

# **Cardiff Replacement LDP Submission for Examination**

## **Preliminary Questions Statement**

**December 2025**

- 1. Has the LDP been prepared in accordance with the requirements of:**
  - a) The approved Delivery Agreement, including the Community Involvement Scheme?**
    - 1.1 The RLDP has been prepared in accordance with the Delivery Agreement (DA) including Community Involvement Scheme (CIS). Further details of the consultation can be found in the Final Consultation Report (RLDP 29).
    - b) The Well-being of Future Generations Act (Wales) (2015)? And**
      - 1.2 The RLDP has had regard to the provisions of the Well-Being of Future Generations Act (WBFGA) 2015. A compatibility assessment has been undertaken of the RLDP objectives, strategic and detailed policies, against the seven Well-Being goals and this is set out in Tables 3.1, 3.3 and 3.5 in Appendix 3 of the RLDP. The RLDP also aligns with the key planning principles and national sustainable placemaking outcomes set out in PPW12 (see Tables 3.2, 3.4 and 3.6) and the Council's Well-being plan.
    - c) The Equality Act (2010)?**
      - 1.3 The RLDP has been prepared in accordance with The Equality Act (2010). The plan is supported by a separate Equalities Impact Assessment (EqIA) and Child's Rights Impact Assessment (RLDP 25). These have been incorporated into the Integrated Sustainability Appraisal (ISA), as part of the ISA process.
  - 2. Has the LDP been subject to a robust Sustainability Appraisal / Strategic Environmental Assessment? Have all of the 'likely significant environmental effects' of the Plan and all 'reasonable alternatives' been identified, described and evaluated?**
    - 2.1 An Integrated Sustainability Appraisal (ISA) is an iterative process and has been undertaken at key stages of the plan preparation process. The integrated ISA (RLDP 22) fulfils the requirements and duties for Sustainability Appraisal and Strategic Environmental Assessment and incorporates the findings of the Equalities Impact Assessment and Child's Rights Impact Assessment (RLDP 25), Health Impact Assessment (RLDP 24), Welsh Language Impact Assessment (RLDP 26) and takes into account the Well-being of Future Generations Act. The ISA assesses the likely sustainability and significant environmental effects of all substantive components within the Plan (strategy, policies, site allocations, etc.) and identified reasonable alternatives. This builds directly upon previous ISA reporting undertaken to accompany earlier stages of the RLDP including an ISA Scoping Report (May 2021) and Initial ISA (May 2023).
    - 2.2 The likely significant effects of the Deposit Plan, based on reasonable assumptions, have been identified, described and evaluated drawing on the ISA objectives identified through the scoping report as a methodological framework. Cumulative effects are also considered, including the potential for the Plan to

impact on an aspect of the baseline data once implemented alongside other plans, programmes, and projects. Explicit reference to cumulative effects is made within the appraisal as appropriate.

2.3 In accordance with regulatory requirements, the ISA appraises reasonable alternatives detailing how they have been established and appraising options relating to the level of growth, the location of growth and strategic growth areas.

**3. Has the LDP been subject to a robust Habitats Regulations Assessment? Where 'likely significant environmental effects' have been identified, has an adequate Appropriate Assessment (AA) been undertaken?**

3.1 A Habitats Regulation Assessment (HRA) has been undertaken throughout the course of the preparation of the RLDP as an integrated and iterative process, with the assessment of the Deposit Plan contained in the HRA of the Cardiff RLDP Deposit Plan – January 2025 (RLDP 23).

3.2 The HRA identified 'likely significant environmental effects" for the Severn Estuary SAC/SPA/ Ramsar site, and the Cardiff Beech Woods SAC and an Appropriate Assessment was undertaken. The HRA set out a series of recommendations that have been incorporated in the plan and concluded that the RLDP with these changes contains a sufficient policy framework that no adverse effect would arise on Habitats sites either alone or in combination with other plans or projects.

**4. Have there been any significant changes in national policy or local circumstances since the LDP was placed on deposit? If there have, what are the implications of these changes for the Plan? Do they need to be addressed through the preparation of new evidence and/or revisions to the Plan? What is the intended timescale for this work?**

4.1 Since the publication of the Deposit RLDP in February 2025, Technical Advice Note (TAN)15: Development, Flooding and Coastal Erosion was published by Welsh Government in March 2025 and sets out the criteria against which the consequences of a development in an area at risk of flooding can be assessed and is accompanied by the Flood Map for Planning (FMfP). TAN15 reflects the core principles of the National Strategy for Flood and Coastal Erosion Risk Management in Wales to adopt a risk-based approach in respect of new development in areas at risk of flooding and coastal erosion. TAN15 comprises technical guidance related to development planning and flood risk and provides a framework within which the flood risks arising from rivers, the sea and surface water, and the risk of coastal erosion can be assessed. In accordance with the updated TAN15, further work has been commissioned to update the relevant parts of the SFCA (RLDP 43) ahead of the examination.

