

# PLANNING STATEMENT

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**Land at Lewis Road,  
Splott,  
Cardiff,  
CF24 5JB**

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November 2023



## Summary

**Proposal:**

Construction of a replacement school for Willows High and associated works

**Location:**

Land at Lewis Road, Splott, Cardiff, CF24 5JB

**Date:**

November 2023

**Project Reference:**

23.175

**Client:**

Morgan Sindall on behalf of Cardiff Council Education Department

**Product of:**

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

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## Introduction and Background

- 1.1 This Planning Statement accompanies a full planning application submitted on behalf of Morgan Sindall & Cardiff Council Education department for the proposed construction of a replacement school for Willows High and associated work at Land at Lewis Road, Splott, Cardiff, CF24 5JB.
- 1.2 Delivered under Cardiff Council and Welsh Government's 21st Century, Band B Schools Programme, the existing Willows High School is to be relocated to a new site located off Lewis Road in Splott.
- 1.3 The new school site will be situated on three parcels of land at Splott Market site, the Portmanmoor Industrial Estate and Ocean Park Leisure Centre. Each land parcel is currently separated by highway; the Market site and the Portmanmoor units are on opposite sides of Lewis Road whilst Ocean Park is approximately 90 metres to the north west along Keen Road.
- 1.4 Planning approval (ref: 22/02308/FUL) has been granted to demolish the existing building, clear and regrade site levels and instal SAB features. This enabling works allow the site to be prepped in readiness for the new school building to be progressed promptly upon grant of planning permission. Works commenced on site in August 2023 and it is anticipated that by the time the planning application for the new school is determined the site preparation works; completed in accordance with the approved enabling application.
- 1.5 This project to relocate the school will provide a state of the art learning facility for 900 pupils aged 11-16, in conjunction with a purpose built Special Resource Base (SRB) for 30 pupils aged 11-16. The new school will also enjoy access to sports facilities at the Ocean Park Arena and a route which connects both sites is proposed to be delivered in the form of a green avenue.
- 1.6 The rebuild and relocation of Willows High School to Lewis Road forms a critical part of delivering on the Council's vision to invest in its education estate to deliver "Inspiring, sustainable, community-focused schools in which children and young people can achieve their potential".
- 1.7 Willows High School is rated as a "D" category for condition, which means the buildings are life-expired. The Welsh Government is committed to removing all "D" condition schools from Wales and as a result, Willows High School was automatically prioritised for investment under Band B. Refurbishment of the current building has

been discounted as in the most recent property survey, by Faithful and Gould in 2017. It was rated as Condition D (End of life) and Condition C for Suitability, with a backlog of maintenance set at £3,842,505 in 2017. Further, the current Willows High School site is within the flood zone and is therefore not viable to be developed for a school at this time.

- 1.8 Land requirements for a 6FE school is 65,000m<sup>2</sup> - 83,265m<sup>2</sup> (c16 acres – 20.35 acres) following Building Bulletin Guidelines 98 for Secondary Schools in Wales; this is a substantial size site for an already built-up area of the city. The Council has considered a number of sites to include the existing school site, Tremorfa Park and other Council owned sites across the immediate wards to include Adamsdown, Splott and Tremorfa. These have all been discounted for various reasons. For example, Tremorfa Park was originally put forward as a short list option for the new school given its extensive size and position within a central location. However, it was clear during earlier consultation that there were significant concerns about building on this community asset and keeping the park land available for future users was considered key.
- 1.9 Given the land requirement to deliver a school compliant with BB98, the search has been expanded to land beyond Cardiff's land portfolio. The land identified has been well considered and a report presented to Cardiff Cabinet on the 25th February 2021 to acquire the freehold interests for land at Lewis Road, Splott to deliver the replacement Willows High School. Cabinet resolved to approved the request.
- 1.10 This project will relocate Willows High School approximately 1.4km to the south-west from its existing site on Willows Avenue in Tremorfa to the site of the former Splott Market and Portmanmoor business units near Lewis Rd.
- 1.11 The planning application comprises the following set of drawings prepared by AtkinsRealis:

<b>Drawing name</b>	<b>Drawing reference</b>
Site Location Plan	26CB05-ATK-01-XX-D-AT-021100
Proposed Block Plan	26CB05-ATK-01-XX-D-AT-021101
Proposed Site Masterplan	26CB05-ATK-01-XX-D-AT-021102
Proposed Site Masterplan	26CB05-ATK-AL-XX-D-L-401001
Proposed Site Masterplan	26CB05-ATK-AL-XX-D-L-401002
GA Ground Floor Plan	26CB05-ATK-01-00-D-AT-011004
GA First Floor Plan	26CB05-ATK-01-01-D-AT-011005

GA Roof Plan	26CB05-ATK-01-RL-D-AT-011006
Site Sections	26CB05-ATK-01-XX-D-AT-021004
Proposed Fencing Layout	26CB05-ATK-AL-XX-D-L-461001
GA Elevations	26CB05-ATK-01-ZZ-D-AT-012003
Entrance View	26CB05-ATK-01-00-D-AT-017001
Aerial View	26CB05-ATK-01-00-D-AT-017002
View from SRB Classrooms	26CB05-ATK-01-00-D-AT-017003
Rear view of school	26CB05-ATK-01-00-D-AT-017004
Landscape Masterplan	26CB05-ATK-AL-XX-D-L-401001
Landscape Masterplan with redline	26CB05-ATK-AL-XX-D-L-401002
External Areas Breakdown BB98	26CB05-ATK-AL-XX-D-L-461001
Proposed Drainage Strategy	26CB05 CUR 52 XX D C 9210 P02
Existing Impermeable Area Plan	26BC05 CUR 52 XX D C 9220 P01
Proposed Surface Water Catchment Plan	26BC05 CUR 52 XX D C 9221 P01
Proposed Levels Plan	26CB05 CUR 52 XX D C 9510 P01

1.12 In addition, the following supporting documents are submitted:

<b>Document</b>	<b>Prepared by</b>
Planning application forms (1APP)	Asbri Planning
Planning Statement	Asbri Planning
Design and Access Statement	AtkinsRealis
Green Infrastructure Strategy	AtkinsRealis
Sustainable Drainage Statement Technical Note	AtkinsRealis
Flood Consequence Assessment	JBA Consulting
Ecological Assessment	BSG
Net Zero Carbon Strategy	Arda
Noise Impact Assessment	Formant
RIBA Stage 3 Fire Strategy Report	Part B
Tree Report	ArbTS
Transport Assessment	Hydrock
Travel Plan	Hydrock

- 1.3 The first section of the Planning Statement is followed by a description of the site and its surroundings in Section 2. Section 3 details the proposals before Section 4 summarises the findings of the supporting documents. Section 5 establishes the pertinent national and local planning policy and Section 6 appraises the proposals against the planning policy established in the preceding chapter. Section 7 concludes the Planning Statement.

## Site description and context

- 2.1 As aforementioned, planning approval (ref: 22/02308/FUL) has been granted to demolish the existing building, clear and regrade site levels and instal SAB features. This enabling works allow the site to be prepped in readiness for the new school building to be progressed promptly upon grant of planning permission. Works commenced on site in August 2023 and as such the application site is now a live construction site; it is anticipated that the enabling works to prepare the site in readiness for the school development will be completed by the time this planning application is determined. The baseline for the site will therefore continue to evolve as this planning application is determined by the Local Planning Authority. Notwithstanding, for the purpose of this planning statement the baseline is described as the site was pre-commencement of the enabling construction works to allow the proposal to be assessed against the original baseline.

### **Location**

- 2.2 The proposed site for the new school comprises a range of buildings associated with Splott Market and B1 office / light industrial units at 53-56 Lewis Road as well as associated hardstanding's and car parking. The site is in the ownership of Cardiff Council.
- 2.3 The site is comprised of 2 distinct areas; the Market site and the Portmanmoor units are on opposite sides of Lewis Road. The stopping up of Lewis Road will create one site from Splott Market and Portmanmorr Industrial estate. The site also incorporates the slip road or filter lane from Lewis Road into Forgeside Close, a left-over provision from Splott market car parking and a slither of Titan Road (which has been realigning and reduced). The combination of these sites create a site with a total area of 41345sq.m.

