



AUGUST 2022

Open Space Assessment

Cardiff Park and Ride East, Llanrumney

Iceni Projects Limited on behalf of
Curtis Hall Limited

August 2022

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Open Space Assessment
CARDIFF PARK AND RIDE EAST, LLANRUMNEY

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APPENDICES

A1. PENTWYN OPEN SPACE SURVEY (2021)

1. INTRODUCTION

1.1 This Open Space Assessment has been prepared by Icen Projects Limited in support of the full planning application being submitted by Curtis Hall ('the Applicant') to Cardiff City Council ('the Council') for the redevelopment of Cardiff Park and Ride East, Llanrumney ('the Site').

1.2 The full planning application seeks planning permission for the following description of development:

Demolition of existing structures and redevelopment of the site to provide commercial floorspace (Use Classes B2, B8, E(b)) and/or Class E) associated drive-thru and car parking; the re-provision of the park and ride; a bridge across the Rhymney River; site wide landscaping and associated works.

1.3 The proposed development has evolved through extensive pre-application consultation with the Council and other key stakeholders.

1.4 The proposed development provides the opportunity to provide significant enhancements to the existing park and ride in addition to the provision of employment floorspace and would also facilitate a new bridge connecting the site with Llanrumney.

1.5 This Assessment provides an overview of planning policies relating to open space. It presents a desktop assessment of the existing open space provision on the site and in the Cardiff area proximate to the site. Any potential impact of the loss of the open space resulting from the proposals on the site is then considered before conclusions are drawn.

2. SITE BACKGROUND AND PROPOSALS

Site Description

- 2.1 The site comprises of approximately 23.2 ha at the existing Cardiff Park and Ride East within the administrative boundary of Cardiff City Council. The existing Park and Ride contains approximately 1,000 car parking spaces, as well bus drop-off and pick-up points, an office/amenity building and various compounds. The site is accessed from the A48, Eastern Avenue.
- 2.2 The site is not shown on the Council's adopted proposals map to be allocated for any specific use. However, in terms of other planning designations, the site features an area of ancient woodland to the north and a small area to the south, in addition to a number of TPO trees. The north of the site and a corridor along the river Rhymney lies in an area of high flood risk from rivers and the rest of the site lies in low flood risk. The site lies within the River Rhymney river corridor.
- 2.3 Immediately to the north-west lies the dual carriageway (A48) which extends to the south towards Cardiff City centre. Beyond this lies the residential area of Pentwyn, while to the east lies the residential area of Llanrumney. To the south, on the opposing side of the river, planning permission for a residential scheme of 98 residential units has been permitted under application ref:18/02594/MJR.