**5. Is the LDP strategy consistent/compatible/in conformity with:**

**a) National policy, guidance and Future Wales: the National Plan 2040?**

- 5.1 The RLDP is considered to be consistent and compatible with national planning policy and guidance, including Future Wales: The National Plan 2040 and PPW12, as set out in the Soundness Self-Assessment of the Deposit RLDP (Appendix 5). In response to the Deposit RLDP consultation, Welsh Government confirmed that 'the Plan is in general conformity with the plan. The strategy set out in the plan accords with the role of Cardiff as a 'national growth area' as a focus for growth and investment.
- 5.2 The Deposit Plan has regard to national policies and guidance as set out in PPW12 and associated Technical Advice Notes (TANs). The RLDP and supporting documents refer to relevant sections of PPW12 specific to the issue being discussed and the policy requirements of PPW12 have been considered and incorporated where relevant in the preparation of the RLDP policies and proposals. The supporting text adds further commentary on the links to national guidance.

**b) The Well-being Goals?**

- 5.3 The RLDP has had full regard to the provisions of the Well-Being Goals as set out in the Future Generations Act (WBFGA) 2015. A compatibility assessment has been undertaken of the RLDP objectives, strategic and detailed policies, against the seven Well-Being goals and this is set out in Tables 3.1, 3.3 and 3.5 in Appendix 3 of the RLDP. The RLDP also aligns with the Council's Well-being plan.

**c) The Welsh National Marine Plan?**

- 5.4 The RLDP covers a number of issues and policy areas which complement the aims and objectives of The Welsh National Marine Plan. Strategic Policies SP4 – Securing Good Quality and Sustainable Design, SP20 Securing Climate Resilience, De-Carbonisation and Renewal Energy in New Developments and SP21 Maintaining and Enhancing Green Infrastructure and Biodiversity, complement the Marine Plan by directing development away from areas of flood risk, protecting and enhancing green infrastructure and network and recognising the challenge posed by climate change. The relationship with the Marine Plan is enhance further through detailed Development Management policies, such as Policy BG7 – Severn Estuary and Cardiff Beechwoods Recreational Pressure, which seeks to ensure that there are no adverse impact on the integrity of the Severn Estuary SAC, SPA and Ramsar as a result of an increase in visitor pressure and Policy W2- Protection of Water Resources, which seeks to ensure development does not impact upon quality and quality of water sources. As such, the RLDP policy framework seeks to safeguard the river ecosystem, which flows into the Severn Estuary and National Marine Plan area.

**d) The relevant Area Statement?**

- 5.5 Cardiff forms part of the South Central Area Statement along with Bridgend, Vale of Glamorgan, Merthyr Tydfil and Rhondda Cynon Taff, which was published by

NRW in 2020. The Deposit Plan has regard to the Area Statement's strategic themes of Building resilient ecosystems, Connecting people with nature, Working with water, Improving our health and Improving our air quality through the plan policies which seek to achieve many of the outcomes associated with each theme. Consequently, the RLDP is considered to be consistent with the key themes and aims of the South East Wales Area Statement.

5.6 Of note, NRW, in response to the Deposit Plan consultation, replied noting that it considers the Deposit Plan has had sufficient regard to the South Central Area Statement and can see synergies between the Councils "Stronger, Fairer, Greener" strategy, and the Area Statement's values and themes.

**e) If an LDP, the relevant strategic development plan (when adopted)?**

5.7 The preparation of an SDP is in its early stages, with no clear policy framework established at this time. However, the Council has been actively involved in the discussions and agreements put in place to date, and the Council has formally resolved to be part of the SDP.

**f) Regional plans/strategies and the programmes of utility providers?**

5.8 Utility companies have been involved throughout the preparation of the RLDP to ensure consistency with their programmes. For example, extensive discussions and consultation have taken place between the Council and Dŵr Cymru Welsh Water to ensure there is foul sewerage drainage capacity, as well as other utility companies such as Western Power, to understand capacity for growth and for renewable energy.