### **Surrounding context**

- 2.4 As aforementioned, the site is bound by a number of adopted highways. Beyond the immediate highway network, the surrounding area comprises largely of industrial units. Surrounding uses are largely B1/B2/B8 and include local trade merchants, offices such as the Prince's Trust, recruitment agency, a marketing company, a gym and supplementary a3 food and drink units such as Greggs and Mikes Café.
- 2.5 Surrounding units are characteristics of those on an industrial unit, red/buff brick plinths, cladding/ corrugates sheets, large areas of glazing and double roller shutter doors. The surrounding industrial uses are largely 2 story in height, albeit instances of 3 story structures



existing including the Cardiff Bay Business Centre directly to the North of Titan Road.

- 2.6 Other local land uses include residential such as the 5 storey apartment blocks at Moorhead Close, to the north of the site, Ysgol Glan Morfa and 2 and 3 storey homes at Bayside Road. East Moors Park and Moorland Park are also within walking distance of the site.
- 2.7 The built environment to the north of East Tryndall Street is more residential in nature with accompanying uses such as a Lidl store.

#### **Site constraints**

- 2.8 The following site constraints have been identified during the design process;
1. A strategic combined water 3350mm diameter brickwork public sewer approximately 6.55m deep below Lewis Road. Flows from north to south along the entire length of Lewis Road. The public sewer will be retained and a no build zone and 20m easement will be observed.
  2. Historic Titan Road alignment - Whilst the section of road within the site is no longer in use the drainage is still in place. Titan Road and a section of Forgeside Close is served by a 1.8m deep 300mm dia. VC pipe running W-E which discharges to the combined sewer in Lewis Road. This drain will be replaced and routed through/around the proposed school development to its existing discharge point. Also under the old Titan Rd is a Gas main, BT Openreach cables, Virgin media and LV cables which all require diversions.
  3. HV connection across the south east corner of Portmanmoor Industrial Estate, to be diverted around the edge of the site.
  4. Gas Medium Pressure main, under Lewis Rd. Retained at North end with subsequent easement observed but diverted at the south end of Lewis Road with an associated proposal to relocate the Gas governor off site to a location further down Lewis Road.
  5. Gas medium pressure to the south of the Splott market building, preference to retain in place with observed 3m easement.

#### **Site Levels**

- 2.9 The site is relatively flat with a slight incline from north to south across the site. However the Splott Market building is located on a section of raised site with a ground floor slab height of approx. 11.00 metres. This raised plinth slopes down to Lewis Road some 1.4m lower and is retained in places along its edge with a low retaining structure.
- 2.10 A pronounced earth bund runs north south along the east side of

Lewis Road. This is the only raised section of ground on the site east of Lewis Road which is otherwise fairly level at around 8.70 metres.

### **Access**

#### **Pedestrians**

- 2.11 The surrounding area has a good network of pedestrian footpaths, that largely run alongside the highway network. A review of Public Rights of Way mapping has established that there are no Public Rights of Way within the Application site or within the immediate vicinity.

#### **Vehicles**

- 2.12 The proposed development site is located within a largely industrial and commercial use area, Lewis Road and Freshmoor Road are generous in scale being capable of supporting local business and light industrial usage. The market site was accessed from Forgeside Close which leads directly from Lewis Road.
- 2.13 Local secondary roads including Titan Road, Guest Road, Keen Road and Galdames Place are not through roads and serve neighbouring Business parks.

### **Ecology and Trees**

- 2.14 An Ecological Assessment has been completed by ESG Ecology to assess the sites biodiversity credentials. The assessment confirms that the site currently supports a limited range of common and widespread habitats, the majority of which have little ecological interest or potential to support protected species. A small area of the non-native invasive shrub wall cotoneaster is present on site. There are four buildings with low – moderate potential for roosting bats. No bats were recorded roosting in the buildings during emergence / re-entry surveys. As previously mentioned these buildings are to be demolished under the enabling works consent.
- 2.15 An Arboricultural Report prepared by ArbTS has been completed to support the application. A Tree Survey of the site confirmed that there were 32 individual trees present on site; 2 Category A; 9 Category B, 20 Category C and a single Category U. There were 12 tree groups identified; 5 category B and 7 Category C. As part of the enabling works consent, one poor quality tree (category U) and a small number of Leyland cypress trees were approved to be removed.

### **Heritage & Archaeology**

- 2.16 There are no Listed Buildings; Scheduled Ancient Monuments; or Registered Historic Parks and Gardens located within or close to the site boundary, and furthermore, the site is not located within or adjacent to a Conservation Area.

### **Flood Risk**

- 2.17 As indicated on the relevant extract from the Welsh Government Development Advice Map below, the site is located entirely within Flood Zone B; areas known to have flooded in the past. The new flood maps for planning identify the eastern proportion of the site as being within Flood Zone 3, defended.

### **Planning history**

- 2.18 The site poses the following relevant planning history;

20/02043/MNR – New access to roadway to Units 70-71 Portmanmoor Industrial Estate. Permitted 06/10/2021.

22/02308/FUL – Demolition of buildings, removal of hardstanding areas, reprofiling of site and associated works. Permitted 03/02/2023

### **Pre-application**

- 2.19 A pre-application enquiry was submitted to Cardiff Council on the 30<sup>th</sup> June 2023. A pre-application meeting was held on the 10<sup>th</sup> August 2023. A summary of the pre-application advice is provided below, a response has been provided in italics;

- Concerns were expressed regarding the impact of the development on existing, high-quality tree. It was requested that the design team review the layout and seek to reduce impact where possible. It was further advised that a robust mitigation strategy would be required to compensate for any proposed loss;
- Concerns were expressed in respect of the proposed location for the SRB; the design team were asked to consider alternative locations;

*Following the pre-application meeting, and as shown on the accompanying updated landscaping drawing, the size of the rugby pitch has been reduced to 104 x 78; this ensures that the northern line of trees (T11-T17), along Freshmoor Road can be retained. This includes 2 x Category B Trees (T11, T13, T16); 3 x Category B Trees (T12, T14, T15); and 1 x Category A Tree, T17. Further, the SRB drop off has been redesigned to ensure that T9 (Category A) and T10 (Category C) can also be retained. As discussed in detail in the below sections a robust landscaping scheme is also delivered as part of the proposal to enhance this brownfield site.*

- The LPA queried why proposals were seeking to reduce the width of Titan Road; and also, the impact of this on the Business Park



*provides an alternative route for those entering the school from Lewis Road.*

- The LPA asked for further justification to be provided with regards to the principle of development against Policy EC3. Concerns were expressed in respect of the proposed location for the SRB; the design team were asked to consider alternative locations;

*Please see Section 5 of this planning statement for full planning policy justification.*

## Proposals

### Background

- 3.1 Willows High School is an English-medium 11-16 mixed community school maintained by Cardiff Local Authority. The current school is located to the north of Seawall Road, east of Mercia Road and south of Meirion Place/Greenbay Road. The site is accessed from Willows Avenue to the south west. The school serves the areas of Splott, Adamsdown and Tremorfa in the East of Cardiff. There are currently 810 pupils on roll, and this figure is expected to rise to 900 with 6 forms of entry by September 2025.
- 3.2 A Cabinet report outlining the strategic investment in the city's education estate through its Band B 21st Century School Programme was approved on 12 October 2017. This report outlined the challenges and opportunities facing Cardiff in the development of the education estate specific to the sufficiency, suitability and condition issues in Cardiff as assessed in 2017, which provided the basis of the funding request from Cardiff to Welsh Government under the Band B programme. As part of the prioritisation of schools within the Band B capital investment programme, all properties across the school estate were given a rating from A to D for the following issues, with D being the worst category. Willows High School is rated as a "D" category for condition, which means the buildings are life-expired. The school is also rated 'D' for suitability, with 'unsuitable' learning environments, which seriously inhibit the school's capacity to deliver the curriculum. The current Willows High School site is within the flood zone and is therefore not viable to be developed for a school at this time. The Council therefore progressed in their quest to find an alternative site to relocate Willows Highschool; please see section X for a summary of the sequential test completed before selecting the chosen site.