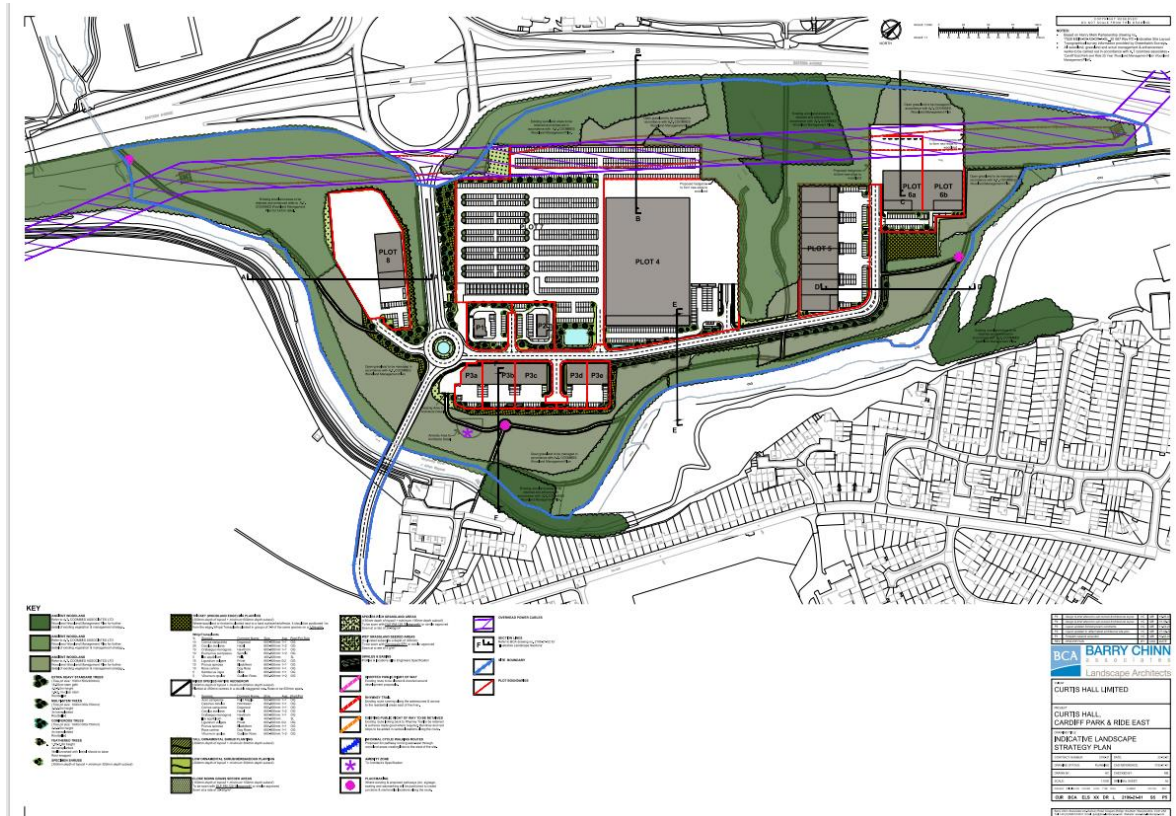
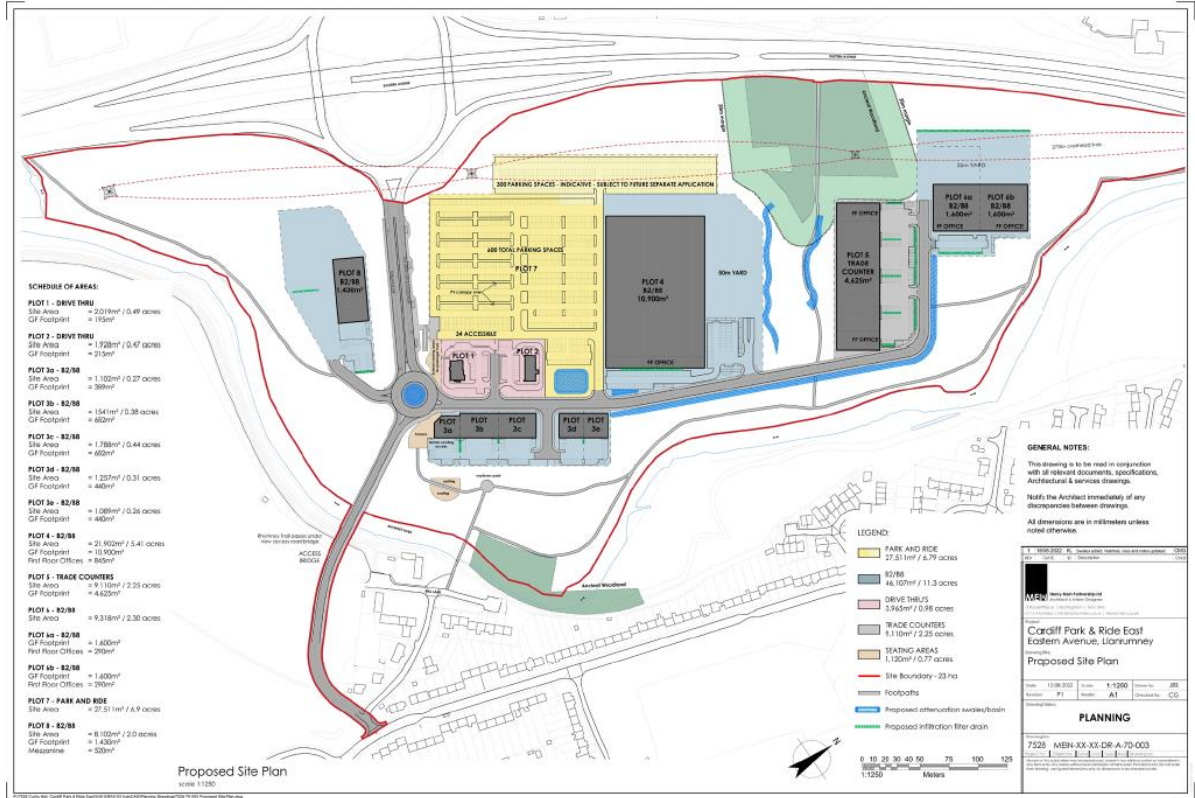
Proposed Development

