

Open Space Impact
Assessment
Channel View, Cardiff
April 2021



This page is intentionally blank

Introduction

Client This statement has been prepared on behalf of Cardiff Council.

Scope This statement accompanies the following application: *'Hybrid planning application for mixed-use development. Outline planning permission is sought for: The redevelopment and extension of part of the existing Channel View Estate to provide up to 321 residential apartments and houses (Use Class C3), up to 285 sq.m of retail floorspace (Use Class A1), communal gardens incorporating allotments and picnic areas, formal and informal children's play space, landscaping, cyclepaths/footpaths, drainage infrastructure, roads and parking; The regeneration of the Marl public open space to include new/improved sports pitches, children's play space, a new 'beach', water features, landscaping, and cyclepaths/footpaths; The provision of a new bus/cycle/pedestrian link between Channel View Road and South Clive Street and a new cycle/pedestrian link between South Clive Street and Ferry Road; The provision of a new parking area; Together with associated works (all matters reserved for future consideration). Full planning permission is sought for a first phase of development comprising of new tower blocks (8-12 storeys) providing 79 elderly-persons (over 55s) accommodation units, a 115sq.m community cafe, communal gardens incorporating allotments and picnic areas, landscaping, drainage infrastructure, footpaths, roads, parking and associated works.'*

Site Details

Site Address Channel View Road, Cardiff.

Site Location Fig.1 Application Site



<p>Site Description</p>	<p>The application site comprises an area of land measuring approximately 5.1 hectares in the Grangetown ward of the City. The site is currently under the control of Cardiff County Council. The site is brownfield in nature and is occupied partially by public open space, which forms the southerly portion of the area known as The Marl. The area of public open space consists of the more informal area of the Marl, which contains open grassland and some sporadic trees and vegetation. The remainder of the site consists of 188 residential properties, which are formed predominantly by a mix of two storey terraced dwellings or flats, plus the 14 storey Channel View Flats building, along with associated highway infrastructure.</p>
<p>Relevant Planning Policy</p>	
<p>Planning Policy Wales</p>	<p>Planning Policy Wales (PPW) Edition 11 (February 2021) is the overarching planning policy document for Wales. It sets out the land-use policy context for the consideration and evaluation of all types of development. Elements of PPW are of direct relevance to the determination of this application, as detailed in the following section.</p>
<p>Technical Advice Notes</p>	<p>Planning Policy Wales is supplemented by a series of Technical Advice Notes (TANs) which provide further national advice and guidance on specific areas of the planning system. Of particular relevance to this application are the following TANs:</p> <ul style="list-style-type: none"> • TAN 2: ‘Planning and Affordable Housing’ (June 2006); • TAN 5: ‘Nature Conservation and Planning’ (September 2009); • TAN 10: ‘Tree Preservation Orders’ (October 1997); • TAN 12: ‘Design’ (March 2016); • TAN 16: ‘Sport, Recreation and Open Space’ (January 2009);
<p>Development Plan</p>	<p>In accord with Section 38(6) of the Planning and Compulsory Purchase Act 2004, development must be carried out in accordance with the development plan (in this case the adopted Cardiff Local Development Plan) unless material considerations indicate otherwise.</p> <p>The Development Plan for the area comprises:</p> <ul style="list-style-type: none"> • Cardiff Local Development Plan – 2006 to 2026, which was adopted in January 2016. <p>The map extract on the following page shows that the site is subject to the following designations within the Proposals Map of the adopted Local Development Plan:</p> <ul style="list-style-type: none"> • Within settlement boundary; • Partly within the River Corridor designation (indicated by the turquoise hatching). <p>There are no other designations of relevance within close proximity to the application site.</p>

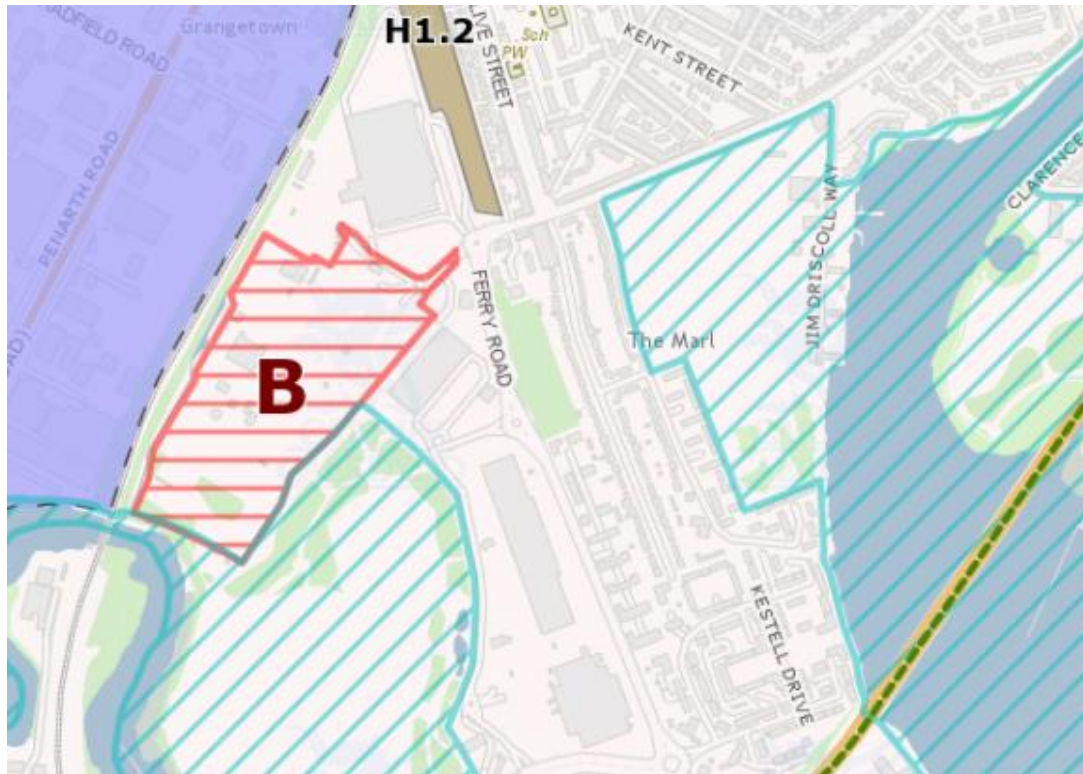





Fig.2 LDP Proposals Map Extract

-  River Corridor (EN4)
-  Strategic Site (refer to Masterplanning Supplementary documents for further details) (KP2)
Refer to Key for list of sites
-  Existing Employment Land (EC1)
Refer to Key for list of sites