5.9 The Integrated Sustainability Assessment and Habitats Regulations Assessment also consider the in-combination effects of the Plan along with other plans and strategies in the region and conclude that the Plan is in line with both regional and local environmental protection objectives.

**g) The plans/strategies of neighbouring local planning authorities? And**

5.10 The Deposit Plan considers cross-border issues and the plans of neighbouring authorities as relevant, and reflects the discussions and agreements reached relating to cross-border issues. Examples include regional collaboration with have undertaken with the Vale of Glamorgan (RLDP 28) looking at population and commuting trends between the two authorities.

**h) The relevant Well-being Plan or National Park Management Plan?**

5.11 The Plan has regard to the provisions of the Cardiff Well-being Plan and the RLDP vision and objectives reflect the seven well-being objectives set out the plan which are (1) A capital city that works for Wales (2) One Planet Cardiff (3) Safe, confident and empowered communities (4) Cardiff is a great place to grow up (5) supporting people out of poverty (6) Cardiff is a great place to grow old and (7) Modernising and integrating our public services.

**6. Has the LPA exhausted all opportunities for joint working and collaboration on both the preparation of the LDP and its evidence base?**

6.1 In recognition of the value of working with neighbouring authorities, and in response to PPW12 and the Development Plans Manual (Ed 3, March 2020) emphasis on collaborative working, the preparation of the Deposit Plan has involved a regional and coordinated approach to the collection of evidence, with a part of the evidence base commissioned on a joint basis with other local authorities in south east Wales. Examples include the regional assessment of future growth and migration for the Cardiff Capital Region (CCR) (LDP 36) and Strategic Flood Consequence Assessment (RLDP 43). This has provided a consistent and comparable approach to methodologies and a basis to consider the evidence and any implications on a more regional basis, as well as at a local level.

6.2 We have held regular joint meetings to ensure there is a consistency of approach. Further details of joint working and collaboration are referenced throughout the RLDP in relation to specific topic areas. On-going regional meetings and collaboration are pursued through the longstanding South-East Wales Strategic Planning Group (SEWSPG), the Planning Officers South Wales (POSW) and the South-East Wales Planning Officer Society (SEWPOS). Work undertaken by SEWSPG and topic-based Pathfinder groups, have helped establish a common approach to a number of Plan preparation tasks including candidate sites assessments, retail and employment land monitoring. Long standing regional working methods associated with areas such as waste and minerals are continued and are reflected in the Deposit Plan.

6.3 Regard will continue to be had to the emphasis on regional working in light of future provisions around the preparation of Strategic Development Plans.

**7. What is the LDP's spatial strategy? How do the key components of the strategy interact? Does it represent an appropriate approach for delivering, managing and distributing growth over the Plan period?**

7.1 Strategic Policy SP1 – Providing for Sustainable Growth, sets out a clear spatial strategy that is considered to reflect a key objective of the RLDP, to meet evidenced economic and social needs whilst maintain and enhancing Cardiff's environmental and natural resources. The key components of the strategy area as follows:

- Provide for 26,400 (including 10% flexibility allowance) new homes during the plan period 2021 to 2036;
- Provide opportunities to deliver a minimum of 32,300 new jobs during the plan period 2021 to 2036 in the city to support the strategic economic and employment ambitions within the city and region;
- Provide sufficient employment land to support economic growth and job creation;

- Potential to deliver 5,000 to 6,000 affordable homes depending on make-up of sites;
- Provide a good range and choice of housing with a 50:50 brownfield/greenfield split;
- Deliver infrastructure, community facilities and sustainable travel objectives;
- Respond to the declared climate and nature emergencies;
- Respect and enhance the rich and diverse environmental qualities of the city;
- Recognise the cultural character of the city and promote Welsh language growth and usage wherever possible;
- Contribute to the delivery of physical and social regeneration opportunities which provide for and reflect a range of diverse and cohesive communities across the city;
- Focus retail change on established centres;
- Recognise the contribution of ‘previously developed land’ and utilises it as appropriate;
- Provide opportunities to cater for the city’s visitor economy;
- Protect and enhance the natural, historic and built conservation qualities of Cardiff and its high value landscapes; and
- Contribute to an integrated transport network both within the city and the region and promote opportunities to use and access alternative means of transport including walking and cycling.