- 2.4 This planning application seeks planning permission for improvements to the existing park and ride facilities in addition to the provision of new commercial and retail units. The proposals comprise 23,189 sqm GEA of development across 14 plots of between 0.1 and 2.75 ha in size.
- 2.5 In summary, the Proposed Development comprises the following:
- Improvement to the existing park and ride facility, providing 600 car parking spaces, with an area which can accommodate a future 300 spaces if required by others at a later date. The future spaces fall outside the parameters of this proposal and would be subject to a separate planning application if required.
 - New vehicular bridge relief road linking the A48 Eastern Avenue with Llanrumney.
 - Commercial floorspace including B2/B8 industrial units, trade counter units and drive-thru units.
 - Landscaping enhancements to provide recreational uses for the Rhymney Trail for walking and cycling.

- Engineering works to improve the Flood Risk level of the Site.

2.6 Image 1. below shows the proposed Site Plan for the scheme.

Image 1 & 2. Site Plan Proposed and Indicative Landscape Strategy Plan



3. PLANNING POLICY POSITION

3.1 The statutory Development Plan for Cardiff City Council consists of the following:

- Future Wales – The National Plan 2040 – National Development Framework (2021);
- Cardiff Local Development Plan 2006 – 2026 (2016);
- Cardiff Local Development Plan Proposals Map 2006 – 2026 (2016); and
- Cardiff Local Development Plan Constraints Map 2006 – 2026 (2016).

3.2 The adopted Proposals and Constraints Map for Cardiff does not identify any specific land use allocations for the site nor does it designate the site as having a specific open space function. The site is however located in a flood risk area and is subject to ancient woodland and TPO's, as highlighted previously within this Statement.

3.3 Cardiff City Council is preparing a new Replacement LDP for Cardiff which will include a new strategy and policies to guide and manage growth in Cardiff up to 2036. The evidence base is timetabled for preparation up until June 2023, and a consultation on the Preferred Strategy is expected to run from October 2022 to November 2022. Submission of the Replacement LDP is expected March 2024 with adopted expected October 2024.

3.4 Cardiff City Council also have a number of supplementary planning documents / guidance (SPDs / SPGs) which also form material considerations for this application, including the Green Infrastructure SPG (2017).

3.5 At a national level, the National Planning Policy for Wales comprises Planning Policy Wales (PPW) (Edition 11, December 2021) which sets out the land use planning policies of the Welsh Government. It is supplemented by a series of Technical Advice Notes (TANs), Welsh Government Circulars, and policy clarification letters, which together with PPW provide the national planning policy framework for Wales

3.6 The policies and planning guidance relevant to the assessment of open space are outlined in further detail below.

Cardiff Green Infrastructure SPG – Technical Guidance Note for the Provision of Open Space

3.7 The Cardiff Green Infrastructure SPG was adopted in November 2017 and “provides planning advice on a number of areas relating to development and the environment, including protection and

provision of open space, ecology and biodiversity, trees, soils, public rights of way, and river corridors”. The document also provides further guidance to Policy KP16: Green Infrastructure and sets out what information is required from developers.

3.8 In section 2 of the SPG it states that “*Planning submissions that are likely to significantly impact upon green infrastructure will be considered to ensure that:*

- The existing green infrastructure resource on the development site, and the potential impacts upon it, have been adequately considered
- The benefits of green infrastructure are reconciled with benefits of development
- Green infrastructure is integrated into proposals
- Opportunities for enhancement of green infrastructure, for the benefit of the community, have been taken as far as is reasonably possible.”

3.9 In addition to the SPG there are a number of individual Technical Guidance Notes (TGNs) providing more detailed planning guidance which include:

- Ecology and Biodiversity
- Protection and Provision of Open Space
- Public Rights of Way and Development
- River Corridors
- Soils and Development
- Trees and Development

3.10 The Cardiff Council Technical Guidance Note for the Protection and Provision of Open Space (November 2017) provides the following definition for open space:

“Open space is defined in the Town and Country Planning Act 1990 as land laid out as a public garden, or used for the purposes of public recreation, or land which is a disused burial ground.

