

Welsh Water  
**Plasdwr Sewer Reinforcement  
Scheme**  
Planning Statement

Issue | 3 November 2021

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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**ARUP**

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# 1 Introduction

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## 1.1 Background

This Planning Statement has been prepared by Ove Arup and Partners Limited (Arup) on behalf of Welsh Water, the Applicant. The purpose of this statement is to support an application pursuant of full planning permission submitted to Cardiff Council, herein referred to as the Local Planning Authority (LPA).

The application relates to the Plasdwr Sewer Reinforcement Scheme (the proposed development) which comprises two mutually connected locations on either side of the River Taff. The eastern site is situated adjacent to Ty-Mawr Road on the northern boundary of Hailey Park, Cardiff (National Grid Reference ST 14451 79567). The western site comprises an overgrown verge adjacent to De Braose Close, a residential cul-de-sac in Danescourt, Cardiff (National Grid Reference ST 13994 79392).

The proposed development is described as follows:

*“Construction of a sewerage pumping station and sewer reinforcement compound on land situated within Hailey Park and the installation of Ino. Actuation kiosk on land north of De Braose Close, Cardiff.”*

An application pursuant of full planning permission was submitted to the LPA under Planning Portal reference PP-10276272 on 3 November 2021.

## 1.2 Need for development

In 2017, Cardiff Council granted outline planning permission for a major residential development in the Radyr area of Cardiff under application reference 14/02733/MJR. The Radyr development will provide up to 5,970 residential dwellings including retail, office and educational infrastructure which is allocated in the Cardiff Council as a Strategic Site (C – North West Cardiff). Welsh Water has agreed a requisition connection with Redrow Homes for the development which would be delivered over the next 20 years.

A new separate sewerage system is currently proposed by Redrow Homes which would collect all domestic flows and discharge into the existing sewer network located in the Danescourt area of Cardiff. Due to the increase in domestic discharges proposed, the existing Cog Moors Wastewater Treatment Works (WwTW) does not have sufficient capacity to accommodate the proposed increase associated with the residential development. A bifurcation gravity sewer is required to transfer excess flows below the River Taff to the proposed pumping station at Hailey Park. The proposed development would discharge excess flows into the existing trunk sewer line which connects to the Cardiff WwTW.

### 1.3 Purpose and Structure of this Planning Statement

This statement outlines the context within which the application has been submitted, rationale for the proposed works, detailed assessment of the national and local planning policy considerations pertinent to the development as justification for consent being granted by the LPA.

The Planning Statement is structured as follows:

- Section 2 of this Statement provides a description of the application site, including a description of the existing and surrounding uses, the sites proximity to other settlements and designations and pertinent planning permissions;
- Section 3 provides a description of the proposed development, a rationale for the works and an assessment of permitted development rights;
- Section 4 reviews the relevant national and local planning policies pertinent to the application;
- Section 5 considers the key planning issues relevant to the development; and,
- Section 6 provides a summary conclusion for the proposed development.

## 2 Application Background

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### 2.1 The Application Site

As stated in Section 1, the submitted application relates to two mutually connected locations on either side of the River Taff in northern Cardiff, as illustrated in **Site Location Plan – 9060**.

The eastern site is situated at Hailey Park in the Melingriffith area of Cardiff. The application site comprises scrubland to the south of the existing gated access track connecting Ty-Mawr Road to the Hailey Park cricket pavilions. Hailey Park benefits from a large single storey pavilion (approximately 580m<sup>2</sup>) with associated hardstanding parking to the east and a formalised unbound overflow parking area to the immediate north of the application site. The site comprises overgrown scrubland including unmanaged grass and shrubs, providing minimal benefit in regard to the public open space. Hailey Park is bounded by the River Taff on the southern and western boundaries, residential properties to the east and the existing railway line to the north. Llandaff railway station is situated approximately 360m to the east of the application site.

The western site is situated at the head of De Braose Close cul-de-sac in Danescourt, Cardiff. The application site is surrounded by semi-detached and terraced residential dwellings with off street parking. The application site is situated adjacent to 48 De Braose Close which is separated from the application site by a stepped footpath which runs to the north as illustrated below. The site is situated adjacent to well-used walking routes through mature woodland which connects to the River Taff to the east and the bridge crossing to Hailey Park. Development at De Braose Close would comprise a 1.2m wide Actuation Kiosk which would be installed within a small section of overgrown vegetation at the head of the cul-de-sac, adjacent to an existing stepped footpath, as illustrated in Figure 1.



Figure 1 Bellmouth location of Actuation Kiosk at De Braose Close, Cardiff.

There are no Listed Buildings within the immediate surrounding of the application sites and the nearest Conservation Area (Church Road, Whitchurch) is situated approximately 200m to the north east, separated by the existing railway line adjacent to Hailey Park. Due to the degree of separation, it is considered that there are no designated or non-designated heritage associated with the application sites at Hailey Park and De Braose Close.

As stated in the **Ecological Impact Assessment (EcIA)**, there are four internationally designated sites within 10km of the application site including the Severn Estuary Special Protected Area (SPA), RAMSAR and Special Area of Conservation (SAC) 8km to the south east and the Cardiff Beech Woods SAC and SPA 3km to the north west. In addition, the Glamorgan Canal Site of Site of Special Scientific Interest (SSSI) is situated 1km to the north. While the application site is not situated in an internationally or nationally designated site, Hailey Park is designated as a Site of Importance for Nature Conservation (SINC).

An assessment of the Proposals and Constraints Map of the Cardiff Council Local Development Plan (LDP) indicates that that the Hailey Park site is situated upon land designated as a SINC and within a River Corridor. There are no designations associated with the De Braose Close site.

## 2.2 Planning History

The following planning applications are considered to be pertinent to the determination of the application and have been considered in the design of the sewer reinforcement works.

Table 1: Overview of planning applications relevant to the proposed development at Hailey Park and De Braose Close.

