



DECEMBER
2025

Planning Statement

Cardiff Park and Ride East, Pentwyn

Iceni Projects Limited on behalf of
Curtis Hall Limited

December 2025

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Planning Statement
CARDIFF PARK AND RIDE EAST, PENTWYN

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1. INTRODUCTION

1.1 This Planning Statement is submitted to Cardiff Council (“the Council”) on behalf of Curtis Hall Ltd (“the Applicant”) in support of a hybrid planning application at Cardiff Park and Ride East, Eastern Avenue, Lanrumney CF23 8HH (“the Site”).

1.2 This application seeks planning permission for:

Hybrid Planning Application (part full/part outline) for the demolition of existing structures and redevelopment of the site to provide a data centre and associated buildings and structures, associated car parking and access roads, a bridge across the Rhymney River, site wide landscaping and associated works.

1.3 A more detailed description of the development proposed (hereafter referred to as the ‘Proposed Development’) is set out in **Section 4** of this Statement. The Application has also been subject to Environmental Impact Assessment and is accompanied by an Environmental Statement.

1.4 In summary, the Proposed Development seeks to provide a data centre campus and ancillary buildings across four development plots, and significant enhancements to surrounding public open space including the provision of public seating areas and extensive landscaping. Some public rights of way are proposed for minor re-routing to accommodate the proposed development. The proposed development would also facilitate a new bridge connecting the site with Pentwyn and Llanrumney.

1.5 This Planning Statement has been produced by Iceni Projects Ltd and provides the planning case in support of the proposed development. It assesses the development in the context of relevant adopted and emerging planning policy and guidance at national, regional and local levels, together with other material considerations.

1.6 The submitted application has benefitted from pre-application discussions with the Council and other key stakeholders, and the Applicant also agreed a Planning Performance Agreement (PPA) with the Council.

1.7 This statement includes details of how the scheme has evolved and developed through this engagement.

The Submission

1.8 This Planning Statement should be read in conjunction with the other documents submitted in support of this planning application, as agreed in pre-application discussions with the Council. This

includes an Environmental Statement as the development requires an Environmental Impact Assessment. These documents (including documents appended to the Environmental Statement) comprise:

Table 1.1 List of Drawings and Documents including in this Planning Application

| Document | Author |
|---|---|
| Application Form | Iceni Projects |
| Application Drawings | Henry Mein Partnership |
| Landscape Drawings | BCA Landscape |
| Design and Access Statement | Henry Mein Partnership |
| Planning Covering Letter (this document) | Iceni Projects |
| Planning Statement including Employment Statement and S106 Heads of Terms | Iceni Projects |
| Environmental Statement, including the following chapters: <ul style="list-style-type: none"> • Chapter 1 – Introduction • Chapter 2 – Site, Surroundings and Background • Chapter 3 - Proposed Development, Construction and Alternative Considerations • Chapter 4 – Air Quality • Chapter 5 - Ecology and Preliminary Ecological Appraisal • Chapter 6 – Landscape and Visual Impact • Chapter 7 – Socio-Economics • Chapter 8 - Transport and Access, and Transport Assessment • Chapter 9 - Water Resources and Flood Risk • Chapter 10 – Climate Change • Chapter 11 – Residual Impacts, Mitigation and Cumulative Effects • Chapter 12 – Conclusion • Non-Technical Summary | Iceni Projects with input from the following consultants: <ul style="list-style-type: none"> • Tetra Tech • WSP • BCA Landscape • SLR Consulting • WSP |
| SUPPORTING / TECHNICAL DOCUMENTS | |
| Document | Author |
| Open Space Assessment | Iceni Projects |
| Landscape Design Statement | BCA Landscape |
| Landscape Earthworks Specification | BCA Landscape |
| Geo-environmental Investigation and Assessment | I&L Consulting |
| Arboricultural Survey and Impact Assessment | AT Coombes |

| Document | Author |
|--|-----------------|
| Woodland Management Plan | AT Coombes |
| Drainage Statement | Pinnacle |
| Flood Consequence Assessment | WSP |
| Water Framework Directive Assessment | WSP |
| Hydraulic Modelling Report | WSP |
| Utilities Report | Haslid Services |
| Energy Statement | Haslid Services |
| Lighting Strategy Report/Plans | Haslid Services |
| Sustainability Statement | Iceni Projects |
| Health Impact Assessment | Iceni Projects |
| Construction Environmental Management Plan (CEMP) | Curtis Hall |
| Soil Resource Survey | ARP |
| Information to inform Habitats Regulation Assessment | WSP |
| Ecological Impact Assessment | WSP |
| Dormouse Impact Assessment | WSP |
| Pre-Application Consultation Report | Iceni Projects |
| Transport Assessment | SLR Consulting |
| Travel Plan | SLR Consulting |
| Air Quality Assessment | Tetra Tech |
| Noise Impact Assessment | KR Associates |

Structure of this Planning Statement

1.9 The following sections of this planning statement are structured as follows:

- **Section 2** – Factual Background – sets out the factual background to the Site, surroundings and planning history, in addition to a summary of the relevant planning policy context.
- **Section 3** – Consultation and Engagement – provides a summary of pre-application consultations and engagements and relevant outcomes.
- **Section 4** – The Proposed Development – details of the Proposed Development.
- **Section 5** – Planning Policy Context – this outlines the relevant development plan documents.

-
- **Section 6** – Key Planning Considerations – outlines how the Proposed Development responds to relevant planning policy, and other planning considerations.
 - **Section 7** – Planning Balance and Conclusions – provides a summary of this Planning Statement and confirms how the scheme accords with the Development Plan

2. FACTUAL BACKGROUND

Site and Surroundings

- 2.1 The Site comprises of approximately 23.4 ha of land at the existing Cardiff Park and Ride East within the administrative boundary of Cardiff City Council. The existing Park and Ride contains a hard-surfaced area of 4.9 ha with approximately 900 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 In addition to the Park and Ride, the site features areas of woodland and scrub land with public rights of way and informal footpaths. The total developed site area would comprise 8.9 ha (including the existing park and ride). The Rhymney River runs along the southern boundary of the site, with the Rhymney Trail running parallel to the river. The Rhymney Trail crosses the river via an existing footbridge to the south of the site.
- 2.3 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.
- 2.4 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 opposite side of the river, planning permission for a residential scheme of 98 residential units has been permitted under application ref:18/02594/MJR. A number of pre-commencement conditions have since been discharged and construction has begun on site.

Figure 2.1 Site Location Plan



- 2.5 The Site does not contain any listed buildings or structures and is not within a conservation area.

Planning History

- 2.6 A review of the planning application history of the site has identified the following planning history for the Site:

Table 1. Site Planning History

| Application reference | Proposal | Decision |
|-----------------------|--|----------|
| 22/02673/FUL | Demolition of existing structures and redevelopment of the site to provide | Granted |

| | | |
|-----------------|---|--|
| | commercial floorspace (Use Classes B1, B2, B8, A3) and/or ancillary Class A1), 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. | 25/06/2024 |
| SC/21/00018/MJR | Request for a Scoping Opinion in relation to the development proposals at the existing Cardiff Park and Ride East, Llanrumney, Cardiff, CF23 8HH. | Scoping Opinion provided 26/05/2022 |
| SC/21/00006/MJR | Request for a formal EIA Screening opinion for commercial development. | EIA required 24/08/2021 |
| 09/00586/E | Revised layout to previously approved park and ride facility to incorporate facilities building, security building with nus operational office and lorry/coach parking area (previous planning permission 07/1374/E). | Granted 11/06/2009 |
| 08/02400/E | Revised amenity building | Withdrawn 18/11/2008 |
| 07/01374/E | Construction of park and ride facility and associated works. | Granted 21/02/2008 |

2.7 As detailed above, the Site is currently subject to an extant planning permission (ref. 22/02673/FUL) which secured the provision of new commercial and retail units, enhanced access to the surrounding open space and associated footpaths and rights of way, and landscaping, as well as improvements to the existing park and ride facilities. The permitted development comprises 23,189 sqm GEA of development across 13 plots of between 0.11 and 2.79 ha in size.