For the purposes of this guidance, open space should be regarded as all open space of public value, including not just land, but also areas of water such as rivers, canals, lakes and reservoirs which offer important opportunities for sport, recreation and tourism, and can also act as a visual amenity, and may have conservation and biodiversity importance.”

3.11 Specifically, Section 4.1 of the TGN sets out the assessment criteria for which the council determines proposals which involve the potential loss of open space, which includes the following:

- Existing local provision of open space (4.2);
- The functional or amenity value of the open space (4.3);
- The quality of the open space (4.4);
- Any significant nature or historic conservation importance of open space which may be lost (4.5); and
- Any compensatory provision for loss of open space (4.6)

Local Development Plan Policy C4 – Protection of Open Space

3.12 Policy C4 ('Protection of Open Space') of Cardiff's Local Development Plan sets out to protect open space of significant functional, conservation, environmental or amenity value. Policy explicitly states that development will not be permitted on areas of open space unless:

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

Local Development Plan Policy EN4 – River Corridors

3.13 Policy EN4 ('River Corridors') of Cardiff's Local Development Plan outlines the Council's position on protecting and enhancing Cardiff's River Corridors, stating that *"The Natural Heritage, character and other key features of Cardiff's river corridors will be protected, promoted and enhanced, together with facilitating sustainable access and recreation."*

4. OPEN SPACE ASSESSMENT

4.1 Whilst the site does not contain designated open space, this section considers the impact of this loss on the supply of undeveloped 'open' space on site and across this area of Cardiff more generally, in terms of quantity, quality and accessibility.

Existing provision of open space

4.2 In order to assess the impact of the loss of open space, it is first necessary to establish the baseline position on the existing site.

4.3 The site does not constitute designated open space and is not used as a public garden or for the purposes of public recreation. The site does contain an area of Ancient Woodland, and the Rhymney River runs along the southern boundary of the site, with the Rhymney Trail running parallel to the river. The Rhymney Trail also crosses the river via an existing footbridge to the south of the site.

4.4 The existing site consists of approximately 9.39 ha of land, with a hard-surfaced area of 3.8ha, comprising the Park and Ride and surrounding roads. In addition to the Park and Ride, the site features areas of woodland and scrub land with some public rights of way and informal footpaths.

4.5 The Proposed Development would see the total developed site area increase to 22.04 acres, which includes the buildings and service yards, the Park and Ride, car parks, roads and associated footpaths, bridge, and general terraced areas. It is important to highlight that this would not include any of the ancient woodland, Rhymey Trail or public footpaths across the open areas.

4.6 At present, access to open space is very limited on the site, with only vehicular access, or pedestrian access via a small pedestrian bridge located on Ball Lane. Access to open space has been further reduced through the closing of the bridge on Pentwyn Road.

