

USW Caerleon Environmental Statement

Chapter L: Mitigation and Monitoring

29 November 2019

**Lichfields
Helmont House
Churchill Way
Cardiff
CF10 2HE**

Contents

L1.0	Introduction	1
L2.0	Mitigation and Monitoring	2
	‘In-Built’ Measures	2
	Mitigation and Monitoring	2
L3.0	Means of Securing Mitigation	5
	Documents Required for Mitigation and Monitoring	5
	Other Planning Conditions	6
	Financial Contributions	6
	Non-Financial Contributions	7
L4.0	Summary	8
L5.0	Abbreviations & Definitions	9

L1.0 Introduction

- L1.1 The Environmental Statement (ES) has identified a series of mitigation and ongoing monitoring and/or management measures which are designed to limit or remove any significant adverse environmental effects of the proposed residential development at the former USW campus at Caerleon.
- L1.2 Schedule 4, Part 7 of the Town and Country Planning (Environmental Impact Assessment) (EIA) (Wales) Regulations 2017 (as amended) requires an ES to provide:
- “A description of the measures envisaged to avoid, prevent, reduce or, if possible, offset any identified significant adverse effects on the environment and, where appropriate, of any proposed monitoring arrangements (for example preparation of a post-project analysis).”*
- L1.3 This chapter will present the mitigation and monitoring measures proposed throughout the ES, and the mechanism for securing these. This is identified to assist the ongoing consideration of the ES and to assist Newport City Council (NCC) in forming their reasoned conclusion of the proposed development.
- L1.4 Most of the measures are standard best practice processes but are summarised below for completeness, while others are specific to the development. All measures are capable of being secured via a planning condition or obligation

L2.0

Mitigation and Monitoring

L2.1

The following discussion sets out the mitigation measures proposed throughout the technical chapters of the ES, including those measures ‘in-built’ into the design as part of the EIA process and those which can be secured via planning condition or obligation.

‘In-Built’ Measures

L2.2

As set out in Chapter C of this ES, the iterative process of EIA has resulted in the incorporation of a range of ‘in-built’ mitigation measures into the design of the proposed residential development and associated infrastructure. These are aspects of the design that have been specifically included in the scheme design and are assumptions on which the assessment and resultant additional mitigation have been based.

L2.3

This includes the following:

- 1 The construction of the site in accordance with Pollution Prevention Guidelines.
- 2 The translocation of existing trees within the site, where possible.
- 3 The scale of the new dwellings and use of materials.
- 4 The provision of new footway/cycle connections.
- 5 The provision of an electric charging point within the curtilage of each new build dwelling.
- 6 Ascertaining ecological licences, as required.

L2.4

The above measures are in-built features of the submitted scheme and serve to mitigate the potential effects on environmental receptors that might otherwise result in significant effects or require additional mitigation measures.

Mitigation and Monitoring

L2.5

Table L2.1 sets out the mitigation measures that have been identified within the relevant technical chapters of the ES. It is anticipated that these measures will be secured by way of planning condition or obligation (see Section L3 of this chapter).

Table L2.1 Summary of Mitigation

Environmental Topic	Summary of Identified Mitigation
During Construction	
Transport	Construction Traffic Management Plan (CTMP), which will include the routing of HGV vehicles to avoid inappropriate routes through villages or along narrow lanes that do not have the capacity to accommodate them. The CTMP will also include information on construction phasing, access arrangements, working hours (0800-1800 Monday-Friday, 0800-1300 Saturdays, no working on Sunday or Bank Holidays without prior agreement), on-site wheel wash facilities, traffic management measures and parking and loading arrangements.
Air Quality	Best practice dust suppression measures applied through the Construction Environmental Management Plan (CEMP). This includes measures on: General Communication (including a Stakeholder Communications Plan), General Dust Management (including a Dust Management Plan), site management and monitoring, preparing and maintaining the site, operating vehicle/machinery and sustainable travel (including a Construction Logistics Plan and Travel Plan), Operations, Waste