2.8 Overall, the development permitted on the Site through planning permission ref. 22/02673/FUL comprises the following:

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- Improvement to the existing park and ride facility, providing 600 car parking spaces, with an additional 295 parking spaces being provided across the other plots. There is also a further area within the park and ride which can accommodate a future 300 spaces if required by the Council at a later date. Those spaces fall outside the parameters of the extant permission and would be subject to a separate planning application if required.
 - New vehicular bridge road linking the A48 Eastern Avenue with Pentwyn and 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.

2.9 The development proposed for the Site via this new planning application uses the extant permission as a basis for new proposals.

2.10 In particular, the development plots proposed as part of this planning application do not expand relative to those agreed under the extant permission. In fact, the development plots have been reduced in size to provide for an increased quantum of open space.

2.11 Focussing the updated proposals exclusively within the previously-agreed development plots has meant that there have been minimal changes proposed for areas outside of these plots, including for areas of public open space, public rights of ways, woodland retention, and retained and improved ecological habitats. Related matters previously agreed under the extant permission, such as the agreed off-site dormouse habitat provision, can therefore be carried forward within any new permission secured as part of this new planning application.

2.12 In addition, formal scoping for the Environmental Statement has not been repeated, given the similarities between the schemes. The ES completed in relation to the permitted development on the Site has been suitably updated to reflect the likely effects of the revised proposals. This approach has been agreed with the Council.

3. CONSULTATION AND ENGAGEMENT

- 3.1 The emerging proposals have benefitted from a number of pre-application meetings with the Council, with feedback from both planning officers and various technical consultees. This feedback has been taken on board and has informed the design evolution of the scheme. The Design and Access statement provides further information as to how the scheme has evolved throughout this pre-application period and how the site layout has responded to the feedback received.
- 3.2 As noted in the previous section, this planning application uses extant permission ref. 22/02673/FUL as a basis for revised proposals. As such, the consultation and engagement undertaken in relation to the extant permission is relevant to this new planning application where it relates to common issues and has not been superseded by updated technical advice or policy.
- 3.3 A comprehensive summary of the topics discussed, and responses issued by the Council to date are detailed in the table below.

Table 3 Summary of Pre-Application Meetings and Feedback Issued

| Topic | Date |
|-----------------------------|---|
| Ecology | 10 th May 2021, 23 rd August 2021, 26 th August 2021, 10 th September 2021, 13 th May 2025, 01 st October 2025 |
| Planning policy | 14 th May 2021, 8 th June 2021 |
| Urban Design | 19 th May 2021 |
| Planning and Masterplanning | 19 th April 2021, 20 th May 2021, 24 th March 2022, 7 th January 2022, 10 th February 2022, 15 th May 2025, 03 rd October 2025, 26 November 2025 |
| Transport | 24 th May 2021, 4 th June 2021, 14 th June 2021, 18 th June 2021, 14 th July 2021, 16 th August 2021, 12 th January 2022 |
| Flooding and Drainage | 7 th June 2021, 5 th August 2021, 21 st January 2022, 26 th January 2022, 24 th March 2022 |
| Trees | 6 th September 2021, 9 th February 2022 |
| Public Right of Way | 10 th February 2022, 15 th February 2022 |
| EIA and LVIA | 13 th January 2022 |

- 3.4 The meetings set out above are a combination of formal pre-application meetings with planning officers, meetings with technical consultees (e.g. SAB pre-apps, meetings with Natural

Resources Wales), as well as meetings arranged by the Council's development team with attendance from planning colleagues.

- 3.5 In addition to engagement with the Council, various other technical consultees such as Welsh Water, Natural Resources Wales and utility providers have been consulted. Their input and guidance has helped inform the emerging proposals and the Environmental Statement ('ES') which supports this application.
- 3.6 The various meetings which have taken place throughout the pre-application stage, as well as the feedback received by officers on a number of different options for the scheme, have informed the design evolution and has resulted in our client's 'preferred' option.
- 3.7 The design development of the scheme is discussed in the Design and Access Statement.

Statutory Pre-Application Consultation ('PAC')

- 3.8 By virtue of its scale, the proposed development constitutes 'major development' and therefore was required to be subject to Pre-Application Consultation ('PAC'), which ran for over 28 days beginning on the 05 December 2025 and concluding on the 04 January 2025. In accordance with the statutory requirements, the planning application is supported by a Pre-Application Consultation Report which identifies the consultation process, response and matters raised.
- 3.9 The report outlines how the local community, local members and statutory consultees have been engaged with, and sets out the feedback received and how we have responded to the comments. Where appropriate, comments raised have been directly responded to or people have been directed to the relevant documentation provided as part of the consultation. Overall, the PAC process has helped us understand and address any relevant concerns through this application submission.
- 3.10 For further information on the comments raised during the PAC consultation and how these have been addressed, please refer to the full PAC Report submitted with this application.

4. THE PROPOSED DEVELOPMENT

- 4.1 The proposed development comprises a data centre campus and associated infrastructure, alongside the construction of a new road, roundabout and vehicular bridge crossing the Rhymney River, as well as open space and ecological enhancements.

- 4.2 Specifically, planning permission is sought for:

Hybrid Planning Application (part full/part outline) for the demolition of existing structures and redevelopment of the site to provide a data centre and associated buildings and structures, associated car parking and access roads, a bridge across the Rhymney River, site wide landscaping and associated works.

- 4.3 The proposed development provides the opportunity to provide a key piece of economic and digital infrastructure in Cardiff, as well as ensuring improvements to landscaping, public access and habitats across the site. The proposal would deliver a number of economic, environment and social benefits, including a new bridge connecting the site with Pentwyn and Llanrumney, and providing local jobs through the construction and operation of the site.
- 4.4 The Site layout comprises a total of 23.4 ha of which only 8.1 ha consists of the proposed development area, including buildings, carparks, service yards, roads, bridge and footpaths. The site as existing has approximately 12.2 acres (4.9 ha) of surfaced area, comprising of park and ride, and roads etc. The total developed area as per the existing site is extended by just 3.2 ha as a result of the proposed development. This is an improvement on the situation approved via the extant permission, with 0.78 ha returned to public open space use and subject to proposed landscaping and habitat improvements.

Planning Strategy

- 4.5 A hybrid application is submitted, with part of the proposals submitted in full, and part submitted in outline. This will enable the detail of the site-wide infrastructure, open space and landscaping improvements to be confirmed at an early stage whilst allowing flexibility regarding the design and layout of the development plots (within specified parameters), to suit the specific requirements of the eventual data centre operator.

Detailed Element

- 4.6 As identified in Dwg. Ref. MEIN-XX-XX-DR-A-70-017, the detailed element includes the site-wide infrastructure, open space, landscaping and the bridge over the Rhymney River. The application seeks full planning permission for these elements, thereby providing certainty and enabling initial works to commence swiftly following the grant of planning permission.

Outline Element

- 4.7 Outline planning permission, with all matters reserved, is sought for up to 30,392.5 sqm GIA of development for data centre use (Use Class B8), with associated buildings and structures, associated car parking and access roads, and other associated works.
- 4.8 The Illustrative Masterplan (Dwg. Ref. MEIN-XX-XX-DR-A-70-008) sets out how this part of the development may come forward, subject to further details being provided at the Reserved Matters stage.

Parameter Plans

- 4.9 The Application provides a Parameter Plan for approval which sets a framework for the detailed design of the outline elements of the proposed scheme. The parameters have been established following an iterative design process which explored a range of design and layout options informed by the technical assessments.
- 4.10 The Applicant is submitting proposals for the Site in outline to allow sufficient flexibility to adapt to changing market and tenant requirements as the development progresses.
- 4.11 A brief summary of each of the parameters is provided below, with further commentary provided in the Design & Access Statement:
- **Land Use Plan (MEIN-XX-XX-DR-A-70-013)** – this plan identifies three separate development plots within which the data centre and associated development will be delivered. These development plots are labelled Plot 4, Plot 5/6 and Plot 8. Each plot will be characterised by a data centre (or ancillary / associated) use, falling under Use Class B8.
 - **Access Plan (MEIN-XX-XX-DR-A-70-014)** – this plan sets out the indicative access points to each development zone, and indicative routes within the development plots. Existing and proposed public rights of way are also shown. While access is a reserved matter, some information is provided via Dwg. Ref. MEIN-XX-XX-DR-A-70-014 regarding access generally within and across the Site, and specifically relating to the development plots which are part of the outline planning application. We note that an internal access road, between Plot 4 and Plot 5/6, is included within the detailed element of the planning application. The proposed development includes for a new link road and bridge between Pentwyn and Llanrumney, with a new roundabout located within the site. Access to the development plots will be off this new roundabout, with internal access within and between plots likely to track around the plot perimeters, subject to detailed design.
 - **Building Heights Plan (MEIN-XX-XX-DR-A-70-015)** – this plan shows different areas within the development plots where various maximum heights can be achieved. In this way, the maximum overall scale of development coming forward can be defined and assessed.