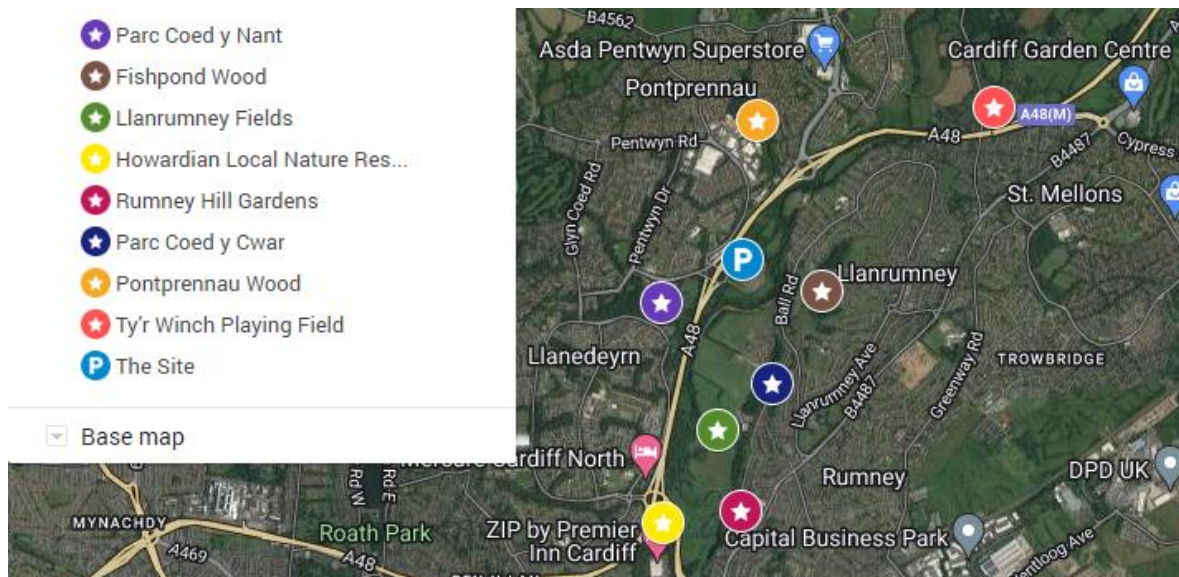
4.7 The Open Space Survey for Pentwyn, appended to this assessment (Appendix 1.), confirms that the existing Park and Ride site is not designated as open space. Additionally, the area surrounding the Park and Ride which is included within the application red-line boundary is identified as being 'Amenity Functional ANG'. The Technical Guidance Note for the Provision of Open Space defines functional amenity spaces as being those containing a path or are otherwise accessible.

Impact on open space provision

Quantity

- 4.8 The existing site consists of approximately 22.82 ha of land, with a hard-surfaced area of 4.94 ha, comprising the Park and Ride and surrounding roads. The total developed site area would comprise 8.92 ha (including the park and ride), resulting in a 3.98 ha reduction in open space on the site. However, as outlined above, it is important to note that this area is not designated open space, and the areas of woodland and scrubland and other features of ecological significance would not be developed on. Therefore, no open space of significant functional or amenity value would be lost, and the impact of the proposals on such open space would be negligible, in line with LDP Policy C4.
- 4.9 The Technical Guidance Note for the Provision of Open Space outlines that assessments of open space should also consider how a development proposal affects the provision of functional open space in the local area and also the wider implications of whether it would cause a city-wide deficiency of open space. Therefore, it is also necessary to review the provision of open space in proximity of the site.
- 4.10 The map below highlights areas of open space within proximity of the site, including the catchment area that would be affected by any loss of open space which would predominantly involve the residential areas of Pentwyn, Llanrumney and Rumney. The open spaces identified do not include informal and private recreational spaces have not been included in the assessment.

Image 2: Open space within proximity of the site



- 4.11 The table below sets out the area of open space per each site highlighted on the above map as per the existing, and compared to the impact of the Proposed Development :

Name	Size (ha)
Parc Coed y Nant	8.16
Fishpond Wood	4.2
Llanrumney Fields	30.12
Howardian Local Nature Reserve	13
Rumney Hill Gardens	1
Parc Coed y Cwar	6.17
Pontpennau Wood	5.96
Total	68.61

- 4.12 Furthermore, other open spaces not included in the map and table above, such as Nant Fawr Meadows, Roath Park and Parc Tredelerch are located within a short driving distance (<10-minutes) from the site. This therefore suggests that there is a surplus of open space in the area and that the proposed development will not impact on the quantity and quality of open space readily available to the residents of Pentwyn, Rumney and Llanrumney.
- 4.13 Based on the above, it is clear that the areas surrounding the site benefit from significant provision of open space serving the residential areas of Rumney and Llanrumney. Additionally, the retained open space identified is also of good amenity value and includes local reserves and formal recreational open spaces.
- 4.14 This is supported by the findings of the Pentwyn Open Space Survey (2021), which identifies 121.68ha of existing amenity open space in Pentwyn. This quantum of amenity open space is significantly higher than neighbouring areas such as Llanrumney (61.01 ha) and Rumney (73.03 ha). Whilst this survey identifies a slight deficit in recreational open space in Pentwyn, it is important to reiterate that the existing provision of open space is classified as amenity functional ANG, and therefore any loss would not increase this existing deficit.

4.15 Furthermore, when comparing the open space provision as per the Pentwyn Open Space Surveycompare with the provision after the Proposed Development is implemented, there would overall only be a very reduction in all open space in the Pentwyn Ward area. This is set out in Table 2 below, which shows that there would only be a minor 3.27% reduction in amenity space, which results in a 2.57% reduction in open space in the ward overall.