### The Proposal

- 3.3 It is proposed to develop a new High School on land at Lewis Road, Splott. This project to relocate the school will provide a state of the art learning facility for 900 pupils aged 11-16, in conjunction with a purpose built Special Resource Base (SRB) for 30 pupils aged 11-16.
- 3.4 The sites context and inherent constraints has had a strong influence on the size, scale and positioning of the built development. These are discussed in detail in section 2 of this report.
- 3.5 The main school building itself has been positioned in a northern central position to the north of the site, taking advance of the active travel connections to the north and east and provides an opportunity

to deliver a strong, welcoming plaza into the school grounds. The SRB is to be located to the north-east of the main building. The proposed school grass rugby pitches are to the east of the school building, the Multi Use Game Areas (MUGAs) are to the south, and football pitches to the west. A visitor and accessible car parking area has been designed to the north of the school with access via Forgeside Close and a secure access route has been provided to the north of Titan Road to provide secure pedestrian access to the Ocean Park Facilities and car parking area.

### **The school Building**

- 3.6 The ground floor consists of the design and technology department, IT, science department, sports hall, changing rooms, dining hall and theatre. In the centre of the building the IT and 2 science labs have been set back to create a sheltered external space to be integrated into the landscape strategy. The dining hall is on the south edge of the building to allow activity to spill outside as well as making it accessible to the sports pitches.
- 3.7 The SRB is to be located to the north-east of the building to optimise SRB access as well as shelter the unit from the activity and noise from the rest of the school, particularly the sports hall.
- 3.8 The first floor consists of admin spaces, top theatre seating, humanities, language literacy and communications, library, music department, art department and maths and numeracy. The majority of the teaching spaces and classrooms will be located on the first floor. The music rooms are located next to the sports hall, meaning that the louder spaces are zoned and therefore less likely to cause interruptions to quieter teaching spaces. The library is in the centre of the floor, acting as a central hub to serve the surrounding classrooms. The staff rooms are spread across the floor allowing each department to have ownership over their offices as well as being offering surveillance across the floor.
- 3.9 The roof plan clearly outlines the roof lighting servicing the theatre, learning village, dining room and library. As these spaces are without external aspect the rooflights are providing daylighting, reducing the requirements for artificial lighting.

### **The Plaza**

- 3.10 The entrance Plaza is an important building which plays a key role in delivering a nodal point off the Freshmoor Road/Lewis Road junction, providing a civic presence to this area alongside the carefully detailed Landscaping proposal with different surface textures and tree lined pedestrian routes. It delivers a parametric form that opens up to the

entrance and welcomes users into the space through its 'open arms' footprint.

**Material strategy**

- 3.11 A sensitive, neutral and robust palette is proposed which aligns with the School's vision for a higher education learning environment. Rich tones are considered for internal finishes, with colour schemes to suit wayfinding, departmental arrangements and identity.
- 3.12 The material palette for Willows High School has been carefully considered in terms of circular economy, demountable components, sustainability measures, embodied carbon and overall carbon footprint.

**External environment and Landscaping**

- 3.13 The landscape proposals provide a diverse variety of multi use spaces across the site, that cater not only for curriculum based learning activities, but also provide an aesthetic backdrop to the learning experience that also enhances the health and well being of pupils, staff and wider users of the use. The project aspiration has been to maintain as many of the existing trees as possible whilst providing adequate space and working zones for the new building and sports pitches.
- 3.14 Science gardens, technology and horticultural spaces, habitat and wildlife gardens, external dining, informal seating and social areas are also proposed providing a rich variety of outdoor learning and usable spaces.
- 3.15 Multiple external sports activities have been proposed, including a Multi Use Games Area (MUGA) for netball, basketball and tennis as well as grassed sports pitches, providing rugby, football, rounders, cricket and athletic provision. The all weather pitch and sports facilities at the neighbouring Oceans Leisure Sports facility will also be used by the school and a secure footpath link has been provided to ensure a safe route to and from this community facility. These spaces are all assimilated into the site wide proposals using a variety of hard and soft landscape treatments that are both robust, low maintenance and provide textural and year round seasonal interest.
- 3.16 Community facilities and focal point entrance plaza space will enhance the identity of this new school development whilst integrating the community and wider stake holders into the school environment.
- 3.17 Opportunities have been embraced to integrate the planting proposals with the site wide drainage strategy which further



contribute towards the UGF aspirations across the site, whilst enhancing the biodiversity and ecological value of this site. Soft landscape proposals include new tree planting, native hedgerow planting, amenity shrub and ground cover planting, rain gardens, sensory shrub planting, amenity mown grass, wild meadow grasslands, native shrub planting and bulb planting, all of which will provide year round.

- 3.18 The external learning spaces and their relationship to the internal departments. The sports pitches will be to the east and west of the main school building, with the east being next to the sports hall. The principal internal-external adjacencies are the SRB to the SRB drop-off, the arts garden to the art department and the science yard to the science department.
- 3.19 The ecological corridor will provide a wildlife corridor between the main site and ocean park. The planting strategy will include mainly native trees and hedgerows as well as species rich grassland. The sections below help to explain the strategy and address the site level changes.

#### **Boundary treatments and Site Security**

- 3.20 The site perimeter is largely enclosed with a 2.4m high weldmesh fence, however, the Entrance Plaza area (along Freshmoor Road/ Lewis Road) will be open but delineated with bollards to prevent vehicular access into this pedestrianised space. It is also intended to propose an enhanced 2.4m high fence to the SRB frontage overlooking Lewis Road providing a feature of this section of fencing.
- 3.21 During the school day the arrival space will be 'open' and operate as a semi-public space with direct access from the pavement. These will be well supervised by the schools reception and general office. Students will filter into the School from the southern point (see access strategy) through a set of gates. As with all gates, these will be managed by the School to safeguard pupils and maintain site security.
- 3.22 An additional 5.0m high ball stop net is provided to the ends of the proposed rugby pitch to prevent rugby balls being kicked into the adjacent Freshmoor Road and adjacent neighbouring properties to the south. The MUGA is enclosed by a 3.0m high ball stop weldmesh fence.
- 3.23 Internal site fencing providing enclosure to the science garden, technology area and SRB area are secured with a 1.8m high weldmesh fence. Additional informal timber picket style fencing, 1.1m high, is proposed to secure water features within the science garden.

Lastly, the connecting route between the main building towards the staff parking/Ocean Park playing fields will be secured by 2.4m high fencing with locked gates which are to be managed by the School.

#### **Access and Movement**

- 3.24 The main visitor and staff entrance is to the North of the site where a landscaped plaza creates a nodal point for site arrival and forms the key focal point of the school.
- 3.25 The main student access is to the south entrance. The main proportion of students will arrive from the north east of the site and to accommodate this, access through the school grounds has been provided from Freshmore Road with a gated entrance. A smaller proportion of students will access the school from the south and west via Ocean Way.
- 3.26 Deliveries to service the catering kitchen and to deliver to technology need not access the site but take advantage of a loading bay accessed from Titan Road. This is also the location for refuse bins. The route to and from Ocean park is managed by staff. Gates with access control should secure both ends of the route, it is solely used for accessing sports areas available to the school at Ocean Park and allowing school staff to access the school site from car parking areas at Ocean Park.
- 3.27 The SRB requires its own dedicated drop off and pick up area for parents, carers, minibuses and taxis. This is located within the SRB secure external area with a covered direct route from the drop off to the SRB student entrance.
- 3.28 After the start of the SRB day the drop off/pick up area can fulfil other functions for example as an extension to the hard social areas or for use as a cycling path for exercise and learning road safety skills.
- 3.29 A maintenance access is to be located off Guest Road for access to the sprinkler tanks, sub station and gas compound.