Application Reference	Description of Development	Decision	Date Issued
20/00187/MJR	Residential development comprising 36no. dwellings together with associated infrastructure, public open space and woodland management	Undecided	N/A
21/02242/DCH	Conversion of existing barn structure into family recreation area	Undecided	N/A
20/00468/DCH	Rear dormer extension with velux window to front elevation	Granted	06/05/2020
20/00786/DCH	Removal of existing attached garage and construction of detached garage and pool house	Granted	23/07/2020
21/00272/DCH	Rear dormer roof extension	Granted	15/03/2021
18/01940/DCH	Two storey side extension, new balcony to front elevation and a detached garage in front garden	Granted	20/12/2018
18/02189/DCH	Proposed double storey rear extension	Granted	15/10/2018
17/01851/DCH	Alterations and extensions to rear of property	Granted	04/09/2017
16/00444/DCH	Demolition of existing single storey rear extension, construction of enlarged single storey extension to provide kitchen, dining, utility and WC	Granted	29/04/2016
08/00702/W	Two storey extension.	Granted	13/05/2008
00/01041/W	New dwelling	Refused	11/08/2000
00/02169/W	Reinstatement of public open space, relocation/reinstatement of car parking, the removal of the mineral railway bridge and one abutment and changes in levels under and adjacent to the railway bridge	Granted	02/0/2001
01/02274/W	Reinstatement works after Y and P sewer installation (including demolition of railway bridge and disused railway embankment).	Granted	17/12/2001
01/00699/W	3no. proposed security flood lights	Granted	18/05/2001
04/01187/W	Site steel container for storage of rugby equipment	Refused	28/09/2004
04/02563/W	2 storey side and rear extension and single rear extension	Granted	17/02/2005



## 3 The Proposed Works

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### 3.1 The Proposed Development

The Plasdwr Sewer Reinforcement Scheme (the proposed development) comprises two mutually connected sites either side of the River Taff, Cardiff. The eastern site comprises scrub land to the north of recreational cricket pitches situated in Hailey Park, Cardiff (National Grid Reference: ST 14458 796567). The proposed compound at Hailey Park would comprise:

- Vehicular compound access connecting to gated cellular ‘grasscrete’ or similar private road situated at Ty-Mawr Road (approximately 90m<sup>2</sup> wide splay);
- Internal site compound road (‘grasscrete or similar’ (approximately 130m<sup>2</sup>);
- Potable water kiosk (1.5m height x 3.0m width x 2.0m depth);
- Standby emergency generator kiosk (2.0m height x 3.5m width x 1.5m depth);
- Motor control centre (MCC) kiosk (2.5m height x 7.6m width x 4.0m depth);
- 4m tall ventilation stack;
- 7m below ground level (bgl) pumping stations;
- Valve slab and above ground level pipework;
- Security fencing (2.4m high with 3no. strand barbed wire topping); and,
- Associated planting.

The western site comprises an overgrown kerbside location at the eastern extent of De Braose Close (National Grid Reference: ST 13998 79391), within a residential cul-de-sac with adjacent pedestrian stepped pathway. The proposed development at the western site would comprise:

- Installation of 1no. actuator valve kiosk (1.2m wide x 1.2m height x 0.4m depth) constructed of bottle green GRP on a 0.15m thick concrete plinth.

### 3.2 Need for Development

As outlined in Section 1.2, Cardiff Council granted outline planning permission for a major residential development in Radyr under application reference 14/02733/MJR for the construction of approximately 6,000 new dwellings. The development was allocated as a Strategic Site under the Cardiff Council Local Development Plan (CLDP) and therefore constitutes a significant delivery of residential development of the CLDP plan period.

A new separate sewerage system is currently proposed by Redrow Homes which would collect all domestic flows and discharge into the existing sewer network located in the Danescourt area of Cardiff. Due to the increase in domestic discharges proposed, the existing Cog Moors Wastewater Treatment Works (WwTW) does not benefit from sufficient capacity to accommodate the proposed increase associated with the residential development. A bifurcation gravity sewer

is required to transfer excess flows below the River Taff to the proposed pumping station at Hailey Park. The proposed development would discharge excess flows into the existing trunk sewer line which connects to the Cardiff WwTW.

### 3.3 Assessment of Permitted Development Rights

As a statutory undertaker, Welsh Water benefit from permitted development rights (PD rights) for sewerage related development under Part 16 Class A of the Town and Country Planning (General Permitted Development) Order 1995 (the GPDO).

Part 16 Class A of the GPDO states that development comprising the following shall be considered permissible when undertaken by a relevant statutory undertaker:

- (a) *development not above ground level required in connection with the provision, improvement, maintenance or repair of a sewer, outfall pipe, sludge main or associated apparatus;*
- (b) *the provision of a building, plant, machinery or apparatus in, on, over or under land for the purpose of survey or investigation;*
- (c) *the maintenance, improvement or repair of works for measuring the flow in any watercourse or channel;*
- (d) *any works authorised by or required in connection with an order made under Section 73 of the Water Resources Act 1991 (power to make ordinary and emergency drought orders);*
- (e) *any other development in, on, over or under their operational land, other than the provision of a building but including the extension or alteration of a building.*

The proposed development, as described in Section 3.1 of this Statement, would be provided on land currently within the ownership of a third party and therefore does not constitute 'Operational Land', as defined under Section 263 of the Town and Country Planning Act 1990.

By virtue that both the eastern and western sites would necessitate development above ground level on non-operational land parcels, it is considered that the proposed works exceed the limitations of Part 16 Class A (e) of the GPDO. As such, this application has been submitted pursuant of full planning permission for both the eastern and western elements of the Plasdwr Sewer Reinforcement Scheme.

The wider Plasdwr Sewer Reinforcement Scheme includes a below ground level pipeline below the River Taff and pipelines connecting to Ty Mawr Road. By virtue that the proposed works would be situated below ground level, each constituent element would accord with Part 16 Class A(a) of the GPDO and falls outside the remit of this planning application.

## 4 Planning Policy Review

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### 4.1 The Development Plan

Section 70(2) of the Town and Country Planning Act 1990 requires that in dealing with an application for planning permission, an LPA “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:

- “(a) the National Development Framework for Wales;
- (b) the strategic development plan for any strategic planning area that includes all or part of that area; and,
- (c) the local development plan for that area.

The Development Plan for the application therefore comprises Future Wales: The National Plan (Future Wales), Cardiff Council Local Development Plan (2006-2026) and supporting Constraints and Proposals Plans.

#### 4.1.1 Future Wales: The National Plan 2040

Future Wales was adopted in February 2021 and constitutes the National Development Framework for Wales, replacing the Wales Spatial Plan (WSP 2008) in setting the direction for development in Wales up to 2040. It is a development plan document with a strategy for addressing key national priorities through the planning systems, including sustaining and developing a vibrant economy, achieving decarbonisation and climate-resilience, developing strong ecosystems and improving the health and well-being of communities.

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

**Policy 1 – Where Wales will grow** states that Welsh Government will support sustainable growth in all parts of Wales. Particular focus will be centres on National Growth Areas, including Cardiff.

