

Our Ref: 26.143
Date: 21st May 2026

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Dear Sir/Madam,

**The Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017
Request from Bridgend County Borough Council for Screening Opinion under Regulation 6 (1)
Proposed Gypsy and Traveller site with associated works at Land off Seawall Road, Cardiff**

On behalf of the Applicant, Cardiff Council, Asbri Planning write to formally request a Screening Opinion (under Regulation 6 (1) of the Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017), as to whether Environmental Impact Assessment (EIA) is required for the proposed Gypsy and Traveller site with associated works at Land off Seawall Road, Cardiff.

In accordance with Regulation 6 (2), we provide the required information as follows:

- a) A plan sufficient to identify the land;
- b) A description of the development, including in particular;
 - A description of the physical characteristics of the development;
 - A description of the location of the development, with particular regard to the environmental sensitivity of geographical areas likely to be affected;
- c) A description of the aspects of the environment likely to be significantly affected by the development;
- d) A description of any likely significant effects, to the extent of the information available on those effects, of the proposed development on the environment resulting from –
 - The expected residues and emissions and the production of waste, where relevant; and,
 - The use of natural resources, in particular soil, land, water and biodiversity; and
- e) Such other information or representations as the person making the request may wish to provide or make including any features of the proposed development or any measures envisaged to avoid or prevent what might otherwise have been significant adverse effects on the environment.

The request for Screening Opinion comprises the following supporting documents and drawings:

- Site Location Plan (ref: 26009 (SK) 04)
- Proposed Site Layout (ref: 26009 (SK) 07)

Site Description

Figure1: Site Location



The application site is located at the north of Seawall Road at Splott, Cardiff. The site currently comprises of xxx The site is situated on the grid co-ordinates of X:311799 and Y:175554 and comprises circa [site area]. The site is currently surrounded by mature trees and hedgerows.

Seawall Road is situated immediately to the south of the site and provides connections to Cardiff City Centre, approximately 2.6 km to the west, and Rover Way that connects the A48 and A4232. In terms of the surrounding land uses, there are a variety of land uses within close proximity to the application site. Existing residential units are located at the north and west from the application site. Willows High School adjoins the southwestern site boundary. Pengam Green adjoins the site's eastern boundary and Tremorfa Park is located at the northeast of the site. A large supermarket is located approx. 500m to the northeast of the application site. Lastly, industrial units are located at the south of the application site.

The site can be accessed from Seawall Road off a roundabout for both vehicular traffic and pedestrians The application site is accessible by public transport with bus route 11 providing access to Cardiff City Centre. The closest bus stop is located approx. 400m to the southwest of the site at Willows Avenue. The site is also benefit from existing pedestrian infrastructure with well-lit footpaths along Seawall Road.

Within the adopted Cardiff LDP the application site is located within the boundary of settlement limits, and forms 'white land' subject to no specific policy designation. However, it should be noted that the site is proposed to be allocated for a Gypsy and Traveller Site within the emerging replacement LDP. In addition, as shown on the LDP Constraints Plan, the site is located within a Site of Importance for Nature Conservation (Pengam Moors).

Planning History

Asbri Planning have undertaken a review of the Cardiff Council online planning register and the site is subject to the following major planning history:

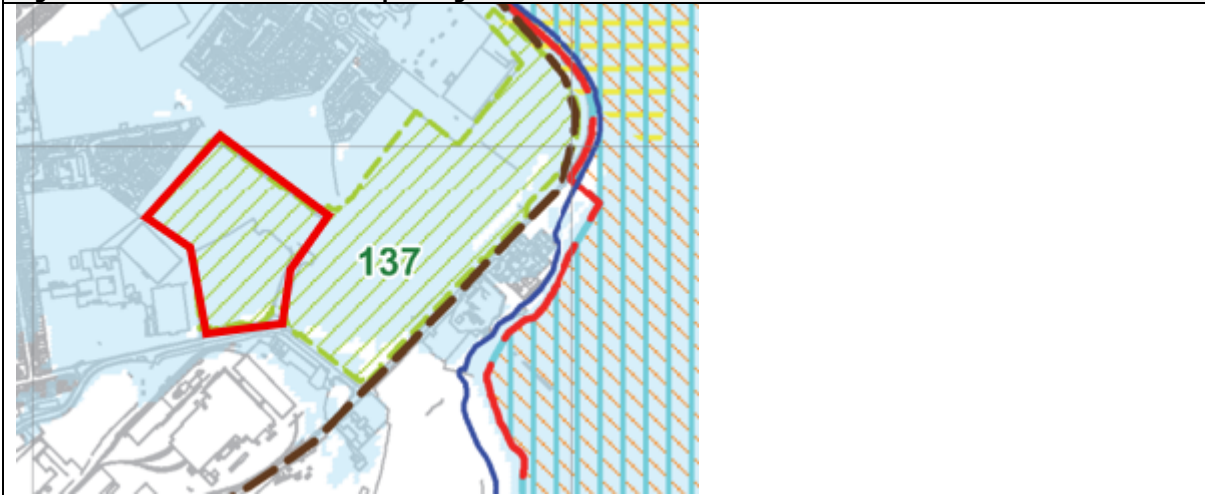
- 90/00949/R – Distributor Road – Approved on 25.07.1990
- 90/01253/R - Proposed district centre incorporating petrol station, A1, A2, A3 uses and ancillary public open space – Approved on 20.02.1991
- 90/02086/R – Central park and broadwalk public open space – Approved on 20.02.1991
- 90/02097/R - Extension to the Seawall Road industrial estate road – Approved on 20.02.1991
- 90/02099/R – Industrial Development – Approved on 20.02.1991
- 91/00322/R – Surface water storage tanks – Approved on 24.04.1991
- 91/01178/R – Extension to the Seawall Road industrial estate road – Approved on 10.09.1991
- 94/00124/R – Proposed district centre incorporating petrol station, A1, A2, A3 uses and ancillary public open space – Renew of permission 90/1253R – Approved on 21.04.1994
- 94/00151/R – Industrial Development – Renewable of Permission 90/209R – Approved on 08.03.1994
- 94/00368/R – Extension to Seawall Road industrial estate road – Approved on 27.04.1994
- 97/00292/R – Pengam Green Ground Reclamation – Approved on 22.04.1997
- 97/00283/R – Renewable of permission 94/151R for industrial development park – Approved on 04.04.1997
- 98/01558/R - B1(C) B2/B8 industrial/warehouse units with associated offices, car parking and servicing facilities – Approved on 04.12.1998
- 98/01712/R – Application for B1(C) B2/B8 industrial/warehouse units with associated offices, car parking and servicing facilities – Approved on 07.12.1998