The site is subject to the following designations within the Constraints Map of the adopted Local Development Plan:

- Part of the site is identified as being within Flood Zone C1 (With Significant Flood Defensive Infrastructure).

There are no other designations of relevance within close proximity to the application site.

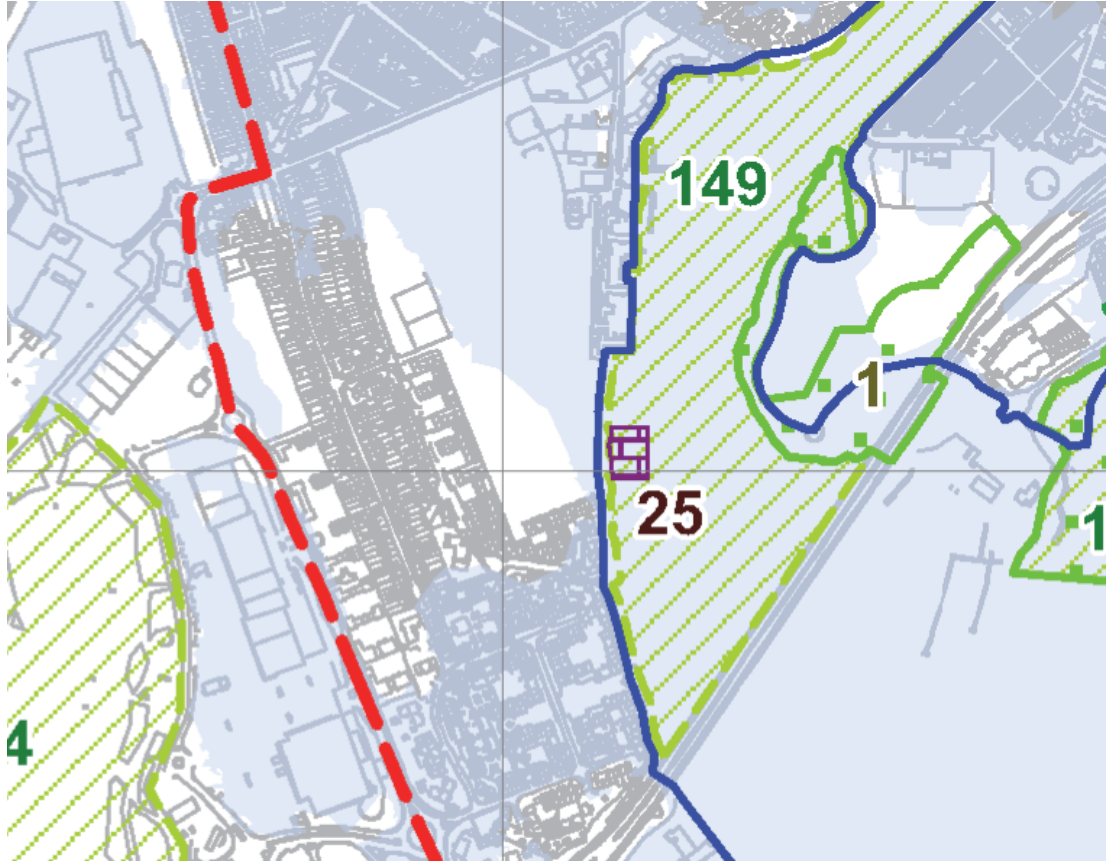




Fig.3 LDP Constraints Map extract

-  Rapid Transit Corridor
(For North West Corridor, all current potential routes shown. Further work will determine the most appropriate route and alignment)
-  Flood Zone C1*
(with Significant Flood Defensive Infrastructure)

The relevant numerical annotations on the map are:

25 - The Wreck of the "Louisa"

149 - River Taff

The following policies are considered to be of direct relevance to the assessment of the proposed development:

(i) Policy C1 'Community Facilities'

Proposals for new and improved community facilities, health and religious facilities will be encouraged, subject to the following criteria being satisfied:

- i. The facility would be readily accessible to the local community it is intended to serve by public transport, walking and cycling;
- ii. The facility would not unduly prejudice the amenities of neighbouring and nearby residential occupiers;
- iii. The facility would not detract from the character and appearance of a property or the locality;
- iv. The facility will not lead to unacceptable parking or traffic problems;
- v. The facility is designed with the greatest possible flexibility and adaptability to accommodate additional community uses without compromising its primary intended use.

(ii) Policy C3 'Community Safety / Creating Safe Environments':

All new development and redevelopment shall be designed to promote a safe and secure environment and minimise the opportunity for crime. In particular development shall:

- i. Maximise natural surveillance of areas which may be vulnerable to crime such as publicly accessible spaces, open space, car parking areas and footpaths;
- ii. Have well defined routes, spaces and entrances that provide convenient movement without compromising security;
- iii. Maintain perceptible distinction between public and private spaces through well-defined boundaries and defensible space;
- iv. Provide a good standard of lighting to public spaces and routes while minimising energy use and light pollution; and
- v. Be designed with management and maintenance in mind, to discourage crime in the present and future.