**Policy 9 – Resilient Ecological Networks and Green Infrastructure** requires developers to ensure the enhancement of biodiversity, the resilience of ecosystems and provision of green infrastructure. In all cases, action towards securing the maintenance and enhancement of biodiversity (to provide a net-benefit), the resilience of ecosystems and green infrastructure assets must be demonstrated as part of development proposals.

**Policy 33 - National Growth Areas** outlines that Cardiff will be the main focus for growth and investment in the South East region. Cardiff will remain the primary settlement in the region and will be shaped by strong housing and employment markets and associated infrastructure.

#### 4.1.2 Cardiff Council Local Development Plan 2006-2026 (2016)

The CLDP was adopted in 2016 and has and covers a plan period of 2006-2026. 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 Key Policies and Detailed Policies which determine and guide how development should be approved within Cardiff.

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

#### Proposals Map

The CLDP Proposals Map indicates one interplay between the application site and land use allocations.



Figure 2 Cardiff Council LDP Proposals Map with eastern application site red line boundary overlay.

As illustrated in Figure 2, the eastern site at Hailey Park is situated within a River Corridor which incorporates land adjacent to the River Taff. Under Policy **EN4** of the CLDP, development proposals should protect, promote and enhance the natural heritage, character and other key features of the river corridor in addition to facilitating sustainable access and recreation. There are no designations associated with the western site at De Braose Close.

## Constraints Map

The CLDP Constraints Map indicates that there are no interplays between the eastern site at Hailey Park and any on-site constraints. Figure 3 illustrates that the application site abuts the Hailey Park and River Taff SINC. In addition, the site is situated within close proximity to a designated recreational route demarcated in blue and the Church Road, Whitchurch Conservation Area.

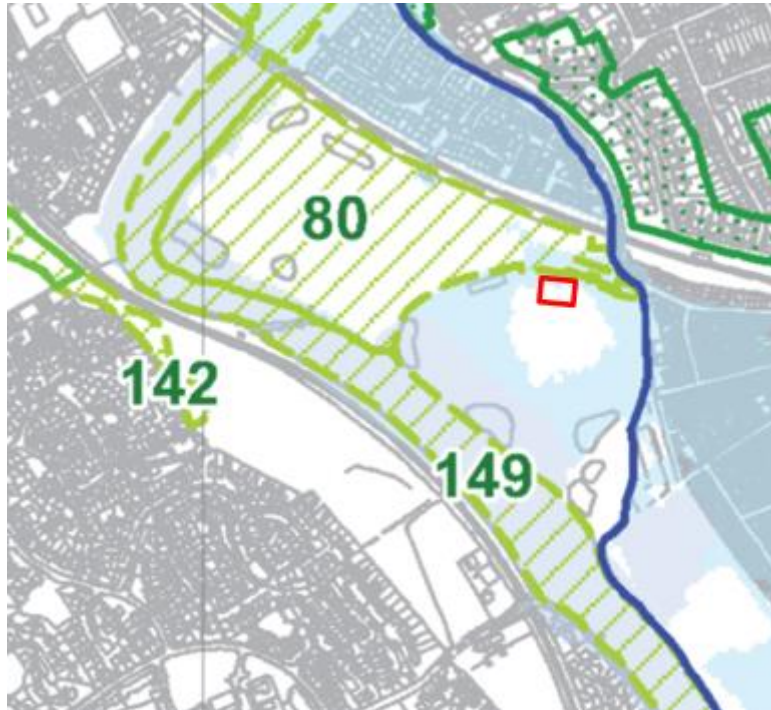


Figure 3 Cardiff Council LDP Constraints Map with eastern application site boundary overlay.

There are no constraints associated with the western site at De Braose Close, as confirmed by the CLDP Constraints Map.

## Written Statement

In addition to the Proposals Map and Constraints Map, the following key and detailed planning policies are of relevance to the proposed development and an analysis of how the proposals respond to these are provided in Chapter 5 of this Planning Statement.

### Key Policies

#### Policy KP5 – Good Quality and Sustainable Design

Development proposals should be of a high quality and positively contribute towards distinctive communities through responding to the local character, providing legible connections, diversity of land uses, safe and accessible connections, healthy environments, maximised renewable energy solutions and ensuring that residential amenity is safeguarded on local communities.

### **Policy KP6 – New Infrastructure**

Development proposals should make provision for or contribute towards essential and enabling infrastructure required in connection and as a consequence of the proposed works in a timely manner. Essential infrastructure would include transportation/highways, utility services and flood mitigation.

### **Policy KP15 – Climate Change**

To mitigate the effects of climate change, development proposals should reduce carbon emissions, adapt to the implications of climate change, promote energy efficiency, avoid areas susceptible to flood risk and prevent flood risk detriment.

### **Policy KP16 – Green Infrastructure**

Development proposals should protect, enhance and manage the integrity and connectivity of green infrastructure. Proposals should demonstrate how green infrastructure has been considered and integrated into the development and any loss of green infrastructure should be adequately compensated.

### **Policy KP18 – Natural Resources**

Development proposals must minimise impacts on natural resources and minimise pollution with specific focus on; protecting water quality, minimising air pollution and remediating land contamination.

## **Detailed Policies**

### **Policy EN3 – Landscape Protection**

Development proposals should not cause unacceptable harm to the character and quality of the landscape and setting of the city.

### **Policy EN5 – Designated Sites**

Development proposals should not cause unacceptable harm to sites of international or national conservation importance. Where proposals interplay with locally designated nature and geological sites, proposals should maintain or enhance the importance of the designation.

### **Policy EN6 – Ecological Networks**

Development will be permitted which does not cause unacceptable harm on landscape features of importance for wild flora and fauna and networks of importance for landscape or nature conservation. Priority will be given to the protection, enlargement, connectivity and management of the overall nature of semi-natural habitats.

### **Policy EN7 – Priority Species and Habitats**

Development proposals which would give rise to an adverse impact on legally protected habitats or those outlined as a priority in UK and Local Biodiversity Action Plans will be permitted where the need for development outweighs the nature conservation importance, there are no satisfactory alternative locations or where effective mitigation measures are provided.



**Policy EN8 – Trees, Woodland and Hedgerows**

Development proposals should not 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.

**Policy EN11 – Protection of Water Resources**

Development proposals must not cause unacceptable harm to the quality and quantity of underground, surface or coastal waters.

**Policy EN13 – Air, Noise, Light Pollution and Land Contamination**

Development proposals will not be permitted in which would cause unacceptable harm to health, local amenity, the character and quality of the local area as a result of air, noise, light pollution or the presence of unacceptable land contamination.