Environmental Topic	Summary of Identified Mitigation
	Management, measures specific to demolition, earthworks, construction and trackout. CTMP including routing advice for HGVs to avoid the Caerleon AQMA and gyratory system, limiting site access to Lodge Road and Ponthir Road/Station Road.
Landscape and Visual	Implementation of a comprehensive landscape strategy that includes replacement planting and relocation of identified trees.
Arboriculture	- Implementation of a Landscape Strategy to include mixed native woodland, specimen tree relocation and native hedgerows. - Appointment of a qualified arborist/woodland specialist to produce a report for Tree Group 23, prepare a wider management plan and to supervise an Arboricultural Watching Brief. - Implement tree protection measures during the construction phase and planning site operations to avoid Root Protection Areas, trunk stems and branches of retained trees. - The above measures can be implemented through an Arboricultural Method Statement and Tree Protection Plan.
Ecology	- Ecological Construction Method Statement (ECMS) and Detailed Landscape Strategy, to be overseen by an Ecological Clerk of Works (ECoW). - The ECMS will include provisions for the sensitive siting of work compounds/storage areas, site clearance and the use of artificial light. It will also establish Ecological Protection Zones (EPZs) to mitigate impacts associated with habitats, species important ecological features (IEFs), breeding birds, bats and reptiles. - Securing any required development licences from Natural Resources Wales (NRW) - Landscape and Ecology Management Plan (LEMP) and European Species Mitigation Strategies (including Derogation Licencing). Detailed mitigation strategies for bats will be prepared to inform and European Protected Species (EPS) Development Licence Application. - Undertaking any required ecological survey updates prior to the commencement of the relevant phase of development. - Employment of appropriate pollution control measures (in accordance with the relevant Pollution Prevention Guidelines (PPGs).
Cultural Heritage	Implementation of a programme of archaeological mitigation work.
Socio Economic	None required.
During Operation	
Transport	- Travel Plan with school-specific travel planning measures, which could include a walking bus scheme, organised bike/scoot to school days, provision of secure/sheltered scooter and cycle parking and provision of high visibility gear for children and parents. - Sustainable Travel Initiatives including improving the existing PRoW on the northern boundary to provide a 3m footway/cycleway, an electric charging point provided for each dwelling. - Off-Site Highway Improvements including improved pedestrian linkages

Environmental Topic	Summary of Identified Mitigation
	from the site to Lodge Road, new bus stops outside the site with the southbound bus stop relocated on Lodge Road and removal of some parking spaces on High Street near the junction with Station Road to improve visibility. • Commitment to fund an enhanced on-road cycle link from the site via Lodge Road to Roman Reach, linking with the National Cycle Network. Also, junction upgrades including lining and signing at the Station Road/High Street mini roundabout.
Air Quality	• Development-related Inclusive Travel Plan. • Measures to avoid pollution by design (inherent mitigation), including the provision of an electric car charging point for each dwelling.
Landscape and Visual	None required.
Arboriculture	• Preparation of a Risk Zone Plan and undertake cyclical tree condition surveys. • Monitoring and maintenance of newly planted and transplanted trees for 5 years.
Ecology	• Implementation of the Landscape Strategy that includes the creation of new habitat (through landscaping, and the installation of bird and bat boxes and bat roost features) • Management and monitoring of habitats.
Cultural Heritage	None required.
Socio Economic	• Financial contribution(s) in relation to education. • The creation of on-site leisure and amenity areas.

L3.0

Means of Securing Mitigation

L3.1

This section sets out the means by which the mitigation proposed throughout the ES can be secured.

L3.2

Welsh Government Circular 016/2014 (published October 2014) provides guidance on the use of planning conditions for development management. Section 3.0 of the Circular details the following six tests that must be applied when drafting a planning condition, which require that planning conditions are:

- i Necessary;
- ii Relevant to planning;
- iii Relevant to the development to be permitted;
- iv Enforceable;
- v Precise; and,
- vi Reasonable in all other aspects.

L3.3

Any required monitoring measures can also be attached via planning conditions or planning obligations, as long as any provisions used are clear and precise and ensure clarity for all parties concerned.

L3.4

The implementation of, or the provision and implementation of, following documents will be secured by way of planning condition or planning obligation:

Documents Required for Mitigation and Monitoring

- 1 A **Construction Environmental Management Plan (CEMP)** has been submitted with the ES and is provide at Appendix C3. Contractors working on the Site will be required to comply with the CEMP. This will include (inter alia):
 - a Standard PPE to be worn by ground workers. Standard hygiene measures to be taken by ground workers, including hand washing, etc.;
 - b Regular tool box talks to ensure all workers are aware of any contamination risks;
 - c Pollution prevention measures;
 - d Fuel stored on site to be carried out under best practice. Plant refuelling activities to be carried out by using best practice techniques and any spills controlled with appropriate spill kits;
 - e Dust suppression techniques to be implemented to minimise the potential for dust generation. Materials and surfaces should be regularly damped down as appropriate;
 - f Directional lighting should be employed;
 - g Wheel washing facilities in order to minimise the potential for dust generation;
 - h Environmental monitoring to be carried out;
 - i A Construction Waste Management Plan (CWMP) incorporated within the CEMP; and,
 - j A Construction Traffic Management Plan (CTMP) and Construction Logistics Plan to include the route and delivery time restrictions identified in Table L2.1.
- 2 **Demolition Construction Environmental Management Plan**, to be prepared by the specialist Demolition Contractor;