Table 2. Existing vs Proposed Open Space in Pentwyn Ward

Category	Existing Open Space (ha)	Proposed Open Space (ha)	% Change (+/-)
Amenity	121.68	117.7	- 3.27% (3.98 ha)
Children's Play	0.56	0.56	0%
Education	20.57	20.57	0%
Formal	1.82	1.82	0%
Informal	7.31	7.31	0%
Urban Spaces	0.00	0.00	0%
Water	2.63	2.63	0%
Total	154.57	150.72	-2.57%

4.16 Furthermore, this impact is considered to be negligible owing to the fact that the open space that would be lost as a result of the proposals is currently inaccessible. Therefore, the proposals are not considered to cause or exacerbate a deficiency of open space, in line with the requirements set out in TGN and LDP Policy C4.

Quality

Ecology

4.17 Whilst the surfaced area of the site would be increased through the Proposed Development, a key objective of the proposals is to protect and enhance the areas of nature and conservation importance, with a focus on ecological improvements.

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- 4.18 Scrub mosaic and invasive weeds would also be maintained and managed in accordance with ecologist's recommendations, in order to enhance biodiversity, amenity and usability of the riverside for people, flora and fauna. Similarly, scrublands would also be retained and managed to prevent encroachment into native grassland areas. These areas would also be seeded with native wildflowers to increase biodiversity.
- 4.19 As per the Woodland Management Plan, the existing areas of Ancient Woodland would be protected and enhanced through thinning/coppicing, and a 20m buffer is proposed for the central, larger Ancient Woodland area which would be positively managed to enhance the quality of the ecology and general biodiversity. The smaller section would also be improved for better ecology and biodiversity.
- 4.20 Furthermore, a number of interventions are proposed to enhance the screening of the site protect open space of amenity and nature conservation value against any impacts of development. For example, native hedgerow, Woodland edge and Standard native trees are proposed to close the gap between existing vegetation while aiding to screen the development from Eastern Avenue. Similarly, an enhanced landscape buffer is proposed to be planted between the riverside and the development plots to aid in diminishing the scale of the massing of the built form from the public right of way and Rhymney Trail.
- 4.21 To further mitigate against impacts of the built development to the river corridor, a dry river channel would be constructed within the flood zone areas, which would fill during extreme weather events. Amenity Zones are also proposed in various locations across the site, which are designated for resting, seating and meeting other users of the site and open space. The amenity zones would also provide key viewpoints across the river, green corridors, grasslands and woodlands on the site.
- 4.22 Therefore, the Proposed Development is considered to comply with LDP Policies C4 and EN4 as it not only mitigates and protects against the impacts of the proposals for all open space including the river corridor, but proposes numerous enhancements to these open spaces.

Visual Amenity

- 4.23 Green infrastructure has also been integrated into the proposals to enhance the screening of the site protect open space of amenity and nature conservation value against any impacts of development. For example, native hedgerow, Woodland edge and Standard native trees are proposed to close the gap between existing vegetation while aiding to screen the development from Eastern Avenue. Similarly, an enhanced landscape buffer is proposed to be planted between the riverside and the development plots to aid in diminishing the scale of the massing of the built form from the public right of way and Rhymney Trail

4.24 Furthermore, a formal avenue of native trees set within clipped native hedges are proposed to be offset from the road by mown grass verges to provide a clean and structured arrival into the site and break up the massing of the built development.

4.25 Tree planting would also serve to enhance Park and Ride; the car parking zones are proposed to be broken up by rows of native trees set within native hedgerows and bordered by shrub planting. This would serve to green the plot and add structure and height to screen the parked vehicles from the remaining open space.

Access

4.26 In addition to enhancements to the open space itself, several interventions to increase accessibility to the open space within and surrounding the site. For example, a new pedestrian access bridge across the river is proposed, which would improve pedestrian access to the development and riverside footpaths created as part of the scheme, whilst providing more accessible green space to the community.

4.27 There are a number of Public Rights of Way that cross the application site and wider character area. As part of the application, these footpath routes would be retained and be brought into active management thereby improving the recreational resource. In addition to formalising the footpaths into walking routes, the Rhymney Trail would be upgraded through the introduction of sensitive lighting. Therefore, not only is access to the Trail improved, but the proposals would create a safer environment for all users.

