup and associated works. As above, a contamination assessment should be submitted with any future planning application to demonstrate that the use of the land as a compound has not given rise to potential risks to human health and the environment.

S106

- Based on the latest housing mix proposal, no contribution would be required from Education as the yield falls beneath the SPG threshold.
- S106 required to secure affordable housing in perpetuity.

Ecology

- Updated ecology survey reports required.

Transport

- Conditions which were recommended as part of the Outline consent (19/02843/MJR refers) are likely to be requested again. In respect of Sustainable Transport Modes, it was previously required that detailed plans should make provision for improved pedestrian links to include a new continuous footway adjacent to Crickhowell Road between its junction with Willowbrook Drive and the existing footpath link to Trowbridge Green, with a further link between Trefasor Crescent and Willowbrook Drive.
- Due to the possibility of the layout changing I will only provide site specific comments rather than plot specific comments. The amount of car parking provision is prescribed in the Cardiff SPG Managing Transportation Impacts (Incorporating Parking Standards) adopted in July 2018 (SPG). Maximum car parking spaces the number of car parking spaces that can be provided is set out in the SPG based on land use and strategic parking area but there is no minimum number of car parking spaces that must be provided. This proposed residential development is in the Outer Zone and the maximum car parking spaces are as follows:-
 - 1 bedroomed = 1 car parking spaces per unit.
 - 2+ bedroomed = 2 car parking spaces per unit.

Placemaking

- The existing development consists mostly of buff and yellow tones where brick is prevalent within newer development and render within more established parts. The proposal is for mostly red brick units containing timber detailing. This is considered an uncharacteristic addition. The supporting document states that the proposed development will reflect

massing, form and materials of the approved development, north of Willowbrook Road. However, this has not yet been constructed and does not form part of the existing context. It is expected that existing development should also inform the design of the proposed units.

- Within the northern part of the scheme, the proposed apartments are orientated to provide natural surveillance over the Willowbrook Drive (east) and the established pedestrian connectivity (north).
- Providing natural surveillance over pedestrian routes is a positive approach. However, the gable end of the building is sited less than 6.5m from the existing neighbouring dwelling. The proposal is missing apartment elevation and floor plan details but overlooking of the route is expected. It is therefore probable that the building will need to be revised to allow a 10.5m separation distance from neighbouring properties in compliance with the CRDG, p.53.
- Further detailed comments and discussions have taken place with the placemaking team.

Pre-Application Consultation

3.6 In accordance with Part 1A of ‘The Town and Country Planning (Development Management Procedures) (Wales) (Amended) Order 2016’ (DMPO 2016), all major developments are required to be subject of pre-application consultation, prior to the Planning Application being validated by the Local Planning Authority.

3.7 Accordingly, statutory Pre-Application Consultation will take place involving statutory, community and ‘other’ consultees being invited to view the submission package and provide their comments.

3.8 As part of the statutory Pre-Application Consultation, drop in sessions will be held to allow interested members of the local community to view the submission materials and provide their comments.

SAB Pre-App

3.9 Discussions with the SAB engineer have been undertaken in formulating the development proposals, and it is understood that pre-application discussions have been held. This has guided the SuDS design of the scheme.

Proposed Development

Amount, Scale and Layout

- 4.1 The accompanying layout demonstrates that a total of 35no. dwellings can be accommodated within the site, with green spaces incorporated within the centre of the site. The southern part of the development to be served by an internal roadway off Crickhowell Road, designed to adoptable standards, cumulating in a turning head to the east of the southern layout.
- 4.2 The proposed development comprises a mix of 1, 2,,3, and 4 bedroom flats and houses, with the specific mix as follows:
- 6no. 4 person two-bedroom affordable house units;
 - 4no. 2 person one-bedroom affordable flat units;
 - 4no. 3 person two-bedroom affordable flat units;
 - 4no. 1-person one-bedroom affordable flat units;
 - 1no. coach house unit;
 - 8no. two-bedroom house units;
 - 2no. three-bedroom house units (Type C);
 - 4no. three-bedroom house units (Type D); and
 - 2no. four-bedroom house units.
 - = **35no. units**
- 4.3 The layout shows the retention of the existing trees to the north of the site, within the submitted Tree Report, these are noted as a Category A Common Oak and a Category B Sycamore, respectively.
- 4.4 As some of the properties proposed are to be affordable and their development dependent on Welsh Government grant funding, the homes will be designed to accord with Welsh Development Quality Requirements 2021 (WDQR 2021).
- 4.5 In line with the predominant character within the local area, the proposed units are designed to rise no higher than three storeys, so as to ensure a positive relationship with nearby properties on Crickhowell Road and Rhodfa Crughywel, which are characterised by detached and semi-detached two-storey properties benefitting from on-plot parking. Each property is afforded garden and amenity space through the form of either private or shared spacing, in addition to level access.
- 4.6 The proposed properties are largely designed near the perimeter of the site, with multiple access points into the site facilitated by Crickhowell Road and Willowbrook Drive. As per the accompanying proposed layout, the internal access road at the southern section of the site is to be adopted for the initial part, with a private road running east. Three no. vehicular access points are proposed off Willowbrook Drive to serve the northern section of the proposed development.

- 4.7 The proposed layout looks to incorporate the existing landscaping context, with the retention of trees and hedgerows along the west of the site in order to provide an element of separation between properties on Trefaser Crescent. The central area of the site, which features a range of tree and shrub species, is to also be retained in order to separate the northern and southern sections of development while ensuring that the green infrastructure and ecological quality of the site is not significantly reduced.
- 4.8 The proposed development comprises a dwelling density of 23 dwellings per hectare, on the basis of 35no. units proposed across a site area of 1.6 Ha. This is considered to be reflective of the density and character of the local residential context in the east of Cardiff, guided by the Cardiff LDP which states that the density of new residential developments should be guided by the character of the local area.
- 4.9 The layout utilises a mix of apartments and houses that is reflected in the development immediately surrounding the site. The form of the layout, using semi-detached and terraced dwellings also reflects the prevailing character of the area. The attractiveness and safety of street frontages will be enhanced by residential development of the proposed scale and the natural surveillance it will provide to all frontages, active travel routes, streets and public open spaces.
- 4.10 The nature of the site, which as established is surrounded on three sides by existing highways together with the presence of extensive landscaping, has resulted in the scheme being designed as two individual parcels. These parcels are separated by extensive retained landscaping is considered to significantly reduce the domination of the buildings which allows the existing landscape character of the site to be preserved.