## Planning policy context

### Introduction

- 4.1 The planning policy framework for the determination of this application is provided by national planning policy and guidance, together with the statutory 'development plan'.
- 4.2 The planning policy framework of relevance to the development proposals at the national level comprises the following:
- The Well-Being of Future Generations (Wales) Act 2015
  - National Development Framework: Future Wales – The National Plan 2040
  - Planning Policy Wales (PPW) 11
  - Technical Advice Notes (various)
- 4.3 The planning policy framework of relevance to the development proposals at the local level comprises the following:
- Cardiff Local Development Plan (LDP) (adopted 28th January 2016)
  - Cardiff Council Supplementary Planning Guidance (various)

### The Well-Being of Future Generations (Wales) Act 2015

- 4.4 The Well-Being of Future Generations (Wales) Act 2015 (which came into force on 1st April 2016) requires "public bodies to do things in pursuit of the economic, social, environmental and cultural well-being of Wales in a way that accords with the sustainable development principle", in accordance with seven 'well-being' goals. Within the Act, sustainable development is defined as follows: *"the process of improving the economic, social, environmental and cultural well-being of Wales by taking action, in accordance with the sustainable development principle, aimed at achieving the well-being goals"*.

### National Development Framework: Future Wales – The National Plan 2040

- 4.5 The National Development Framework was published on 24th February 2021. When determining a planning application, decision makers will need to apply the policies in Future Wales and a Local Development Plan to the proposal. The vast majority of planning applications are determined by Local Planning Authorities and are small scale developments of local rather than regional or national significance. Future Wales' focus is on national and regional spatial issues and as such, whilst its policies will need to be considered, the Local Development Plan policies will provide the detailed development management framework in the vast majority of cases.

- 4.6 'Future Wales – the National Plan 2040' sets out the Welsh Government's strategy for addressing key national priorities through the planning system, including sustaining and developing a vibrant economy; achieving decarbonisation and climate-resilience; developing strong ecosystems; and improving the health and well-being of our communities. The Welsh Government's strategic growth strategy is set out in Policy 1 of Future Wales as follows:

*Policy 1 – Where Wales will Grow*

*The Welsh Government supports sustainable growth in all parts of Wales. In three National Growth Areas there will be growth in employment and housing opportunities and investment in infrastructure. The National Growth Areas are:*

- *Cardiff, Newport and the Valleys*
- *Swansea Bay and Llanelli*
- *Wrexham and Deeside*

- 4.7 It is set out at Page 60 that "Our strategy is to build on existing strengths and advantages. It encourages sustainable and efficient patterns of development, based on co-locating homes with jobs and vital services and the efficient use of resources". The benefits of the proposed growth strategy and specifically the co-location of homes, jobs and services is highlighted as follows: "Growing urban areas across Wales will create concentrations of jobs, services and amenities and a critical mass of people to sustain good public transport services and a range of economic activities. Urban growth enables more people to walk and cycle for everyday journeys and, with good urban design, can create positive impacts on public health, air quality and well-being". The importance of the implementation of policies which require development to be directed towards sustainable locations and designed to make it possible for everyone to make sustainable and healthy travel choices is highlighted in Future Wales, and it is stated that planning authorities will be required "to refuse planning permission for car-dependent developments which would otherwise encourage car use and undermine sustainable travel" (page 85).

**Planning Policy Wales (PPW) Edition 11**

- 4.8 PPW Edition 11 was adopted by the Welsh Government in February 2021 and is the principal document for planning considerations in Wales. PPW provides land use planning policy and should be taken into account when preparing planning applications. PPW is supplemented by a series of Technical Advice Notes (TANs), Welsh Government Circulars, and policy clarification letters, which together with PPW and the recently adopted Future Wales provide the national planning policy framework for Wales.

4.9 The primary objective of PPW is to ensure that the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental and cultural well-being of Wales, as required by the Planning (Wales) Act 2015, the Well-being of Future Generations (Wales) Act 2015 and other key legislation. PPW and the National Development Framework (NDF) set out how the planning system at a national, regional and local level can assist in delivering these requirements through Strategic Development Plans (SDPs) and Local Development Plans (LDPs).

4.10 Sustainable development is defined as:

*“Sustainable development” means the process of improving the economic, social, environmental and cultural well-being of Wales by taking action, in accordance with the sustainable development principle, aimed at achieving the well-being goals.*

*Acting in accordance with the sustainable development principle means that a body must act in a manner which seeks to ensure that the needs of the present are met without compromising the ability of future generations to meet their own needs. “*

4.11 Under Section 2 – People and Places – Achieving Well Being through Placemaking, 5 Key Planning Principles are highlighted, under the general heading of *Achieving the Right Development in the Right Place* which are:

- 1. Growing our economy in a sustainable manner*
- 2. Making best use of resources*
- 3. Facilitating Accessible and Healthy Environments*
- 4. Creating and Sustaining Communities*
- 5. Maximising environmental protection and limiting environmental impact.*

4.12 Section 3 – Strategic and Spatial Choices states that effective strategic placemaking requires early collective consideration of placemaking issues at the outset, in the formulation of a development plan, or when developing specific proposals.

4.13 Paragraph 3.3 emphasises that good design is fundamental to creating sustainable places where people want to live, work and socialise. Design is not just about the architecture of a building but the relationship between all elements of the natural and built environment and between people and places.

4.14 Section 3.8 relates to how good design can help to ensure high environmental quality. Landscape and green infrastructure

considerations are an integral part of the design process. Integrating green infrastructure is not limited to focusing on landscape and ecology, rather, consideration should be given to all features of the natural environment and how these function together to contribute toward the quality of places.

- 4.15 Community safety is a key social consideration with the aim to produce safe environments that do not compromise on design quality in accordance with the cohesive communities well-being goal.
- 4.16 Section 4 – Active and Social Places defines those places which promote our social, economic, environmental and cultural well-being by providing well-connected cohesive communities. Places which are active and social contribute to the seven goals of the Well-being of Future Generations Act. The key issues in this theme include:
- assisting in the delivery of cohesive communities which will meet the needs and are accessible to all members of society, including older people;
  - tackling inequalities between communities, delivering services and jobs closer to where people live and acknowledging the importance of inclusive communities and the wider environment for good health and well-being;
  - improve sustainable access to services, cultural opportunities and recreation facilities to support people to adopt healthy, culturally fulfilled lifestyles
- 4.17 Paragraph 4.1.10 states that the planning system has a key role to play in reducing the need to travel and supporting sustainable transport, by facilitating developments which:
- are sited in the right locations, where they can be easily accessed by sustainable modes of travel and without the need for a car
  - are designed in a way which integrates them with existing land uses and neighbourhoods; and
  - make it possible for all short journeys within and beyond the development to be easily made by walking and cycling.
- 4.18 Section 6 – Distinctive and Natural Places requires that development plan strategies, policies and development proposals should be formulated to look to the long-term protection and enhancement of the special characteristics and intrinsic qualities of places, be these of natural, historic or built environments, ensuring their longevity in the face of change. This means both protecting and enhancing landscapes, habitats, biodiversity, geodiversity and the historic environment in their own right as well as other components of the natural world, such as water resources or air quality.

- 4.19 Paragraph 3.55 of PPW confirms that “Previously developed (also referred to as brownfield) land (see definition overleaf) should, wherever possible, be used in preference to greenfield sites where it is suitable for development. In settlements, such land should generally be considered suitable for appropriate development where its re-use will promote sustainability principles and any constraints can be overcome.

**Technical Advice Notes**

- 4.20 The following TANs are considered relevant to this planning application:

***Technical Advice Note 5 – Nature Conservation and Planning***

- 4.21 TAN 5 provides advice about how the land use planning system should contribute to protecting and enhancing biodiversity and geological conservation.