Maximum AOD heights are provided for each height zone. Dwg. Ref. MEIN-XX-XX-DR-A-70-014 sets the parameters for maximum building heights within defined height zones. At detailed design / reserved matters stage, building heights must conform to this plan and will not be able to exceed these maximum heights. The plan provides information on finished floor levels (FFL) and maximum figures for building heights from FFL to ridge / parapet. Across the four development plots, there are five distinct zones. The tallest buildings will be no more than 34.55 m, while the smallest buildings will be a maximum of 19.3 m.

- 4.12 The final layout and design of the buildings will be subject to future reserved matters planning applications.

Detailed Element

- 4.13 The proposed development within the detailed element includes:

- New through-road and roundabout providing improved access through the Site.
- New bridge linking the A48 Eastern Avenue with Pentwyn and Llanrumney.
- Vehicular access between Plot 4 and Plot 5 / 6 and associated pedestrian underpass.
- 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.

- 4.14 Outside of the identified development plots for which planning permission sought in outline, the proposed development seeks full planning permission for the areas of public access, including open space, the new link road and bridge. In addition, part of what will be an internal access road and an associated pedestrian underpass, is applied for in detail.

- 4.15 Public amenity / seating areas are also proposed. The central amenity area would be located adjacent to the central roundabout and to an additional amenity area located further within the forested area and near to the existing pedestrian footbridge over the Rhymney river linking the Site to Llanrumney. Both seating areas would connect to the public rights of way, which have been retained, redirected and created in continuation from the Rhymney trail. With the proposed bridge as a transport link to Pentwyn and Llanrumney for bus, vehicles, pedestrians and cyclist, these seating areas would offer break out zones for users.

- 4.16 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, including using native hedgerow, woodland edge and standard native trees to close the gap between existing vegetation

while aiding to screen the development from Eastern Avenue. An enhanced landscape buffer would also be planted between the riverside and the development plots.

- 4.17 As part of the application, the footpaths and routes within the site 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.
- 4.18 One footpath will need to be routed via pedestrian underpass underneath a new access road between Plots 4 and Plots 5/6, in the interest of keeping the data centre uses secure. This pedestrian underpass has been carefully considered to minimise impacts on the surrounding landscape, while ensuring a safe and suitable walking route for pedestrians. We refer to the Transport Statement and Dwg. No. C250801192-PIN-XX-XX-DR-C-02110.
- 4.19 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.

Outline Element

- 4.20 The outline proposals include for a maximum provision of 30,392.5 sqm GIA of development across three development plots ranging between 0.74 ha and 5.05 ha in size and totalling 7.47 ha.
- 4.21 With regards to these development plots, access, appearance, landscaping, layout and scale are all reserved matters and will be determined via a separate future planning application.
- 4.22 In summary, the Proposed Development comprises the following:
- Data Centre (Use Class B8) uses (maximum 30,392.5 sqm GIA; 150 MW capacity), including associated buildings and structures (including admin and storage areas, back-up generators, site substations).
 - Associated internal access roads, car parking areas, drainage features and landscaped areas.
 - Ancillary energy centre (maximum 47 MW capacity) / Grid Supply Point (GSP) substation.
- 4.23 The proposed development provides the opportunity to provide a key piece of economic and digital infrastructure in Cardiff, as well as ensuring improvements to landscaping, public access and habitat protections across the site. The proposal would deliver a number of economic, environment and

social benefits, including a new bridge connecting the site with Pentwyn and Llanrumney, and providing local jobs through the construction and operation of the site.

- 4.24 The proposed development includes for the provision of a GSP substation which will transform energy directly from the grid for use by the data centre scheme. However, a connection to the grid may not be possible until after the data centres have been constructed and brought into use. To address this, the proposed development includes for a temporary energy centre to supply energy to the scheme in the interim, which would have a maximum energy generation capacity of 47 MW.

Illustrative Masterplan

- 4.25 An Illustrative Masterplan (Dwg. Ref. RK/6543-PL-03F) showing how the proposed development could be delivered based on the above-referenced Parameter Plan has been prepared to accompany this application for outline planning permission.
- 4.26 As noted above, the final configuration of the data centre scheme, including details of site layout and building design, will be decided through future reserved matters applications.
- 4.27 The Illustrative Masterplan demonstrates how the scale of development for which permission is sought can be achieved. The Illustrative Masterplan demonstrates how a 30,392.5 sqm GIA data centre development (Use Class B8) could be configured across the Site.
- 4.28 As per the Illustrative Masterplan, Plot 4 would incorporate two data centre buildings, as well as an admin and storage area. Plot 5 would include another smaller data centre, and Plot 6 would feature a substation associated with the data centre uses. These plots will also include for ancillary parking and surface water drainage features, as well as generator zones for the location of necessary back-up generators. The plots also include for internal access routes within the plots.
- 4.29 The data centre buildings would include green walls on key elevations to increase contributions to biodiversity and reduce any residual visual impacts.
- 4.30 The Illustrative Masterplan shows associated development on Plot 8. This plot will include a GSP substation which would provide energy directly from the electricity grid to the data centres. It is possible that a temporary energy centre is required to supply power to the data centre use. Both of these scenarios have been assessed within the relevant planning application documents. Further details of these elements of the scheme will be agreed through future reserved matters applications.
- 4.31 Full details of all of these outline elements will be confirmed via future reserved matters applications, with agreement from Cardiff Council.

5. PLANNING POLICY SUMMARY

- 5.1 This section of the Planning Statement defines the Development Plan and sets out the relevant adopted and emerging planning policy and guidance at national, regional and local level.

Data Centres in National Policy

- 5.2 In a press release in September 2024, the Department for Science, Innovation and Technology and the then-Technology Secretary Peter Kyle confirmed that data centres are now considered Critical National Infrastructure (CNI), and as such should be afforded equal importance to defence, healthcare and energy. This reflects how reliant society and the economy have become on digital services. A dedicated CNI data infrastructure team provides strategic support for the sector, seeking to ensure sovereign, secure and sustainable systems.
- 5.3 The UK's Modern Industrial Strategy, published in June 2025, places a new focus digital and technological industries, and on the development of the Artificial Intelligence (AI) capabilities of the country. The Industrial Strategy builds on the Artificial Intelligence Action Plan (January 2025) which identified key opportunities to encourage growth in the sector. The Action Plan sees Government involvement including support, information-sharing, intervention, and instruction, and emphasises the level of support nationally for data centre developments.
- 5.4 The Welsh Government has published a digital strategy for Wales, which aims to accelerate the benefits of technological progress for people, public services and businesses. The digital strategy is based on the recommendations of Wales 4.0: Delivering Economic Transformation for a Better Future of Work (September 2019), a review investigating how the rapid advances in digital innovation are likely to impact the economy and future of work in Wales. The strategy also builds on the objectives of the Welsh Government's Prosperity for All: Economic Action Plan (2017).
- 5.5 A key pillar of the digital strategy is to "drive economic prosperity and resilience by embracing and exploiting digital innovation". The strategy recognises that digital infrastructure plays an important part in the short-term rapid recovery and ongoing longer-term transformation of the Welsh economy. A related key pillar is to ensure that "services are supported by fast and reliable infrastructure". The strategy notes that underlying infrastructure is crucial to ensure that the economic benefits of digital innovation are realised. The Government have committed to "create the right conditions for investment and innovation" in digital infrastructure.
- 5.6 On 18 November 2025, the AI Plan for Wales was published by the Welsh Government, promising to – amongst other things – "harness the power of AI responsibly to deliver economic growth". The growth of the AI industry in Wales is lauded as an immediate opportunity to attract further investment.