Spatial Environmental Constraints

Ecology & Biodiversity

The site is located within the Site of Importance for Nature Conservation Ref 137-Pengam Moors. The location of the SINC is illustrated below (green hatching)

Figure 2: Cardiff LDP Constraints Map - Pengam Moors SINC



Flood Risk

The Natural Resources Wales TAN 15 Flood Map for Planning indicates the site is located within Flood Zone 3 (a greater than 1 in 200 (0.5%) chance of flooding from the sea in a given year including climate change). The map also shows that the site is located within a TAN15 Defended Zones (ref: Tre,prfa_T), which refer to areas where flood risk management infrastructure provides a minimum standard of protection against flooding from the sea of 1:200 (plus climate change and freeboard).

In respect of flood risk emanating from surface water and small watercourses, the site is relatively unconstrained with minor extents of Flood Zone 2 (Areas with 0.1% to 1% (1 in 1000 to 1 in 100) chance of flooding from surface water and/or small watercourses in a given year, including the effects of climate change) and Zone 3 (a greater than 1 in 100 (1%) chance of flooding in a given year, including climate change), which mostly situated along the site boundary and the site entrance.

Figure 3 : NRW TAN 15 Flood Map for Planning River and Sea Flood Risk

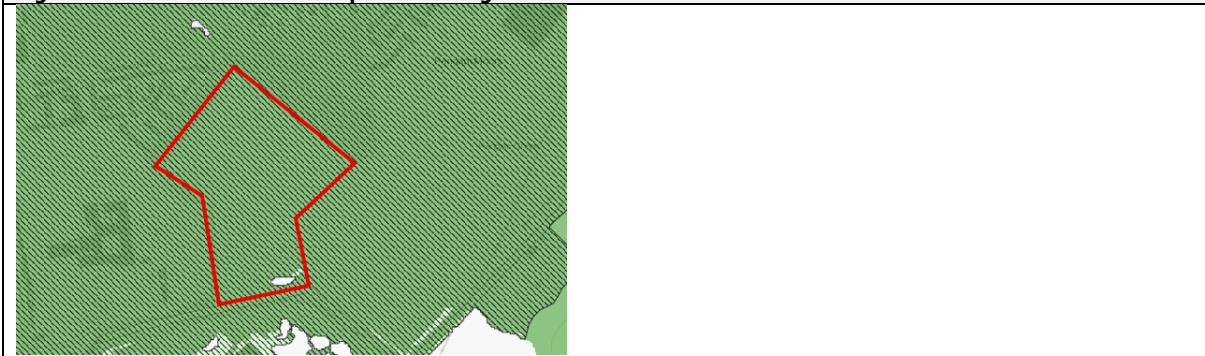
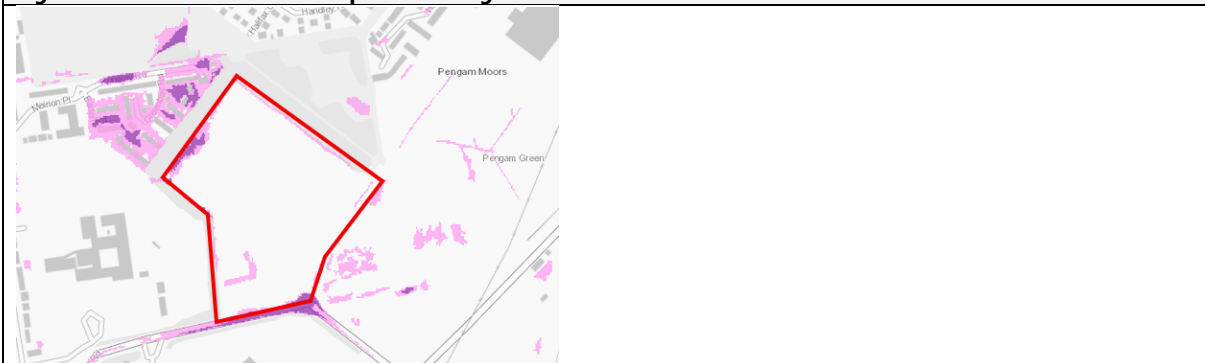


Figure 4 : NRW TAN 15 Flood Map for Planning Surface Water and Small Watercourse Flood Risk



Heritage

The Historic Wales shows that there are no listed building and schedule monuments locate within close proximity of the application site. However it should be noted that a historic record owned by Heneb known as RAF Pengam Moor is located at the northeast of the site boundary. However, it is noted the said airfield has already been demolished and it is not considered that this would raise a significant concerns going forward.

Figure 5 : Historic Wales Map



Planning Policy Context

In terms of applicable designations within the adopted Local Development Plan, the relevant policy designations as illustrated on the adopted LDP proposals of the Local Authority is summarised below:

Figure 6 : Cardiff LDP Proposals Map



The adopted Cardiff Local Development Plan 2006-2026 Proposals Map shows that the site is considered as 'whiteland' with no specific policy designation within the settlement boundary. A review of Cardiff's LDP Constraints Map shows that the site is within a Site of Importance for Nature Conservation (137-Pengam Moors).

Policy EN5: Designated Sites states "Development will not be permitted that would cause unacceptable harm to sites of international or national nature conservation importance.