***Technical Advice Note (TAN) 12: Design (2016)***

- 4.22 TAN 12 provides guidance on how good design should be achieved through the planning process. The document recognises that design is a process of analysis of the surrounding area recognising and resolving any issues that may be present.

***Technical Advice Note 15 – Development and Flood Risk (2004)***

- 4.23 TAN 15 supplements the policy set out in Planning Policy Wales in relation to development and flooding. It advises on development and flood risk as this relates to sustainability principles (section 2.2 PPW), and provides a framework within which risks arising from both river and coastal flooding, and from additional run-off from development in any location, can be assessed.

***Technical Advice Note (TAN) 18: Transport (2007)***

- 4.24 TAN 18 explains how to integrate land use and transport planning with particular emphasis on how transport impacts should be assessed and mitigated through well designed developments.

***Technical Advice Note (TAN) 23: Economic Development (February 2014)***

- 4.25 TAN 23 confirms that “*Planning Policy Wales (PPW) defines economic development broadly so that it can include any form of development that generates wealth, jobs and income. In producing development plans or determining planning applications local planning authorities need to bear in mind that traditional business use, classes B1-B8, only account for part of the activity in the economy. It is important that the planning system recognises the economic aspects of all development*

*and that planning decisions are made in a sustainable way which balance social, environmental and economic considerations”.*

- 4.26 TAN 23 confirms that;
- *Economic development is development (new or change of use) where the resulting space will be occupied by economic activities;*
  - *An economic activity, or economic land use, is an activity which directly generates wealth (output), jobs and income;*
  - *Generating jobs includes providing or sustaining existing jobs as well as creating new jobs.*

- 4.27 PPW2 advises that economic land uses include the traditional employment uses (Class B in the Use Classes Order) as well as retail, tourism and public services.

#### **Cardiff Local Development Plan (2006-2026)**

- 4.28 The Cardiff LDP (2006-2026) (adopted 28th January 2016) forms the prevailing development plan for Cardiff Council. The Council is in the process of preparing a replacement LDP – however, this is at a very early stage of preparation and the policies of the adopted LDP remain in force.

- 4.29 Within the adopted Cardiff LDP the application site is located within the boundary of settlement limits and falls within an ‘Existing Employment Land’ designation i.e. EC1.1 Ocean Park with primary uses being listed as B1/B2/B8. Policy EC1 sets out *“The city’s existing employment areas outside of the Central and Bay Business Areas (as designated 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 EC2)”.*

- 4.30 Paragraph 5.40 of the LDP advises that *“The employment sites identified in Policy EC1 display strong potential to continue playing an important economic role, whether this is to provide local employment on smaller sites within key neighbourhoods or whether the sites are more strategic in size, position and function”.*

- 4.31 The key LDP policy against which the principle of redevelopment of the application site for educational use will be assessed is Policy EC3 (Alternative Use of Employment Land and Premises). This policy sets out that:

*“Development of business, industrial and warehousing land and premises for other uses will only be permitted if:*



- i. *The land or premises are no longer well located for business, industrial and warehousing use; or*
- ii. *There is no realistic prospect of employment use on the site and/or the property is physically unsuitable for employment use, even after adaption/refurbishment or redevelopment; or*
- iii. *There is no need to retain the land or premises for business, industrial or warehousing use, having regard to the demand for such land and premises and the requirement to provide for a range and choice of sites available for such use; and*
- iv. *There will be no unacceptable impact on the operating conditions of existing businesses”.*

4.32 It is advised at Paragraph 5.49 that “The ‘robust evidence’ for assessing the need to retain land and premises for business, industrial and warehousing use include the following criteria:

- *Whether and for how long land or premises have been vacant and actively marketed and the expressions of interest during this period;*
- *Whether the site offers particular benefits not generally available within the overall land bank;*
- *Whether the site is within an area of high unemployment and offers realistic prospects of use for appropriate employment purposes;*
- *Whether the relocation of existing occupiers to other suitable accommodation will be facilitated;*
- *Whether the proposed development would retain an element of industrial, office or warehousing floorspace; **and***
- *Whether the proposed use needs to be accommodated on business, industrial or warehousing land (e.g. transport depots).*

4.33 Paragraph 5.51 also highlights that “*It is also important to ensure that the introduction of residential or other uses into an industrial or warehousing area does not unduly restrict the operating conditions of remaining businesses”.*

4.34 In addition to the above, the following LDP policies of relevance to the proposed development are as follows:

- *Policy KP3(B): Settlement Boundaries*
- *Policy KP5: Good Quality and Sustainable Design*
- *Policy KP6: New Infrastructure*
- *Policy KP7: Planning Obligations*
- *Policy KP8: Sustainable Transport*
- *Policy KP12: Waste*
- *Policy KP13: Responding to Evidenced Social Needs*
- *Policy KP14: Heathy Living*

- *Policy KP15: Climate Change*
- *Policy KP16: Green Infrastructure*
- *Policy KP17: Built Heritage*
- *Policy KP18: Natural Resources*
- *Policy H3: Affordable Housing*
- *Policy EN1: Countryside Protection*
- *Policy EN6: Ecological Networks and Features of Importance for Biodiversity*
- *Policy EN7: Priority Habitats and Species*
- *Policy EN8: Trees, Woodlands and Hedgerows*
- *Policy EN9: Conservation of the Historic Environment*
- *Policy EN10: Water Sensitive Design*
- *Policy EN11: Protection of Water Resources*
- *Policy EN12: Renewable Energy and Low Carbon Technologies*
- *Policy EN13: Air, Noise, Light Pollution and Land Contamination.*
- *Policy EN14: Flood Risk*
- *Policy T5: Managing Transport Impacts*
- *Policy T6: Impact on Transport Networks and Services*
- *Policy W2: Provision for Waste Management Facilities in new Development*
- *Policy C1: Community Facilities*
- *Policy C3: Community Safety/Creating Safe Environments*
- *Policy C5: Provision for Open Space, Outdoor Recreation, Children's Play and Sport*
- *Policy C6: Health*

#### **Supplementary Planning Guidance**

4.35 The content of the following SPG's as adopted by Cardiff Council will be of relevance to the development proposals:

- *Waste Collection and Storage Facilities (2016)*
- *Green Infrastructure (2017)*
- *Managing Transport Impacts (2018)*
- *Local Development Plan/Unitary Development Plans*

# Appraisal

## Overview

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

- The **principle of development** in terms of land use planning policy and sustainable development;
- The impact of the development on the **character and appearance of the surrounding area;**
- The acceptability of the development in terms of **highways capacity and safety.**
- The acceptability of the development in terms of **Green Infrastructure, biodiversity and enhancements**
- The impact of the development on **Flood Risk**
- The impact of the development as a result of **Noise**
- The impact of the development on **community facilities**
- **Other Material Considerations.**

### **The principle of development in terms of land use planning policy and sustainable development;**

5.2 The Application Site is located within the boundary of settlement limits, within which the principle of development is established as acceptable, subject to detailed design considerations. The site is allocated under Policy EC1.1 'Ocean Park' as 'Existing Employment Land' with primary uses being listed as B1/B2/B8. Policy EC3 allows alternative uses to be considered on Employment Land and Premises; the Policy provides a list of criteria to assess development proposals.

5.3 To ensure compliance with Policy EC3, proposals would need to comply with criteria i, ii or iii and iv. These are listed below and discussed in turn;

*Development of business, industrial and warehousing land and premises for other uses will only be permitted if:*

*i. The land or premises are no longer well located for business, industrial and warehousing use; or*

It would be hard to argue that the land is no longer well located for business, industrial and warehousing use however the proposed site is located in the norther proportion of the wider EC1.1. The site is bound to the north by Moorhead Close, which is technically allocated under Policy EC1.1 but actually comprises residential properties following a consensual departure from the development plan. The

redevelopment of the site for education purposes would not sever the existing extent of EC1.1. but would rather redefine the boundary.