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- 5.7 The AI Plan for Wales seeks to “strengthen and increase the UK’s compute capacity to support AI development in Wales in line with the UK government’s AI Opportunities Action Plan. As part of this, maximise the opportunities resulting from AI Growth Zones in Wales”. The Government has committed to “work with partners to exploit the potential benefits from the construction and operation of data centres for the communities where they are located”.
- 5.8 The AI Plan for Wales recognises that a thriving data centre will support the creation of more skilled jobs, helping make Wales a more attractive place to work, providing opportunities for innovation across the public and private sector, promoting environmental responsibility and attracting investment into Wales.

Future Wales: The National Plan 2040 (February 2021)

- 5.9 Future Wales was published on the 18th of February 2021, and it provides a strategy for addressing key national priorities through the planning system, including sustaining and developing a vibrant economy, achieving decarbonisation and climate-resilience, developing strong ecosystems and improving the health and wellbeing of communities.
- 5.10 Future Wales recognises the importance of key future sectors such as advanced engineering, renewable technologies, Artificial Intelligence, transport, automation and digital innovation
- 5.11 Future Wales divides Wales into four regions, North, Mid Wales, The South West and The South East. The Site falls within the South East Region, which is the most populous region of Wales with over 1.5 million residents.
- 5.12 The National Plan identifies 11 outcomes that can be achieved over the next 20 years if the planning system focusses on the long-term and provides quality development in the right places for the right reasons. The eleven outcomes outline that the intention is to create a Wales where people live....
1. ... and work in connected, inclusive and healthy places
 2. ... in vibrant rural places with access to homes, jobs and services
 3. ... in distinctive regions that tackle health and socio economic inequality through sustainable growth
 4. ... in places with a thriving Welsh Language
 5. ... and work in towns and cities which are a focus and springboard for sustainable growth
 6. ... in places where prosperity, innovation and culture are promoted

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7. ... in places where travel is sustainable
 8. ... in places with world class digital infrastructure
 9. ... in places that sustainably manage their natural resources and reduce pollution
 10. ... in places with biodiverse, resilient and connected ecosystems
 11. ... in places which are decarbonised and climate resilient
- 5.13 Policy 1 ('Where Wales Will Grow') outlines three National Growth Areas where there will be growth in employment, housing opportunities and investment in infrastructure, one of which is 'Cardiff, Newport and the Valleys'.
- 5.14 Policy 2 ('Shaping Urban Growth and Regeneration') states that the growth and regeneration of towns and cities should positively contribute towards sustainable development that supports active and healthy lifestyles, including through the creation neighbourhoods that are organised around mixed-use centres and public transport, and integrated with green infrastructure.
- 5.15 Policy 8 ('Flooding') outlines that flood risk management that enables and supports sustainable strategic growth and regeneration in National and Regional Growth Areas will be supported. Additionally, it sets out that proposals must not have adverse impacts on international and national statutory designated sites for nature conservation and the features for which they have been designated.
- 5.16 Policy 13 ('Supporting Digital Communications') states that the Welsh Government supports the provision of digital communications infrastructure and services across Wales, and that Planning authorities must engage with digital infrastructure providers to identify the future needs of their area and set out policies in Strategic and Local Development Plans to help deliver this.
- 5.17 Policy 33 ('National Growth Area') reiterates that Cardiff will be a focal point for growth and investment in the South East Region.
- 5.18 With regards to digital infrastructure, Future Wales expressly recognises the importance of key future sectors such as Artificial Intelligence, automation and digital innovation, and related infrastructure development. The plan seeks to ensure Wales can lead and keep pace with the latest global technological advancements.

National Planning Policy for Wales

- 5.19 The National Planning Policy for Wales comprises Planning Policy Wales (PPW) – Edition 12 (July 2024) – which is the principal document which sets out the land use policy context of the Welsh Government. The primary objective of PPW is to ensure that the planning system contributes towards the delivery of sustainable development whilst improving the social, economic, environmental and cultural well-being of Wales, as required by the Well-being of Future Generations Act 2015 and other

pertinent legislation. PPW is supplemented by 19 Technical Advice Notes (TANs) which provides further details on its specific aims and objectives.

5.20 The primary objective of PPW, as set out at Paragraph 1.2, is *“to ensure that the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental and cultural well-being of Wales”*.

5.21 Sections of PPW relevant to the proposals are set out in more detail below.

Economic Development

5.22 PPW recognises the fundamental role that telecommunications and digital systems play in supporting the economy.

5.23 Paragraph 5.2.2 states that ‘Modern society demands reliable fast and high capacity communication networks to ensure large amounts of data can be easily accessed or exchanged’.

5.24 Paragraph 5.4.1 states that *“for planning purposes the Welsh Government defines economic development as the development of land and buildings for activities that generate sustainable long-term prosperity, jobs and incomes”*. Paragraph 5.4.1 also highlights that *“the planning system should ensure that the growth of output and employment in Wales as a whole is not constrained by a shortage of land for economic uses”*.

5.25 Paragraph 5.4.2 goes on to confirm that *“economic land uses include [...] telecommunications sectors”*.

5.26 Paragraph 5.4.4 provides that *“wherever possible, planning authorities should encourage and support developments which generate economic prosperity and regeneration”*.

Transport

5.27 A key objective of PPW is to encourage sustainable transport. It is highlighted at Paragraph 41.8 that *“The planning system should enable people to access jobs and services through shorter, more efficient and sustainable journeys, by walking, cycling and public transport”*.

Open Space

5.28 PPW provides guidance on the protection of open space in chapter 4 (‘Active and Social Places’). Paragraph 4.5.3 states that *“formal and informal open green spaces should be protected from development, particularly in urban areas where they fulfil multiple purposes.”*

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- 5.29 More specifically, paragraph 4.5.5 outlines that planning authorities should protect playing fields and open spaces which have significant amenity or recreational value to local communities from development.

Biodiversity and Ecological Networks

- 5.30 PPW recognises the importance of protecting and enhancing biodiversity and the resilience of ecosystems. Paragraph 6.4.25 states that *“planning authorities should protect trees, hedgerows, groups of trees and areas of woodland where they have ecological value, contribute to the character or amenity of a particular locality, or perform a beneficial and identified green infrastructure function.”*
- 5.31 Further, paragraph 6.4.26 outlines that ancient woodlands should be afforded protection from development which would result in their loss or deterioration unless there are significant and clearly defined public benefits.

Technical Advice Note ‘TAN’ 23 – Economic Development

- 5.32 Paragraph 1.2.5 states *“local planning authorities should recognise market signals and have regard to the need to guide economic development to the most appropriate locations, rather than prevent or discourage such development”*.
- 5.33 Paragraph 2.1.1 states that planning should seek ‘win-win’ outcomes whereby economic objectives are not necessarily in conflict with environmental and social objectives. However, paragraph 2.1.2 also states that, where economic development would cause environmental or social harm which cannot be fully mitigated, careful consideration of the economic benefits will be necessary.

Technical Advice Note ‘TAN’ 15 – Development and Flood Risk

- 5.34 Paragraph 7.2 states *“whether a development should proceed or not will depend upon whether the consequences of flooding of that development can be managed down to a level which is acceptable for the nature/type of development being proposed, including its effects on existing development.”*
- 5.35 Paragraph 7.4 outlines that an assessment examining the likely mechanisms that cause the flooding, and the consequences on the development of those floods, must be undertaken, which is appropriate to the size and scale of the proposed development, to inform decisions on whether a development should take place.