Development proposals that would affect locally designated sites of nature conservation and geological importance should maintain or enhance the nature conservation and/or geological importance of the designation. Where this is not the case and the need for the development outweighs the conservation importance of the site, it should be demonstrated that there is no satisfactory alternative location for the development which avoids nature conservation

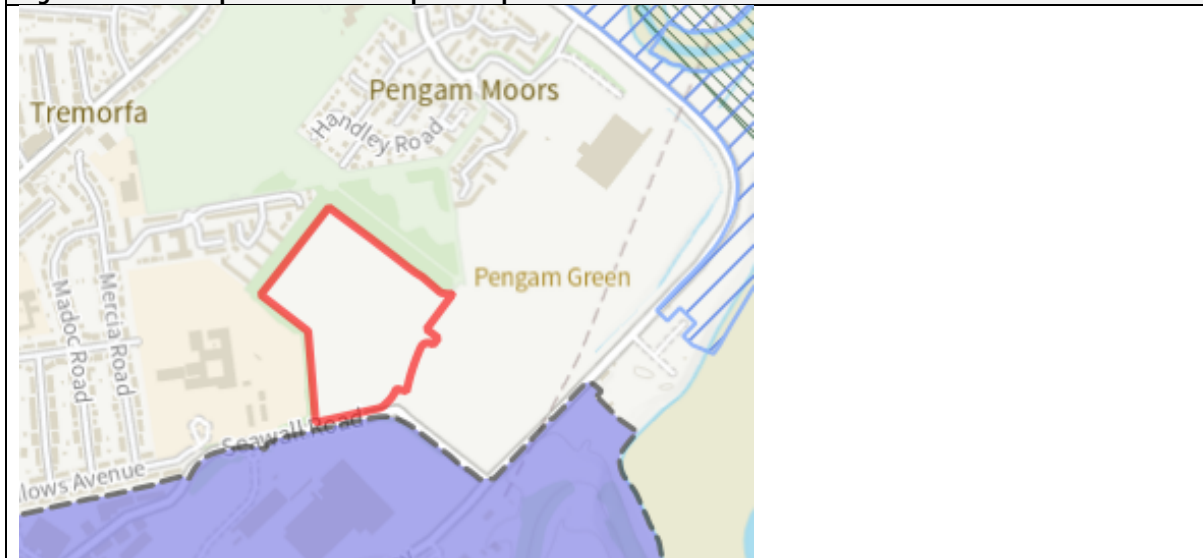
impacts, and compensation measures designed to ensure that there is no reduction in the overall nature conservation value of the area or feature.”

Policy H7: Sites for Gypsy and Traveller Caravans states “New sites and extensions to existing sites will be permitted where:

- i. Necessary physical, transport and social infrastructure are accessible or can be readily provided;
- ii. Environmental factors including flood risk, ground stability, land contamination and proximity of hazardous installations do not make the site inappropriate for residential development;
- iii. The site is designed with reference to both the Welsh Government Good Practice Guide in Designing Gypsy Traveller Sites and the views of local Gypsies and Travellers;
- iv. There would be no unreasonable impact on the character and appearance of the surrounding areas including impact on residential amenity of neighbouring occupiers or the operating conditions of existing businesses; and
- v. In the case of a transit or touring site, it has good access to the primary highway network.

In addition, it should be noted that within the replacement LDP (at deposit stage) the site is proposed to be allocated for a Gypsy and Traveller Site under **Policy H11: Gypsy and Traveller Site**, which states “Land is allocated for the provision of temporary Gypsies and Travellers accommodation at Pengam Green as defined on the Proposal Map.

Figure 7 : Cardiff Replacement LDP Proposal Map



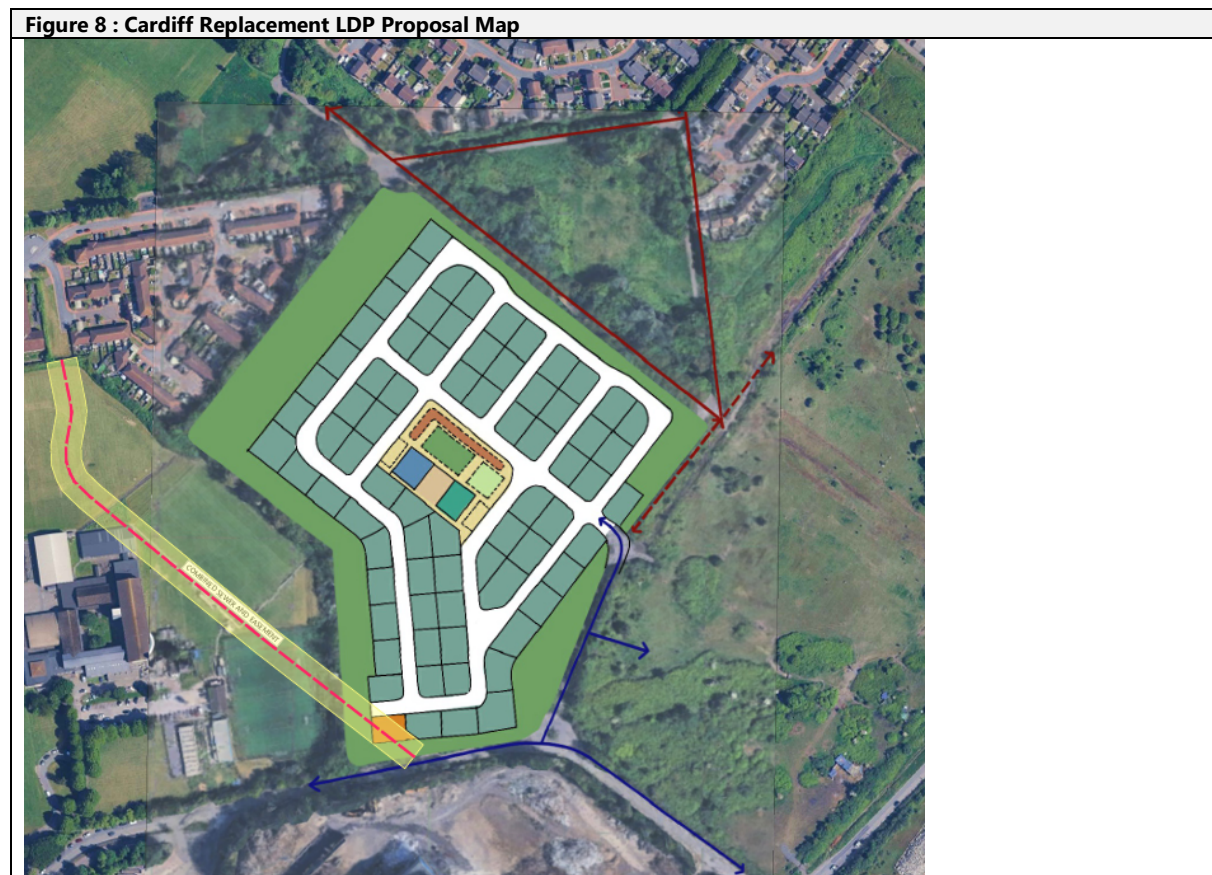
The Proposed Development

The development proposals comprise the Gypsy and Traveller site with 73 no. pitches and a large central area which provides amenities facilities including a 2 storey office and medical training facility, a single storey Sure Start facility and garden, play area, fitness trail and hardstanding area to provide parking for the office and Sure Start facilities. It is also proposed that a gas bottle storage area is proposed at the southern section of the site.