*ii. There is no realistic prospect of employment use on the site and/or the property is physically unsuitable for employment use, even after adaption/refurbishment or redevelopment; or*

The premises on site have been demolished following approval of the enabling application and as such there are no suitable business, industrial and warehousing buildings on site. The redevelopment of the site to deliver business, industrial and warehousing would require substantial investment.

*iii. There is no need to retain the land or premises for business, industrial or warehousing use, having regard to the demand for such land and premises and the requirement to provide for a range and choice of sites available for such use; and*

Prior to being purchased by Cardiff Councils Education team, the site comprised of the former Splott Market site and Portmanmor Buildings and associated offices. Splott Market was the larger unit on site and comprised 6,625 sq.m of floor space. Splott Market comprised a sui generis use, and it is our understanding that the unit was only in operation every Thursday/Saturday and Sunday. Further, Splott Market vacated the site in September 2022 and as such the site has remained vacant since. Portmanmor Buildings were occupied by Bad Wolf Studios until they vacated the site in March 2022. The studio comprises 3,500 sq.m and had a 650 sq.m associated office building. There is therefore a loss of 4,150 sq.m of traditional B1/B2/B8 employment use, however this is considered to be outweighed by the level of employment generated by Willows High School.

*iv. There will be no unacceptable impact on the operating conditions of existing businesses.*

As demonstrated under the below subheadings, the delivery of a school will not have an unacceptable impact on the operating conditions of existing businesses inline with criteria iv.

5.4 The supporting text of Policy EC3 confirms at Paragraph 5.49 that in assessing the need to retain land and premises for business, industrial and warehousing uses consideration can be given to whether the site offers particular benefits not generally available within the overall land bank.

5.5 As discussed in the preceding section, there is a real commitment by Welsh Government to removing all "D" condition schools from Wales; further Cardiff City Council have identified that additional secondary school places will be required to accommodate children from new

housing developments following the successful delivery of allocated residential sites across the City.

- 5.6 The Willows High School catchment area comprises the primary school catchment areas of Adamsdown Primary School, Baden Powell Primary School, Moorland Primary School and Stacey Primary School, which serve Adamsdown and Splott. The area is also served by St Albans RC Primary School, Tredegarville Primary School, Ysgol Glan Morfa. St Peter's Catholic Primary School, located within the Plasnewydd ward, also serves the area and is in close proximity to Adamsdown. The Adamsdown and Splott areas are within the catchment area of Ysgol Gyfun Gymraeg Bro Edern, and are also served by St Illtyd's Catholic High School and St Teilo's Church in Wales High School. A plan showing the extent of Willows High School is included within appendix A.
- 5.7 The average intake over the last 3 years at entry to Reception year within the Willows High School catchment area is 206 pupils (approximately 7FE); however based on the population projections, historic take up of places in the area and the potential for an uplift parental preference following investment, 6FE capacity (180 places per year group for pupils aged 11-16) is expected to be sufficient to meet the demand for places from within the existing catchment area of Willows High School in the Band B period.
- 5.8 As aforementioned, refurbishment options have been discounted as the property was rated as Condition D (End of life) with a backlog of maintenance set at £3,842,505 in 2017. The current Willows High School site is within the flood zone and is therefore not viable to be developed for a school at this time. Land requirements for a 6FE school is 65,000m<sup>2</sup> - 83,265m<sup>2</sup> (c16 acres – 20.35 acres). Alternative sites have been considered within the catchment; however, they have been discounted for various reasons.
- 5.9 The Council has considered a number of sites to include the existing school site, Tremorfa Park and other Council owned sites across the immediate wards to include Adamsdown, Splott and Tremorfa. Given the land requirement to deliver a school compliant with BB98, the search was expanded to land not within the ownership of the Council. Following an initial assessment of the long list, Tremorfa Park was originally put forward as a short list option for the new school. Tremorfa Park comprises a large site, with a central location in the catchment and is owned by CCC, which means there would have been no capital expenditure to purchase the land. However, it was clear from the consultation that there were significant concerns about building on this community asset with a really desire expressed for keeping the park land available for future users.

- 5.10 The application site presents a viable option, to bring forward a much needed, fit for purpose comprehensive school to serve Adamsdown and Splott. This is inline with supporting text of Policy EC3 which confirms that in assessing the need to retain land and premises for business, industrial and warehousing uses consideration can be given to whether the site offers particular benefits not generally available within the overall land bank.
- 5.11 Whilst it is acknowledged that Policy EC3 cannot be strictly complied with, there is a pressing need for a replacement school in this catchment. The immediate area is mixed use in nature, with a primary school (Ysgol Glan Morfa) located only 90m north of the site. Residential properties share a boundary with the sites most northern boundary and are present along Lewis Road and Tyndall Street to the north. Further, proposals presents an opportunity to regenerate the area, provide community facilities and placemaking benefits including active travel enhancements. Whilst not a B1/B2/B8 use, a comprehensive school undoubtedly an employment generating use and therefore goes some way to delivering the aspirations of the policy.
- 5.12 The site comprises previously developed land. Planning policy at all levels encourages the efficient use of such sites in preference to greenfield land, and as such, it is considered that the principle of the proposed development is supported in this regard. Finally, proposals are also in accordance with the Welsh Government's national growth strategy – the site is located within a Growth Area ("Cardiff, Newport, and the Valleys"), as identified in Future Wales. Future Wales confirms Cardiff as the primary settlement within the south east region, and Policy 33 states that *"strategic and local development plans should recognise that the growth area should be the focus for strategic economic and housing growth and for essential services and facilities"*.
- 5.13 In conclusion there is a desperate need for a new 21<sup>st</sup> century school in this area of Cardiff, where limited land of this scale, for development opportunities exist. This presents a material planning consideration upon which any future application should be considered positively.

**The impact of the development on the character and appearance of the surrounding area**

- 5.14 This application is accompanied by a robust Design and Access Statement prepared by AtkinsRealis which successfully demonstrates the design process that has been undertaken to reach this final proposal. The DAS demonstrates a good understanding of the site,

context and brief, clearly communicates and explains design ideas and discusses how the proposal contributes to placemaking.

- 5.15 As discussed in detailed within the DAS, the main school building itself has been positioned in a northern central position, to the north of the site, taking advantage of the active travel connections to the north and east. Its position provides an opportunity to deliver a strong, welcoming plaza into the school grounds. The entrance Plaza is an important building which plays a key role in delivering a nodal point off the Freshmoor Road/Lewis Road junction, providing a civic presence to this area alongside the carefully detailed Landscaping proposal with different surface textures and tree lined pedestrian routes. It delivers a parametric form that opens up to the entrance and welcomes users into the space through its 'open arms' footprint.
- 5.16 The SRB is to be located to the north-east of the main building; the SRB has been strategically located to optimise access opportunities as it requires its own dedicated drop off and pick up area for parents, carers, minibuses and taxis. The drop off space is located within the SRB secure external area and a covered route from the drop off is provided to the SRB student entrance. The drop off area has been designed to double up as a secure external play space for the SRB during school hours where the drop off provision has been close off for access. The location of the SRB shelters the unit from activity and noise from the rest of the school, particularly the sports hall and music spaces.
- 5.17 The proposed school grass rugby pitches are to the east of the school building, the Multi Use Game Areas (MUGAs) are to the south, and football pitches to the west.
- 5.18 The northern and eastern facades of the school building are important as they are part of the public image and contribute largely to the civic presence of the locality and the proposal for the plaza entrance. Hence, the brickwork rhythm continues across both of these facades and only breaks up at the Learning Lounge into the metal cladding which drapes across the facade. The Learning Lounge shape and disconnection from the main building creates a presence at this junction. Simple materials with sharp detailing reinforce this presence.
- 5.19 The building profile is accentuated through a clear use of materials, where the recess is highlighted through the use of metal cladding. The brickwork is rhythmic with windows punctuated with hints of colour through the louvres. This same metal is envisioned on the facade of the Learning Lounge. A glazed canopy is proposed to

compliment the neutral palette. This will be robust in specification to provide longevity.