Technical Advice Note ‘TAN’ 16 – Sport, Recreation and Open Space

- 5.36 Paragraph 2.5 defines “Open Space as *“all open space of public value, including land, and water areas like rivers, canals, lakes, reservoirs and disused dock basins which offer opportunities for sport, recreation and tourism.”*

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- 5.37 Paragraph 3.12 states *“Open space, particularly that with a significant amenity, nature conservation or recreational value should be protected. Local planning authorities should identify these areas in the development plan and establish criteria against which sites should be assessed if development pressures arise. It is important that urban vacant and underused land is not unnecessarily protected from development where the land is not of significant amenity, nature conservation or recreational value, as it may potentially relieve development pressures in more sustainable locations.”*

Cardiff Local Development Plan (LDP)

- 5.38 Section 38 (6) of the Planning and Compulsory Purchase Act 2004 states that planning decisions must be made in accordance with the Development Plan, unless material considerations indicate otherwise.
- 5.39 The statutory development plan, insofar as it is relevant to the proposed development, consists of:
- Cardiff Local Development Plan (LDP)
- 5.40 The Cardiff LDP was adopted on 28th January 2016. The relevant policies are listed below and expanded upon in the subsequent sections:
- KP1: Level of Growth
 - KP5: Good Quality and Sustainable Design
 - KP6: New Infrastructure
 - KP7: Planning Obligations
 - KP8: Sustainable Transport
 - KP9: Responding to Evidenced Economic Needs
 - KP14: Healthy Living
 - KP15: Climate Change
 - KP16: Green Infrastructure
 - EC7: Employment Proposal on Land Not Identified for Employment Use
 - EN3: Landscape Protection
 - EN4: River Corridors
 - EN5: Designated Sites
 - EN6: Ecological Networks and Features of Importance for Biodiversity
 - EN7: Priority Habitats and Species
 - EN8: Trees, Woodlands and Hedgerows
 - EN10: Water Sensitive Design
 - EN13: Air, Noise, Light Pollution and Land Contamination

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- EN14: Flood Risk
 - T1: Walking and Cycling
 - T2: Strategic Rapid Transit and Bus Corridors
 - T3: Transport Interchanges
 - T6: Impact on Transport Networks and Services
 - T8: Strategic Recreational Routes
 - C4: Protection of Open Space

5.41 Cardiff Council are preparing a new Replacement Local Development Plan (LDP) for Cardiff which will include a new strategy and policies to guide and manage growth in Cardiff up to 2036. Consultation on the Deposit Replacement LDP took place from 18 February 2025 to 15 April 2025. Submission of the Replacement LDP is expected late 2025 with adoption expected in 2026. Cardiff Council voted to submit the Replacement LDP to the Welsh Government for independent examination on 27 November 2025.

5.42 The Deposit Replacement LDP includes a draft allocation for the Site, referred to as Site Ref. EC3.25. Related planning policy EC3 'Protected Employment Land and Premises' notes that "the following designated protected employment areas (outside of the Central and Bay Business Areas) listed in the table below and identified on the Proposals Map will be protected for B Use Class employment generating uses (together with appropriate ancillary and/or complementary uses and activities as referred to in Policy EC4."

Supplementary Planning Guidance

Green Infrastructure SPG

5.43 This document sets out key information on green infrastructure in relation to new developments, including definitions of terms, what information will be required from an applicant, and the relationship between different elements of green infrastructure

5.44 The SPG is also supported by a number of Technical Guidance Notes (TGNs), which are part of this SPG, and include the following

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

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- Trees and Development TGN
 - Managing Transportation Impacts (Incorporating Parking Standards)
 - Green Infrastructure SPG

6. KEY PLANNING CONSIDERATIONS

- 6.1 This section of the statement sets out the key planning considerations arising from the proposal and sets out the case in favour of the proposed development.

Principle of Development

- 6.2 The Site falls within the settlement boundary and does not contain a specific land use allocation or designation and is therefore considered to be “white land”. Whilst not specifically allocated for employment use, under the Cardiff Local Development Plan (LDP) Policy EC7, employment proposals on land not identified for employment use are acceptable when they demonstrate that they cannot reasonably be accommodated on existing employment land; propose uses that are compatible with uses in the surrounding area; and are well-related to the primary highway network and accessible to sustainable modes of transport.
- 6.3 Justification for the specific uses proposed on site is set out in more detail below.

Principle of Data Centre Use (Use Class B8)

- 6.4 The principle of a data centre development has been assessed against the requirements of Policy EC7 which sets out that *“proposals for employment use (B use class) on unallocated site will be permitted where:*
- i. the proposal cannot reasonably be accommodated on existing land*
 - ii. the site falls within the settlement boundary and has no specific policy designations*
 - iii. the use is compatible with use in the surrounding area; and*
 - iv. the proposal is well related to the primary network and accessible to sustainable modes of transport.”*
- 6.5 The Site falls within the settlement boundary and has no specific land use policy designation or allocation. Therefore, the proposed development meets the 2nd criterion of Policy EC7.
- 6.6 The Site is adjacent to the junction of the A48, with the A48 dual carriageway located to the west of it. It is partially developed and in use as a Park and Ride with a river corridor and green infrastructure to the east. There are no adjacency issues where the form of development proposed could result in bad neighbour uses, for example with residential areas, as detailed in the supporting technical reports (discussed further below). Therefore, the proposed development meets the 3rd criterion.
- 6.7 The Site is adjacent to the primary highway network (A48), to which it has direct access. The Site is also served by sustainable modes of transport including bus (as discussed above), public rights of

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- way and informal walking and cycling routes. As shown in Figure 3.1 it is adjacent to a Strategic Bus Route highlighting strong public transport accessibility. Therefore, the proposed development meets the 4th criterion.
- 6.8 In relation to the first requirement in the policy, there are no allocated employment sites which could accommodate the proposed development and thus the development meets the requirements of Policy EC7. None of the strategic sites allocated in the adopted Local Plan for new employment floorspace are deemed suitable for data centre uses in policy terms – i.e. none of the new employment sites are allocated for B8 use. None of the existing employment allocations which incorporate B8 uses are considered suitable for data centre uses. There are no alternative sites for data centre use which provide potential for development in the short-term.
- 6.9 The Deposit Replacement LDP identifies that 35 ha of new industrial land, particularly for Classes B2 and B8, is required to meet the future needs of Cardiff. The Cardiff Employment Land and Premises Study, prepared on behalf of Cardiff Council to support the Deposit Replacement LDP, notes that “this is substantially greater than the available supply within the current pipeline and strategic allocations”. In this context, it is clear that additional sites are required to meet identified needs. As a result, this site is allocated for employment development (including B8 uses) in the Deposit Replacement LDP.
- 6.10 Furthermore, the principle of employment and other uses on this site was confirmed as acceptable in the Council’s assessment of application 22/02673/FUL, with the Planning Officer’s report noting that an employment use is considered compatible with the existing park and ride use of the site, and it is sufficiently located away from any sensitive users. The nearby residential dwellings would also provide a potential workforce for the proposal. The same key principles apply to the data centre scheme now being proposed.
- 6.11 We conclude that the principle of a data centre use in this location accords with Policy EC7 of the LPD which related to employment proposals in land not identified for employment use.
- 6.12 The proposal will deliver much-needed data centre floorspace in Cardiff, strengthening the region’s burgeoning role in a critical industry. Data centre developments are strongly supported by government economic and industrial policies. Data centre networks are considered to be fundamental to securing economic growth and are defined as critical infrastructure due to the underlying function they plan within social and economic networks. The proposed scheme would therefore accord with the principles of the UK’s Modern Industrial Strategy, the Digital Strategy for Wales, the Welsh Government’s Prosperity for All: Economic Action Plan (2017), and the AI Plan for Wales, and would help to achieve the stated outcomes of Future Wales: The National Plan 2040 (February 2021) and Planning Policy Wales (PPW) – Edition 12 (July 2024).

Open Space

- 6.13 The adopted Proposals and Constraints Map for Cardiff does not designate the site as having an open space function, however the Open Space Survey for Pentwyn does identify the site as having an amenity function.
- 6.14 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."* Similarly, 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.
- 6.15 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.
- 6.16 Although the proposal would result in an uplift of 3.98 ha of developed land when compared to the existing situation, the proposed development would make numerous interventions to protect and enhance the existing open space, both in terms of quality and accessibility. This includes formal amenity spaces and paths through the site, and 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.
- 6.17 The site would continue to serve the surrounding area, and future employees at the site would be able to benefit from the open space during lunch breaks and after work. Further, the area surrounding the site benefits from significant provision of open space serving the residential areas of Rumney and Llanrumney.
- 6.18 Overall, the proposed development would accord with Policies C4 and EN4, and would improve the quality and accessibility of the open space provided on site.

Bridge

- 6.19 The proposed development would facilitate the provision of a vehicular, pedestrian and cycle bridge to link the site and wider area with Pentwyn and Llanrumney to the east. The bridge would provide a new access off Ball Lane and is considered to be important infrastructure in enhancing accessibility and connectivity to the A48, the rest of Cardiff and the Strategic Road Network. This would help to reduce traffic flows on local and residential roads to the east of the A48.

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- 6.20 The provision of new infrastructure is supported by Policy KP6 which requires new development to make appropriate provision for, or contribute towards, all essential, enabling and necessary infrastructure required as a consequence of the development. Overall the principle of a bridge in this location is supported and represents a notable benefit of the development proposals.