Roads, Access and Parking

- 4.11 The proposed adopted road into the southern section of the development site, accessed off Crickhowell Road, has been designed to adoptable standards with a 5.5m carriageway and footways included on one or both sides of the internal access road. This will ensure an appropriate and extension of the existing highway to the south of the site.
- 4.11 Vehicular access into the northern parcel of the site will be achieved via three access points, comprising two priority junctions onto Willowbrook Drive and one junction onto Crickhowell Road. Visibility splays have been based on Manual For Streets' guidance on sight stopping distances of vehicles travelling at 20mph.
- 4.12 With reference to the provision of car parking spaces, the accompanying proposes site layout plan indicates that a total of 63no. car parking spaces, with a minimum of one car parking space

provided per residential unit delivered, in addition to areas for visitor parking in the southern section of the site.

- 4.13 One no. car parking space is proposed for each of the 1-bedroom dwellings proposed, while 2no. car parking spaces are proposed for all dwellings of 2+ bedrooms.
- 4.14 This is considered to be a betterment from the current car parking provision within the local area and will help in easing existing pressures relating to on-road parking within the locality.
- 4.15 With regard to bicycle parking, it is proposed to deliver a total of 71no. bicycle parking spaces, which will be contained within secure sheds as previously delivered on other Cardiff Living schemes.
- 4.16 Pedestrian access to the site is proposed to be achieved via the main vehicular access points, through a 2m wide footway provided alongside the vehicular access carriageways.
- 4.17 Existing footpath provision within the site boundary will be maintained, with new footpaths linking to the existing footpath infrastructure to facilitate a permeable site.
- 4.18 In addition, a new footway is proposed on the northern edge of the Crickhowell Road carriageway, which will be incorporated into the existing footway network.
- 4.19 All proposed access points have been designed to accommodate a range of vehicles that are likely to service the site. Service vehicles will only be required to enter the southernmost section of the site (Crickhowell Road), while refuse collection will be facilitated kerb-side off Willowbrook Drive for the northern parcel of the site.
- 4.20 As per the accompanying Transport Statement, swept path analysis has been undertaken which demonstrates that vehicles of significant sizing including refuse vehicles, panel vans, and fire engines can access the site at the southern turning head.

Appearance

- 4.21 The proposed material finishes schedule includes (inter alia) concrete roof tiling, uPVC fascias and soffits (soffit colours to match grey uPVC windows), facing brickwork, reconstituted stone sills, cast stone facing masonry, and fibre cement timber effect cladding.
- 4.22 In addition, rooftop solar PV panelling is proposed on all properties. The anthracite grey uPVC soffits is considered to represent an appropriate pallet for the design of the scheme. Further information regarding the chosen material specification can be found within the accompanying Design & Access Statement.
- 4.23 The architectural style proposed is considered to be contemporary,

combined with robust, high-quality materials to result in a safe, attractive and sustainable neighbourhood that will create a diverse, affordable place to live.

Landscaping and Biodiversity Enhancements

- 4.24 Opportunities for biodiversity enhancement have been incorporated into the detailed design of the development, in accordance with the objectives detailed within the Environment (Wales) Act, which places a duty on Local Planning Authorities to conserve and enhance biodiversity through new development.
- 4.25 This planning application is accompanied by a Green Infrastructure Statement and landscaping package (Tir Collective) which, as required by national planning policy, sets out how biodiversity and green infrastructure are being enhanced as part of the proposed development.
- 4.26 As established within the accompanying GI Statement, the landscape proposal for the site seeks to retain the existing vegetation along the site's western boundary, in addition to the extensive area of vegetation at the centre of the site. The landscaping quality of the site is to be enhanced through the proposed planting of native and non-native tree and shrub planting within these areas, as well as developing high-quality private garden and shared amenity areas.
- 4.27 A key feature of the site is the existing trees and associated scrub vegetation that forms an ecotone to the trees and green corridor within and adjacent to the site. Where possible, existing trees and vegetation are to be retained and protected, which includes the adjacent trees along the south and southwest boundary of the site and the Category A Common Oak and Category B Sycamore trees which are identified within the accompanying tree report.
- 4.28 Proposals for the soft landscape areas is influenced by site's drainage strategy. The majority of trees proposed are to be located in raingardens or attenuation features. Proposed tree species include native and ornamental species that would provide seasonal and biodiversity interest with flowers and berries. Private soft landscape areas are to be planted with a mix of shrub and herbaceous species for seasonal interest.
- 4.29 Tree planting will be planted to help cool the land and developed site during the summer months and provide structural interest in the winter. The retention of trees and hedgerows along the site's western boundary, as established, will continue to provide screening between the application site and existing properties on Trefaser Crescent / Trowbridge Green. The drainage proposals include the provision of a SUDs feature at the south-east of the site, which will contribute towards effective drainage management in addition to a high landscaping quality.

4.30 The development proposals have considered the existing green infrastructure on the site, particularly the existing ecology and proposed vegetation. Mitigation and enhancements include appropriate measures for avoidance of impacts on bats, planting of new trees, shrub planting, species rich seeding, the installation of bat and bird boxes and hedgehog fence gaps. These new features would contribute to the wider green infrastructure of the site and local context, whilst enhancing biodiversity.

DRAFT

Planning Policy Context

Introduction

5.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications be determined in accordance with the Development Plan unless material considerations indicate otherwise. The Development Plan for the purposes of this Planning Application comprises the following:

- National Development Framework: Future Wales – The National Plan 2040 (February, 2021);
- The Cardiff Local Development Plan 2006-2026 (Adopted January 2016)

5.2 In addition to the Development Plan, the Planning Application has been informed by policy and guidance set out in the following:

- Planning Policy Wales Edition 12 (February, 2024), informed by The Well-Being of Future Generations (Wales) Act 2015, and supplemented by Technical Advice Notes;
- Building Better Places: The Planning System Delivering Resilient and Brighter Futures (July, 2020);
- Cardiff Council Supplementary Planning Guidance (SPG)

5.3 This section of the Planning Statement provides an overview of the Development Plan context and planning policy framework of specific relevance to the determination of this application. For ease of reference, this overview is set out below at the national and local level.