- 5.20 This southern elevation is hidden from view, hence, the brick frontage is retained with a glimmer of metal from the metal cladding encapsulating the southern staircase. As this is located within a high level activity zone (dining hall overspill), the specification will be enhanced to ensure robustness and mitigation of damage to the cladding itself. Following the architectural language of the other facade treatments, the recess of the elevation has been highlighted but this time in brick between two zones of cladding.
- 5.21 Continuing the evagination treatment of the southern facade, the recess of the western elevation mirrors the recess in brickwork, sandwiched between two largely metal clad zones.
- 5.22 The external material choices reflect Cardiff Council's key planning policies and the historical backdrop of the site. A sensitive, neutral and robust palette is proposed which aligns with the School's vision for a higher education learning environment. Rich tones are considered for internal finishes, with colour schemes to suit wayfinding, departmental arrangements and identity.
- 5.23 It is without question that the proposed design responds positively to the local character and context of the built and landscape setting. The layout, scale, form, massing, height, density, colour and materials have been carefully selected to not only ensure no impact, but rather to enhance the character and appearance of the area. The proposed entrance Plaza has been designed as a legible, destination building at the end of Lewis Road creating a welcome environment to the school. Boundary treatments have been carefully selected to ensure a sense of security whilst also ensuring that the site is welcoming and attractive. The masterplan has been designed to deliver a healthy and convenient environment for all users that supports the principles of community safety, encourages walking and cycling, enables employment, essential services and community facilities to be accessible by sustainable transport and maximises opportunities and connections to open spaces and active routes to encourage healthier lifestyles.
- 5.24 The proposals therefore fully accord with PPW paragraphs 3.3 – 3.18, TAN12, Well-being of Future Generations (Wales) Act and Policy KP5 of the LDP which seeks to create high quality, healthy and distinct places by contributing positively to the built form.



### **The acceptability of the development in terms of highways capacity and safety**

- 5.25 The application is supported by a Transport Assessment (TA) prepared by Hydrock. Whilst the TA should be referred to for full technical detail and relevant appendices, the document does confirm the sustainable location of the school site, sited close to the city centre and to residential properties that can be comfortably reached on foot or by bike. The school site's location is such that use of the private car will be discouraged.
- 5.26 Furthermore, the TA notes that the development will benefit from the wider network of proposed Active Travel Routes which sit in close proximity to the site. The TA identifies how the existing Active Travel provision could be improved in order to safeguard safe routes to school. To promote Active Travel modes to / from the proposed development there is potential scope to convert the existing southern footway of Freshmoor Road (which is currently c.3.0m) into an SUP / segregated cycle track. This would create a link from Moorland Park (with current pupil postcodes heavily concentrated to the north). There is potential scope to continue the SUP (that currently terminates in the vicinity of the bus stop (opposite The Maltings)) along the western footway of Lewis Road (via widening into East Moors Park) (terminating in the vicinity of the Ysgol Glan Morfa access road). There are a number of further active travel improvements being considered within the surrounding highway network, including cycle cut throughs and crossing improvements. It is understood that the proposed Active Travel Routes will be delivered by Cardiff Council, utilising funds made available for active travel improvements throughout the city. These potential improvements are contained within Appendix A of the DAS.
- 5.27 Crucially, the TA includes a review of Personal Injury Accident data covering the latest available five-year period. The data confirms that there are *"no clusters of accidents which would indicate a deficiency in the local highway which would be exacerbated by the proposed development"*.
- 5.28 With reference to visitor and staff car parking, the number of spaces has been driven by the operational demands of the school. The TS confirms that data from the existing Willows High School indicates the need for a greater level of parking (beyond the policy maximum). At paragraph 6.5.14, the TA notes that *"The provision of 76 parking spaces to serve the proposed school will be sufficient to accommodate the existing demand at the school and allow for a level of flexibility whilst ensuring that there is minimum overspill of parking onto the surrounding highway network"*.

- 5.29 With reference to trip rates, the TA confirms that whilst the new school will result in a net increase in trips on local network, these trips will not be new trips within the city itself, as the proposals comprise the relocation of an existing school. Instead, the trips will be dispersed across the highway network and the result would *“not result in an unacceptable impact on highway safety and its residual cumulative impacts on the road network would not be ‘severe’”*.
- 5.30 Therefore, the impact on highways capacity and safety is considered to be acceptable and in line with the policies and ambitions of Future Wales, Planning Policy Wales (11<sup>th</sup> Edition), LDP policies KP5, KP8, KP14, T1, T6 and relevant Supplementary Planning Guidance.

**The acceptability of the development in terms of Green Infrastructure, biodiversity and enhancements**

- 5.31 The application is supported by an Assessment prepared by BSG, a Tree Report (including AIA, ARM and TPP) and a Green Infrastructure Strategy prepared by Atkinsrealis.
- 5.32 As aforementioned works have commenced on site in August 2023 inline with the enabling work application, and as such the application site is now a live construction site. It is anticipated that the enabling works to prepare the site in readiness for the school development will be completed by the time this planning application is determined. The baseline for the site will therefore continue to evolve as this planning application is determined by the Local Planning Authority.
- 5.33 With regards to the ecological baseline, an extended Phase 1 survey and bat survey was completed in 2021. Habitats surveys were updated in August 2023 in advance of permitted enabling works and inline with conditions imposed on the enabling consent (demolition and levelling of site). The combination of desk study and field survey work identified that prior to enabling works the Site supports a limited range of common and widespread habitats, the majority of which had little ecological interest or potential to support protected species. No roosting bats were recorded in the buildings. Some small-scale use of the site by foraging bats was noted, and it was concluded there was some potential for common and widespread birds typical of urban habitats to breed (principally in trees and scrub).
- 5.34 The ecological impacts of the development are likely to be very limited. Some localised tree loss will be necessary, but these trees are not of significant age and the scale of the proposed loss is very limited. The detail is contained within the accompanying Arboricultural Report which includes Tree Survey, Tree Constraints Plan, Arboricultural Impact Assessment, Tree Protection Plan and

Arboricultural Method Statement. As discussed, the proposal will result in the loss of 8 individual trees, notably one category U and 7 category C trees. 5 tree groups will be removed in total to facilitate the development; notably 3 category B groups and 2 category C groups. It should be highlighted that one Category B group and category U tree was approved for removal under the enabling application. Most of these trees identified for removal are low-quality trees (C Category) and their removal should not present a constraint on developing the site. The removal of the moderate quality trees (B Category Trees) can be mitigated by suitable compensatory tree planting within the design.

- 5.35 The ecological impact assessment confirms that the proposals will achieve biodiversity net benefit in accordance with Section 6 of PPW 11 (2023). The new school will deliver far improved local multi-functional green infrastructure (as set out in the Design and Access Statement and Green Infrastructure strategy). The proposal will not impact on designated sites, on significant trees or woodland, and the overall number of trees on the Site will be significantly increased as part of the design. As shown on the detailed landscape masterplan and discussed within the GI Statement, it is proposed to deliver 20 extra heavy standard trees, 49 Semi mature Trees and 31 Advanced Nursey Stock trees. In total, the development will deliver 100 new trees, which far exceeds the 9 individual trees and 4 tree groups to be lost. The proposal will further deliver an ecological corridor which will provide a wildlife corridor between the main site and ocean park. The planting strategy will include mainly native trees and hedgerows as well as species rich grassland. The proposal delivers a bespoke plaza entrance, community gardens, science gardens, SRB external play, playing field and landscape areas throughout the site.
- 5.36 All aspects of the DECCA Framework are satisfied by the project, indicating its local contribution to achieving ecosystem resilience. Measures will include significant hedgerow planting, species-rich grassland creation, a pond, rain gardens, and a mixture of native and ornamental planting. Bird and bat boxes will be built into the buildings. The proposals will deliver greater diversity of species, increase the extent of valuable habitats significantly, provide for the positive management of these habitats over time and enhance connectivity within the Site and to areas beyond its boundary.
- 5.37 The proposals therefore fully accord with PPW, TAN12, Well-being of Future Generations (Wales) Act and Policy KP5, KP15, KP16, EN6, EN7, EN8 of the LDP which seeks to create ecological networks, safeguard ecology and trees and deliver attractive green infrastructure to contribute positively to the built form.