Layout and Design

- 6.21 Policy KP5 (Good Quality and Sustainable Design) outlines that new development is required to be of a high quality, sustainable design that responds to the local character and context of the built and landscape setting and that 'new development will be required to be of a high quality, sustainable design and make a positive contribution to the creation of distinctive communities, people and spaces'.
- 6.22 The layout of the redeveloped site has evolved through pre-application discussions with the Council officers and the wider technical team, and has built upon established principles agreed in the assessment and approval of application 22/02673/FUL. For example, initial design iterations were discounted due to the location of the overhead power lines inclusion of the proposed vehicular bridge. The layout of the proposed development is closely related to the approved layout as per permission ref. 22/02673/FUL.
- 6.23 The Site layout comprises a total of 23.4 ha of which only 8.1 ha consists of the proposed development area, including buildings, car parks, service yards, roads, bridge and footpaths. The site as existing has approximately 12.2 acres (4.9 ha) of surfaced area, comprising of park and ride, and roads etc. The total developed area as per the existing site is extended by just 3.2 ha as a result of the proposed development. This is an improvement on the situation approved via the extant permission, with 0.78 ha returned to public open space use and subject to proposed landscaping and habitat improvements.
- 6.24 Details of the design evolution are included in the Design and Access Statement (DAS). In summary:
- The primary goal was to fit the Data Centre layouts within the confines of the development plot areas as per the extant planning permission, therefore replicating the agreed mitigation measures, landscape and biodiversity enhancements, PROW's, access road and bridge construction;
 - a buffer was provided to the area of Ancient Woodland to ensure its long term future is protected;
 - the introduction of more important principles of placemaking, such as the introduction of a central 'hub' space located near to the roundabout with seating and wayfinding features for public use, including people employed in the wider site and users of the Rhymney Trail;

- the proposals have also evolved to ensure that there is minimal impact on the surrounding woodlands and natural habitats; and
- the access to open space is by enhance by the bridge which would facilitate improved pedestrian and cyclist access;
- the layout enables a hydrology model to be developed that addresses both the on-site and third party flooding implications.

6.25 With regards to materiality, we note that the proposed buildings are part of the outline element of the application and as such the detailed design of the buildings will be confirmed through future reserved matters applications. The DAS notes that the design principles will be based on provision of a high-end development, using a mixture of higher quality wall panels, larger areas of glazing, and interesting roof/building forms, providing for well-detailed buildings. It is envisaged that the materials would also be scaled to the size of the relevant building and plot to ensure cohesion across the site. It is suggested that the buildings will be muted, dark / neutral colours which will help them visually recede within their setting, with the introduction of colour in key locations to provide visual interest and coherence.

6.26 The external materials for seating areas and signage would also utilise features from the natural environment, such as timber, slate and stone.

6.27 Buildings will have green walls where possible, and ancillary administration areas will have windows overlooking the river and landscaped areas to improve the amenity of those working on the site and discourage anti-social behaviour.

6.28 The proposed outline scheme complies with Policy KP5 (Good Quality and Sustainable Design).

Highways and Access

6.29 Policy KP8 (Sustainable Transport) considers how 'development in Cardiff will be integrated with transport infrastructure and services'. In particular, this policy outlines Cardiff Council's aspiration to 'achieve the target of a 50:50 modal split between journeys by car and journeys by walking, cycling and public transport' and 'reduce travel demand and dependence on the car'.

6.30 SLR Consulting has prepared a Transport Chapter included within the Environmental Statement, as well as a Transport Assessment and draft Travel Plan.

6.31 The Transport Assessment identifies that the traffic generation and distribution from the site would have no adverse impact on the surrounding highway network and no further mitigation measures are proposed as part of this development to increase capacity at the existing junctions in the vicinity of

the site. This assessment of highway capacity in the area has demonstrated that the site can be delivered without any severe effects on the local highway network or delays to bus services within the vicinity of the site. The overall impact of the proposed development with regard to traffic generation would be reduced when compared with the extant permission on the Site.

- 6.32 The Travel Plan details how the site aims to improve on current mode share for the area, to ensure the proposed development delivers on local and national policy.
- 6.33 The new link road to Ball Road across the Rhymney River will provide pedestrian and cycle connections to the neighbouring communities as well as the possibility of improved bus services in future. The proposed road bridge over the River Rhymney would also have a number of accessibility benefits (particularly for residents and businesses to the east of the A48 in Rumney, Llanrumney, and to a lesser extent Trowbridge), including improved access to the A48, the rest of Cardiff and the Strategic Road Network. This would help to reduce traffic flows on local and residential roads to the east of the A48.
- 6.34 This increased connectivity across the site would also have a number of social and economic benefits for local residents such as improved access to nearby neighbourhoods which had been hindered by the river as well as increased access to employment opportunities, including those created by the proposed development. It will also allow local businesses to trade more easily across Cardiff and the UK.
- 6.35 The proposed development complies with Policy KP8 (Sustainable Transport).

Energy and Sustainability

- 6.36 The proposed development has been designed to achieve high levels of energy efficient and sustainable design. Policy EN12 (Renewable Energy and Low Carbon Technologies) considers how schemes incorporate the use of renewable and low carbon technologies, including opportunities to minimise carbon emissions associated with the heating, cooling and power systems for new development.
- 6.37 Sustainability has been a core consideration in the evolution of the proposals and has been incorporated from the outset. A Sustainability Statement has been prepared by Iceni Projects in support of this application to provide an overview as to how the redevelopment of the site contributes to sustainable development in the context of the strategic, design and construction considerations.
- 6.38 The Sustainability Statement concludes that the siting and design of the proposals support relevant policies relating to sustainable development, and confirms that the Proposed Development will:

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- make efficient use of land, seeking to develop a site which includes brownfield land;
 - incorporate low-impact materials, according to the BRE Green Guide to Specification;
 - minimise internal water consumption through the employment of water efficient fittings;
 - incorporate measures to improve site biodiversity, including biodiverse planting;
 - minimise waste production during construction and maximise the proportion of waste to be diverted from landfill;
 - achieve a significant on-site reduction in CO₂ emissions, following the Energy Hierarchy methodology;
 - ensure air, noise, vibration, ground, light and water pollution are minimised as far as possible; and
 - reduce surface water runoff rates through the use of sustainable drainage measures, including swales, detention crates and filter drains.
- 6.39 Overall, the proposals for the scheme are in line with the principles of sustainable development as well as the policy requirements of the PPW and the Cardiff City Council, and will provide a development that promotes these principles in operation.
- 6.40 An Outline Energy Report has been produced by Haslid Services and outlines the energy strategy for the proposed scheme. The proposed efficiency interventions to be incorporated as part of the scheme have been selected to target a best level of CO₂ emissions performance when assessed against Building Regulations Part L:2013 and associated policies, accounting for economic, technical and functional feasibility. The scheme will aim to achieve BREEAM 'Very Good', subject to further details to be confirmed at reserved matters stage.
- 6.41 The energy strategy for the scheme will prioritise fabric-first and efficient design before considering low and zero carbon technologies.
- 6.42 Server systems housed in data centres require cooling systems, which often use water. For the proposed development, it is envisaged that Air Handling Units (AHUs) using external air will provide cooling and ventilation air to the data processing areas and equipment rooms. This would be designed to offer the highest level of operable efficiency. The Outline Energy Report provides further suggestions to increase the energy efficiency of the data centres.
- 6.43 As noted, Plot 8 will include a Grid Supply Point substation which would provide energy directly from the electricity grid to the data centres. It is possible that a temporary energy centre will be required

to supply power to the data centre use before this connection can be made. Both of these scenarios have been assessed within relevant documents submitted as part of this planning application. Further details of these elements of the scheme will be agreed through future reserved matters applications.

- 6.44 The proposed development complies with Policy EN12 (Renewable Energy and Low Carbon Technologies).