(iii) Policy C4 'Protection of Open Space' of the adopted Local Development Plan (LDP):

Development will not be permitted on areas of open space unless:

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

The supporting text to Policy C4 goes on to state:

5.318 The aim of this Policy is to protect open space that has significant functional, conservation, environmental or amenity value. It applies to all areas of open space within the County.

5.320 The Policy is in accordance with the Wales Spatial Plan, PPW and Technical Advice Note 16: Sport Recreation and Open Space (2010) which requires that all types of open space are protected, particularly where it has a strategic countywide importance.

5.321 The various types of open space in Cardiff will be listed and explained in detail in the Cardiff Open Space SPG. For the purposes of this policy functional green space includes land that can accommodate formal and / or informal recreational uses including sporting use and children's play.

5.322 Proposals for development on areas of open space will be assessed against a functional green space requirement of 2.43 hectares per 1,000. This is explained in more detail under Policy C5.

The quality of an area of open space will be assessed having regard to issues such as:

- *Accessibility;*
- *Biodiversity; Facilities;*
- *Management and maintenance;*
- *Contribution to local amenity;*
- *Contribution to recreation; and*
- *Strategic value'.*

(iv) Policy C5: *'Provision for OpenSpace, Outdoor Recreation, Children's Play and Sport'*

Provision for open space, outdoor recreation, children's play and sport will be sought in conjunction with all new residential developments. This policy is aimed at securing the provision or improvement of open space and other appropriate outdoor recreation and sport in conjunction with all new residential developments over 8 units and on site provision of functional open space in conjunction with all new residential developments over 14 units. The appropriate amount of multi-functional green space is based on a minimum of 2.43 hectares of functional open space per 1,000 projected population. All other open space provision will be in addition to the provision of multi-functional green space.

(v) KP16: 'Green Infrastructure'

Cardiff's distinctive natural heritage provides a network of green infrastructure which will be protected, enhanced and managed to ensure the integrity and connectivity of this multi-functional green resource is maintained.

Protection and conservation of natural heritage network needs to be reconciled with the benefits of development. Proposed development should therefore demonstrate how green infrastructure has been considered and integrated into the proposals. If development results in overall loss of green infrastructure, appropriate compensation will be required.

Natural heritage assets are key to Cardiff's character, value, distinctiveness and sense of place. They include the City's:

- i. **Undeveloped countryside and coastline (EN1 and EN2);**
- ii. **Landscape, geological and heritage features which contribute to the City's setting (EN3);**
- iii. **Strategically important river valleys of the Ely, Taff, Nant Fawr and Rhymney (EN4);**
- iv. **Biodiversity interests including designated sites and the connectivity of priority habitats and species (EN5, EN6 and EN7);**
- v. **Trees (including street trees), woodlands and hedgerows (EN8);**
- vi. **Strategic recreational routes, cycleways and the public rights of way network (T5, T6 and T8);**
- vii. **Parks, playing fields, green play areas and open spaces (C4 and C5); and**
- viii. **Growing spaces including allotments, community orchards and larger gardens; and**
- ix. **Holistic integrated surface water management systems (EN10).**

(vi) Policy EN4 'River Corridors':

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.

(vii) EN8: 'Trees, Woodlands and Hedgerows'

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.

Cardiff Supplementary Planning Guidance

- Green Infrastructure (November 2017)
 - (i) Technical Guidance Note (TGN) relating to Protection and Provision of Open Space in New Developments (November 2017).
- Cardiff Supplementary Planning Guidance on Planning Obligations (January 2017) provides further guidance on the Council's open space requirements, as follows:

'5.23. Functional open space provision is calculated from the projected population of a development and the application of a minimum standard of 2.43ha per 1000 projected population. This is an aggregation of four components:

- *Equipped play and children's play areas: 0.25ha*
- *Teen equipment: 0.30ha*
- *Informal functional open space: 0.68ha*
- *Formal functional open space: 1.20ha'*

Supplementary Planning Guidance on Green Infrastructure

In November 2017 the Council adopted their Green Infrastructure SPG, which included a Technical Guidance Note on the Protection and Provision of Open Space in New Developments.

The SPG includes within it definitions of the various open space provisions, including:

Open Space: Open space is defined in the Town and Country Planning Act 1990 as land laid out as a public garden, or used for the purposes of public recreation, or land which is a disused burial ground. For the purposes of this guidance, open space should be regarded as all open space of public value, including not just land, but also areas of water such as rivers, canals, lakes and reservoirs which offer important opportunities for sport, recreation and tourism, and can also act as a visual amenity, and may have conservation and biodiversity importance. Areas which are privately owned may have amenity value, although access will not be possible without the agreement of the land owner. Areas like domestic gardens are relevant, since places without or with few gardens, are likely to be more reliant upon the provision of public spaces.

Public Open Space: The term public open space is often used interchangeably with the term open space and in legal terms, the definition is the same (see above).

Functional Open Space: Functional open space is open space that is capable of defined recreational use or multiple uses. These uses will include formal and informal sport and recreation, children's play and provision for teenagers although the balance of defined uses may change with time according to local demand.

Formal Recreation: Formal outdoor sports activities such as football and cricket. Land designated for formal recreation can include artificial turf and 3G pitches, greens, courts and athletic tracks, including dedicated ancillary facilities such as floodlighting, changing rooms and associated parking. Formal recreation does not include golf courses, indoor sports and leisure centres.

Informal Recreation: Informal open space uses such as walking, jogging, cycling, informal ball games, and general leisure. Land provided for informal recreation can include green corridors that can be used for active recreation due to presence of a permanent hard surfaced footpath. The open space may contain water features or SuDS where it is demonstrated that these serve a recreational function.

Teen facilities: Areas designed for teen use including Multiuse Games Areas (MUGAs), skate parks, outdoor fitness equipment and shelters.

Regarding open space standards for Cardiff the Guidance Note states:

2.6.2 The Cardiff standard is based on quantitative, qualitative and accessibility criteria based on the FIT 'Benchmark Standard' of 2.43 hectares of functional open space per 1,000 projected population.