The site will be accessed from the eastern boundary, off the roundabout at Seawall Road and it is currently proposed that further pedestrian access is proposed towards the adjacent Pengam Green located at the east and north of the application site. Internal roads are proposed to provide direct access to the pitches and facilities on site.

In terms of boundary treatment, the application site will be surrounded by existing hedgerows and tree planting.

The site plan below shows the indicative layout of the site:



EIA Regulations - Schedule 2 Development

As set out within the Town and Country Planning (Environmental Impact Assessment) Wales Regulations 2017, "EIA development" means development which is either—

- (a) Schedule 1 development; or
- (b) Schedule 2 development likely to have significant effects on the environment by virtue of factors such as its nature, size or location.

The proposed development is not categorised as 'Schedule 1 development' where EIA would be mandatory.

'Schedule 2 development' is development of a type listed in Schedule 2 which:

- a) is located wholly or in part in a 'sensitive area' as defined in regulation 2(1); or*
- b) meets one of the relevant criteria or exceeds one of the relevant thresholds listed in the second column of the table in Schedule 2.*

The proposed development is considered to fall within the following development type listed in Schedule 2: *Class 12 (e) Tourism and leisure – Permanent camp sites and caravan sites.*

The proposed development exceeds the following threshold listed in the second column of the table in Schedule 2 in relation to Class 12(e): *The area of the development exceeds 1 hectare.*

Based on the above, the development is therefore considered to comprise Schedule 2 development.

EIA Regulations – Schedule 3 Selection Criteria

Schedule 3 of the Regulations sets out the selection criteria which must be taken into account in determining whether a development falling in Schedule 2 is "likely to have significant effects on the environment" (and is therefore EIA development). The three broad criteria set out under Schedule 3 are:

- 1) characteristics of the development;
- 2) the environmental sensitivity of the location; and
- 3) types and characteristics of the potential impact.

In addition, Welsh Office Circular 11/99 sets out that in general EIA will be needed for Schedule 2 development in three main types of case as follows:

- 1) for major developments which are of more than local importance;
- 2) for developments which are proposed for particularly environmentally sensitive or vulnerable locations; or
- 3) for developments with unusually complex and potentially hazardous environmental effects.

An assessment of the likely significant effects of the proposed development on the environment in the context of the selection criteria outlined in Schedule 3 of the Regulations is set out below.

'Characteristics of the Development'

A brief assessment of the detailed criteria outlined at Paragraph 1 of Schedule 3 in relation to the characteristics of the development is provided below:

(a) The size and design of the development

The proposed development is positioned on a previously developed site, formerly occupied by [site history]. Although the proposals exceed the relevant threshold listed in Schedule 2 of the EIA regulations in terms of the number of units to be created, it is the case that the size and design of the proposed development responds sensitively to the character of the site and surrounding area

Annex A of Circular 11/99 is relevant in considering the size of the development, confirming at Paragraph A33 in regard to 'permanent camp sites and caravan sites' that "EIA is likely to be required for major new tourism and leisure development which require a site of more than 10 hectares. In particular, EIA is more likely to be required for holiday villages or hotel complexes with more than 300 bed spaces, or for permanent camp sites or caravan sites within more than 200 pitches." The proposed development comprises of xx no. pitches and is considered to be much smaller than the size considered above. It is therefore considered that the proposed development

(b) The cumulation with other existing development and/or approved development

There is limited existing development located within the close proximity to the application site as the site is located within close proximity to existing built up area and parks. The only major development located within the neighbouring area is coastal flood defences scheme along the River Rhymney and Rover Way. However, it is not considered that the combination of flood defences and the proposed G&T site will not lead to a detrimental impact to the environment as they are of different natures

(c) The use of natural resources, in particular land, soil, water and biodiversity

In regard to the use of natural resources, the proposal makes good and efficient use of previously developed site, which will incorporate sustainable drainage in accordance with Schedule 3 to the Flood and Water Management Act 2010. [ecological constraints]. In summary, it is considered that the proposed development would not give rise to any significant implications in respect of use of natural resources.

(d) The production of waste

The proposed development would generate waste during the construction phase, comprising excavated soils and subsoils. Limited surplus material is anticipated, and if required, this would be removed from site and disposed of or recovered at appropriately licensed facilities. The management of waste will be regularised by a Construction Environmental Management Plan.

The proposed development is unlikely to create any significant implications in respect of the production of waste, and the management of waste/recycling will be carefully incorporated into the design of the proposed development (bin and recycling storage details will be shown in detail on the application drawings, and will be provided in accordance with Council standards).

(e) Pollution and nuisances

Potential pollution and nuisance effects would be largely confined to the construction phase and would be temporary and localised in nature. These may include short-term noise and vibration from excavation and pipe-laying activities, dust generation, and construction traffic. Construction activities would be undertaken in

accordance with standard best practice measures, including appropriate working hours, dust suppression, pollution prevention controls and compliance with relevant guidance (which would be detailed within a Construction Environmental Management Plan accordingly). The works would progress along the route such that disturbance at any individual location would be of limited duration.

During the operational phase, it is not considered that the proposed development will generate a significant amount of traffic that leads to air pollution. With the implementation of standard construction controls, the development is not considered likely to result in significant pollution or nuisance effects in EIA terms.

(f) The risk of major accidents and/or disasters relevant to the development concerned, including those caused by climate change, in accordance with scientific knowledge

By nature of the development proposed, there is unlikely to be any undue risk of major accidents and/or disasters.

