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Development Management
Strategic Planning, Highways and Traffic and Transportation,
County Hall
Cardiff
CF10 4UW

March 17th 2020

Dear Sir/Madam

**Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017.
Land adjacent to St Julian's House, Bridge Road, Old St Mellons, Cardiff. CF3 6YJ**

I refer to the above site. It is proposed that an outline planning application will be submitted shortly following the required pre-application consultation. The site identified on the attached red line site plan is 4.69 Ha and the proposal is for up to 160 dwellings along with associated access, parking, landscaping, open space and drainage.

It is intended to submit an outline application with some matters reserved for future consideration. The application will be accompanied by the following:

- Planning Statement
- Design and Access Statement
- Green Infra Structure Assessment
- Illustrative masterplan, site sections and parameter plans
- Transportation Assessment
- Heritage assessment
- Ecological Assessment including extended phase 1 habitat survey, Bat surveys, reptile surveys and dormouse surveys.
- Tree Survey in accordance with BS 5837:2012
- Landscape Visual Impact assessment
- Geotechnical Desk Study incorporating Preliminary Risk Assessment for land contamination
- Drainage Strategy
- Noise Assessment
- Agricultural Land Assessment
- Soil Resource Report

As required, I set out below the potential impact of the proposed development in the context of the legislation.

(a) Characteristics of Development

- (a) The size of the development
- (b) The cumulation with other development
- (c) The use of natural resources

- (d) The production of waste
- (e) Pollution and nuisances
- (f) The risk of accidents, having regard in particular to substances and technologies used.

The proposal is for the development of 4.69 Ha of agricultural land which is surrounded by hedgerow and scattered trees. The site has most recently been used for grazing.

The size of the site is below the threshold set out in paragraph A19 (Annex A WO Circular 11/99) i.e. 5 Ha which is the indicative figure to provide guidance as to when an EIA is more likely to be required for a development of this nature.

The LPA also has to consider whether the proposed development will have a significant urbanising effect in a previously non-urbanised area.

The circular suggests that this is likely to occur when developments are 1000 dwellings or more. The proposal is for up to 160 residential dwellings.

It is acknowledged that the proposed development will urbanise the site but given its location, surrounded on three boundaries by new development already taking place and established housing along the part of the fourth boundary, it is considered that this development of itself will not have an urbanising effect on the area as a whole.

There would be a cumulative impact with the existing development but this in itself does not infer that an EIA will automatically be required. Rather, it is relevant to consider the size of the development in question and whether its impacts would add to those of the existing settlement to such a degree that would warrant an EIA.

In this case, the development would be surrounded by new development and the proposed unit numbers would represent just 13% of the development either recently completed or currently taking place in the locality. This does not warrant a significant impact and in the applicant's view of itself would not warrant an EIA.

The application will be accompanied by a series of reports outlined above which will address any impact (including cumulative impact) with the already built and committed development.

The proposed development will use natural resources in the construction of dwellings and associated infra structure. Whilst there will be some waste and pollution arising from the development it is considered that these are not significant or beyond local importance.

(b) Location

It is necessary to consider the area for its environmental sensitivity and whether any part of the development would be carried out in a sensitive area. The EIA Regulations provide definitions of those areas that are regarded as sensitive. These include:

- Sites of Special Scientific Interest,
- National Parks,
- Areas of Outstanding Natural Beauty,
- World heritage Sites,

- Conservation Areas,
- Scheduled Ancient Monuments, and
- Internationally designated sites.

The proposed development is not located in any sensitive area identified in the EIA Regulations.

Circular 11/99 advises that the relationship between a proposed development and its location is a crucial consideration. For any given development proposal, the more environmentally sensitive the location, the more likely it is that the effects will be significant and will require an EIA.

The site in question identified as part of Strategic Site G in the Cardiff LDP: Land East of Pontprennau Link Road. The site forms part of a wider allocation for a housing-based scheme of a minimum of 1300 homes with associated community uses, together with essential, enabling development and necessary supporting infrastructure which will be delivered in a phased manner. This site will be the last of the parcels of land to be the subject of a planning application.

There are no statutory or non-statutory conservation designations present on the site. There are a number of designated sites within the surrounding area including the River Rhymney Site of Importance for Nature Conservation.

As indicated above an Ecological Assessment including extended phase 1 habitat survey and bat, reptile and dormouse surveys along with a Green Infra Structure Assessment will be submitted with the application. It is the applicants' view that this will be more than adequate to address the potential impacts and inform any required mitigation. The local nature of this impact would not be significant and in the applicant's, view would be insufficient to warrant an EIA in its own right.

There are trees and hedgerows surrounding the site. As indicated above the application will be accompanied by a Tree Survey in accordance with BS 5837 :2012 which will include inter alia tree protection methodology during construction.

It is the applicants view that the presence of trees and hedges around the site does not in itself give rise to the need for an EIA as the impact (and mitigation) will be localised and not significant.

The environmental sensitivity of geographical areas likely to be affected by development must also be considered having regard in particular to –

- (a) the existing land use;
- (b) the relative abundance, quality and regenerative capacity of natural resources in the area;
- (c) the absorption capacity of the natural environment,
- (d) areas classified or protected under Member States' legislation; areas designated by Member States pursuant to Council Directive 79/409/EEC on the conservation of wild birds and Council Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora;
- (e) areas in which the environmental quality standards laid down in Community legislation have already been exceeded;
- (f) densely populated areas;
- (g) landscapes of historical, cultural or archaeological significance.

The site has been most recently used for grazing of sheep and horses and is identified as Best and Most Versatile Agricultural Land. However, the loss of less than 5HA of such land is not considered to be significant in the wider context.

It is not considered the proposal would adversely impact on the abundance, quality and regenerative capacity of natural resources in the area or prejudice the absorption capacity of the natural environment. The site does not fall within an area classified or protected under Member States' legislation or within an area where the environmental quality standards laid down in Community legislation have already been exceeded.

In respect of archaeology an archaeological assessment (as part of a Heritage Assessment) will accompany the application but this does not need to be part of an EIA.

The adjacent area is developed (insofar as it is now an urban area as opposed to countryside) however, it is considered that the potential environmental impacts would not be significant in terms of the effect on that existing adjacent population.

(c) Characteristics of Potential Impact.

The potential significant effects of development must have particular regard in particular to:

- (a) the extent of the impact (geographical area and size of the affected population);
- (b) the transfrontier nature of the impact;
- (c) the magnitude and complexity of the impact;
- (d) the probability of the impact;
- (e) the duration, frequency and reversibility of the impact

As identified above, the proposed development would be sited across an area of 4.69 hectares. It is not considered that the size and extent of the development is so large that it could be considered as being of more than local relevance/importance. The site is surrounded by new and established housing and this site is identified for development in the adopted LDP.

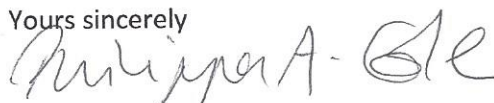
In respect of the second and third criteria, it is considered that the transfrontier nature of the impact and the magnitude/complexity of the development would not be significant, such that an EIA would be required.

The probability of the impact would theoretically be 100%, however, for the reasons given above it is considered that the size of the impacts would not be 'significant'. The duration of the impacts would be continuous; however, it is not considered that this alone necessitates an EIA.

I trust that this sets out the information you require. I will be grateful if you would accept this letter as a formal request for your authority to screen the proposal under the above Regulations and advise whether you consider an EIA is necessary in this case.

I look forward to hearing from you.

Yours sincerely



PHILIPPA COLE