7.2 To inform this strategy various growth options have been considered and consulted on and expert advice sought. The level of growth set out within this Policy is considered to best reflect an analysis of all relevant factors. Importantly, it is based on the most up-to-date information, takes account of all relevant National planning policy guidance as set out in Planning Policy Wales and is considered to:

- Accord with Future Wales: The National Plan 2040 which identifies the city as a National Growth Area;
- Accord with the Council’s vision and LDP objectives;
- Effectively respond to the clear evidenced need to provide for a considerable number of new homes and jobs. The Plan makes provision to deliver the official projections and is considered to strike the right balance having regard to the full range of factors;
- Deliver necessary homes and jobs, but in a managed and controlled manner protecting key elements of Cardiff’s environment;
- Meet deliverability and capacity factors - the LDP contains proposals and mechanisms which justify how deliverability and capacity matters can be adequately addressed.
- Responds in an evidence-based manner to the divergence of views expressed during the consultation on strategic options.

**8. How was the LDP's settlement hierarchy defined? Is the methodology used to define the hierarchy clear and rational?**

8.1 As Cardiff is largely an urban area the plan does not include a settlement hierarchy. Strategic policy SP12 – Delivering Sustainable Neighbourhoods, Social Cohesion and Affordable Housing does seek to promote the creation of sustainable neighbourhoods. This approach accords with Planning Policy Wales and aims to develop sustainable neighbourhoods, ensure strong and cohesive communities, tackle deprivation, reduce inequalities, and improve the quality of life for all. In delivering sustainable communities, the Council will seek to ensure a range of dwelling sizes, types and affordability is provided in terms of both market and affordable housing to meet identified needs (including supported and older persons accommodation and other special needs where appropriate), in safe neighbourhoods.

**9. What is the rationale for the distribution of new development? Is the approach consistent with the National Sustainable Placemaking Outcomes?**

9.1 To provide for growth the following eight alternative Spatial Options were identified:

Option 1: Further extension of existing Strategic Site commitments

Option 2: Urban intensification based on a brownfield only strategy

Option 3: Renewal and regeneration based on brownfield mixed use sites

Option 4: Growth based around district and local centres in line with the city of villages concept

Option 5: Growth based around transport nodes

Option 6: Strategic public transit growth corridors

Option 7: Dispersed greenfield growth areas

Option 8: Dispersed combination of brownfield and greenfield

9.2 All options sought to:

- Support Cardiff as a key driver for growth, as part of a National Growth Areas as set out in Future Wales;
- Focus on sustainable development and the place making principles;
- Align with the One Planet Cardiff approach – to decarbonise the city and become a Carbon Neutral City by 2030, whilst creating economic opportunities and promoting social well-being
- In developing the spatial options, regard was had to the Candidate Sites submitted, the Well-Being of Future Generations (Wales) Act 2015 and the Cardiff wellbeing objectives. The options identified assume that infrastructure

improvements need to be aligned with new development, including improvements to transport networks, utilities, green infrastructure, health, education and social facilities. Consequently, the term 'development' used in the Spatial Options for Growth refers to the balance of housing, employment opportunities and the accompanying infrastructure.

- The development of the preferred option has emerged from the consideration of the spatial options and other considerations, including but not limited to:
- the well-being objectives;
- the content of the Annual Monitoring Reports and Review Report;
- the engagement processes; and
- the Integrated Sustainability Report findings.

9.3 In identifying the preferred option, there was always an acceptance that there would be potential variations on the strategic options identified, including an option which would consider a mix of the positive outcomes from a number of those options. In considering the above, and having reference to the issues, objectives and vision discussed earlier in the plan, and the comments received from the engagement process, a hybrid option, which reflects some of the characteristics of the eight spatial options, emerged as the most appropriate approach to delivering a balanced and sustainable spatial strategy for the city.

9.4 This hybrid option builds on the approach highlighted through the brownfield strategic options 2, 3, 4 and 5. The strategy is essentially a brownfield strategy and seeks to meet the majority of housing land required during the plan period to 2036 through a range of brownfield sites within the existing settlement boundary. Such sites will be major regeneration and renewal areas, located within or adjacent to district or local centres or on transport nodes within the urban areas. These sites in combination with the substantial existing landbank of sites on greenfield sites around the edge of the city will provide for a range and choice of housing types and locations across the city

9.5 The policy framework set out in the Deposit Plan is considered to reflect the policy objectives of the National Sustainable Placemaking Outcomes and Future Wales policy and provide the basis to make a significant contribution to placemaking objectives at the local level within Cardiff. A compatibility of the plan objectives, strategic and detailed policies with the National Sustainable Placemaking Outcomes is set out in Appendix 3 to the plan (see Tables 3.2, 3.4 and 3.6).