(g) The risks to human health

By nature of the development proposed, there is unlikely to be any risks to human health.

'Environmental Sensitivity of the Location of the Development'

It is set out at Paragraph 2 of Schedule 3 that "*The environmental sensitivity of geographical areas likely to be affected by development must be considered*", having regard to the following detailed criteria:

(a) the existing and approved land use;

The SINC encompasses a larger area of land extending beyond the boundaries of the Application Site and collectively supports lowland calcareous habitats, calcareous meadow and open mosaic habitat on previously developed land, all priority habitats for Wales. The SINC is of further importance for rare maritime plants including sea clover (*Trifolium squamosum*), brackish water crowfoot (*Ranunculus baudotii*) and water whorl-grass (*Catabrosa aquatica*), and for roosting and breeding rare waterfowl and wintering birds of prey.

Whilst detailed ecological investigations are ongoing to assess the current quality, species-richness and condition of the SINC, an initial Extended Phase I habitat survey undertaken during January 2026 noted the Application Site to be characterised by a circa 1.61ha area of ephemeral/short perennial vegetation which has colonised bare ground and hardstanding remaining from a previous development. Such habitat is subject to significant scrub encroachment from mature vegetation along the southern boundary with Seawall Road (characterised by dense scrub and scattered trees) and western boundary with Willows High School (characterised by plantation woodland).

The Application Site also overlaps with an area of marshy grassland characterised by scattered rush species in its north-west corner, whilst a thick band of gorse (*Ulex europaeus*)/bramble (*Rubus fruticosus* agg.) scrub is present across the northernmost extents of the Application Site, significantly eroding poor semi-improved grassland located here. Initially such habitat communities appear species-poor with grassland communities subject to heavy grazing and pounding by horses, limiting breeding, foraging and hibernation opportunities for protected/notable species such as birds, bats, amphibians, reptiles and invertebrates.

Whilst proposed development of the Application Site would thus result in a reduction of the overall size of the SINC with a reduction in the quantity of habitat available for protected/notable species, such losses have been limited to a part of the SINC that encompasses previously developed land and is characterised by predominantly species-poor habitats that are common and widespread in the wider locality.

(b) the relative abundance, availability, quality and regenerative capacity of natural resources (including soil, land, water and biodiversity) in the area and its underground;

The Application Site encompasses a limited range of semi-natural habitats that require consideration in relation to their ecological value, connectivity and ecosystem services. Ephemeral/short perennial vegetation, marshy grassland and scrub communities appear predominantly species-poor, subject to significant grazing pressure and typically common and widespread within the landscape. Subsequently, the reduction in the quantity of habitat and resources available for protected/notable species potentially present, as well as the overall extent of Pengam Moors SINC is not considered likely to be significant in EIA terms, albeit requiring delivery of appropriate mitigation. In this regard, there is considered to be sufficient opportunity for ecological restoration and enhancement of retained habitats across the wider extents of Pengam Moors SINC. Of further note, woodland and mature trees represent relatively high-value ecological resources, providing more habitat and ecological connectivity for protected and

notable species and will be retained within the proposals with sufficient flexibility to protect these resources during the construction and operational phase of proposed development

Overall, while development has the potential to affect valued habitats and species supported by the Application Site, it is considered that the present natural resources within the Site and/or wider environs are capable of being protected and enhanced through appropriate mitigation and management measures.

- (c) the absorption capacity of the natural environment paying particular attention to the following areas—*
- (i) wetlands, riparian areas, river mouths;*
 - (ii) coastal zones and the marine environment;*
 - (iii) mountain and forest areas;*
 - (iv) nature reserves and parks;*
 - (v) European sites and other areas classified or protected under national legislation;*
 - (vi) areas in which there has already been a failure to meet the environmental quality standards laid down in Union legislation and relevant to the project, or in which it is considered there is such a failure;*
 - (vii) densely populated areas;*
 - (viii) landscapes and sites of historical, cultural or archaeological significance.*

Plantation woodland along the northern and western boundaries of the Application Site are proposed for retention, thus preserving tree stock within the immediate landscape which will continue to deliver benefits to climate regulation and attenuation of surface water. The Application Site is, however, located within 450m of the Estuary Ramsar site/SAC/SPA/SSSI, designated for its intertidal and subtidal habitats sensitive to changes in water quality that may arise during construction and operation of the proposed development. Nevertheless, potential pollution during the construction phases arising from contaminated surface water runoff would be avoided through the adoption of standard best practice measures (to be detailed within a Construction Environmental Management Plan). New development will further be delivered alongside a sustainable drainage strategy which will intercept and remediate surface water runoff prior to its discharge to the surrounding drainage network during the operation phase. Whilst potential effects upon nitrogen-sensitive habitats and European designations associated with changes in air quality may also arise, it is not considered that the proposed development will generate a significant amount of traffic that leads to air pollution whilst pollution effects associated with a mobilisation of dust during the construction phases can be adequately controlled through implementation of a CEMP combined with the existing offset of the Application Site from the Severn Estuary in particular.

In addition to the Severn Estuary Ramsar site/SPA/SAC/SSSI, a desk study identified 11 SINC's within 2km of the Application Site in addition to Cardiff Beechwoods SAC circa 8.8km north-west and a further two nationally importance designations within 2km.

However no direct significant impacts on such statutory and non-statutory designation sites are anticipated due to distance. Whilst Cardiff Beech Woods SAC and Howardian LNR are sensitive to recreational disturbance such that delivery of development which would increase the size of a local population may result in negative effects, the Application Site is sustainably placed in proximity to existing public open space such as Tremorfa Park, whilst other parks and open green space, including the Wales Coast Path, are located in proximity to the Application Site, offering local, alternative opportunities for recreation and minimising potential recreational effects to insignificant levels.