**Policy EN14 – Flood Risk**

Development proposals should not be located within tidal or fluvial flood plains or in locations in which would exacerbate flooding elsewhere, in locations in which would hinder the maintenance of flood defences/watercourses or in locations in which would adversely affect the integrity of defences.

**Policy T5 – Managing Transport Impacts**

Safe and convenient provision should be made of pedestrians, cyclists, disabled people, vehicle parking and vehicle access.

**Policy T6 – Impact on Transport Networks and Services**

Development proposals will not be supported in which cause unacceptable harm to the safe and efficient operation of the highway, public transport and other movement networks, including cyclist and pedestrian routes.

**Policy T8 – Strategic Recreational Routes**

The adopted LDP outlines that a series of recreational routes will be developed and maintained which will form an integral part of the wider cycling and walking network in Cardiff. Development proposals should respect the existence of recreational routes and the enhancements will be supported.

**Policy C3 – Community Safety/Creating Safe Environments**

Development proposals must be designed to promote a safe and secure environment to minimise the opportunity of crime. Proposals should maximise natural surveillance, establish well defined routes, maintain distinction between public and private space and provide a good standard of lighting.

**Policy C4 – Protection of Open Space**

Development proposals must not cause or exacerbate a deficiency of open space, loss of function or amenity value. Developers may be required to make satisfactory compensation provision to offset impacts where proposals would lead to harm.

## 4.2 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 consideration in the determination of this application are:

- Planning Policy Wales – Edition 11 (2021)
- Technical Advice Notices (TAN)
  - TAN 5: Nature Conservation and Planning;
  - TAN 12: Design;
  - TAN15: Development, Flooding and Coastal Erosion; and,
  - TAN 16: Sport, Recreation and Open Space.
- The Well-being of Future Generations (Wales) Act (2015)
- Building Better Places (2020)
- Cardiff Local Development Plan Review (2021)
- Cardiff's adopted Supplementary Planning Documents:
  - Green Infrastructure

### 4.2.1 Planning Policy Wales: Edition 11 (2021)

Planning Policy Wales: Edition 11 (PPW11) sets out the land use planning policies of the Welsh Government. PPW11 provides advice on a wide range of issues and is supported by a number of Technical Advice Notes (TANs) which contribute toward the delivery of improved social, economic, environmental and cultural well-being in Wales. The Welsh Government is committed to sustainable development and PPW11 states that the planning system shall provide a presumption in favour of sustainable development.

Paragraph 3.61 states that adequate and efficient infrastructure, including water supply and sewers are crucial for economic, social and environmental sustainability.

Paragraph 3.62 further outlines that LPAs should take a strategic and long-term approach towards the provision of infrastructure which may include collaboration between key infrastructure providers and the LPA to ensure sustainability and assets are fit for purpose.

Paragraph 3.9 of PPW states 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 3.10 states that in areas of recognised landscape, townscape, cultural or historic character, it can be appropriate to seek to promote or reinforce local distinctiveness.

Paragraph 6.6.9 states that the planning system has an integral part to play in ensuring that infrastructure is suitable to meet the needs of communities and business in which they serve.

Effective forward planning mechanisms between water/sewerage companies and planning authorities is essential. The capacity of existing infrastructure assets and need for additional facilities requires early identification.

As stated in paragraph 6.6.12, planning authorities should encourage the use of sites where existing water and/or sewerage infrastructure exists to avoid the use of sites where adequate provision is unlikely to be achieved.

## 4.2.2 Technical Advice Notes (TANs)

### TAN 5: Nature Conservation and Planning

TAN 5<sup>1</sup> sets out that wildlife and its habitats are of fundamental importance to our future well-being and prosperity because a rich and diverse environment supports a long-term sustainable economy and contributes to a healthier and happier society. Biodiversity is an important indicator of sustainable development. Biodiversity and geodiversity add to the quality of life and local distinctiveness.

Section 2 of TAN5 outlines that the planning system in Wales should integrate nature conservation into all planning decisions, provide a net-benefit for biodiversity conservation with no significant loss of habitats and plan to accommodate and reduce the effects of climate change.

The proposed development should identify at an early stage, the nature conservation interests likely to be affected and the likely significance of impacts. It should ensure that impacts of projects likely to have a significant effect on the environment are thoroughly investigated, understood and considered.

### TAN 12: Design

TAN12<sup>2</sup> outlines that Welsh Government is strongly committed to achieving the delivery of good design in the built and natural environment which is fit for purpose and delivers environmental sustainability, economic development and social inclusion. Design is defined as:

*“the relationship between all elements of the natural and built environment. To create sustainable development, design must go above and beyond aesthetics and include the social, environmental and economic aspects of the development, including its construction, operation and management, and its relationship to its surroundings”.*

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<sup>1</sup> <https://gov.wales/sites/default/files/publications/2018-09/tan5-nature-conservation.pdf>

<sup>2</sup> <https://gov.wales/sites/default/files/publications/2018-09/tan12-design.pdf>

Section 5.4.10 outlines that to effectively adapt to the effects of climate change, attention should be attributed to the ways in which design can minimise and manage impacts. This includes:

- An awareness and appreciation of the current and future effects of climate change;
- Responding to the effects of climate change through the structure and use of materials;
- Ensure that design solutions do not constrain current or future opportunities to adapt or a developments vulnerability to climate change; and,
- Recognise the relationship to more strategic responses to climate change such as flood risk and drainage.

Good design should achieve solutions which maximise the natural landscape assets and minimise environmental impacts on the landscape. Proposals which amend the landscape should be considered from an early stage and should not be an afterthought.

### **TAN 15: Development, Flooding and Coastal Erosion**

An updated version of TAN15<sup>3</sup> will take effect from 1 December 2021 which provides technical guidance in relation to development and sets out the precautionary framework to guide planning decisions in respect of development in areas of flood risk. It provides guidance on how to fully assess flood consequences and how to design and implement sustainable development.

The consequences of flooding can be serious and can occur without significant warning. The frequency and severity of flooding is increasing and is expected to increase further as a result of climate change. Flooding from coastal, fluvial and surface water sources can give rise to significant social, environment and economic impacts.

Wales' topography and industrial history has resulted in the majority of development be concentrated on valley floors, lowland areas and coastal locations, increasing the susceptibility of flooding.