## **10. What was the methodology underlying the site selection process?**

10.1 As part of the RLDP preparation process, the Council invited landowners, developers and the public to put forward 'Candidate Sites' to be considered for development, redevelopment or protection in the RLDP. This was undertaken in summer 2021 and the findings of the assessment process for each of the 'Candidate Sites' are set out Background Technical Paper Number 10 (RLDP 21).

### **Are the resultant allocated sites:**

**a) In sustainable locations and generally free from physical constraints, such as land ownership, infrastructure, access, ground conditions, flood risk issues, pollution, landscape, biodiversity and heritage designations? and**

10.2 The spatial strategy is essentially a brownfield strategy and seeks to meet the majority of housing land required during the plan period to 2036 through a range of brownfield sites within the existing settlement boundary. Such sites will be major regeneration and renewal areas, located within or adjacent to district or local centres or on transport nodes within the urban areas in sustainable locations.

10.3 The RLDP allocates a range of Housing led regeneration areas, two non-strategic housing sites and some residual areas of the large strategic housing sites identified in the adopted LDP now under construction. These sites in combination with the substantial existing landbank of provide for a range and choice of housing types and locations across the city.

10.4 The allocated sites have been assessed through the candidate sites assessment process as noted above and none have fundamental constraints that would prevent their development (RLDP 21). Consultation and dialogue with external and internal stakeholders have also been undertaken throughout the RLDP process in relation to candidate sites and has continued in relation to allocated sites as the Plan has progressed. Where any specific requirements are considered necessary in relation to allocated sites these are noted in the site-specific policies.

**b) Attractive to the market (both private and/or public sector) for development, able to accommodate the policy and infrastructure requirements set out in the Plan, viable, and deliverable during the Plan period?**

10.5 The allocated sites are considered to be attractive to the market with housebuilders, land promoters and registered social landlords having been engaged throughout the RLDP process on the promotion of the allocated housing/mixed-use sites.

10.6 The RLDP is supported by a viability assessment (RLDP 38) which demonstrates the sites are viable based on key policy requirements set out within the RLDP, including the provision of 30% affordable homes on greenfield sites and 20% on brownfield sites.

10.7 The delivery rates of the allocated sites are set out in the Housing Trajectory in Appendix 7 of the RLDP, which is the key mechanism to demonstrate how sites will be delivered in the identified timescales throughout the Plan period to meet the RLDP housing requirement.

**11. Will the LDP be supported by supplementary planning guidance? If so, what subjects will be addressed? What are the timescales for the adoption of the guidance? How will it assist in the delivery of the Plan?**

11.1 The RLDP will be supported by Supplementary Planning Guidance (SPG) to cover a range of policy areas as set out in Appendix 4 of the RLDP. The SPGs will be prepared to provide further detail on certain policies and proposals and to support the interpretation and implementation of the Plan's policy framework.

**12. What is the LDP's strategy for the provision of housing? Is it appropriate to meet the needs of the area over the Plan period?**

12.1 Strategic Policy SP1 – Providing for Sustainable Growth, sets out a clear spatial strategy that is considered to reflect a key objective of the RLDP, to meet evidenced economic and social needs whilst maintain and enhancing Cardiff's environmental and natural resources. The key components of the strategy include the providing for 26,400 (including 10% flexibility allowance) new homes during the plan period 2021 to 2036.

12.2 The level of housing growth is informed by a Demographic Study undertaken by Edge Analytics (RLDP 35) and is considered to best reflect an analysis of all relevant factors. Importantly, it is based on the most up-to-date information, takes account of all relevant National planning policy guidance as set out in Planning Policy Wales and is considered to:

- Accord with Future Wales: The National Plan 2040 which identifies the city as a National Growth Area;
- Accord with the Council's vision and LDP objectives;
- Effectively respond to the clear evidenced need to provide for a considerable number of new homes. The Plan makes provision to deliver the official projections and is considered to strike the right balance having regard to the full range of factors;
- Deliver necessary homes, but in a managed and controlled manner protecting key elements of Cardiff's environment;
- Meet deliverability and capacity factors - the LDP contains proposals and mechanisms which justify how deliverability and capacity matters can be adequately addressed.
- Responds in an evidence-based manner to the divergence of views expressed during the consultation on strategic options.

