

Hi Annamarie

Thank you for the invitation to comment on this PAC which outlines a proposal to replace an approved biomass plant with additional warehousing (Use Class B8 Use). I would also confirm receipt of a discussion note outlining the approach in Transportation terms in April 2021.

The proposal is to replace the approved biomass plant and 12,000m² of B8 with 50,000m² of B8 which would result in an additional 38,000m² of B8. There are a number of indicative internal layouts for the proposed development provided and one has been used as a possible example of the layout of development being proposed.

The applicant is proposing to retain the existing vehicular access via Tide Fields Road as well as the new approved priority junction with right turn lane on Rover Way. The new access arrangement off Rover Way has full approval to construct and it is illustrated that the junction would operate in an acceptable manner. It is noted that the PAC documentation provides no detail regarding the Tide Fields Road access, but it is noted this forms part of Cardiff Council's adopted highway and currently provides for all movements associated with the Welsh Water Treatment Works. It was also the access used by Cardiff County Council to accept over a million tons of fill material onto the site from the St Davids 2 development and the new Cardiff City Stadium and sports arena at Leckwith. As such, it is considered totally acceptable and satisfactory that Tide Fields Road can be used as an additional access to the site during construction and operation.

As outlined in the PAC documentation the removal of waste material from the site would be undertaken in the already approved manner (associated with the approved land use permission) assuming that no changes in duration of the process were to be applied. There are a number of existing conditions associated with the movement and number of HGVs associated with the operation within the existing permission, which it is envisaged (at this time) would continue / be re-applied to any permission.

It is noted that the documentation identifies additional traffic movements on Rover Way in particular generated by the additional B8 use. The Transport Note in Appendix 9.1 indicates that there will be an increase in AM and PM peak flows of 2% and daily flow of 3% over the scheme which had its consent extended in January 2021. Your suggestion is that the traffic flows within Cardiff are now well below pre-Covid flows. Whilst this is a general statement and there is no detailed evidence to support this assertion with particular reference to Rover Way, increases of this small magnitude are well within weekly variations of existing flows and are considered acceptable.

We would normally expect applicants to use the junction assessment tool within the Council's Managing Transportation Impact SPG, as well as the associated guidance document, which refers to the methodology for Assessment of Priority Controlled Junctions. However, we recognise that Vectos have undertaken a detailed junction capacity assessment using industry standard software within the submitted Transport Statement (Junctions9) and this is considered robust. The assessment confirms the junction will operate within capacity albeit with some queueing (typically one vehicle) on the development arm during the morning and evening peak period.

The PAC documentation indicates support for a number of policy documents, including PPW (ed 11), Wales Transport Strategy, Active Travel Act (Wales) 2013, Future Wales and the council's LDP, which rely upon the support of alternative modes of travel to a site. We recognise that the Transport Statement included in Appendix 9.1, within the PAC documentation, makes reference to the scheme is indicative at this stage and describes the reasoning for the difference in the SPG Parking Standards and that shown on the indicative layout. It is recognised that this is an outline application and this

matter will need to be the subject of more detailed discussion at the time of submission of a detailed application and supporting Transport Management Plan.

Regards Chris

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