The National Strategy for development, flooding and erosion is to prevent exposure to risk and should follows and hierarchy as set out below:

- Development should be directed to areas of minimal risk of flooding known as 'Zone 1';
- Resilient development in areas served by formal flood risk management defences should be directed to 'TAN15 Defended Zones';
- Resilient development in undefended areas of relatively low risk may be allowed in 'Zone 2'; and,

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<sup>3</sup> <https://gov.wales/sites/default/files/publications/2021-09/technical-advice-note-15.pdf>

- Water compatible development, essential infrastructure and less vulnerable developments may be allowed in areas of higher risk, known as ‘Zone 3’.

The new TAN15 is supported by new flood maps (Flood Maps for Planning) which outlines the location of watercourses and flood zones described in respect of rivers, sea, surface water and small watercourses and TAN15 Defended Zones.

### **TAN16: Sport, Recreation and Open Space**

Playing fields and green open spaces have special significance for their recreational and amenity value, specifically in towns and cities due to their ability to support biodiversity. Open space adds interest and vitality to living and working environments in urban environments, as well as responding to climate change.

Section 3.9 outlines that better, or at least equivalent alternative replacement provision could be made available to provide for the local area’s needs. Replacement land will depend on the size, characteristics, location and accessibility of open space.

### **4.2.3 The Well-being of Future Generations (Wales) Act (2015)**

The Well-being of Future Generations (Wales) Act 2015 (WFGA) requires public bodies to work with people and communities to plan and adapt to persistent issues such as climate change and population growth for both current and future generations. A goal of the Act focusses on ‘a Resilient Wales’ which is defined as:

*‘A national 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’.*

The Applicant considers that the proposed development would futureproof the existing sewerage network and would accommodate additional population growth and housebuilding in northern Cardiff. The Applicant considers that the proposed development accords with ‘a Resilient Wales’ as set out in the WFGA, providing additional resilience to the existing sewerage network.

### **4.2.4 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 PPW11 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 PPW11. 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.

Welsh Government outlines that development management decision making should focus on creating healthy, thriving, active places with a focus on a positive, sustainable future for communities. Decision makers should continue to consider what is material to a particular application, particularly where the outcome will be a benefit to creating better places.

#### 4.2.5 Cardiff Local Development Plan Review (2021)

On 18 March 2021, Cardiff Council agreed to start work on preparing a replacement LDP. On 30 March 2021, Welsh Government approved the Cardiff Replacement LDP Delivery Agreement. As such, Cardiff Council are in the process of preparing a new Replacement LDP which will include a new strategy and policies to guide and manage growth and change in the city over the next 15 years to 2036.

#### 4.2.6 Supplementary Planning Guidance

##### Green Infrastructure SPG

In regard to planning and development, all new developments will need to satisfy the requirements for green infrastructure as set out in Policy KP16 of the LDP which states that:

*'Cardiff's distinctive natural heritage provides a network of green infrastructure which will be protected, enhanced and managed to ensure the integrity and connectivity of this multi-functional green resource is maintained. Protection and conservation of natural heritage network needs to be reconciled with the benefits of development. Proposed development should therefore demonstrate how green infrastructure has been considered and integrated into the proposals. If development results in overall loss of green infrastructure, appropriate compensation will be required.'*

Planning submissions in which a likely to significantly impact on green infrastructure should ensure that; the existing infrastructure resource and its potential impacts are considered, green infrastructure has been integrated into proposals and opportunities for green infrastructure enhancement have been considered.

The Green Infrastructure SPG outlines the wider Cardiff Green Infrastructure Plan which sets out six objectives:

- To protect and enhance Cardiff's ecosystem to ensure that they continue to support diverse habitats and species, allowing them to adapt to change;

- To ensure that Cardiff's green infrastructure is enhanced and managed in a way that increases resilience to the changing climate and provides protection for people and places;
- To maximise the contribution that green infrastructure makes to Cardiff's economy by enhancing the city's attractiveness for business, tourism and living;
- To increase the potential physical and mental health benefits from a food quality, natural environment by improving, promoting and creating connected, multi-functional green infrastructure in Cardiff;
- To use Cardiff's green infrastructure to provide opportunities for to access the outdoor environment and to participate in learning, training and volunteering to foster social inclusion and quality and improve life chances; and,
- To build upon Cardiff's reputation as a vibrant, green and attractive city by continuing to enhance and sustain the green infrastructure that underpins the city's unique qualities and sense of place.

## 5 Scheme Appraisal

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Key issues to consider in the determination of the application, in accordance with the identified planning policy framework include:

- Is the development acceptable in principle?
- How does the proposed development impact the character and setting of the application sites?
- Are the ecological impacts of the development acceptable?
- Are the proposed arboriculture and landscape impacts acceptable?
- Does the proposed development impact upon accessibility or road safety?

### 5.1 Principle of Development

An assessment of the application site against the CLDP Constraints and Proposals Map outlined that the site is situated upon land designated within the River Corridor, 220m north east of the Rive Taff. In addition, there are no extant planning permissions in which would be prejudiced by the proposed development. By virtue that the proposed development would not conflict with any designations or allocations set out in the CLDP or existing/proposed land uses within Hailey Park, the development is considered to be acceptable in terms of land use.

As set out in Section 1.2, the proposed development is wholly necessary to provide essential infrastructure to facilitate the development of a Strategic Site (C – North West Cardiff) in Radyr. The proposed development is required to enable sewerage connection and sufficient domestic discharge capacity for approximately 6,000 new dwellings which would be provided over the next 20no. years. As stated in Policy KP6 of the CLDP, enabling infrastructure required to support development should be provided in a timely manner, including the delivery of utilities infrastructure. The implementation of the proposed development is considered to wholly accord with the requirements of Policy KP6 and would support the delivery of the Strategic Site.

The proposed development demonstrates a proactive approach to infrastructure resilience and population growth. The WBFGA state development proposals should contribute towards a ‘Resilient Wales’ which defined as ‘*a nation which maintains and enhances a biodiverse natural environment with healthy functioning ecosystems that support social, economic and ecological resilience the capacity to adapt to change*’. Due to the nature of development, future proof design and absence of any restrictive allocations or permissions, the principle of essential and supporting utilities infrastructure is acceptable an in accordance with Policy KP6 of the CLDP, Paragraph 3.61 of PPW and the WBFGA.

### 5.2 Design and Character

The proposed development includes installation of an actuation valve kiosk at the eastern extent of De Braose Close which would measure approximately 1.2m in height x 1.2m in width x 0.4m in depth. The kiosk would be finished in GRP

green material similar to other statutory undertaker kiosk installations and would suitably assimilate with the dense vegetation to the rear of its proposed siting. The proposed development would be of a scale and siting which would not undermine the built form of the residential street and would be set back from the pedestrian footway, limiting both visual intrusion and obstruction. The installation would be similar to other utilities installation and would be in keeping with the immediate context. The proposals would constitute an informed design which demonstrates an appropriate siting, scale and massing and is therefore considered to accord with Policy KP5 of the CLDP.