**13. What is the LDP's housing requirement figure (HRF)? How has it been calculated?**

13.1 The RLDP's housing requirement figure is 24,000 homes for the period 2021-2036. As stated in Strategic Policy SP1 – Providing for Sustainable Growth, a 10% flexibility allowance has been applied to the requirement figure, with the Plan making provision for 26,400 homes.

13.2 The RLDP housing growth strategy adopts a 'dwelling-led\_1600' policy approach which makes provision for an average of 1,600 dwellings per annum over the 15-year plan period. Further details are set out in the Demographics Study undertaken by Edge Analytics (RLDP 35).

**14 In defining the HRF, was adequate regard paid to the latest household and population projections? Was consideration given to the main local influences on housing demand in the area (including household formation rates, migration levels, and household conversion ratios etc)?**

14.1 As set out in response to question 13 the HRF reflects work undertaken by Edge Analytics set out in the Demographic Study (RLDP 35). The HRF is based on a "dwelling-led\_1600" policy approach which makes provision for an average of 1,600 dwellings per annum over the 15-year plan period. This scenario presents high growth outcomes and estimates population growth of 10.7%, with a corresponding household growth of 14.6% and a net migration of 1,390 per annum over the plan period.

14.2 The 'dwelling-led\_1600" scenario demonstrates the impact of a return to a more positive outlook on housing completions. The housing industry remains a critical component of the continued economic bounce-back and a key driver of the future growth and distribution of population. For Cardiff, a continued renaissance in its housing completions, recovering from the COVID-19 interruption, will be a fundamental component of its future economic development, underpinning the achievement of the National Plan's strategic ambition.

**15 Were alternative housing growth scenarios considered? If so, what alternative scenarios were they, why were they discounted, and why was the preferred option selected?**

15.1 A number of growth options were considered and consulted upon over the course of the plan preparation to reach the Deposit stage, with details set out in the RLDP Strategic Options Consultation Paper (RLDP 04). These were informed by a range of population growth options presented in the Demographics Study prepared by Edge Analytics (RLDP 35).

15.2 Edge Analytics used POPGROUP technology to configure a range of growth scenarios for Cardiff, incorporating demographic statistics from both the Office for National Statistics (ONS) and Welsh Government, to produce forecasts for a 2021 to 2036 plan period. These are set out in detail in Table 2 (page 24) of the Demographic Study (RLDP 35).

15.3 The RLDP housing growth strategy adopts a 'dwelling-led\_1600' policy approach which makes provision for an average of 1,600 dwellings per annum over the 15-year plan period. It is considered to best reflect an analysis of all relevant factors. Importantly, it is based on the most up-to-date information, takes account of all

relevant National planning policy guidance as set out in Planning Policy Wales and is considered to:

- Accord with Future Wales: The National Plan 2040 which identifies the city as a National Growth Area;
- Accord with the Council's vision and LDP objectives;
- Effectively respond to the clear evidenced need to provide for a considerable number of new homes. The Plan makes provision to deliver the official projections and is considered to strike the right balance having regard to the full range of factors;
- Deliver necessary homes, but in a managed and controlled manner protecting key elements of Cardiff's environment;
- Meet deliverability and capacity factors - the LDP contains proposals and mechanisms which justify how deliverability and capacity matters can be adequately addressed.
- Responds in an evidence-based manner to the divergence of views expressed during the consultation on strategic options.

## **16 What is the LDP's housing land supply figure and how has it been calculated?**

16.1 The RLDP makes provision for 29,429 homes based on the housing requirement figure of 26,400 homes and the addition of a 10% flexibility allowance equating to an additional 2,640 homes. Details of the housing supply components are set out in the Housing Background Paper (RLDP 12).

16.2 A 10% flexibility allowance ensures delivery of sustainable growth and to overcome any potential unforeseen deliverability issues. This will allow for the Plan and associated housing trajectory to be resilient and sufficiently flexible to deal with unforeseen challenges, whilst still enabling the housing requirement to be delivered.

## **17 Is the housing trajectory set out in the LDP realistic?**

17.1 A housing trajectory has been prepared as part of the Deposit Plan, which demonstrates housing delivery rates can be achieved to ensure the delivery of the Anticipated Annual Build Rate (AABR) throughout the Plan period. The trajectory and forecast completions have been prepared in consultation with housebuilders and developers and site promoters, and in accordance with the Development Plans Manual's (March 2020) front loading principle. The housing trajectory is set out in Appendix 7 to the Deposit RLDP.