Flood Risk and Drainage

- 6.45 Policies EN10 (Water Sensitive Design), and EN11 (Protection of Water Resources) consider how new developments can reduce impacts on local water resources and networks via careful management and design. Policy EN14 (Flood Risk) seeks to ensure that proposals for new developments carefully consider the impact of flooding and do not increase flood risk elsewhere.
- 6.46 The existing site is considered to have low risk of flooding from surface water, groundwater and tidal sources but a medium to high risk of flooding from fluvial sources. It is noted that the site is mostly within DAM Zone C2, with the proposals classified to be “Less Vulnerable”. LDP Policy EN14 (Flood Risk) identifies that, amongst others, development would not be permitted within tidal or fluvial flood plains unless it can be demonstrated that the site is justified in line with national guidance and an appropriate detailed technical assessment has been undertaken and where it would increase the risk of flooding from fluvial and/or tidal flooding or from additional run-off from the development in any location.
- 6.47 The engineering works propose to change the levels of the site to provide a betterment to the flood risk profile of the site, reducing the likelihood of flooding, and consequently improving the operation of the park and ride.

Drainage

- 6.48 The planning application is supported by a Drainage Strategy which has primarily been informed by engagement with the Council as part of the extant permission through the Sustainable Drainage Approval Body (SAB) consultation, and consequently is considered to comply with the following SAB standards. SAB consultation will be undertaken for the updated scheme in tandem with the planning application process.

Surface water run-off destination:

- Surface water will be via infiltration as close as possible to the source for Plot 8, the remainder of the site will discharge to the water course.

Surface water run-off hydraulic control:

- Discharge to the water course will be limited to a greenfield run-off rate of 3.9 l/s/ha with the exception of Plot 8.

Water quality:

- Water quality will be achieved by directing hardstanding surface water to grassed infiltration bioswales with roof water directed to attenuation crates / basin with 1m deep sand filter medium allowing for water to then enter the sewer via perforated pipes.

Amenity:

- The swales and attenuation basins will be planted and allows for surface water ponding for short duration. The planting will be co-ordinated with the landscape architect. This in turn will help reduce overland erosion.

Biodiversity:

- Biodiversity requirements will be achieved by planting the attenuation basins and swales allowing for bio-habitats to be introduced into the development.

Design of drainage for Construction and Maintenance and Structural Integrity:

- A construction management plan will be formulated and submitted. A full drainage and SuDS maintenance plan will be prepared as a guidance for the owner of the assets.

6.49 Further detail can be found within the Drainage Strategy submitted with this application.

6.50 The proposed development complies with Policies EN10 (Water Sensitive Design), EN11 (Protection of Water Resources) and EN14 (Flood Risk).

Open Space, Landscaping and Landscape and Visual Impact

Open Space

6.51 Policy C4 seeks to protect areas of existing open space. Policy EN4 (River Corridors) states that river corridors will be protected, promoted and enhanced, together with facilitating sustainable access and recreation.

6.52 An Open Space Assessment has been prepared by Iceni Projects to assess the impact of the proposals on the baseline context of open space provision on the site in line with the assessment

criteria outline in Cardiff's The Cardiff Council Technical Guidance Note for the Protection and Provision of Open Space (November 2017).

- 6.53 Whilst the proposals would result in an uplift of 3.2 ha of developed land compared to the existing situation, this area is not considered to be of significant amenity value, and there is considered to be a surplus of amenity open space in the surrounding area. We note that the developed land has been reduced by 0.78 ha in the proposed scheme when compared to the previously approved scheme. Additionally, numerous interventions are proposed to protect the existing open space with regards to both quality and accessibility such as through enhanced screening and implementation of buffers, and new or improved pedestrian pathways. The scheme would formalise the footpaths into walking routes and the Rhymney Trail would be upgraded through the introduction of sensitive lighting, creating a safe environment for all users and increasing accessibility to the open space on site, in line with LDP Policy T8, which sees to facilitate access to Cardiff's river corridors, open spaces, countryside and regional network of routes including the Rhymney Trail.
- 6.54 Therefore, the assessment concludes that Proposed Development would protect, promote and enhance the value and character of the open space and river corridor, in line with LDP Policies C4 and EN4. Furthermore, the Proposed Development would serve to enhance the open space by access to green spaces, in line with Paragraph 4.5.5 of PPW.

Landscape and Visual Impact

- 6.55 Policy EN3 (Landscape Protection) notes that development will not be permitted that would cause unacceptable harm to the character and quality of the landscape and setting of the city.
- 6.56 A Landscape and Visual Impact Assessment ('LVIA') has been undertaken in accordance with best practice guidance, and through a thorough understanding of both the Site and the surrounding area.
- 6.57 The LVIA finds that the visual residual effect of the proposals on the landscape of the River Rhymney and surrounds (CDRFFLH010) and the Rhymney Valley Corridor (CDRFFCL015) are likely to remain at negligible neutral, and the Rhymney Valley Floor (CDRFFVS051) is also expected to be reduced from minor adverse to negligible neutral after 15 years following the establishment of mitigation planting.
- 6.58 The landscape strategy also considers the careful retention and enhancement of the boundary planting to application site boundaries. The new built form, details of which will be agreed through future reserved matter applications, has been considered in terms of materials and form to reduce its appearance in views from the wider landscape. Existing vegetation will be supplemented with new tree and shrub planting on the proposed development boundaries, alongside access roads and associated with parts of the new parking areas. The landscape proposals have been carefully designed to ensure the new planting responds to the local character and enhances the ecological

value of the landscape framework. Following establishment this structure will provide a mature setting to the Proposed Development helping to assimilate it into the immediate surroundings. There are no significant adverse landscape or visual effects anticipated.

- 6.59 Further information can be found in the landscape drawings and the supporting LVIA, prepared by BCA Landscape.
- 6.60 The proposed development complies with Policy EN3 (Landscape Protection).

Ecology

- 6.61 Policies EN5 (Designated Sites), EN6 (Ecological Networks and Features of Importance for Biodiversity) and EN7 (Priority Habitats and Species) seek to protect local ecological features and networks. Development will not be permitted that would cause unacceptable harm to sites of international or national nature conservation importance. Proposals should avoid harm to landscape features or networks of importance for wild flora and fauna. Development proposals that would have a significant adverse effect will only be permitted in specific circumstances. Where harm is unavoidable it should be minimised by effective mitigation to ensure that there is no reduction in the overall nature conservation value of the area. Where this is not possible compensation measures designed to conserve, enhance, manage and, where appropriate, restore natural habitats and species should be provided.

Ecological Impact Assessment

- 6.62 An Ecological Impact Assessment ('EclA') has been prepared by WSP, which forms part of the Environmental Statement.
- 6.63 The EclA identified a number of protected species, which have been considered through the design evolution of the preferred option. As set out by LDP Policy EN7, where development proposals cause unavoidable harm, it should be minimised through effective mitigation to ensure that there is no reduction in the overall nature conservation value of the area, or, where this is not possible, be designed to conserve, enhance, manage and, where appropriate, restore natural habitats and species.
- 6.64 The habitats present on Site are widespread in the local area, and on a national scale. None of the habitats on Site are rare. The proposed development will result in the loss of woodland, scrub and poor semi-improved grassland as well as scattered scrub and trees. To mitigate this, habitat protection and enhancement measures would be incorporated to protect the dormouse population, and the construction and management of the site would be secured through a woodland management plan. This mitigation has previously been agreed by the Local Planning Authority

through the extant planning permission. The proposed development reduces the overall impacts on surrounding habitat when compared to that permission.

- 6.65 Further, management practices, including coppicing and native planting will benefit the dormouse population and the biodiversity of the site. Details of this are set out within the Woodland Management Plan and EclA and relevant ES chapter.

Habitat Regulations Assessment

- 6.66 Information to inform a Habitats Regulations Assessment ('HRA') has also been prepared by WSP to assess whether there are any impact pathways as a result of the proposed development of the Site that would have a Likely Significant Effect on the 'National Site Network' (previously Natura 2000, European conservation sites) (CIEEM, accessed 2021), either alone or in combination with other plans or projects.
- 6.67 The HRA found that without mitigation in place, there may be Likely Significant Effect (LSE) on the Severn Estuary SAC, SPA and Ramsar sites during the construction period, in particular relating to the bridge construction methods.
- 6.68 The HRA information recommends mitigation measures to address the potential impacts, including seasonal and time restrictions on piling activities to avoid effects on some fish species, as well as measures for the management of fire-water runoff. The HRA information concludes that, on the basis that the above-referenced mitigation measures will be implemented, there will be no adverse effects (alone or in-combination) upon the integrity of the Severn Estuary SAC and Severn Estuary Ramsar resulting from the Proposed Development.
- 6.69 Further information can be found within the HRA submitted with this application.
- 6.70 Overall, the proposed development complies with Policies EN5 (Designated Sites), EN6 (Ecological Networks and Features of Importance for Biodiversity) and EN7 (Priority Habitats and Species).