4.2.1 Functional open space is defined in section 1.8. It may be in public or private ownership, but must be available for public use for formal / informal recreation, for children's play or for use by teenagers. Functional open space includes equipped children's play areas, informal play spaces and formal recreation

areas, such as pitches, greens, athletic tracks, courts and educational land where it is laid out to accommodate formal recreation.

This standard is broken down by type of provision as follows:

Type	Quantity	Straight line catchment
Open space (functional green space) comprising a mix of:	2.43 ha per 1000 population	Dependent upon type of provision made (see below)
<ul style="list-style-type: none"> • Level land suitable for formal sport 	1.2 ha per 1000 population (see Appendix 2)	1000m
<ul style="list-style-type: none"> • Children's play 	Designated area dependent on type. Minimum area of dedicated children's play provision is 0.25 ha per 1000 population (see Appendix 3)	Should be provided within 400m of homes
<ul style="list-style-type: none"> • Teen facilities <ul style="list-style-type: none"> ○ BMX ○ MUGA ○ Teen shelters ○ Skateboard parks 	Designated area dependent upon type minimum area 0.3 ha per 1000 population (see Appendix 4)	Should be provided within 600m of homes and located to prevent any negative impact of their use on adjacent properties.
<ul style="list-style-type: none"> • Allotment / growing provision <p>Strategic sites only – additional to open space provision. Non-strategic sites, provision may be made within the 2.43ha per 1000 population with agreement.</p>	One 40 plot allotment site per 1800 properties ⁴ , increasing pro rata according to the size of the development - strategic sites only. (See Appendix 5)	No distance criteria

Cardiff Council also undertakes an 'Open Space Assessment', the most recent available assessment being dated 2019.

The Open Space Assessment also provides a 'Multi-functional Greenspaces, Quality and Value Audit.'

Planning History

Planning History

The following planning history is of relevance:

Full Planning Application No. 17/00810/MNR

'HOUSING REGENERATION SCHEME COMPRISES OF 1) THE CHANGE OF USE OF GREEN PUBLIC SPACE TO ADDITIONAL PARKING BAYS. 2) THE CHANGE OF USE OF GREEN PUBLIC SPACE TO RESIDENTIAL COMMUNAL GARDEN AREA, BOUNDARY OF 1.8M HIGH TIMBER FENCE. 3) DEMOLISH EXISTING BIN STORES AND REPLACE WITH NEW 1.8M HIGH BIN STORES . 4) DEMOLISH A SECTION OF EXISTING BRICK WALL AND REPLACE WITH 1.8M HIGH BRICK WALL TOPPED WITH RAILINGS AND NEW PEDESTRIAN RAMP | 69-287 CHANNEL VIEW ROAD'.

Withdrawn November 2017

Full Planning Application No. 16/01898/MNR

'COMBINE AND CONVERT ADJOINING BASKETBALL AND NETBALL COURTS INTO A 'THIRD GENERATION' (3G) ARTIFICIAL TURF PITCH (ATP) FOR FOOTBALL TRAINING. 6 NEW REPLACEMENT COLUMNS AT THE ATP BOUNDARY AND ASSOCIATED WORKS INCLUDING ALTERATIONS TO BOUNDARY WALLS AND REMOVAL OF SOME TREES, NEW COURT SURFACE, PORTABLE GOALS AND DIVIDING CURTAIN NET AT THE MARL RECREATION GROUND, FERRY ROAD, GRANGETOWN'.

Approved October 2016

Pre-Application Enquiry No. PA/20/00054/MJR

'Pre-Application Enquiry for: 'DEMOLITION OF 188 RESIDENTIAL UNITS OF BETWEEN 2 – 4 STOREYS HIGH AND THE DEMOLITION OF THE 14 STOREY BLOCK OF FLATS TO ACCOMMODATE THE CONSTRUCTION OF 370 NEW RESIDENTIAL DWELLINGS. THE DWELLINGS WOULD PROVIDE A MIX OF 2 STOREY PROPERTIES AND BLOCKS OF FLATS OF UP TO 7 STOREYS HIGH AND AN OLDER PERSON'S SCHEME OF UP TO 15 STOREYS HIGH. PROPOSALS FOR THE SITE ALSO RELATE TO A SEPARATE PROJECT TO DEVELOP A NEW PEDESTRIAN/ CYCLE BRIDGE OVER THE RIVER TAFF LINKING THE AREAS OF GRANGETOWN AND BUTETOWN. THE MARL PUBLIC OPEN SPACE WOULD BE RE-DEVELOPED AS AN INTEGRAL PART OF THE PROPOSALS'.

LPA Response July 2020

Analysis

Land Use Planning and Design

This Open Space Impact Assessment concentrates solely on the assessment of the impact of the proposed development upon the redevelopment of a portion of The Marl area of public open space (POS). The planning application is accompanied by an Environmental Statement which analyses the material planning impacts of the proposed development in all other respects.

To set the context of the application, this is a proposal for the redevelopment of an existing, predominantly residential area, which is in poor condition and does not comply with modern planning principles in terms of its layout, natural surveillance and beneficial relationship with the area of adjacent POS. The proposals are for a comprehensive redevelopment of the site, to ensure an improved environment for the current occupants, who are all to be re-housed on site. In addition the redevelopment of the site will deliver an opportunity for additional residential development.

The increase in the number of units on site is required to assist in the delivery of much needed additional housing stock for the growing City, much of which will be affordable housing. As such the development complies with the aspirations of PPW. In accord with Section 38(6) of the Planning and Compulsory Purchase

Act 2004, development must be carried out in accordance with the development plan (in this case the adopted Cardiff Local Development Plan) unless material considerations indicate otherwise. In this instance the vast majority of site comprises of previously developed residential land within the settlement boundary of Cardiff, which is otherwise unallocated within the adopted LDP. Therefore, the principle of the redevelopment of the previously developed residential land for housing purposes is sound and is supported by the Local Planning Authority.