The proposed development would include the construction of sewerage pumping station (SPS) compound which would extend to an area of approximately 560m<sup>2</sup>, bounded by a 2.4m high security fence. Proposals would include a 4m wide double gate from the 90m<sup>2</sup> Bellmouth junction access. As stated in Section 3.1, the development would include the installation of kiosk structures ranging between 1.5m and 2.5m in height and a ventilation stack measuring 4.0m in height on the south western boundary. In accordance with Policy KP5 of the CLDP, the Applicant has sought to reduce the verticality and massing of necessary sewerage infrastructure to minimise visual intrusion on Hailey Park. The proposed compound boundary and most northerly kiosk would be set back approximately 11m and 22m from the existing access track respectively. As such, the proposed development would not give rise to a sense of overbearing or visual intrusion on public walkways and would appear subservient to the wider landscape. It is considered the proposed development would not undermine the character of Hailey Park and would limit visual intrusion through an appropriate scale, form and massing, as required under Policy KP5 of the CLDP.

As illustrated in **Landscape Layout Plan – 0002** and **Landscape Elevations - 0003**, the proposed development would include comprehensive landscape planting around the boundary of the SPS compound, obscuring the site from public open space. The proposals include the planting of 8no. trees around the south eastern and south western boundaries of the SPS which would minimise visual intrusion on the open setting of the park. In addition, native scrub mixes and wildflower planting would be included upon the eastern, western and southern boundaries of the SPS to obscure fencing from view and would screen the development from Hailey Park and limit intrusion from the northern pavilions track. As illustrated in the **Landscape Elevations – 0003**, the proposed development would remain visually subservient to the setting of the park by virtue of the limited verticality of security fencing and kiosk elements. Landscaping proposals, as illustrated in Figure 4 and the Landscape Elevations and Layout drawings, illustrate that the constituent elements of the SPS compound at Hailey Park would not be overtly evident within the landscape and would be adequately screened.



Figure 4 Southern elevation of Hailey Park SPS compound inclusive of planting.

While the proposed planting mitigation is designed to offset the visual impacts on sewerage infrastructure provision, it is considered that proposals would be sympathetic to the landscape character of Hailey Park as required under Policy EN3 of the CLDP, constitute a well-informed quality design for essential utilities development as outlined in Policy KP5 and delivery essential arboriculture and habitat mitigation as prescribed under Policy 9 of Future Wales and Policies KP16, EN7 and EN8 of the CLDP. As such, it is considered that the proposed development would be of a suitable location and scale and includes well-informed planting which respects the character and setting of the application site and is therefore acceptable.

### 5.3 Ecological Impacts

The application is supported by an **Ecological Impact Assessment (EcIA)** which confirms that there are 4no. internationally designated sites and 1no. nationally designated site within 10km of the application site. International designations associated with the application site include the Cardiff Beech Woods Special Area of Conservation (SAC) 3km from Hailey Park. In addition the Severn Estuary SAC, Special Protected Area (SPA) and Ramsar site are situated 8km to the south east of Hailey Park.

An Extended Phase 1 Habitat Survey was undertaken which identified 12 types of habitat within the immediate setting of the Hailey Park application site. As outlined in the **EcIA**, the proposed development demonstrates the ability to give rise to both construction and operational impacts on the habitats and species within and adjacent to the application site such as habitat loss, disturbance, severance and species injuries. General mitigation measures would be implemented by the contractor to minimise any potential impacts such as adherence to best practice for pollution prevention, containment of works within the site boundary, implementation of a site management plan (SMP), daylight working hours and all excavations to be provided with a means of escape and adequate fencing. General enhancements in the nature of native scrub and wildflower mixes would be provided to enhance biodiversity and screen the development as well as a replanting ratio of 4:1, according with Policies KP16 and EN8 of the CLDP. Given the limited ecological sensitivity of the site, it is considered that mitigation and enhancement measures outlined would provide a biodiversity net-gain as advocated under Policy 9 of Future Wales and accord with Policy EN6 of the CLDP.



As outlined in the **EcIA**, the Severn Estuary SPA, SAC and Ramsar site is situated 8km from the application site, however, is hydrologically connected. The proposed development would include best practice for pollution prevention measures to minimise any contaminants adversely impacting upon the integrity of the designated site. With the inclusion of mitigation measures, the proposed development would not give rise to any significant effects at a local or county level on designated sites. Due to the localised nature of the proposed works, there would be no negative effects on any designated sites situated more than 1km from Hailey Park. As such, it is considered that the proposed development would accord with Policy 9 of Future Wales and Policies EN5 and EN6 of the CLDP and would be acceptable.

The application site demonstrates limited ability to accommodate common toads, frogs and great crested newts due to lack of water and suitable breeding habitat within the application site. Pollution prevention and construction mitigation would be included for any required reptile displacement, including one-way reptile and amphibian fencing which would result in no significant residual effects at a local scale. The site is suitable for nesting birds which are common within the local area and are supported by wider suitable habitats. The **EcIA** confirms that pollution prevention measures and suitable vegetation clearance outside of the breeding bird season would be undertaken in addition to the erection of at least 5no. bird boxes to the north of the site. As such, it is considered that there would be no significant effects on bird species at a local level. No bat roosts were recorded within the site, however foraging and commuting species have been noted within the residential areas surrounding Ty Mawr Road. Appropriate lighting to prevent spills would be used during construction and at least 5no. bat boxes would be installed to the north of the SPS as a precaution. As such, it is considered that due to limited bat species and precautionary mitigation measures, there would be no significant effects at a local scale.

In total, 6no. records of Badgers were noted 620m north of the application site, however, no signs were identified within the site during Phase 1 surveys undertaken in April and September 2021. As a precaution, all works would be undertaken in the presence of a suitably qualified ecologist and all excavations would be provided with a means of escape and fencing to prevent entrapment. Subject to the proposed mitigation measures, it is considered that there would be no significant residual effects at a local level.