### **The impact of the development as a result of Noise**

- 5.38 The application is supported by a Noise Impact Assessment (NIA) prepared by Formant. The full report should be referenced for technical details and relevant appendices. The NIA confirms that the proposed development has been assessed *"in terms of environmental noise impacts on the proposed school and building services plant noise emissions affecting nearby noise sensitive receptors."*
- 5.39 Where required, noise mitigation measures have been designed into the scheme in order to ensure the school site meets best practice guidance e.g. BB93 and BS 4142.
- 5.40 Crucially, the NIA confirms that no significant, adverse noise impacts are predicted as a result of the proposals.
- 5.41 With reference to planning conditions, the NIA highlights that the development will be required to comply with the relevant criteria of BB93 under the Building Regulations Approved Document E – therefore, it is not deemed necessary to apply any conditions relating to internal noise levels or noise break-in to the development as part of any forthcoming planning permission. With reference to plant noise, any emissions will be controlled by achieving BREEAM Po15. Notwithstanding, as detailed within the NIA, it may be appropriate for the Local Planning Authority to apply an appropriately worded planning condition to any future permission which would ensure the appropriate selection of plant and noise mitigation measures.
- 5.42 Therefore, the submitted NIA confirms that the proposals sit in line with the policies and ambitions of Future Wales, Planning Policy Wales (11<sup>th</sup> Edition), TAN 11, LDP policies KP5, KP14, EN13 and relevant Supplementary Planning Guidance.

### **Other materials considerations**

#### ***Drainage***

- 5.43 The application is supported by a full suite of drainage strategy documents and plans prepared by Curtins. Note that the plans and reports should be referred to for full technical detail.
- 5.44 With reference to surface water, the strategy confirms that the through the utilisation of surface flow attenuation measures, the scheme ensures a betterment on peak run off rates at the 2, 30 and 100-year storm return period.
- 5.45 The proposed development includes the following measures to provide interception to surface water runoff:
- Lined permeable paving
  - Bio-retention areas (rain gardens)

- Filter strips
- Filter drains

- 5.46 Curtins confirm that in terms of attenuation, surface water flows in excess of the peak discharge rate shall be stored in a below-ground attenuation crate system. Small, localised areas of surface water storage may be able to supplement this main storage, for example in the stone layer below permeable paving and bio-retention areas. As the design develops, more flow control devices shall be introduced around the development to utilise these distributed volumes of storage, and the required size of attenuation crate system is likely to decrease.
- 5.47 With reference to surface water quality, improvement measures are proposed by virtue of SuDS features across the scheme, including bio-retention areas and permeable paving. Rainwater downpipes will, wherever possible, be discharged above-ground either directly into a SuDS feature or via a surface channel.
- 5.48 The Drainage Strategy confirms that foul drainage flows from the site will connect to the existing Dŵr Cymru Welsh Water combined sewer within Lewis Rd.
- 5.49 To conclude, with reference to drainage, the proposals are considered to sit in accordance with the policies and ambitions of Future Wales, PPW (11th Ed) and LDP policies KP5, KP15, KP18, EN10 & EN11.

### **Flood**

- 5.50 The application is accompanied by a Flood Consequence Assessment (FCA) prepared by JBA. The FCA was prepared in response to the site's positioning with Zone B of the Development Advice Map (DAM) and Flood Zone 3 of the Flood Map for Planning for the Sea and a Technical Advice Note (TAN) 15 Defended Zone. As the site sits within Zone B, the established Justification Tests do not apply, however, as detailed within JBA's report, an FCA is recommended.
- 5.51 The existing "*significant and extensive coastal flood defences*" along the Rhymney River and Severn Estuary provide flood protection to the site. Furthermore, works on an additional scheme of enhanced floor defences along the banks of the Rhymney River and Severn Estuary are due to commence during the winter of 2023 into 2024. JBA confirm within their FCA that following the completion of these works, "*the risk of coastal flooding will be significantly reduced for the Rover Way area of Cardiff, including the application site*".

- 5.52 With reference to flood modelling, the FCA confirms that detailed flood modelling taken from the Cardiff Coastal Flood Defence scheme has been updated and used to confirm that the site is predicted to be flood free during the 0.5% AEP and 0.1% AEP flood events for the lifetime of development, with or without the additional benefits of the Cardiff Coastal Flood Defence scheme.
- 5.53 To conclude, the site has a very low risk of flooding from rivers, sea, reservoirs, and sewers. The site is considered to have a low risk of groundwater, surface water and small watercourses. The scheme is considered to sit in accordance with Future Wales, PPW (11<sup>th</sup> Ed), TAN 15, LDP policies KP5, KP15, KP18, EN10, EN11 & EN14.

***BREEAM Excellence/Sustainability***

- 5.54 The school has been designed to ensure that sustainability is at its core. The application is supported by a Net Zero Carbon Strategy prepared by adra. The Strategy confirms that the project will take a Whole Life Carbon approach which reports on the combined impact of Embodied Carbon and Operational Energy over the life of the building. The school has been developed using Cardiff Council's 'Net Zero Carbon Schools Standard' which means that 100% of embodied carbon associated with the development at Practical Completion should be offset through an approved carbon standard, including the UK Woodland Carbon Code, and UK Peatland Code. The proposed development therefore complies with the core message that underpins PPW, TAN12, Well-being of Future Generations (Wales) Act and LDP Policies.

## Conclusion

- 6.1 This Planning Statement accompanies a full planning application submitted on behalf of Morgan Sindall & Cardiff Council Education department for the proposed construction of a replacement school for Willows High and associated work at Land at Lewis Road, Splott, Cardiff, CF24 5JB.
- 6.2 This project to relocate the school will provide a state-of-the-art learning facility for 900 pupils aged 11-16, in conjunction with a purpose-built Special Resource Base (SRB) for 30 pupils aged 11-16. The new school will also enjoy access to sports facilities at the Ocean Park Arena and a route which connects both sites is proposed to be delivered in the form of a green avenue.
- 6.3 The rebuild and relocation of Willows High School to Lewis Road forms a critical part of delivering on the Councils vision to invest in its education estate to deliver "Inspiring, sustainable, community-focused schools in which children and young people can achieve their potential".
- 6.4 It is without question that the proposed design responds positively to the local character and context of the built and landscape setting. The layout, scale, form, massing, height, density, colour and materials have been carefully selected to not only ensure no impact, but rather to enhance the character and appearance of the area. The proposed entrance Plaza has been designed as a legible, destination building at the end of Lewis Road creating a welcome environment to the school. Boundary treatments have been carefully selected to ensure a sense of security whilst also ensuring that the site is welcoming and attractive. The masterplan has been designed to deliver a healthy and convenient environment for all users that supports the principles of community safety, encourages walking and cycling, enables employment, essential services and community facilities to be accessible by sustainable transport and maximises opportunities and connections to open spaces and active routes to encourage healthier lifestyles.
- 6.5 The TA confirms that whilst the new school will result in a net increase in trips on local network, these trips will not be new trips within the city itself, as the proposals comprise the relocation of an existing school. Instead, the trips will be dispersed across the highway network and the result would *"not result in an unacceptable impact on highway safety and its residual cumulative impacts on the road network would not be 'severe'"*.

- 6.6 The new school will deliver far improved local multi-functional green infrastructure in the form of 100 new trees, which far exceeds the 9 individual trees and 4 tree groups to be lost; an ecological corridor which will provide a wildlife corridor between the main site and ocean park; a bespoke plaza entrance, community gardens, science gardens, SRB external play, playing field and landscape areas throughout the site.
- 6.7 The proposed development responds positively to comments received during pre-application discussions and accords with relevant national and local planning policy and guidance and any material planning considerations. It is therefore requested that Cardiff City Council grant planning permission accordingly.