The land of the Marl to be lost would be from the southern portion of the Marl, to the south of the footpath which travels east to west as a continuation of Beecher Avenue. The southern portion of the Marl currently lacks real value, in terms of arboriculture / ecology or amenity. The land is largely an open area of featureless grassland, save for some limited areas of vegetation in the far south and a natural turf rugby pitch within the most northerly part of the southern section of the Marl.

TAN 16 'Sport, Recreation and Open Space' provides '*advises on the role of the planning system in making provision for sport and recreational facilities and informal open spaces, as well as protecting existing facilities and open spaces in urban and rural areas in Wales*'.

Paragraphs 3.5 – 3.12 entitled '*Protecting and Enhancing Existing Sport and Recreation Facilities and Open Spaces*' contain guidance which is of particular relevance to the development proposals for consideration.

Paragraph 3.6 provides relevant guidance for the assessment of the proposed development: '*The use of open spaces and facilities may be affected by factors such as landform and landscape features, their relationship to adjoining land uses, means of access such as footpaths, cycle paths and roads, the mix of users, levels of security, vandalism, unsupervised dogs, maintenance standards, the provision of warden or ranger services, and proximity to home, particularly for younger children. The poor condition of recreational facilities, playing fields and open spaces may be a constraint on their use, particularly in relation to the quality of facilities, surfaces and drainage. In such circumstances it may be more appropriate to prioritise improvements rather than to seek additional provision*'.

The existing open space is of average quality and is not considered to be of high value, due to its relatively featureless form, which lacks diversity and interest in landscape, ecological or botanical form. The open space also lacks in terms of its pedestrian and cycle connectivity. The open space also suffers from problems with dog fouling, littering, vandalism and anti-social behaviour. The proposed development seeks to improve the quality and interest of the landscape with significant improvements in both hard and soft landscaping and connectivity through the park. The aspiration is to attract greater numbers of people into the open space by making it more attractive and user friendly. These improvements, along with improved natural surveillance are aimed towards reducing issues of crime and littering / dog fouling. Whilst the area of POS will be modestly reduced, the significant area of remaining green space will be enhanced, enabling the residents to derive more enjoyment from the use of this amenity.

Paragraph 3.7 advises: '*Playing fields and green open spaces have special significance for their recreational and amenity value and, particularly in towns and cities, for their contribution to the urban environment and for supporting biodiversity. Playing fields and green spaces add interest and vitality to living and working environments. In addition to their environmental role they can also offer health and well-being benefits, and opportunities for community engagement..... Only where it can be clearly shown that there is no deficiency, should the possibility of their use for alternative development be considered. Playing field loss will need to be justified in relation to policies in the LDP, PPW and, where available, be consistent with the findings of the Open Space Assessment*'.

The proposed development is intended to enhance the health and well-being benefits which the Marl can offer by making it a more inviting, attractive environment where residents feel more comfortable and are

less concerned about anti-social behaviour and crime. The proposals will also ensure no detriment to sport provision by the replacement of the rugby pitch which would be lost with another pitch on the Marl. Guidance indicates that the value of an area in terms of the quality of its landscape, ecological resource and its attractiveness of use to the community are more important than the overall size of the area which is available for use. Paragraph 6.8 of Cardiff Council's Planning obligations SPG states: *'In some circumstances it may be appropriate to provide an alternative form of functional open space provision that caters to the needs of the local population. For example, the loss of an area of informal open space may be better compensated for by investment in qualitative improvements to other open space in the locality (such as a sports pitch)*'. The loss of a small proportion of the Marl would enable a significant improvement in the quality of the remaining open space.

Paragraph 3.8 is of relevance to the proposed development and offers endorsement of the adopted approach: *'Sometimes, the retention and enhancement of facilities may best be achieved through the redevelopment or rehabilitation of a small part of a site, particularly where this would be related to playing field use, for example the provision of changing facilities, which would not adversely affect the quantity or quality of remaining pitches, or their use. Some forms of development, for example housing, may affect the use of remaining playing areas, and the possible benefits offered by such development should be weighed against the possible effects on open space, which may occur*'.

Whilst the loss of any public open space is unfortunate the applicant considers that the provision of much needed housing outweighs the loss of a limited area of average quality open space. The proposed development seeks to invest considerably in the retained portion of the Marl to ensure that this open space is a pleasurable place for the residents to enjoy spending time. There is significant opportunity for improvements to the Marl, which otherwise could not capably be delivered.

Paragraph 3.12 advises: *'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*'.

The acceptability of the scheme will largely depend on the acceptability of the redevelopment of a portion of the Marl POS. The development therefore, falls to be assessed against Policy C4 *'Protection of Open Space*' and Policy C5 *'Provision for OpenSpace, Outdoor Recreation, Children's Play and Sport*', along with Cardiff Supplementary Planning Guidance *'Green Infrastructure*' and Technical Guidance Note (TGN) *'Protection and Provision of Open Space in New Developments*'.

LDP Policy C4 states: *'Development will not be permitted on areas of open space unless:*