Based on the information set out in the **EcIA**, it is considered that the proposed development would not give rise to any significant effects on designated sites, habitats or species within the application site or its immediate setting. All works would be undertaken in accordance with the outlined mitigation measures and a Construction Environmental Management Plan (CEMP). As such, it is considered that the proposed works at both Hailey Park and De Braose Close would not give rise to any significant adverse impacts on ecological receptors and would give rise to enhancements in regard to planting and bird and bat boxes to the north of the site. It is therefore considered that the proposed development would accord with Policy 9 of Future Wales and Policies EN5, EN6 and EN7 of the CLDP and is therefore acceptable.

## 5.4 Arboriculture and Landscape Impacts

This application is supported by an **Arboricultural Impact Assessment (AIA)** which outlines the nature of tree loss required to facilitate development and the protection measures which will be implemented to safeguard onsite trees. In total, the proposed development would require the felling of 2no. trees within the application site and the felling of 1no. offsite Category U tree for arboricultural reasons.

As illustrated in the **AIA**, the proposed development would require the felling of tree G64 which is situated within the proposed location of the proposed Bellmouth vehicle access of the SPS compound. Additionally, tree G63 is situated within the proposed compound area and would necessitate removal to provide the required below ground level pipework and associated kiosk structures. Both trees G63 and G64 are classified as Category C assets, demonstrating a life expectancy of approximately 10 years. Tree T62 (Category U) is situated to the east of the application site adjacent to the existing hard standing access track. Category U trees are classified as being in a terminal state of decline and should not be considered as constraint to planning. The proposed development of essential sewerage infrastructure would necessitate the loss of 2no. trees within Hailey Park which would be suitably compensated through landscaping proposals surrounding the compound boundary.

Although the development would only necessitate the loss of 2no. Category C trees, landscape mitigation has been proposed to limit the visual intrusion of the SPS compound, resulting in the compensatory provision of 8no. trees, native scrub mixes and wildflower planting. Indicative native tree species proposed include *Acer Campestre*, *Betula Pubescens*, *Carpinus Betulas*, *Fagas Sylvatica* and *Quercus Robur* along the south eastern and south western boundaries of the site. As illustrated in the **Landscape Layout Plan – 0002**, a root protection barrier would be provided around the perimeter fence of the SPS to prevent interplay between introduced scrub and tree species with below ground level infrastructure assets. All works would be undertaken in accordance with British Standard 5836:2012 and would include adequate protection measures for retained arboriculture assets, as outlined in the AIA. The provision of a 4:1 replanting ratio and extensive scrub/wildflower planting would appropriately compensate the necessary tree loss and provide wider arboriculture and ecological benefits within Hailey Park while also delivering upon the objectives of minimising visual intrusion on the setting/character of the site. Due to the limited arboricultural value associated with onsite Category C trees, compensatory planting of 8no. native trees is considered to accord with Policy 9 of Future Wales and Policies KP16, EN3 and EN8 of the CLDP.

Due to the nature of works proposed at De Braose Close, there is no requirement for tree felling and as such, no compensatory planting would be necessary in this location. Due to the minimal nature of works in this location, it is considered that the proposed development would accord with Policy EN8 of the CLDP and would not give rise to any unacceptable impacts on existing arboriculture assets.

## 5.5 Accessibility and Transport

The proposed development would include the installation of an actuation valve kiosk upon an overgrown verge at the eastern extent of De Braose Close. As previously illustrated in Figure 1, the application site is set back from the adjacent pedestrian footpath and cul-de sac turning head, limiting obstruction of the public footway and vehicle movements. The kiosk structure would extend to 1.2m in height and would be finished in a bottle green GRP finish, assimilating with adjacent existing hedgerows. By virtue of the informed material finish and location away from vehicle junctions, it is considered that the development would not place a high degree of cognitive demand on road users and would therefore safeguard road user and pedestrian safety. The kiosk structure would not result in the loss of any parking spaces at De Braose Close and ongoing maintenance and inspection could be undertaken with minimal impact to the road and pedestrian network. Due to the scale and nature of development, it is considered that the proposed development would give rise to inconsequential impacts accessibility and the road network and therefore accords with Policies T5 and T6 of the CLDP.

Development proposed at Hailey Park would be situated to the south of the existing hardstanding gated access connecting to Ty-Mawr Road. The existing access road follows a relatively straight alignment which is shared with recreational users of the parkland and minimal levels of vehicular traffic. The proposed pumping station compound would connect to the access track via a Bellmouth junction access which would benefit from good levels of visibility. By virtue that the existing pavilions and parking exist along the access track, the principle of shared use of the track is well-established. Due to the infrequent nature of inspection and maintenance of the site, it is considered that the proposed development would not give rise to unacceptable increases in traffic movement to and from the site and would not unacceptably impact road user safety at Ty-Mawr Road. Access of the site by Welsh Water operatives would be negligible and would not give rise to unacceptable impacts on pedestrians use of Hailey Park or road user safety either within the parks boundary or upon the local road network. As such, it is considered that the proposed development is in accordance with Policies T5 and T6 of the LDP and is therefore acceptable in terms of accessibility and transport impacts.

## 5.6 Flood Impacts

The application site is situated within Flood Zone 2 for fluvial flood risk, as defined under the new TAN15 and updated NRW Flood Map for Planning. The western application site at De Braose Close is situated within Flood Zone 1 for river and coastal flooding and is not impacted by surface water or ordinary watercourse flood risk. While the Hailey Park site does not meet the definition of 'previously developed land', the proposals constitutes 'less vulnerable development'. Utilities infrastructure on the site would be installed above grasscrete, resulting in no-net increase in impermeable surfaces in which would undermine surface runoff or infiltration rates. The application site demonstrates sloping topography running from north to south towards the River Taff along the southern extent of Hailey Park, minimising the risk of river and surface water

flooding. As identified in the updated Flood Map for Planning, the site sits outside both Zones 2 and 3 for surface water and ordinary watercourse flooding and is not subject to the requirements of a Flood Consequences Assessment (FCA) due to surface water flooding. Although the proposed development is within the Flood Zone 2 for river flooding, it is considered that onsite topography, material choices and the classification of essential less vulnerable development to support a major Cardiff Council Strategic Site would negate the need for an FCA. It is considered that the proposed development is acceptable in term of flood risk and accords with Policies KP6 and EN14 of the CLDP and TAN15.

## 5.7 Open Space

As outlined in Section 2 of this Statement, the application site is situated on scrubland adjacent to the hardstanding access track at Hailey Park. The site comprises overgrown shrubs to the north east of sports pitches and is not used for formal recreation, as illustrated in Figure 5 below.