Wellbeing of Future Generations Act

5.4 The Well-Being of Future Generations (Wales) Act 2015 (which came into force on 1st April 2016) requires “*public bodies to do things in pursuit of the economic, social, environmental and cultural well-being of Wales in a way that accords with the sustainable development principle*”. The Act sets out seven ‘well-being’ goals as follows:

- *A prosperous Wales: An innovative, productive and low carbon society which recognises the limits of the global environment and therefore uses resources efficiently and proportionately (including acting on climate change); and which develops a skilled and well-educated population in an economy which generates wealth and provides employment opportunities, allowing people to take advantage of the wealth generated through securing decent work.*
- *A resilient Wales: A nation which maintains and enhances a biodiverse natural environment with healthy functioning ecosystems that support social, economic and ecological resilience and the capacity to adapt to change (for example climate change).*

- *A healthier Wales: A society in which people’s physical and mental well-being is maximised and in which choices and behaviours that benefit future health are understood.*
- *A more equal Wales: A society that enables people to fulfil their potential no matter what their background or circumstances (including their socio-economic background and circumstances).*
- *A Wales of cohesive communities: Attractive, viable, safe and well-connected communities.*
- *A Wales of vibrant culture and thriving Welsh language: A society that promotes and protects culture, heritage and the Welsh language, and which encourages people to participate in the arts, and sports and recreation.*
- *A globally responsive Wales: A nation which, when doing anything to improve the economic, social, environmental and cultural well-being of Wales, takes account of whether doing such a thing may make a positive contribution to global wellbeing.*

5.5 Within the Act, sustainable development is defined as follows: “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”. The Act sets out that when making decisions, public bodies need to take into account the impact they could have on people living in Wales in the future and must apply the sustainable development principle in all decisions.



National Development Framework: Future Wales – The National Plan 2040

5.6 The National Development Framework: Future Wales – the National Plan 2040 was published on 24th February 2021. ‘Future Wales’ sets out the Welsh Government’s strategy for addressing key national priorities through the planning system, including sustaining and developing a vibrant economy; achieving decarbonisation and

climate-resilience; developing strong ecosystems; and improving the health and well-being of our communities.

- 5.7 Future Wales sets out its overarching ambitions based on the national planning principles and national sustainable placemaking outcomes set out in Planning Policy Wales by means of 11 Outcomes. As set out on Page 52 of Future Wales, the 11 Outcomes are collectively a statement of where the Welsh Government aspire Wales to be in 20 years' time, as follows:

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*
11. *...in places which are decarbonised and climate-resilient.*

- 5.8 On urban growth, Policy 2 of Future Wales states:

Urban growth and regeneration should be based on the following strategic placemaking principles:

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

Planning authorities should use development plans to establish a vision for each town and city. This should be supported by a spatial framework that guides growth and regeneration, and establishes a structure within which towns and cities can grow, evolve, diversify and flourish over time."

Housing

5.9 It is stated at Page 73 of Future Wales that *“the planning system has a long-established role in the delivery of affordable housing. We are committed to ensuring that new housing meets the needs of all members of society especially those unable to afford to buy on the open market. Echoing the strategic placemaking principles in policy 2, sustainable places are inclusive and welcoming to all; they do not exclude sections of the community or create ghettos of the affluent and the poor.”*

5.10 Policy 7 is of key relevance in regard to the delivery of affordable housing, which states the following:

“The Welsh Government will increase delivery of affordable homes by ensuring that funding for these homes is effectively allocated and utilised. Through their Strategic and Local Development Plans planning authorities should develop strong evidence based policy frameworks to deliver affordable housing, including setting development plan targets based on regional estimates of housing need and local assessments. In response to local and regional needs, planning authorities should identify sites for affordable housing led developments and explore all opportunities to increase the supply of affordable housing.”

Placemaking

5.11 Placemaking forms a key concept upon which many national planning policies are based. It is set out at Page 65 of Future Wales that *“Placemaking is at the heart of the planning system in Wales and this policy establishes a strategic placemaking approach and principles to support planning authorities to shape urban growth and regeneration”*.

Biodiversity and Green Infrastructure

5.12 It is identified at Page 76 that the strategic focus of Future Wales on urban growth requires *“an increased emphasis on biodiversity enhancement (net benefit) in order to ensure that growth is sustainable”* (page 76).

5.13 In addition, the associated importance of green infrastructure is highlighted: *“As the population of Wales becomes increasingly urban, the opportunity to optimise well-being benefits from green infrastructure will be greatest in and around these areas. Innovative use of nature-based solutions and integrating green infrastructure in and around urban areas can help restore natural features and processes into cities and landscapes. Providing locally accessible, high quality green spaces and corridors helps to maintain and enhance the strategic functioning of our natural resources and ecological networks and address physical and mental well-being”* (page 78).

5.14 Policy 9 of Future Wales is of key relevance in regard to green infrastructure and biodiversity enhancement, which states the following:

“To ensure the enhancement of biodiversity, the resilience of ecosystems and the provision of green infrastructure, the Welsh Government will work with key partners to:

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

5.15 In respect of climate change, Future Wales confirms that:

“It is vital that we reduce our emissions to protect our own well-being and to demonstrate our global responsibility. Future Wales, together with Planning Policy Wales will ensure the planning system focuses on delivering a decarbonised and resilient Wales through the places we create, the energy we generate, the natural resources and materials we use, and how we live and travel.”

5.16 Finally, Policy 33 identifies Cardiff to be within the South East region of Wales, which is the identified National Growth Area for new development. In full, this policy states:

“Cardiff, Newport and the Valleys will be the main focus for growth and investment in the South East region.

Strategic and Local Development Plans should recognise the National Growth Area as the focus for strategic economic and housing growth; essential services and facilities; advanced manufacturing; transport and digital infrastructure.

The Welsh Government will work with regional bodies and local authorities in the region and in neighbouring regions of England to promote and enhance Cardiff, Newport and the Valleys’ strategic role and ensure key investment decisions support places in the National Growth Area and the wider region.