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

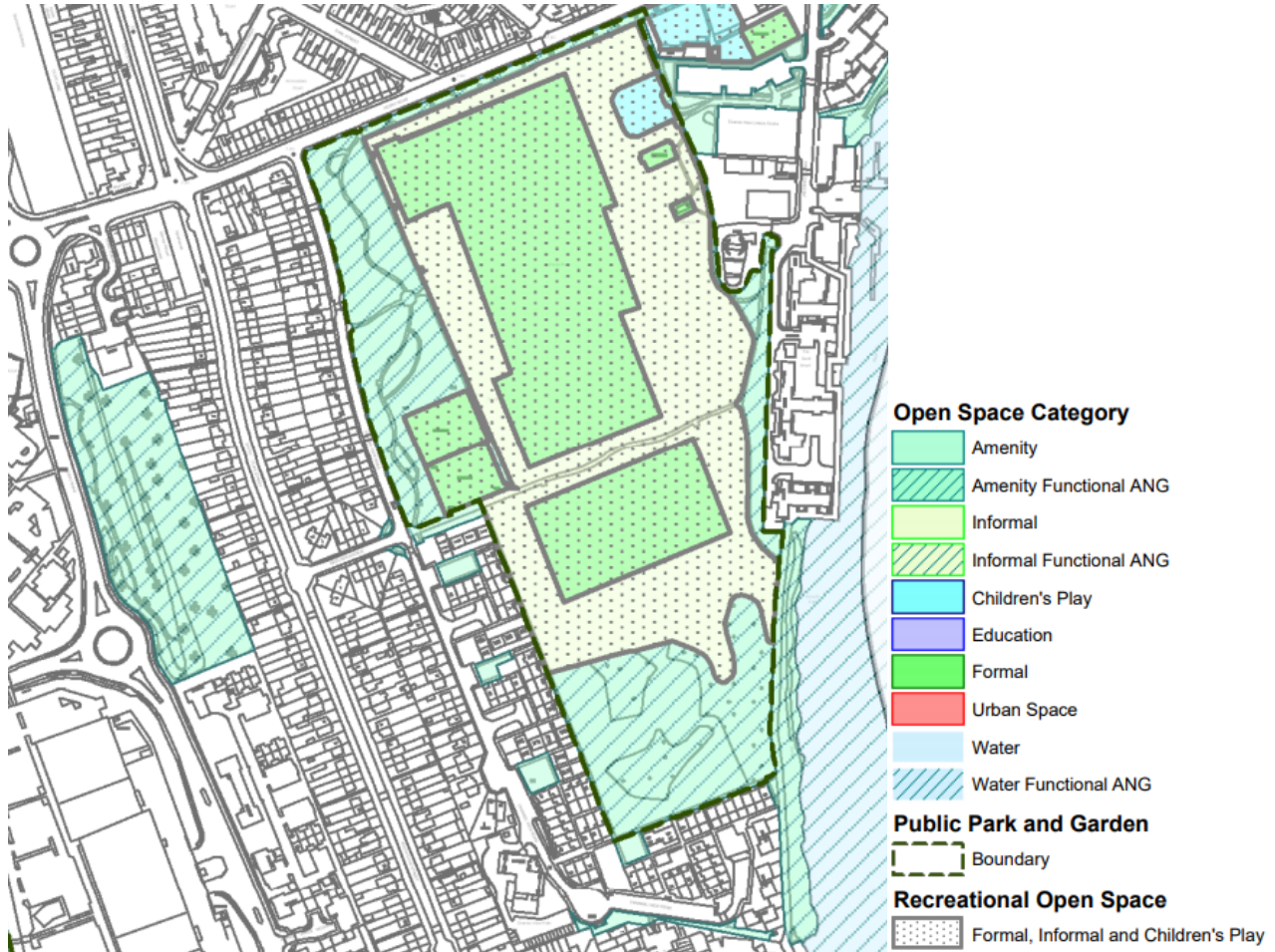
Each of the provisions of Policy C4 will be examined in turn.

- i. 'It would not cause or exacerbate a deficiency of open space in accordance with the most recent open space study;'*

Cardiff Council undertook an updated Open space survey in May 2019. The results of the survey indicated that the ward benefits from 14.60 Hectares of Recreational Open Space. The Recreational Open Space

requirement (ha) based upon 2.43ha per 1000 population is 53.22ha. Therefore, there is deficit of Open Space of 38.62ha within the ward.

The study provides an analysis of the existing Open Space provision within the ward and breaks down open space into different categories dependant upon its form and use. The study map extract below identifies the categories of open space provision within the Marl:



Open Space Locations Grangetown Map Extract

The data in the below table is extracted from the Open Space Category Area (ha) by Ward table provided within the 2019 Open Space Survey (May 2019).

Category	Grangetown
Amenity	54.04
Children's Play	0.53
Education	1.22
Formal	6.14
Informal	7.93
Urban Spaces	0.00
Water	94.86
Grand Total	164.72

As identified earlier the 2019 Open Space Assessment categorised the open space within the application site as predominantly 'Informal' and 'Amenity Functional Accessible Natural greenspace (ANG land)'. The

Open Space Survey shows that there are 54.04 Hectares of Amenity land within the Grangetown Ward, which aside from water represents the greatest quantum of provision.

There is also an area of formal recreational space, in the form of a rugby pitch within the southern portion of the Marl. However, no formal amenity space is to be lost, as the existing rugby pitch is to be replaced within the Marl.

The proposed development would result in a modest reduction in the availability of 'Informal' and 'Amenity Functional Accessible Natural greenspace (ANG land). However, this loss would be off set by a significant provision of new areas of amenity space in the form of communal gardens and integrated open space into the streetscene throughout the development. The proposed development also includes new opportunities for children's play, which the Grangetown ward currently suffers a deficit.

ii. *'The open space has no significant functional or amenity value; and'*

The Open Space provided on the southern portion of the Marl, upon which the proposed development partially impacts, is predominantly 'Informal' and 'Amenity Functional Accessible Natural greenspace (ANG land).

There is an area of formal recreational space, in the form of a rugby pitch within the southern portion of the Marl. However, the proposals will not result in the loss of this space, as a new replacement pitch will be provided orientated north / south (instead of the existing east / west orientation).

iii. *'The open space is of no significant quality, or'*

The most recent Multi-Functional Green Spaces: Quality and value Audit (2019) scored the Marl on a scale of 4 (being excellent) to 0 (Very poor) against a wide range of assessment criteria. The overall Value Rating of the Marl was concluded to be 63.6%. The following results, which show where the Marl failed to achieve a good rating and are considered to be of relevance are shown below:

The following criteria were judged to be 2 (Average):

- Accessible from neighbouring streets/parking by wheelchair;
- Informal surveillance from neighbouring properties;
- Horticultural interest and range of habitat types;
- Well distributed street furniture;
- Freedom from litter;
- Freedom from dog fouling;
- Freedom from dangerous materials (eg broken glass);
- Freedom from erosion;
- Condition of grassed areas;
- Relationship with adjacent buildings;
- Range of habitats; and
- Social importance of the site within its neighbourhood.