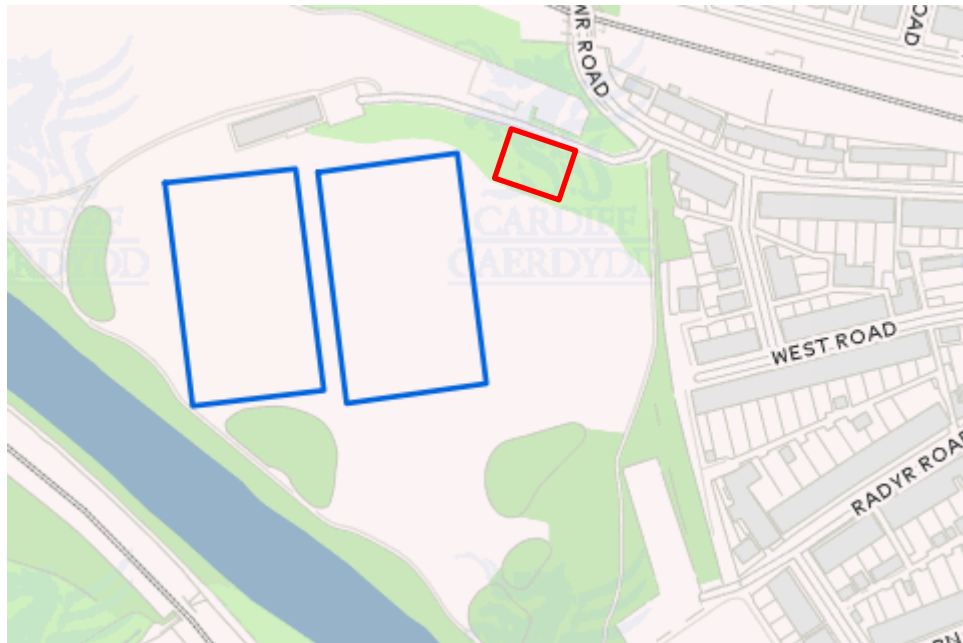


Figure 5 Application site in relation to designated open space and sports pitches at Hailey Park.

The proposed development would result in the loss of scrubland and would not encroach into designated open space which would require the reorientation and designation of 2no. rugby pitches and a cricket pitch during the summer months. Although TAN16 outlines that open space provides leisure and amenity benefits to users, the application site, by virtue of its overgrown nature, provides limited functional or amenity value to users of Hailey Park. The proposed development would constitute a SPS compound covering an area of approximately 550m<sup>2</sup> and would provide additional planting of 1,660m<sup>2</sup> of scrub mixes, wildflower planting and 8no. trees on site. Although the loss of 550m<sup>2</sup> would be required for essential sewerage infrastructure, the proposed development would enhance the amenity value of Hailey Park through comprehensive replanting and safeguarding of recreational and leisure uses. As outlined in Policy C4 of the CLDP, the proposed

development would not lead to a deficiency of open space or its functionality and therefore it is not considered that provision of alternative areas is required by virtue of the enhanced amenity value of the area and the essential nature of the proposed works. As such, it is considered that the proposed loss of low quality open space with minimal functional use is entirely essential and would safeguard recreational sports pitches at Hailey Park, whilst enhancing the amenity value. The proposed loss of open space is therefore considered to accord with Policy C4 of the CLDP and TAN16.

## 5.8 Summary

Based on the information provided in this chapter and documents submitted in support of this application, it is considered that the proposed development accords with the relevant planning policies set out in Future Wales and the CLDP.

It is therefore considered that planning permission should be granted for the proposed development.

## 6 Conclusion

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This Planning Statement has been prepared by Welsh Water in support of an application pursuant of the Plasdwr Sewer Reinforcement Scheme at two locations at Hailey Park and De Braose Close.

As established, the need for the proposed development derives from the grant of planning permission by Cardiff Council to deliver approximately 6,000 new residential dwellings and associated retail and educational development in the Radyr area of Cardiff. The proposed development is required to provide appropriately phased utilities to ensure appropriate capacity across both the Cog Moors and Cardiff WwTW. By virtue that the proposed development is required to deliver a Strategic Site, as allocated in the CLDP, it is considered that the proposals are entirely essential and would not undermine any existing allocations of extant planning permissions. As such, the principle of essential sewerage infrastructure is considered be acceptable and wholly necessary.

Although the proposed development would require the development of scrubland situated adjacent to the northern hardstanding access track at Hailey Park, the site evidences limited recreational use amenity value. The proposed development would include comprehensive replanting and screening and would therefore not give rise to a loss of functional open space as required under Policy C4 of the CLDP and TAN16. The proposed development would constitute a small SPS compound with cellular grasscrete with associated landscaping to prevent visual intrusion on Hailey Park. The proposals would be of a scale and siting which would be sympathetic to the character and setting of Hailey Park through appropriate green infrastructure enhancements and screening, thus according with Policies KP5 and KP16 of the CLDP. Through adequate provision of screening, it is evidenced that the proposals would achieve suitable tree replanting ratios and suitably replace Category C trees on site, as required under Policies KP16 and EN8 of the CLDP.

The proposed development would not give rise to any significant effects on designated sites, habitats or species as a result of the proposed development at either the construction or operational stages. In addition, the proposed development would be suitably located to benefit from vehicle access from the gated access track connecting Ty Mawr Road and Hailey Park and would not give rise to a material increase in trips which egress and ingress the local road network. Notwithstanding the inconsequential transport impacts associated with development at Hailey Park, the installation of an actuation kiosk on land situated at De Braose Close would not overhang or obstruct the pedestrian footway and would be discretely located adjacent to the cul-de-sac turning head, facilitating ongoing maintenance without giving rise to accessibility issues. As such, it is considered that the proposed development would not give rise to any unacceptable transport or accessibility issues and would accord with Policies T5 and T6 of the CLDP.

By virtue that the proposed development would not give rise to any unacceptable design, ecology, transport/accessibility or arboriculture impacts, as assessed in Section 5 of this Statement, it is considered that the proposed development would

be acceptable. The principle of development is considered to be wholly necessary and would facilitate the wider delivery of approximately 6,000 dwellings within the LPA Strategic Site at Radyr. Development would ensure that essential utilities infrastructure is provided at an appropriate stage and would therefore be wholly necessary. By virtue that the proposed development is considered to be wholly required and proposals demonstrate a well-informed and sympathetic design, it is considered that the proposed development is acceptable. In the absence of any significant issues outlined in this Statement and supporting documentation, it is concluded that the proposed development accords with both national and local planning policy and material considerations outlined in Section 4. It is therefore considered that full planning permission should be granted for the Plasdwr Sewer Reinforcement Scheme.