Arboricultural Impact

- 6.71 Policy EN8 (Trees, Woodlands and Hedgerows) states that development will not be permitted that would cause unacceptable harm to trees, woodlands and hedgerows of significant public amenity, natural or cultural heritage value, or that contribute significantly to mitigating the effects of climate change.
- 6.72 An Arboricultural Impact Assessment (AIA) has been prepared by A.T. Coombes Associates to advise the design team of tree constraints. A Woodland Management Plan has also been submitted as part of this planning application.

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- 6.73 The site features a variety of trees and shrubs, and in particular areas of ancient semi natural woodland to the north and south, in addition to an area subject to a TPO. LDP Policy EN8 (Trees, woodland and hedgerows) sets out that development will not be permitted that would cause unacceptable harm to trees, woodlands and hedgerows of significant public amenity, natural or cultural heritage value, or that contribute significantly to mitigating the effects of climate change.
- 6.74 Development on the site would require the clearance of existing category B and category C trees in order to meet the development density required. However, the Proposed Development would retain key foraging corridors and habitats, and the loss of trees would be mitigated by new planting and woodland management across the wider site. Additionally, remedial tree planting as this will be provided on a separate site to be identified by the Council.
- 6.75 The protection and enhancement of the ancient woodland has been considered through the design evolution with the ancient woodland being protected by a 20m buffer. In most areas this buffer has no tree cover and will be edged with 865m of native planting. Further, and an effective management programme for the woodland would be engaged to improve the habitat and biodiversity on site. This includes:
- 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 2,508 new trees.
 - New tree planting in the immediate vicinity of the development in the context of a separate Landscape Plan.
 - Implementation of a 25-year Woodland Management Plan to preserve and protect the woodland and open areas surrounding the site. This will include, over the 25 years of the plan, planting areas of native broadleaved trees and 865m of traditional native hedging.
- 6.76 Overall, the AIA concludes that, whilst the development would require tree losses, the proposed remedial planting, even without taking the landscape planting into consideration, represents a significant contribution to the local landscape and biodiversity. The previously permitted scheme was considered acceptable with regards to impacts on trees. The proposed development would see an additional four trees retained on the site.
- 6.77 The proposed development complies with Policy EN8 (Trees, Woodlands and Hedgerows).

Environmental Health – Air, Noise, Light Pollution and Land Contamination

- 6.78 Policy EN13 (Air, Noise, Light Pollution and Land Contamination) seeks to avoid unacceptable harm to health, local amenity, the character and quality of the countryside, or interests of nature

conservation, landscape or built heritage importance because of air, noise, light pollution or the presence of unacceptable levels of land contamination.

Lighting

- 6.79 An External Lighting Plan has been prepared by Haslid Services to for detailed elements of the proposed development. Furthermore, a sensitive lighting plan has been produced for the Site to ensure that it can continue to be used by bats and other nocturnal wildlife; all ecological design principles and limitations are satisfied.
- 6.80 The current Site has no residential properties in relatively close proximity that would require design compliance against the ILP Guidance Notes for Obtrusive Light in obedience of Light Intrusion into Windows (lux) and Luminaire Intensity (candelas).
- 6.81 Overall, the External Lighting Plan will ensure the proposed development adheres to the industry recognised and desired task illuminance lighting level(s); are wholly appropriate, acceptable, and conditionally demonstrate compliance against all relevant standards, guides, and planning policies.
- 6.82 Furthermore, mitigation measures have been considered and will be included to ensure that the proposed lighting design minimises and mitigates any effects that are produced with exterior artificial lighting.

Air Quality

- 6.83 An Air Quality Impact Assessment was carried out by Tetra Tech identify potential impacts from the proposed development.
- 6.84 The Assessment concludes that the proposed development will generate some emissions but will not have an adverse impact on the existing human health or ecologically sensitive sites. Both long and short term effects are considered to be insignificant.

Noise

- 6.85 It was agreed with the Council during the initial EIA scoping that noise and vibration is unlikely to cause a significant impact on the environment and therefore should be considered as a non-EIA issue. However, a Noise Impact Assessment was carried out by KR Associates for robustness to determine that the does not have an adverse impact on the existing noise sensitive properties.
- 6.86 The Assessment concludes that the proposed development will generate noise and some vibration but will not have an adverse impact on the existing noise sensitive properties. Additionally, the assessment finds that the design of the scheme has been maximised with passive mitigation measures to ensure that impact of noise and vibration is kept to a minimum.

Geo-Environmental Investigation

- 6.87 Intrusive ground investigations were undertaken by I&L Consulting to assess the potential ground contamination risks in the context of the Proposed Development.
- 6.88 The ground investigation was undertaken in March and April 2021. Data from monitoring wells indicated that groundwater is reached within the Alluvium or Glaciofluvial deposits generally at depths between about 1 m and 5 m below current ground level. Additionally, monitoring for ground gases did not record elevated concentrations of carbon dioxide or methane, and it has therefore been concluded that no special gas protection methods would be required.
- 6.89 With regards to the ground contamination assessment, the results show that the majority of soils and groundwater at the site are unlikely to pose a potentially unacceptable risk to human health or to controlled waters for the proposed commercial land use.
- 6.90 Overall, the laboratory chemical analysis of soil and groundwater samples also did not indicate significant chemical contamination and for all 8 soil samples that were laboratory screened for the presence of asbestos containing materials, all reported a result of Not Detected. 10 soil samples and 7 groundwater recorded chemical concentrations below the selected generic assessment criteria, with the exception of BH2 – 0.5m, where concentrations of two PAH compounds were marginal elevated within the Made Ground. It is therefore proposed that this would be removed as part of the redevelopment proposals.
- 6.91 Further details can be found in the supporting Geo-Environmental Investigation Report submitted with this application.
- 6.92 The proposed development complies with Policy EN13 (Air, Noise, Light Pollution and Land Contamination).

7. PLANNING BALANCE AND CONCLUSION

- 7.1 This Planning Statement has been prepared on behalf of Curtis Hall Ltd to support the comprehensive redevelopment of Cardiff Park and Ride East and sets out its compliance with the relevant Development Plan.
- 7.2 The over-arching objective of the proposals is to deliver a modern data centre campus to help serve the pressing need for new data centre infrastructure in Cardiff and Wales more generally. The Proposed Development has the opportunity to deliver a wide range of benefits as detailed above, within this Planning Statement.
- 7.3 In summary, the key benefits of the scheme can be summarised as follows:

Social Benefits

- The Site will deliver significant benefits including the provision of critical data centre uses, supporting wider economic development and stability, as well as dependent essential services, delivering employment.
- A key feature of the scheme includes the provision of a vehicular bridge across the River Rhymney, linking Pentwyn and Llanrumney with the A48. This would provide a significant benefits to the wider area, improving connectivity in the local area and reduce the volume of traffic passing through Llanrumney and the surrounding area to connect with the A34 to the north and south.
- The proposal would improve access to open space and the Rhymney Trail for pedestrians, cyclists and vehicles. The scheme would formalise the footpaths into walking routes and the Rhymney Trail would be upgraded through the introduction of sensitive lighting, creating a safe environment for all users and increasing accessibility to the open space on site.

Economic Benefits

- The proposals will deliver a significant number of jobs in both the construction and occupation stages of the development. This includes up to 505 direct construction employment jobs and 603 indirect and induced construction employment jobs per annum and up to 125 jobs during the operational phase, with up to 244 additional indirect and induced jobs.
- The site would assist will deliver much-needed data centre floorspace in Cardiff, strengthening the region's burgeoning role in a critical industry. Data centre developments are strongly supported by government economic and industrial policies. Data centre networks are considered to be fundamental to securing economic growth, and are defined as critical infrastructure due to the underlying function they plan within social and economic networks.

Environmental Benefits

- There would be a reduction in the number of cars travelling into Cardiff city centre, reducing car emissions and congestion within the city centre.
- The woodland would be managed to increase its biodiversity.
- Improved pedestrian and cycle links.

7.4 Overall, the proposed scheme is considered to constitute a sustainable development that complies with the relevant planning policies of the development plan and will deliver a significant number of planning benefits. It is therefore considered that the development should be supported, and planning permission granted without delay.