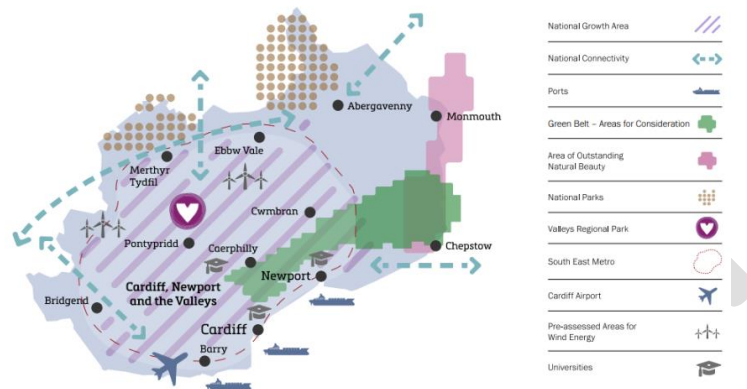
The Welsh Government supports Cardiff’s status as an internationally competitive city and a core city on the UK stage. Cardiff will retain and extend its role as the primary national centre for culture, sport, leisure, media, the night time economy and finance.

The Welsh Government supports an increased strategic role for Newport as a focus for sustainable, long-term growth and investment. 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.

The Welsh Government supports co-ordinated regeneration and investment in the Valleys area to improve well-being, increase prosperity and address social inequalities. The Welsh Government will work with regional bodies, local authorities, businesses, the third sector, agencies and stakeholders to support investment, including in the manufacturing sector, and to ensure a regional approach is taken to addressing socio-economic issues in the Valleys.

The Welsh Government supports development in the wider region which addresses the opportunities and challenges arising from the region's geographic location and its functions as a Capital Region."

Regional strategic diagram



Planning Policy Wales, Edition 12

- 5.17 Planning Policy Wales (PPW) Edition 12 was published on 7th February 2024. The primary objective of PPW is to ensure that the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental and cultural well-being of Wales, as required by the Planning (Wales) Act 2015, the Well-being of Future Generations (Wales) Act 2015.
- 5.18 Sustainable Development is defined at Page 7 of PPW as follows: "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".
- 5.19 Paragraph 1.18 sets out that "Legislation secures a presumption in favour of sustainable development in accordance with the development plan unless material considerations indicate otherwise to ensure that social, economic, cultural and environmental issues are balanced and integrated"
- 5.20 In accordance with the National Development Framework, placemaking is also at the heart of PPW – Paragraph 2.1 for example, states that "Everyone engaged with or operating within the planning system in Wales must embrace the concept of placemaking in both plan making and development management decisions in order to

achieve the creation of sustainable places and improve the well-being of communities”.

- 5.21 Paragraph 2.3 of PPW states that *“The planning system should create sustainable places which are attractive, sociable, accessible, active, secure, welcoming, healthy and friendly. Development proposals should create the conditions to bring people together, making them want to live, work and play in areas with a sense of place and well-being, creating prosperity for all”.*
- 5.22 PPW states that previously developed (‘brownfield’) land should be used in preference, where possible, over greenfield land. In settlements, such land should generally be considered suitable for appropriate development where its re-use will promote sustainability principles and any constraints can be overcome.
- 5.23 Section 3 – Strategic and Spatial Choices, states that *“effective strategic placemaking requires early collective consideration of placemaking issues at the outset, in the formulation of a development plan, or when developing specific proposals. The policy issues should not be considered in isolation from one another. Section 5 – Productive and Enterprising Places covers the economic components of placemaking which promote the economic, social, environmental and cultural well-being by providing well-connected employment and sustainable economic development. These places are designed and sited to promote healthy lifestyles and tackle climate change” [3.1].*
- 5.24 The importance of good design in development proposals is highlighted in Paragraph 3.3 of PPW, which states:

“Good design is fundamental to creating sustainable places where people want to live, work and socialise. Design is not just about the architecture of a building but the relationship between all elements of the natural and built environment and between people and places. To achieve sustainable development, design must go beyond aesthetics and include the social, economic, environmental, cultural aspects of the development, including how space is used, how buildings and the public realm support this use, as well as its construction, operation, management, and its relationship with the surrounding area”.
- 5.25 It is set out at Paragraph 4.2.1 that *“New housing development in both urban and rural areas should incorporate a mix of market and affordable house types, tenures and sizes to cater for the range of identified housing needs and contribute to the development of sustainable and cohesive communities”*
- 5.26 The importance of considering SuDs as an integral part of the development process is highlighted at Paragraph 6.6.18 of PPW where it is stated that:

"The provision of SuDS must be considered at the earliest possible stage when formulating proposals for new development". It is advised at Paragraph 6.6.19 that "Design for multiple benefits and green infrastructure should be secured wherever possible and as part of Green Infrastructure Assessments suitable approaches towards the provision of SuDS should be identified".

5.27 Regarding Green Infrastructure, Paragraph 6.2.11 of PPW advises:

"The development proposals have considered the existing green infrastructure on the site, particularly the existing ecology and proposed vegetation. Mitigation and enhancements include appropriate measures for avoidance of impacts on bats, planting of new trees, shrub planting, species rich seeding, the installation of bat and bird boxes and hedgehog fence gaps. A swale is provided along the southern boundary of the site. These new features would contribute to the wider green infrastructure of the site and local context, whilst enhancing biodiversity."

5.28 Paragraph 6.2.12 of PPW (12th Edition) states that a Green Infrastructure statement should be submitted with all planning applications. This should *"be proportionate to the scale and nature of the development proposed"* and *"will describe how green infrastructure has been incorporated into the proposal."*

Technical Advice Notes

5.29 The following Technical Advice Notes (TANS) are of relevance to the proposed development.

5.30 *TAN2 'Planning and Affordable Housing'* provides advice on how the planning system, and local planning authorities, can adopt an affordable housing target within a local development plan that shapes local development policy and growth aims, based on the needs identified within needs assessments carried out.

5.31 *TAN5 Nature Conservation and Planning (2009)* provides advice about how the land use planning system should contribute to protecting and enhancing biodiversity and geological conservation. It seeks to demonstrate how local planning authorities, developers and key stakeholders in conservation can work together to deliver more sustainable development that does not result in losses from the natural heritage but instead takes every opportunity to enhance it.

5.32 *TAN12 Design (2016)* provides advice on how 'promoting sustainability through good design' and 'planning for sustainable building' may be facilitated through the planning system.

5.33 *TAN 18 'Transport' (2007)* offers national guidance on transportation related planning policies, and advises that it should be read in conjunction with Manual for Streets. It advocates the integration of land use planning and transport in order to promote resource and

travel efficient settlement patterns, ensuring that development is located in areas of good accessibility, and managing parking provision.”