4.28 Additionally, a new diverted public right of way is proposed in the form of a 3m wide pathway beneath the woodland canopy. This would create a new link from the East-West across the site, therefore promoting accessibility for pedestrians residing on either side of the Proposed Development.

4.29 Furthermore, the built form of the proposals has been pushed to the back of the site and paths linking the buildings have been prioritised for pedestrians and cyclist to ensure that access routes through the site would be optimised.

4.30 On this basis, it is considered that the proposals have maximised opportunities to enhance access to green infrastructure space when compared with the existing site, in line with Section 2 of the Green Infrastructure SPG. Significant improvements are proposed in particular to pedestrian access, which will greatly benefit local residents and reduce reliance on vehicular transport to access the open space on site. Overall, the proposals therefore serves to protect, promote and enhance the value and character of the open space and river corridor, in line with LDP Policies C4 and EN4.

Wider planning benefits

4.31 As per Section 2 of the Cardiff Green Infrastructure SPG, it is also important to demonstrate who the benefits of green infrastructure have been reconciled with the benefits of the development.

4.32 In addition to the benefits to green infrastructure and open space outlined above, the Proposed Development would also deliver a number of social, economic and environmental benefits that would have a positive impact on the locality and wider area.

4.33 These benefits can be summarised as follows:

- The delivery of a significant quantum of new employment floorspace, including trade counters and drive thru units, and the subsequent increase in employment for a range of occupations and skill levels.
- The mixed-use nature of the proposals is also expected to facilitate wider regeneration for this part of Cardiff and is likely to stimulate catalytic regeneration which will have a direct impact on the prosperity of residents, and further benefit the wider area through an increase in local spending.
- Short-term economic benefits such as jobs would be provided during the construction phase
- Improvements to the operation of the existing park and ride would attract new users, which, in turn would reduce reliance on the private car and the number of cars travelling into Cardiff city centre.
- The loss of lower quality trees would be more than compensated for through the planting or funding the planting of 2.3 ha of new native woodland in the local area, which would involve the planting of at least 2350 new trees.
- Further environmental and social benefits would come from the engineering works, which would reduce the flood risk designation of the site. This would greatly improve the operation of the park and ride which would no longer flood, except in extreme flood events. This would reduce the weather events that cause the park and ride to close due to flooding.

4.34 Therefore, it is evident that the Proposed Development would provide a significant social, economic and environmental benefits to the locality and wider area, including and beyond the enhancements to green infrastructure.

5. CONCLUSION

- 5.1 In summary, the impact of the proposals on the baseline context of open space provision has been assessed against the criteria set out in Cardiff Council's Technical Guidance Note for the Protection and Provision of Open Space (November 2017). Thus, this report also serves to demonstrate how potential impact upon the existing green infrastructure have been adequately considered, in line with Section 2 of Cardiff's Green Infrastructure SPG.
- 5.2 The proposals would result in an uplift of 3.98 ha of developed land compared to the existing situation. However, this area is not designated as open space or considered to be of significant amenity value.
- 5.3 Additionally, the desk-based research of open space in close proximity to the site found there to be a number of open spaces of good amenity value, including local reserves and formal recreational open spaces. Findings also showed there to be a potential surplus provision, whereby open space sites beyond the initial search scope in short driving distance of the site were also identified. Therefore, the proposals are not considered to have a significant impact on the existing provision of open space.
- 5.4 In contrast, the assessment highlights numerous interventions proposed to protect and enhance the existing open space, both in terms with quality and accessibility. The proposals are therefore considered to make satisfactory compensation in terms of open space provision and comply with LDP Policies C4 and EN4.
- 5.5 Overall, any loss of undeveloped 'open space' proposed is considered to be negligible due to being of little amenity value, and the impact to existing open space of amenity value would be further mitigated through the protection and enhancement measures proposed. Furthermore, access to open space would be significantly improved, and the impacts of the proposals have been reconciled with the developments of the Proposed Development. Therefore, it is considered that opportunities for enhancement of green infrastructure, for the benefit of the community, have been taken as far as reasonably possible in line with Section 2 of the Green Infrastructure SPG.