- 3 **Dust Management Plan (DMP)**, within the CEMP, setting out the means by which matters relating to air quality management will be managed and monitored. This will include measures addressing the following matters:
 - a Site management, including complaints procedure and record keeping;
 - b Preparation and maintenance of the site, including (where possible) locating dust causing activities away from receptors, screening dusty activity, avoiding site runoff, ensuring site is cleaned using wet methods, remove dusty materials as soon as possible, and take measures to prevent wind whipping;
 - c Operation of vehicles and machinery, including ensuring that emissions are reduced in accordance with relevant guidance;
 - d Management of operations, including operation of equipment, to minimise dust creation;
 - e Incorporating dust-reducing measures specific earthworks, construction and trackout.
- 4 **Stakeholder Communications Plan**, setting out the means by which neighbours and other affected parties are to be kept informed of activity throughout the construction phase;
- 5 An **Ecological Construction Method Statement (ECMS)**, to be overseen by an Ecological Clerk of Works;
- 6 **Travel Plan**, in line with the Interim Residential Travel Plan provided at appendix D2, to control the management of the development during operation from a traffic management perspective.
- 7 A **Detailed Landscape Scheme**, based on the submitted Landscape Strategy.
- 8 An **Arboricultural Watching Brief** and **Arboricultural Method Statement**, which should include a Tree Protection Plan and Management Plan (to include a section on Tree Group 23).
- 9 A **Landscape and Ecology Management Plan** ('LEMP') to include habitat management and monitoring for a period of 5 years, as well as cyclical tree condition surveys.

Other Planning Conditions

- L3.5 It is anticipated that other mitigation and monitoring identified throughout the ES, which does not fall within the remit of a specific monitoring of mitigation document, will be secured via issue-specific planning conditions. These measures include the submission and agreement of details of materials, glazing and detailed planting plans to ensure that the positive townscape/visual and biodiversity effects identified are secured.

Financial Contributions

- L3.6 Having reviewed the ES and the recommended mitigation measures, the Socio-Economic assessment has identified the need for contributions to secondary education.
- L3.7 Commitment to fund an enhanced on-road cycle link from the site via Lodge Road to Roman Reach, linking with the National Cycle Network is also identified within the ES Transport chapter.
- L3.8 Depending upon the method for future monitoring and maintenance of landscape, arboriculture and habitats, a financial contribution may also be required for these.

Non-Financial Contributions

- L3.9 Having reviewed the ES and the recommended mitigation measures there is no identified requirement for additional non-financial contributions to mitigate the identified significant adverse impacts.
- L3.10 The highway improvements will be delivered via a Section 278 Agreement and S38 for the dedication of any land within the site that is to be adopted by the Local Highway Authority. This will be secured following the granting of any planning application.

L4.0 Summary

- L4.1 This ES sets out the findings of an EIA of proposals for the redevelopment of the USW Caerleon campus to provide new housing with associated infrastructure and open space provision, alongside the restoration and change of use of the listed buildings to create apartments.
- L4.2 The ES has assessed the potential for impacts to occur in relation to the following matters:
- Transport
 - Air Quality
 - Landscape and Visual
 - Arboriculture
 - Ecology
 - Cultural Heritage
 - Socio Economic
- L4.3 The summary of residual effects as identified within Table K2.1 demonstrates that there will be some temporary adverse impacts on landscape/visual, arboriculture and cultural heritage receptors, set against beneficial impacts secured from temporary construction employment.
- L4.4 During the operational phase benefits will be delivered in respect of transport, air quality, some landscape/visual receptors, ecology, cultural heritage and socio economic. Adverse impacts are predicted for some landscape/visual and arboriculture receptors due to the nature of redeveloping the site. It is noted, however, that for landscape/visual receptors impacts improve over time as the landscaping becomes established.
- L4.5 The ES has also considered the possibility of impacts arising from either synergistic or cumulative effects. No significant effects were identified.
- L4.6 This chapter summarises the range of mitigation and monitoring measures that have been identified throughout the ES. The identified mitigation measures are largely capable of being enforced through planning conditions, either as part of management documents, as standalone conditions or obligations, financial contributions secured via s106 agreement, or other non-financial obligations.

L5.0

Abbreviations & Definitions

- 1 CEMP – Construction Environmental Management Plan
- 2 CTMP – Construction Traffic Management Plan
- 3 CWMP – Construction Waste Management Plan
- 4 DMP – Dust Management Plan
- 5 ECMS – Ecology Construction Method Statement
- 6 EIA – Environmental Impact Assessment
- 7 EPS – European Protected Species
- 8 EPZ – Ecology Protection Zone
- 9 ES – Environmental Statement
- 10 HGV – Heavy Goods Vehicle
- 11 IEF – Important Ecological Feature(s)
- 12 LEMP – Landscape and Ecology Management Plan
- 13 NCC – Newport City Council
- 14 NRW – Natural Resources Wales
- 15 PPG – Pollution Prevention Guidelines
- 16 PRoW – Public Right of Way