Local Level

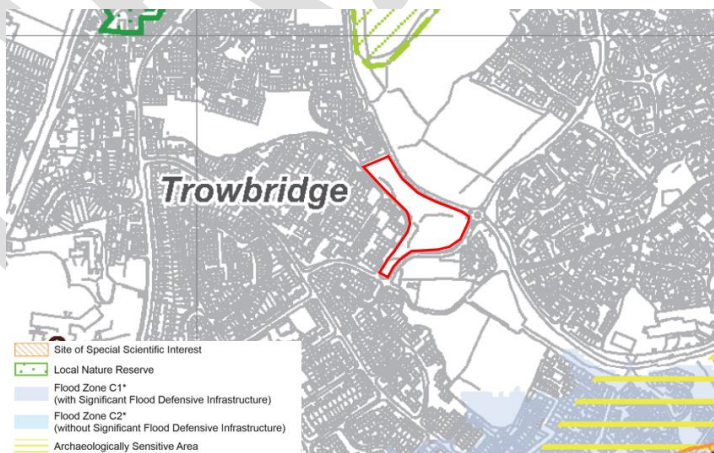
The Cardiff Local Development Plan 2006-2026

5.34 The Cardiff Local Development Plan was adopted in January 2016 and is the prevailing development plan for the city of Cardiff for the development plan period (2006-2026). As such, it is a material consideration for planning applications within Cardiff.

5.35 As shown below, the Cardiff Local Development Plan Proposals Map indicates that the site is within the defined settlement boundary and is not subject to any site-specific allocations or policy designations.



5.36 The Cardiff Local Development Plan Constraints Map (below) indicates that the site is not subject to any constraints.



5.37 In light of the above, the following Local Development Plan policies are considered relevant in the context of the proposed development:

Policy Reference	Referring to
Strategic Policies	

KP1	Level of Growth
KP3(B)	Settlement Boundary
KP4	Masterplanning Approach
KP5	Good Quality and Sustainable Design
KP6	New Infrastructure
KP7	Planning Obligations
KP8	Sustainable Transport
KP12	Waste
KP13	Responding to Evidenced Social Needs
KP15	Climate Change
KP16	Green Infrastructure
Detailed Policies	
H3	Affordable Housing
EN8	Trees, Woodlands, and Hedgerows
EN10	Water Sensitive Design
EN13	Air, Noise, Light Pollution and Contamination
T1	Walking and Cycling
C4	Protection of Open Space

5.38 Development is encouraged to be located within the defined settlement boundary for Cardiff, as per Policy KP3(B) 'Settlement Boundaries' of the Local Development Plan. In full, this states:

"In order to strategically manage the spatial growth of Cardiff, settlement boundaries are proposed as shown on the Proposals Map. In all areas outside the defined settlement boundaries, otherwise referred to as countryside, there will be a corresponding presumption against inappropriate development."

5.39 Policy KP5 'Good Quality and Sustainable Design' sets out the Council's position in securing high quality design through new development. This is shown in full below:

"To help support the development of Cardiff as a world-class European Capital City, all new development will be required to be of a high quality, sustainable design and make a positive contribution to the creation of distinctive communities, places and spaces by:

- i. Responding to the local character and context of the built and landscape setting so that layout, scale, form, massing, height, density, colour, materials, detailing and impact on the built and natural heritage are all addressed within development proposals;*
- ii. Providing legible development which is easy to get around and which ensures a sense of continuity and enclosure;*
- iii. Providing a diversity of land uses to create balanced communities and add vibrancy throughout the day;*
- iv. Creating interconnected streets, squares and spaces as distinctive places, which are safe, accessible, vibrant and secure and incorporate public art where appropriate;*

- v. *Providing a healthy and convenient environment for all users that supports the principles of community safety, encourages walking and cycling, enables employment, essential services and community facilities to be accessible by sustainable transport and maximises the contribution of networks of multi-functional and connected open spaces to encourage healthier lifestyles;*
- vi. *Maximising renewable energy solutions;*
- vii. *Achieve a resource efficient and climate responsive design that provides sustainable water and waste management solutions and minimise emissions from transport, homes and industry;*
- viii. *Achieving an adaptable design that can respond to future social, economic, technological and environmental requirements;*
- ix. *Promoting the efficient use of land, developing at highest practicable densities and where appropriate achieving the remediation of land contamination;*
- x. *Ensuring no undue effect on the amenity of neighbouring occupiers and connecting positively to surrounding communities;*
- xi. *Fostering inclusive design, ensuring buildings, streets and spaces are accessible to all users and is adaptable to future changes in lifestyle; and*
- xii. *Locating Tall buildings in locations which are highly accessible through walking and public transport and within an existing or proposed cluster of tall buildings."*

- 5.40 Under Policy KP6 'New Infrastructure', new development will make appropriate provision towards, or contribute towards essential, enabling and necessary infrastructure including access roads, flood mitigation/defences, affordable housing provision, and protection/mitigation of the natural and built provision.
- 5.41 Policy KP7 'Planning Obligations' states that planning obligations will be sought to mitigate any impacts generated by new development, assessed appropriately on a case-by-case basis.
- 5.42 With regard to Sustainable Transport and new development within Cardiff, Policy KP8 'Sustainable Transport' states that development will be integrated with transport infrastructure in order to achieve a number of outcomes, including private car demand and usage reduction, improved travel safety, and maximising use of sustainable and active modes of transport.
- 5.43 The sustainable storage and collection of waste in new developments will be supported as appropriate, as per Policy KP8 'Waste'.
- 5.44 Policy KP13 'Responding to Evidenced Social Needs' details the Council's approach for developing sustainable neighbourhoods, tackling deprivation, and improving qualities of life. This is set out to

be achieved with a number of measures, including *“Providing a range of dwelling sizes, types, and affordability including seeking to provide a target of 6,646 affordable dwellings over the remaining 12 years of Plan period.”*

5.45 Cardiff Council detail their measures to mitigate the impacts of climate change in Policy KP15 ‘Climate Change’. This states:

“To mitigate against the effects of climate change and adapt to its impacts, development proposals should take into account the following factors:

- i. Reducing carbon emissions;*
- ii. Protecting and increasing carbon sinks;*
- iii. Adapting to the implications of climate change at both a strategic and detailed design level;*
- iv. Promoting energy efficiency and increasing the supply renewable energy; and*
- v. Avoiding areas susceptible to flood risk in the first instance in accordance with the sequential approach set out in national guidance; and*
- vi. Preventing development that increases flood risk.”*

5.46 Policy H3 ‘Affordable Housing’ of the Local Development Plan states that housing developments on brownfield land proposing 5 or more dwellings, or exceeding 0.1 Ha in gross site area, or where adjacent residential properties result in combined numbers above the above thresholds, will be required to deliver an affordable housing provision of 20%.