The following criteria scored 1 (Poor):

- Freedom from vandalism and graffiti.

The results of the Quality and Value Audit 2019 reveal that there are numerous aspects of the Marl's offering which could benefit from improvement. The proposed development is likely to have a significant improvement upon all of the above criteria, save for those matters relating to behavioural issues such as vandalism and graffiti and littering and dog fouling. However, the improvements proposed to the Marl

would likely have an indirect impact upon these issues through improved surveillance of the Marl and greater use of the open space resulting from improved accessibility and the enhanced environment.

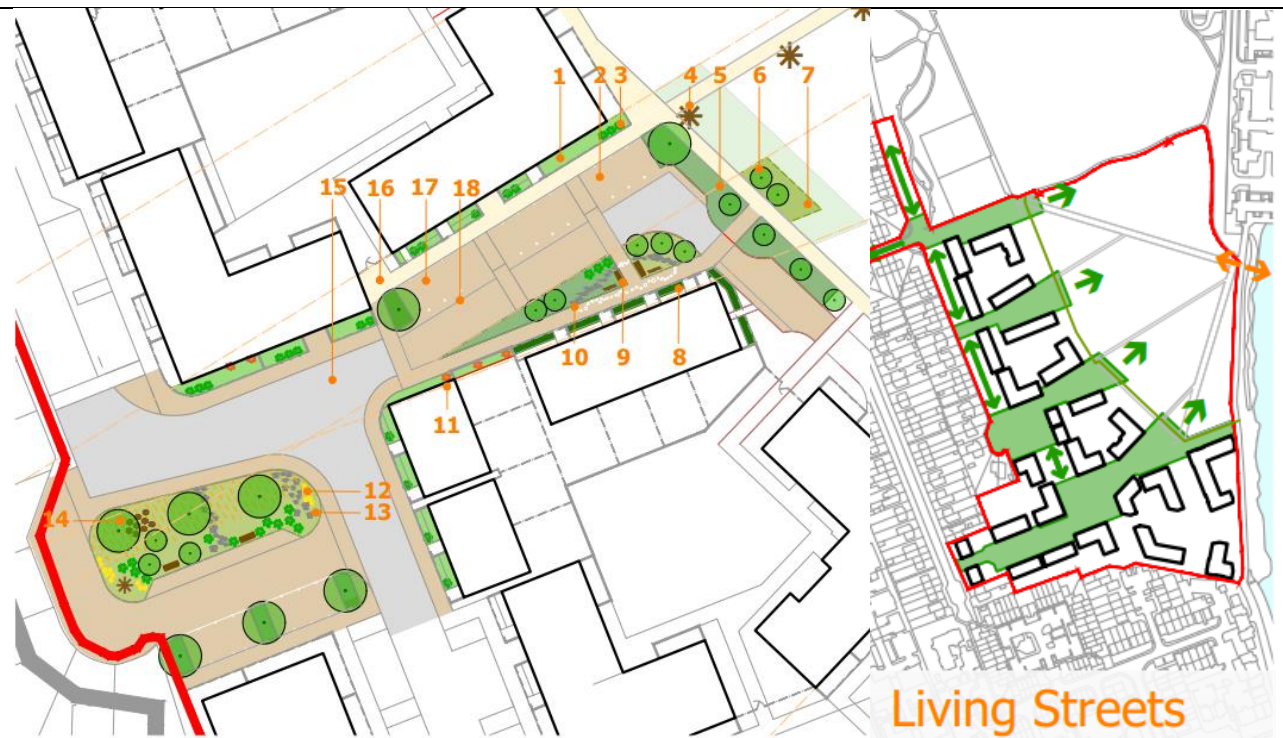
iv. *'The developers make satisfactory compensatory provision; and, in all cases;'*

The proposed development will result in a modest reduction in the area currently identified as the Marl. However, the proposals seek to address and mitigate for this reduction in open space by providing compensatory open space within the development. It is proposed to achieve this by significantly enhancing the offering of and opportunities for, recreation within open green spaces within the redeveloped residential area. Cardiff Council's Planning Obligations SPG (paragraph 6.8) confirms that *'In some circumstances it may be appropriate to provide an alternative form of functional open space provision that caters to the needs of the local population. For example, the loss of an area of informal open space may be better compensated for by investment in qualitative improvements to other open space in the locality (such as a sports pitch)'*.

The proposed development will include areas of communal amenity space around the proposed buildings which will incorporate a mixture of shrubs, herbaceous plants and grasses. The planting scheme will also incorporate focal / feature planting. Large trees are to be planted within the 'living' streets to provide shade and cooling during the summer months and provide additional character. Structure planting is to be used along roads and junctions to incorporate a mixture of evergreen and deciduous robust and low maintenance shrubs. Architectural foliage is proposed to carry the design theme of the Marl into the development. Rain gardens are also proposed to provide year-round interest and enhance biodiversity with a mixture of shrub and herbaceous planting as well as managing rainwater runoff. Boulders and logs are to be used within planting areas / rain gardens and delineated routes within footways, for opportunities for creative play / seating and interest within features. Seating will be used throughout the development within and adjacent to communal / street garden areas to encourage social interaction and the enjoyment and ownership of these spaces by the local community. The image below shows an example of a "living" street, along with proposed landscape drawing extracts, on the following page, provide a better understanding of the significant opportunities for enhancing the quality of life of the community through a more integrated and cohesive approach to green open space provision.