Overall the environmental sensitivity of the Application Site is primarily associated with its proximity and connectivity to the internationally designated Severn Estuary, the presence of locally designated ecological sites such as Pengam Moors SINC, and the network of woodland, trees, and grassland habitats that support protected species within and beyond the boundaries of the Application Site, in what is an otherwise urbanised landscape. Nevertheless, it is considered that potential impacts arising from development of the Application Site are not likely to be significant in EIA terms and which can be adequately avoided, minimised and/or mitigated through implementation of habitat enhancement and biodiversity mitigation measures including: provision of new native planting along the boundaries of the Application Site and in association with the wider Pengam Moors SINC, effective water management through implementation of a SUDs; and adoption of best practice during construction,

'Types and Characteristics of Potential Impact'

The type and characteristics of the potential impacts arising as a result of the development are considered below, having regard to the criteria under Paragraph 3 of Schedule 3, namely:

- (a) the magnitude and spatial extent of the impact (for example geographical area and size of the population likely to be affected);*
- (b) the nature of the impact;*
- (c) the transboundary nature of the impact;*
- (d) the intensity and complexity of the impact;*
- (e) the probability of the impact;*
- (f) the expected onset, duration, frequency and reversibility of the impact;*
- (g) the cumulation of the impact with the impact of other existing and/or approved development;*
- (h) the possibility of effectively reducing the impact.*

Ecology

To inform potential ecological constraints and opportunities to proposed development a desk study and Extended Phase I habitat survey of the Application Site and wider environs was undertaken by EDP during January 2026. Circa 1.61ha of the Application Site is characterized by ephemeral/sort perennial vegetation which has colonized bare ground/hard standing across its southern extents whilst c.133 hectares in the north west corner of the Application Site is characterised by marshy grassland communities. Such habitats are subject to heavy grazing and poaching by horses and scrub encroachment. The northernmost extents of the Application Site encompasses a block of species-poor scrub dominated by bramble and gorse which has eroded patches of poor semi-improved grassland. Overall, such communities appear species-poor and subject to unsympathetic grazing practices and a lack of management which will have suppressed any inherent botanical diversity. The northern and western boundaries of the Application Site are defined by broadleaved plantation woodland with some coniferous species and considered to be of some inherent ecological importance whilst mature scrub and a tree line is present along part of the Application Site's eastern boundary. Such habitats are of some importance to protected/notable species including a breeding bird assemblage, foraging/commuting/roosting, bats, amphibians and common reptiles, although grassland/scrub habitats in particular are considered largely sub-optimal given the limited structural and perhaps botanical diversity, subject to heavy grazing pressure.

Of pertinence to an ecological assessment, the Application Site does, however, overlap with the boundaries of Pengam Moors SINC, designated for its calcareous meadow habitats, assemblage of rare marine plants and roosting/breeding waterfowl and wintering birds of prey. As such and combined with seasonal constraints to the Extended Phase I habitat survey, detailed ecological surveys are ongoing across spring/summer 2026.

The Application Site is, furthermore, located within 450m of the Severn Estuary Ramsar site/SPA/SAC/SSSI designated for its diverse assemblage of intertidal and subtidal habitats, migratory fish species and populations of migratory and overwintering birds. Wintering bird surveys of the Application Site and wider Pengam Moors SINC were thus undertaken in January, February and early March 2026 to assess the importance of an overwintering bird assemblage potentially utilising the Application Site for roosting/foraging and also to determine whether the Application Site comprises functionally linked land for the Severn Estuary. Overall, wintering bird surveys identified a limited assemblage of species utilising Pengam Moors SINC for roosting/foraging. No bird species listed as a qualifying species of Severn Estuary Ramsar or SPA were recorded during the wintering bird survey, with the exception of mallard (a species which contributes to an internationally important assemblage of waterfowl for which the SPA is designated under Article 4.2); and lesser black-backed gull (not formally designated under criterion for designation of a Ramsar but are identified for future consideration). Such species were, however, not present in any significant numbers with only a single lesser black-backed gull identified within the Application Site alongside small numbers of priority bird species, typically recorded in association with scrub and woodland boundaries. The Application Site is thus not considered to comprise functionally linked land for the Severn Estuary Ramsar site/SPA/SAC.

Ground Condition

A Phase I desktop study report has been undertaken by Capita on the site in June 2017. The report outlines the anticipated ground conditions based on historic boreholes and BGS mapping. The ground make up is expected to comprise estuarine alluvium over Mercia Mudstone Group bedrock. Made ground is also anticipated due to the sites previous use and infilling of reens that historically crossed the site. Groundwater levels are anticipated close or present to the ground surface.

The report identifies the following geotechnical hazards;

- Shrinking and swelling clay, the significance of which may be compounded by the presence of stands of semi mature deciduous trees at the site.
- Unconsolidated soils of low load bearing capacity.
- Anomalous groundwater conditions.
- Ground or groundwater containing sulphates aggressive to buried structural concrete.
- Compressible soft ground – alluvium and peat.

Foundations

The strength of the near surface soils is indicated as being soft to firm with peat beds being noted. It is anticipated that shallow foundations may be unsuitable for low rise structures due to the presence of the soft estuarine material but this needs to be confirmed with a suitably designed ground investigation. The presence of clay soils within the site may require special design measures to protect against the effects of seasonal shrinkage and swelling for both foundations and pavements.

Ground Gases

Historical landfill sites were identified in the Envirocheck Report and on historical maps, near to the site, which are to be considered to be a potential source of ground gas generation. Estuarine alluvium also contains peat beds and organic material which is known to produce pocket of land gas. Should this be proven, it will be necessary to install and monitor gas wells confirm to the presence or absence of ground gases.

Drainage

Soakaway drainage is not considered to be practical at the site due the poor infiltration properties of the alluvium and potential high groundwater develops.

Contamination

With the presence of Made ground and fly tipping on the site, a suite of contamination testing will be required as part of an intrusive site investigation.

Unexploded Ordnance (UXO)

The site was formerly used as an airfield by the RAF, on initial review shows the site a 'moderate' German Bombing density. A preliminary UXO Risk Assessment (Stage 1 UXO report) will need to be undertaken to inform further measures to be undertaken on the site.

Groundwater Vulnerability

The site is not within a groundwater source protection zone. The superficial aquifer designation is 'Secondary undifferentiated' and groundwater vulnerability is negligible with the area being defined as 'Non-Aquifer (Negligibly Permeable)'.