## **18 What is the LDP's strategy for the provision of affordable housing? Has it been informed by a reliable and up-to-date market assessment (LHMA)? What scale, tenure and type of housing need was identified and how will this need be met over the Plan period?**

18.1 Affordable housing provision is a key issue for the city and forms an integral part of the overarching Strategy with 30% provision required on all new site greenfield allocations and 20% on all new brownfield allocations of 5 or more dwellings or sites exceeding 0.1 hectares in gross site area.

18.2 The Deposit RLDP has been informed by the latest Local Housing Market Assessment 2022- 2027 (LHMA) (2025) (RLDP 37). The LHMA estimates a net need of 960 affordable homes per annum in Cardiff over the 15-year plan period 2021 to 2036. The majority of the estimated affordable housing need relates to social rent accommodation (687 per year) and intermediate rent/low cost home ownership (274 per year) accounting for the remainder. This would represent an affordable housing requirement of 14,400 homes if extrapolated over the Plan period. This is not a realistic affordable housing target for the Plan and it is not expected to be as new development is only one of a variety of means of achieving a supply of affordable homes.

18.3 The LHMA identifies the greatest social rent need is for one-bed homes. Although this need is particularly high, it is important to ensure that a mix of house types and tenures is provided on new developments in order to achieve balanced communities. The mix and tenures of homes will be agreed with the Council at the planning application stage.

**19 What is the LDP's affordable housing target? How was it calculated? Does it maximise the opportunities for delivery?**

19.1 The RLDP will deliver approximately 5,000 to 6,000 affordable homes over the Plan period based on homes in the substantial existing housing landbank and contributions from the housing allocations in the plan under policies H1A, H1B and H2.

19.2 The RLDP seeks to maximize affordable housing delivery on new housing allocations, reflecting the Council's commitment to deliver 30% affordable homes on new greenfield housing sites and 20% on new brownfield sites to help tackle Cardiff's housing need, homelessness and social inequality. The RLDP enables the Council to consider alternative mechanisms for delivering affordable homes and all opportunities to increase the supply of affordable housing will be considered.

**20 Will the LDP's affordable housing target meet the need for social rented and intermediate accommodation identified in the LHMA? If not, how will**

20.1 The LHMA target would represent an affordable housing requirement of 14,400 homes if extrapolated over the Plan period. As noted in the response to question 18, this is not a realistic affordable housing target for the Plan and it is not expected to be as new development is only one of a variety of means of achieving a supply of affordable homes.

20.2 In addition to new development, the Council is exploring and implementing a range of other interventions to increase the supply of affordable housing. These include:

- Implementing a comprehensive housing partnership programme “Cardiff Living” across the city with the aim to deliver 4,000 new homes including 2,800 new Council homes.
- Repurposing existing buildings – this involves opportunities such as bringing empty homes back into use and converting commercial properties.
- Acquisitions – Cardiff Council and partner Registered Social Landlords (RSLs) are acquiring existing properties and refurbishing them for use as affordable housing.

**21 How have the LDP’s site-specific affordable housing target(s) been defined? In which geographical locations will the target(s) apply?**

21.1 Detailed Policy H3 - Affordable Housing, provides detail of the thresholds at which affordable housing will be required. A Viability Assessment (RLDP 38) has been undertaken to inform the affordable housing targets, which demonstrates that on-site provision of 30% affordable homes is achievable on greenfield sites and 20% affordable housing is achievable on brownfield sites throughout the city on sites of 5 or more dwellings or sites exceeding 0.1 hectares in gross site area.

**22 How were the affordable housing site thresholds defined? Have they been informed by robust, proportionate and credible evidence?**

22.1 A Viability Assessment (RLDP 38) has been undertaken to inform the affordable housing targets, which demonstrates that on-site provision of 30% affordable homes is achievable on greenfield sites and 20% affordable housing is achievable on brownfield sites throughout the city. The Assessment recommends a threshold of 5 or more dwellings or sites exceeding 0.1 hectares in gross site area when applying these targets.

**23 How will off-site contributions be used to deliver affordable housing?**

23.1 Financial contributions will be required for sites of 5 or more dwellings or sites exceeding 0.1 hectares in gross site area including conversions and sub- divisions. Financial contributions towards the provision of affordable housing in the local planning authority area will be required in accordance with details to be set out in the Planning Obligations Supplementary Planning Guidance.

23.2 Off-site financial contributions will support the delivery of affordable housing, including options such as social rent and intermediate housing. These homes will be made available to individuals and families who are unable to access market housing.