5.47 Policy EN8 ‘Trees, Woodlands, and Hedgerows’ states:

“Development will not be permitted that would cause unacceptable harm to trees, woodlands and hedgerows of significant public amenity, natural or cultural heritage value, or that contribute significantly to mitigating the effects of climate change.”

5.48 Regarding the relationship between water and new development, Policy EN10 ‘Water Sensitive Design’ states:

“Development should apply water sensitive urban design solutions (the process of integrating water cycle management with the built environment through planning and urban design). To include the management of:

- i. Water demand and supply;*
- ii. Waste water and pollution;*
- iii. Rainfall and runoff;*
- iv. Watercourses and water resource;*
- v. Flooding; and vi. Water pathways.”*

5.49 Development that is considered to cause or result in unacceptable harm to public health, local amenity and character, or the natural and historic environment will not be permitted, as per Policy EN13 'Air, Noise, Light Pollution, and Land Contamination'.

5.50 Policy T1 'Walking and Cycling' states:

"To enable people to access employment, essential services and community facilities by walking and cycling the Council will support developments which incorporate:

- i. High quality, sustainable design which makes a positive contribution to the distinctiveness of communities and places;*
- ii. Permeable and legible networks of safe, convenient and attractive walking and cycling routes;*
- iii. Connections and extensions to the Cardiff Strategic Cycle Network and routes forming part of the Cardiff Walkable Neighbourhoods Plan;*
- iv. Measures to minimise vehicle speed and give priority to pedestrians and cyclists;*
- v. Safe, convenient and attractive walking and cycling connections to existing developments, neighbourhoods, jobs and services;*
- vi. Infrastructure designed in accordance with standards of good practice including the Council's Cycling Design Guide;*
- vii. Supporting facilities including, signing, secure cycle parking and, where necessary, shower and changing facilities;*
- viii. The provision of Car-Free Zones."*

5.51 Finally, Policy C4 'Protection of Open Space'

"Development will not be permitted on areas of open space unless:

- i. It would not cause or exacerbate a deficiency of open space in accordance with the most recent open space study; and*
- ii. The open space has no significant functional or amenity value; and*
- iii. The open space is of no significant quality; or*
- iv. The developers make satisfactory compensatory provision; and, in all cases;*
- v. The open space has no significant nature or historic conservation importance."*

Supplementary Planning Guidance

5.52 The following Supplementary Planning Guidance (SPG) adopted by Cardiff Council is of relevance to the proposed development:

- Green Infrastructure SPG (Adopted June 2019)
- Managing Transportation Impacts (Incorporating Parking Standards) SPG (Adopted July 2018)
- Planning Obligations SPG (Adopted January 2017)

- Residential Design Guide (Adopted January 2017)
- Waste Collection and Storage Facilities SPG (Adopted October 2016)

DRAFT

Appraisal

Overview

6.1 This section aims to identify the main issues relevant to the determination of the application and assess the scheme against the relevant planning policy framework. These matters are considered to be as follows:

- **Principle of Development**
- The **Loss of Public Open Space (LDP Policy C4)**
- Impact of the development on the **character of the surrounding area.**
- The impact of the development on the **local highway network.**
- The impact of the development on **biodiversity and the local landscape.**

Principle of Development

6.2 PPW (12th Edition) states that planning applications must be determined in line with the adopted local development plan, unless material considerations indicate otherwise. As established, the application site is located within the defined settlement boundary for Cardiff and is situated within a wholly residential setting in the east of Cardiff.

6.3 Policy KP3 'Settlement Boundaries' of the Cardiff Local Development Plan 2006-2026 places strict control on development outside of the defined settlement boundary, detailing a preference for new development to be focused within the settlement boundary.

6.4 The application site comprises a mixture of brownfield and greenfield land, with national and local planning policy identifying a preference for new development to be located on previously developed 'brownfield' land within the settlement boundary.

6.5 The scheme would therefore, in principle, result in the loss of an area of greenfield land to the north of the site. Notwithstanding, the application has been identified as an appropriate location for new residential development in accordance with the wider Willowbrook and Silvertale Park development in a heavily residential context. The local area is considered to benefit from extensive green space provision for the benefit of the local community and as such the loss of this area of greenfield land is not considered to represent a significant loss when assessed appropriately.

6.6 In addition, the Cardiff Local Development Plan (2006-2026) does not explicitly prohibit new residential development on greenfield land. Policy EN8 'Trees, Woodlands, and Hedgerows' advises that development which would cause unacceptable harm to trees, woodlands, and hedgerows of significant public amenity, will not be permitted. As established, the proposed development has been

guided by a comprehensive landscaping scheme which looks to preserve and enhance on the site's existing GI quality, and is considered to represent a betterment on the existing landscaping context.

- 6.7 Local Development Plan Policy KP13 'Responding to Evidenced Social Needs' identifies that a range of dwelling sizes, types, and affordability is required to be delivered in the form of 6,646 affordable dwellings, in order to drive socio-economic growth across the city and reduce deprivation.
- 6.8 As established, the proposed development comprises the development of 35no. residential units, inclusive of 18no. affordable units and 17no. open market units. As such, it is considered to contribute significantly to the targeted development of 6,646 affordable units stipulated within LDP Policy KP13.
- 6.9 The Principle of Development is also established through the sites planning history with outline planning permission granted in January 2017 and extended March 2021. In line with the above, it is considered that the principle of development is established and that the proposed development can be considered as acceptable, as it is in accordance with Policies KP3B 'Settlement Boundaries' and KP13 'Responding to Evidenced Social Needs' of the Cardiff Local Development Plan 2006-2026.