Flood Risk and Drainage

A review of the available flood risk information, including detailed information from the Cardiff Coastal Defence Scheme has been undertaken by JBA Consulting. This review confirms that the site lies within Flood Zone 3 and the TAN 15 Defended Zone for tidal flooding, and within Flood Zones 1, 2 and 3 for surface water and small watercourses. The site is within Flood Zone 1 for fluvial flooding, with very low risk from groundwater and reservoirs and low risk from sewer flooding. The key constraints are therefore tidal flood risk in the context of the defended coastal setting and localised surface water ponding on the periphery of the site.

For the purposes of EIA screening, the relevant question is whether these flood risk constraints are likely to give rise to significant effects on the environment by reason of the nature, scale or location of the proposed development. At this stage, that is not considered to be the case.

The site benefits from the Cardiff Coastal Defence Scheme, which provides strategic tidal flood protection along this part of the coastline and lower River Rhymney and materially reduces the likelihood of tidal inundation affecting the site over the lifetime of the proposed development. In practical terms, the scheme protects the site from flooding in all TAN15 design events across an assumed 100 year lifetime of development. Therefore, the existing evidence is that the site will comfortably satisfy the requirements of TAN15, include the justification for development in a flood zone (Chapter 10) and the acceptability criteria (Chapter 11). This supports the conclusion that tidal flood risk is being managed through established flood risk infrastructure rather than representing an unmitigated environmental constraint.

Surface water effects are minimal and localised principally with edge-of-site topographical depressions. These are identifiable, site-specific constraints of a type routinely addressed through detailed design, layout and mitigation. They do not indicate an unusually complex, extensive or severe effect, nor one that would extend over a wide geographical area or affect environmental receptors in a manner that is likely to be significant in EIA terms.

Flood risk remains a material planning consideration and will require detailed assessment at application stage, particularly given the vulnerability of the proposed use. A planning application would therefore need to be supported by a site-specific Flood Consequences Assessment to consider the acceptability of the development under TAN 15, including finished levels, the treatment of any ordinary watercourses, the avoidance of the more constrained parts of the site where necessary, and safe access and egress during extreme events. However, the need for that further assessment does not of itself mean that significant environmental effects are likely. Rather, it reflects the normal operation of the planning and technical approval process for development in this location.

In relation to surface water drainage, no preferred drainage strategy has been prepared or assessed at this stage. Notwithstanding that, any future development of the site would be required to comply with the statutory sustainable drainage approval regime in Wales under Schedule 3 to the Flood and Water Management Act 2010 and the associated Statutory Standards for Sustainable Drainage. That regime is specifically intended to ensure that surface water runoff is managed in a way that avoids increasing flood risk, protects water quality, and where possible delivers multifunctional environmental benefits. On that basis, and subject to the detailed drainage design being secured through the separate SuDS approval process, surface water drainage is not considered likely to result in significant adverse effects on the environment. Indeed, depending on the final design, there is potential for minor positive effects through betterment in runoff control, water quality treatment and the integration of landscape and biodiversity features within the drainage network.

Overall, whilst flood risk and drainage are important technical considerations for the proposed development, they are not considered, either individually or in combination, likely to give rise to significant environmental effects such that Environmental Impact Assessment would be required on these grounds.

Trees

There are no trees located at the centre of the application site. It is noted that boundary trees and hedgerows are present but none of them are protected by Tree Preservation Order (TPO). Based on the proposed site layout, it is not considered that the proposed site layout will have lead to a detrimental impact to the boundary trees. The planning application will be supported by a comprehensive tree survey and arboricultural impact assessment. Tree protection measures during the construction phase will be implemented in according to the report. Overall, it is not considered that the proposed development will have a significant negative impact on trees in EIA terms.

Landscape & Visual Impact

According to the LDP proposal and constraints map The application site is not considered to be located at a landscape sensitive location. The buildings and pitches for the caravan sites proposed on site will mostly be single storey, with a couple of amenities buildings to be two-storey. As previously mentioned, the application site is surrounded by boundary trees and hedgerows that provides sufficient screening. In addition, there are a mixed of land use within close proximity of the application site, including industrial units, schools and existing residential units. The proposed use of the site is not considered out of place or has a negative impact to the landscape when viewing from Rover Way as the site is surrounded by developed area. Overall, the proposed development will not lead to a detrimental visual impact on landscape in EIA terms.

Traffic & Transportation

The site benefits from an existing vehicular access from Seawall Road via the existing roundabout junction and is well connected to the local and strategic highway network, including Rover Way, which provides access to the A48 and A4232.

The site is situated in a sustainable location with access to a range of transport modes. Existing footways are provided along Seawall Road and surrounding streets, enabling convenient pedestrian access to nearby services and facilities. Public transport accessibility is provided by local bus services operating along Willows Avenue, with the nearest bus stops located within walking distance of the site. Existing pedestrian and cycle infrastructure within the surrounding area also provides opportunities for travel by sustainable modes.

The proposed development comprises a Gypsy and Traveller site with associated infrastructure and internal access arrangements. Whilst the site exceeds the Schedule 2 threshold for caravan site development by virtue of its area exceeding 1 hectare, the scale of development is relatively modest and is anticipated to generate a limited number of daily vehicle movements. Traffic associated with the development would primarily comprise resident vehicles, visitor trips and occasional service and maintenance vehicles. These trips are not anticipated to increase the daily traffic flow along the surrounding highway network by more than 30%, as outlined in the Environmental Assessment of Road Traffic and Movements (2023) (IEMA Guidance).

Construction activities would generate temporary traffic movements associated with staff, deliveries and plant. However, construction traffic would be limited in duration and managed through standard construction management measures. Given the existing access arrangements and the nature of the surrounding highway network, construction traffic is not anticipated to result in significant effects on highway operation, road safety or the amenity of surrounding receptors.

During operation, traffic generation associated with the proposed development is expected to be low and would not materially alter existing traffic conditions on the surrounding highway network. The development would not be expected to give rise to significant congestion, delay, severance, pedestrian amenity impacts, road safety concerns, or substantial increases in vehicle emissions. Access would be taken from the existing highway network and no strategic highway improvements are anticipated to be necessary to accommodate the proposed development.