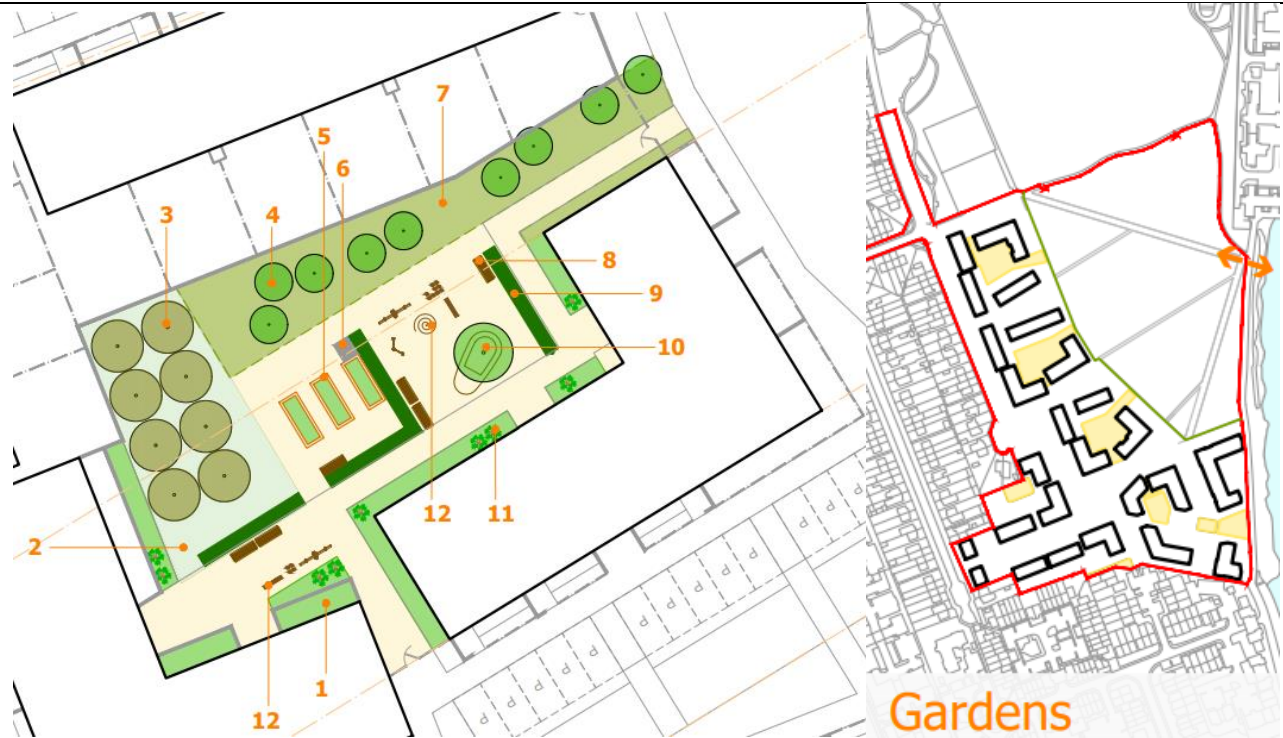
Living Street Example Image



Drawing Extracts from the Supporting Landscaping Proposals 'Living Streets'

The approach to soft planting and landscaping is also proposed within communal gardens, as identified in the following drawing extracts. Communal gardens are proposed throughout the development, as indicated on the gardens plan extract. In addition to the amenity grass, shrub and tree planting proposed, the gardens will include orchards designed to create interest from spring through to autumn and combined with raised planters will provide food growing opportunities for residents, a communal shed is to be provided for the storage of gardening equipment and play equipment and both formal timber seating and informal seat / planters are to be provided.

On balance, the proposals will significantly enhance the open space offering for the local community. The proposals are designed to encourage the community to “take ownership” of these spaces and to play an active part in caring for, nurturing, and enjoying these communal green spaces.



Drawing Extracts from the Supporting Landscaping Proposals Communal Gardens'

- v. *The open space has no significant nature or historic conservation importance'.*

The land in question is not subject to any designations related to ecological or botanical value. The site is predominantly heavily mown and is not known to provide habitat for any protected species. The site does not form part of a Registered Historic Park and Garden, is not within a Conservation Area, does not contain any Scheduled Ancient Monuments nor is it within the setting of any Listed Buildings. Accordingly, the open space is not of historic conservation importance.

The Marl is part of a designated River Corridor and therefore falls to be considered against the provisions of Policy EN4 of the LDP. Policy EN4 of the LDP requires *'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'*. The proposed development seeks to enhance the river corridor by directly improving the built environment along the corridor and also by enhancing the connectivity to this asset through the provision of new footpaths / cycleways through the Marl by improving pedestrian and cycle links. The footpaths will also provide significantly improved access to the Cardiff Bay Trail, which enables the enjoyment of the river corridor and wider Bay area for recreational purposes. The proposals also include the enhancement of the public open space within river corridor to encourage greater use of the area for recreational and leisure purposes.

Conclusion

The proposed development adheres to the provisions of National policy in the form of PPW and all relevant TANs. Furthermore, the development adheres to the policies of the Cardiff LDP and the guidance contained within the adopted SPGs, with regard to the location of the development, the sustainability of the site and the impact of the development upon the public open space (known as The Marl).

The contribution towards the housing-land supply, particularly with regard to affordable housing and the replacement affordable housing which is to be provided on site, along with the sustainability credentials of the scheme weigh heavily in favour of the proposed development.

The development proposals include significant enhancements to the existing Open Space provision within the Marl and wider area, including proposals for improved natural surveillance and accessibility for all to the open space.

The evidence will demonstrate that, whilst the proposals would involve development on area of existing open space, the provision of high-quality, compensatory provision of open space of which there is a greater shortfall within the ward, together with wider enhancements of existing open space provision, will ensure that the scheme complies with LDP Policies C4 and EN4.

The scheme has been developed with careful consideration for technical considerations, as assessed within the submitted Environmental Assessment, which evidences the compliance of the development with both relevant national and local planning policy in these regards. It is therefore, respectfully concluded that the application should be supported.