The Loss of Public Open Space

- 6.10 As set out in the above policy section, Policy C4 'Protection of Open Space' of the Cardiff LDP states that development will not be permitted on areas of open space unless several criteria are satisfied. This is of relevance given the context of the site.
- 6.11 For the benefit of this appraisal section, these criteria will be critiqued below to demonstrate that the proposed development is in conformity with Policy C4.
- i. *It would not cause or exacerbate a deficiency of open space in accordance; and*
- 6.12 There are formal and informal open spaces in close proximity to the site which includes the playing fields to the north of the site west of Crickhowell Road. The southern parcel of the site is not considered to formally comprise open space as it is currently being used for a temporary construction compound as permitted under 22/01096/MNR and 24/00913/FUL. Furthermore the principle of developing the site has been firmly established through its planning history which includes outline planning permission comprising of 31 dwellings.
- 6.13 In addition, much of the central section of the site is to be retained given its existing ecological and landscaping value. Whilst the

development of the northern parcel, in principle, comprises the loss of a small section of open space, it should be recognised that much of this area of land is occupied by trees and shrubbery of low quality and as such does not comprise an area of high quality, sizable open space. The accompanying landscaping scheme demonstrates that areas of public amenity space are to be delivered, which will help in ensuring that the site's existing open space context will not be exacerbated. As such, it is considered that this criterion of Policy C4 can be complied with.

ii. The open space has no significant functional or amenity value; and

6.14 As set out in the above, the southern parcel of the site is currently being used as a temporary construction compound permitted by the LPA under 22/01096/MNR and 24/00913/FUL. Much of the northern parcel of the application site contains overgrowth and scrub, with a limited amount of functional space available for public use, and is considered to be of low amenity value at present. The proposed site layout looks to incorporate areas of amenity space, which will contribute to an increased amenity quality within the local area in comparison to the existing context, and as such it is considered that the proposed development is in accordance with criterion ii. of LDP Policy C4.

iii. The open space is of no significant quality; or

6.15 As above, the existing open space context of the site is considered to be low quality. Areas of higher quality, identified by accompanying reports including the Tree Report and PEA, have guided the proposed development in order to ensure that the parts of the site with a higher open space/ecological value (such as the bank of trees along the west of the site) are retained for the benefit of the future scheme. As such, it is not considered that the proposed development contravenes this criterion.

iv. The developers make satisfactory compensatory provision; and, in all cases;

6.16 Wates Residential and Cardiff Living will look to provide appropriate compensatory provision, including mitigation where required, if deemed necessary, in line with LDP Policy KP7 'Planning Obligations'. Given that this an 'or' criterion, the scope of potential compensatory provision, aside from the accompanying landscaping scheme, has not been ascertained.

v. The open space has no significant nature or historic conservation importance.

6.17 As established, the site is not subject to any significant designations, including historic conservation designations. As such, it is considered

that the proposed development complies with criterion v. of Policy C4.

- 6.18 In line with the above critiquing of Policy C4 'Protection of Open Space', it is considered that the proposed development complies with Policy C4 and that the loss of a small section of low-quality public open space is considered to be acceptable, when considered against the proposed delivery of 35no. affordable and open market dwellings.

Impact of Development on the Character of the Surrounding Area

- 6.19 The site is located within the defined settlement boundary for Cardiff, and situated within an established residential area. As such, the proposed residential development is considered appropriate in this setting and the resulting use of the site would conform to its surrounding uses.
- 6.20 The proposed layout plan demonstrates that the potential density of the site and its form, massing, and scale, are acceptable in reflecting the character of this part of the city, as highlighted by the recent residential development on land south of Crickhowell Road at Rhodfa Crughywel which contains dwellings of three and two storeys. houses and bungalows.
- 6.21 The proposed development looks to deliver a total of 35no. units, cumulating in a dwelling density of 23 dwellings per Hectare. A significant area of the site is made up of woodland and cannot be lost to the development as such this figure is slightly skewed. The density minus the woodland totals 29.9 dwellings per hectare. The proposed site layout has been formulated carefully in order to achieve a balanced relationship between the proposed dwellings, associated infrastructure, and landscaping features as per national and local planning policy. On this basis, the proposed density is considered to be acceptable, as reflected by pre-application discussions had with officers at Cardiff Council.
- 6.22 As established, the proposal accommodates a range of properties varying from one, two, three, and four bedroom properties of affordable and open market type. The development is therefore considered to provide a strong tenure mix and is considered to reflect the local housing need for the ward of Trowbridge which is calculated to have a housing need gap of 1,991 dwellings as per the Local Authority Prospectus 2023-24 (July 2023).
- 6.23 With regard to design, the local area is not considered to benefit from a predominant architectural style or character of significance, with a clear variety of design apparent, driven by the evolution of development within St Mellons and Trowbridge across past decades. The proposed pallet is considered to reflect residential developments within this area of Cardiff in recent years, including south of

Crickhowell Road and west of Willowbrook Drive, to the south-east of the application site. Accordingly, the material pallet, is considered to be acceptable and will ensure it assimilates into the local residential context.

- 6.24 On this basis, it is considered that the proposed development is considered acceptable and complies with the design principles set out within Local Development Plan Policies KP4 'Masterplanning Approach', KP5 'Good Quality and Sustainable Design', and KP15 'Climate Change'.

Impact of development on the Amenity of Surrounding Residential Properties

- 6.25 The proposed layout has been formulated to achieve appropriate amenity standards with each dwelling provided with the beneficial use of private and/or public external amenity areas and appropriate parking provision.
- 6.26 No significant amenity impacts are considered to arise with regard to privacy, overlooking, or overshadowing on any property within the site's vicinity. The development offers no significant amenity impact, in terms of privacy, overlooking, overbearing or overshadowing on any property within the vicinity. This is aided by the retention of, and enhancement of the existing tree/shrub line to the west of the site in addition to the area of landscaping to the centre of the site, which will provide screening between the proposed development and nearby residential properties. Accordingly, the scheme is considered to have an acceptable relationship on the neighbouring residential context.
- 6.27 In line with the above, the proposed development is not considered to generate any significant impacts on the amenity of surrounding properties within the local context, and is in line with Policies KP4 'Masterplanning Approach', KP5 'Good Quality and Sustainable Design' of the Cardiff Local Development Plan 2006-2026, as well as Cardiff Council's adopted Residential Design Guide SPG.

Impact on Green Infrastructure and Biodiversity

- 6.28 The accompanying Preliminary Ecological Appraisal (PEA) (Soltys Brewster) submitted as part of this planning application concludes that the proposed development will not have a significant effect on the site's biodiversity opportunities with a limited range of habitats on site. The PEA advises that a range of recommendations are used to inform the proposed development, including the following:

- PEA/ECLA findings/recommendations?