The site is located within an established urban area where transport infrastructure already exists and where residents can access local facilities by a range of travel modes. As such, the development is not considered likely to result in significant effects on traffic and transportation in EIA terms, either in isolation or cumulatively with other committed development within the locality. Based on this, it is concluded that the proposed development is unlikely to give rise to significant environmental effects in relation to traffic and transportation. Accordingly, a detailed Environmental Impact Assessment of transport effects is not considered necessary.

Air Quality

Potential impacts on air quality may arise during both the construction and operational phases of the proposed development. A construction dust risk assessment would be undertaken to identify best practice mitigation measures, based on the scale and nature of the works. Following the successful implementation of these measures through the CEMP, residual impacts on the surrounding area are expected to be negligible.

Emissions from traffic generated by the proposed development have the potential to affect both human and ecological receptors. The Site is not located in an Air Quality Management Area, and a review of local air quality monitoring data indicates that existing concentrations of NO₂, PM₁₀ and PM_{2.5} (the primary pollutants associated with road traffic emissions) near the Site are likely well within the air quality standards. Based on the scale of the proposed development, emissions from traffic generated by the Site are therefore unlikely to result in significant effects with respect to human health. Depending on the trip generation in-combination with other committed and proposed developments in the area, a detailed assessment of ecological impacts may, however, be required for the Severn Estuary SSSI/SPA/SAC/Ramsar.

Air quality at the proposed development has the potential to be affected by emissions from nearby industrial installations, in particular the Celsa steelworks, which is adjacent to the Site. The facility is regulated by Natural Resources Wales and emissions are therefore subject to strict limits to ensure that off-site impacts are minimised. It is therefore unlikely that future occupants of the proposed development would be exposed to pollutant concentrations above the air quality standards for the protection of health. Nevertheless, all potential off-site sources will be evaluated to determine whether the Site is suitable for residential development, as proposed.

A full detailed air quality assessment will accompany the planning application. Based on the likelihood of significant impacts an EIA of air quality effects is not considered necessary.

Noise

The proposed development would introduce short-term construction noise to existing sensitive receivers to the area. However, impact would be short-term in nature, and could be minimised through the provision of, and adherence to a CEMP during the construction phase. An increase in road traffic volume and its subsequent noise

during construction, is expected to be negligible given the size of the application site and number of expected trades required to complete the works.

The proposals are all residential in use, therefore would not introduce a new noise source that is incongruous to the existing sensitive residential receivers to the north boundary of the application site. Thus, reducing the operational significance of impact. In addition, and given the size of the site, a change in road traffic volume due to the proposed residential use would be expected to have a negligible impact on the current noise climate at the existing residential receivers.

The application site is adjacent to the existing and well-established Celsa / 7Steel facility. The noise impact from this industrial site would be robustly considered in a programme of site surveys and a standalone noise impact assessment to minimise potential impact. A standalone assessment such as this would provide noise control measures required to achieve a suitable level of impact, and therefore an EIA is not considered necessary.

Human Health & Population

Potential impacts on human health and the local population are primarily associated with the construction phase. This could potentially include:

- Temporary exposure to construction dust, noise and vibration
- Increased construction traffic with potential for minor delays or safety risks

However, it is considered that the effect would be temporary, localised and reversible, and standard mitigation measures would be implemented to reduce potential impacts. During operation, it is not considered the proposed G&T site will lead to a detrimental impact on human health & population. Overall, the development is not considered likely to result in significant effects on human health or the population in EIA terms.

Requirement for EIA – Summary

As set out within this letter, Cardiff Council request a formal Screening Opinion as to whether the proposed proposed Gypsy and Traveler Site constitutes EIA development.

In summary, the proposal constitutes Schedule 2 development i.e. the development is of a type listed in Schedule 2 (i.e. Class 12(e) and exceeds the relevant threshold)

In assessing whether the Schedule 2 development is likely to have significant effects on the environment, having regard to the characteristics of the development; the environmental sensitivity of the location; and the types and characteristics of the potential impact (in accordance with the criteria set out within Schedule 3 of the Regulations), it is not considered that the proposed development is likely to have significant effects on the environment. The development is not of more than local importance; is not proposed for a particularly environmentally sensitive or vulnerable location, and does not have unusually complex and potentially hazardous environmental effects

It is noted that the application site is located within Pengam Moors SINC, designated for its calcareous meadow habitats, assemblage of rare marine plants and roosting/breeding waterfowl and wintering birds of prey. However, it is noted in the PEA that the application site is subject heavy grazing and poaching by horses and scrub encroachment. Overall, the habitat on-site appear species poor and subject unsympathetic grazing practices and a lack of management which will have suppressed any inherent botanical diversity. The northern and western boundaries of the Application Site are defined by broadleaved plantation woodland with some coniferous species and considered to be of some inherent ecological importance whilst mature scrub and a tree line is present along part of the Application Site's eastern boundary. Such habitats are of some importance to protected/notable species including a breeding bird assemblage, foraging/commuting/roosting, bats, amphibians and common reptiles, although grassland/scrub habitats in particular are considered largely sub-optimal given the limited structural and perhaps botanical diversity, subject to heavy grazing pressure. In addition, wintering bird surveys identified a limited assemblage of species utilising Pengam Moors SINC for roosting/foraging. No bird species listed as a qualifying species of the neighbouring Severn Estuary Ramsar or SPA were recorded during the wintering bird survey, with the exception of mallard and lesser black-backed gull. However, such species were not present in any significant numbers. The application site is therefore not considered to comprise functionally linked land for the designated site and the proposed development is not considered to have a significant environmental impacts in terms of EIA.

In addition to the above, as demonstrated above, the application site is not considered to have a significant impact, on, noise, transport, air quality and human health as most of the impacts are mostly related to the construction

period, which will be regularised by a CEMP. In terms of landscape, trees, flood risk and ground condition, it is demonstrated that the relative concerns can be addressed once the measures are implemented.

It is concluded that the proposed development of a G&T site is unlikely to have significant effects on the environment, enough to warrant an EIA. As such, it is considered that EIA is not required.

We would be grateful if you could review this screening request and formally respond within the statutory 21 days of formal receipt. Should you require any further information, require any further information please do not hesitate to contact me.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Glenn Lee', written in a cursive style.

Glenn Lee
Planner
Asbri Planning Ltd.