- 6.29 As per the accompanying landscaping strategy, the proposed development demonstrates that the proposed development incorporates extensive new native planting within the site, which would provide an attractive layout with green infrastructure

provisions tied in, in order to enhance biodiversity opportunities and to provide a well-designed scheme that provides an attractive environment for future residents to live in and enjoy.

- 6.30 The design of the external lighting proposed, including street lighting and security lighting, has been formulated to minimise impacts to wildlife within the site's vicinity.
- 6.31 It is proposed to retain the bank of trees located along the west of the site boundary, which are currently protected under TPO reference A01 'Part of Western Boundary Alongside Trefaser Crescent'. The proposed layout has been considered carefully in order to ensure that no negative impacts are generated onto the Category A Common Oak and a Category B Sycamore trees located within the site boundary.
- 6.32 The mitigation and enhancement measures for biodiversity and landscaping proposed have been considered in line with the measures detailed within the Environment (Wales) Act 2016 and recent revisions made to PPW (12th Edition) to secure GI and biodiversity enhancement. As indicated in the accompanying landscaping strategy, the following landscape enhancement measures are proposed which will compliment the retention of the existing tree/shrub areas to the west and centre of the site:
- The comprehensive planting of native and non-native species, inclusive of the following; *Alnus incana* 'Aurea' and magnolia x loebneri 'Leonard Messel' trees, cornus and viburnum shrub species, *Corylus avellana* and *crategous monogyna* native specimen shrub species, and *ilex aquifolium* and *sambucus nigra* native planting.
 - The planting of mixed wetland grassland within the proposed attenuation pond at the southern parcel of the site; and
 - The planting of species rich grassland, to be used within amenity grass and public spacing;
- 6.33 The proposed green infrastructure strategy would comprise a range of species, both native and non-native species to enhance biodiversity and botanical diversity. The species selected are adaptable to wet and dry conditions, including lengthy dry spells. The range of both tree and plant species proposed would enhance the biodiversity, increase species diversity, the age diversity of vegetation and improve habitat resilience to climate change.
- 6.34 In line with the above, it is considered that the proposed development will achieve ecological and landscape enhancement in accordance with national planning policy, and is compliant with Local Development Plan Policies KP4 'Masterplanning Approach', KP5 'Good Quality and Sustainable Design', KP16 'Green Infrastructure', EN6 'Ecological Networks and Features of Importance for Biodiversity', and EN8 'Trees. Woodlands, and Hedgerows'.

Impact on Highways

- 6.35 With regard to access, a Transport Statement has been commissioned which demonstrates that access provision for vehicular movements off Willowbrook Drive and Crickhowell Road appears to be acceptable and can be delivered safely with adequate visibility splays provided in both directions.
- 6.36 As established within the Transport Statement, parking provision can be achieved in conformity with Cardiff Council's 'Managing Transportation Impacts (Incorporating Parking Standards)' SPG, with a total of 63no. car parking spaces proposed, inclusive of 2no. visitor car parking spaces.
- 6.37 In addition, a total of 71no. bicycle parking spaces are proposed, which has been considered in accordance with the Incorporating Parking Standards SPG.
- 6.38 The application site is located within proximity to existing bus services and several local amenities and facilities. Moreover, it is within approximately 700m walking distance to the St Mellons Neighbourhood Centre. As such, it is considered that there are sufficient opportunities for the future residents to undertake trips by alternative modes to the private car.
- 6.39 Trip Generation calculations shown within the accompanying Transport Statement indicate that the site will generate up to 17 two-way vehicle movements during the AM peak hours (08:00 – 09:00) and 15 two-way vehicle movements during the PM peak hours (17:00 – 18:00). Throughout the course of the day, the proposed development is estimated to generate up to 153 two-way vehicular movements. This has been identified as acceptable and will not have a detrimental impact on the performance of the local highway network.
- 6.40 Appropriate means off access can be achieved into both parcels of the development site, via Willowbrook Drive and Crickhowell Road. This includes access points with appropriate and safe visibility splays, in addition to safe turning heads to facilitate resident and refuse traffic.
- 6.41 Accordingly, it is considered that the proposed development will not generate any significant adverse impacts on the local highway network, and is able to positively link to nearby facilities and local services and incorporate public transport services. As such, it is considered to be in accordance with national planning policy and guidance on highways and active travel, in addition to Policies T1 'Walking and Cycling' and T5 'Managing Transport Impacts' of the Cardiff Local Development Plan 2006-2026.

Conclusion

- 7.1 This Planning Statement has been prepared on behalf of Wates Residential in relation to the proposed full planning application for the development of 35no. dwellings on land west of Willowbrook Drive, St Mellons.
- 7.2 The proposed development presents an opportunity for Wates Residential, in partnership with Cardiff Living, to deliver much needed affordable and open market housing in a sustainable location within the east of Cardiff. The proposed development will result in the delivery of a mix of housing tenure in a highly sought after area where there is a significant housing need whilst being in keeping with the residential context.
- 7.3 The principle of residential development at the site is firmly established through the sites planning history which includes outline planning permission for 35 residential dwellings.
- 7.4 The site is located within the settlement boundary within the defined settlement boundary for Cardiff, as per the Cardiff Local Development Plan 2006-2026 (Adopted January 2016). The development of the site would be delivered in a sympathetic manner with appropriate provisions for landscaping, parking, and drainage infrastructure made, in addition to ecological and landscape mitigation where necessary. In line with national planning policy, design measures have been formulated with placemaking principles in mind, and it is considered that the principle of development behind the scheme is sustainable.
- 7.5 In light of the above, it is considered that the proposed development is in accordance with key Local Development Plan policies including Policies KP1 'Level of Growth', KP3(B) 'Settlement Boundary', KP4 'Masterplanning Approach', KP5 'Good Quality and Sustainable Design', KP13 'Responding to Evidenced Social Needs', KP15 'Climate Change', KP16 'Green Infrastructure', H3 'Affordable Housing', and EN8 'Trees, Woodlands, and Hedgerows'.
- 7.6 It is for the above reasons that it is respectfully requested that Cardiff Council grant full planning permission for the residential development, as proposed, on land west of Willowbrook Drive, St Mellons.