23.3 The Council, either directly or in partnership with Registered Social Landlord (RSL) partners, may allocate funds in the following ways:

- New construction: Purchasing land or directly funding the development of new affordable homes.
- Acquisition of existing property: Buying market homes and converting them into affordable housing.
- Building conversions: Repurposing existing buildings for affordable housing use.
- Bringing empty homes back into use: Renovating vacant properties to provide additional affordable housing stock.

**24 What is the LDP's strategy for the provision of Gypsy and Traveller accommodation? Has it been informed by a Gypsy and Travellers Accommodation Assessment (GTAA)? Does the GTAA identify a need for new pitches (permanent and transit) over the Plan period? How will the need be met?**

24.1 The Plan's strategy for the provision of Gypsy and Traveller accommodation is through a combination of a site-specific temporary allocation for 80 pitches and a criteria-based policy to allow the consideration of additional sites that may come forward during the Plan period.

24.2 The Council's most recent Gypsy and Traveller Accommodation Assessment (GTAA) (RLDP 47) was completed in 2021 and was agreed by Welsh Government in June 2024. In summary, the conclusions are a need for 117 pitches for families already living within Cardiff. This need is broken down as follows:

- A current unmet need for 33 pitches
- A short term 2020 to 2025 need of 40 pitches
- Beyond 2025, a further unmet need for 44 pitches over the remaining length of the RLDP (2026 – 2036) to accommodate family growth as children become adults and require their own pitch, giving a total need of 117 pitches until the end of the Plan period.
- There is no need for an allocation for travelling show people or circus people.
- The GTAA did also identifies a need to provide a transit site. Given the cross-border movement associated with families passing through Local Authorities, this topic is best addressed via the regional Strategic Development Plan.

24.3 Since the publication of the GTTA an additional 4 pitches have been granted planning permission adjacent the existing Shirenewton Gypsy and Traveller site reducing the overall need to 113 pitches.

24.4 Policy H11 allocates land at Pengam Green for a temporary Gypsy and Traveller site for up to 10 years. This will enable work to progress on firming up proposals to improve and extend the existing Rover Way Gypsy and Traveller site to meet the need for new pitches identified in the GTAA. This work will also investigate

options for improving and realigning Rover Way and the wider master planning of the Pengam Green area.

**25 What is the LDP's strategy for employment? Has it been informed by an employment land review? Is it consistent with the requirements of national policy? And has it had regard to the key drivers for change in the employment market?**

25.1 Sustaining economic growth and resilience is a key objective of the RLDP. Strategic Policy SP1 – Providing for Sustainable Growth makes provision for 32,300 new jobs over the plan period 2021 to 2036 and Strategic Policy SP2 – Sustaining Economic Growth and Resilience makes provision for a range and choice of employment sites for different types of employment and in different geographical locations across the city which will effectively contribute towards the delivery of the level of growth set out in the plan.

25.2 This will be supported by a strong framework to protect the future role of the city's employment land, through the designation of strategically and locally important employment land and premises. These areas are identified on the proposals map and will continue to be required for employment purposes. Such areas are safeguarded from alternative forms of development, in order to effectively meet future supply in relation to both office/research and development floorspace, as well as industrial and warehousing land, over the plan period.

25.3 As set out above the Strategy sets a framework for delivering a wide range and choice of employment sites in different locations and for different sectors including the key market sectors of ICT, energy and environmental technologies, advanced materials and manufacturing, creative industries, life sciences and financial and professional services. These sites will contribute towards the delivery of the stated level of growth for new jobs. Importantly, different sites will perform different roles in the strategy.

25.4 The provision of employment land as part of wider housing-led comprehensive developments at North West Cardiff and North East Cardiff, provides an important role in terms of the overall supply and mix of employment land offering a good range and choice of small out of centre employment sites, including offices, creative industries, small workshops, and starter units. This will be essential to ensure the continued provision of local employment opportunities and address the geographical employment disparities across the city.

25.5 The geographical spread of the 'Cardiff offer' also addresses the need to provide jobs in accessible locations. In this respect, the key strategic proposal relating to the Cardiff Central Enterprise Zone and Regional Transport Hub represents a highly sustainable and accessible location, close to areas of high unemployment in the city but also readily accessible to the wider region via sustainable modes of transport.

25.6 Cardiff's prime office core known as Central Square comprises Grade A office space including the new headquarters for BBC Cymru Wales and The Interchange, a mixed-use commercial and residential scheme and transport hub.

25.7 The proposed development at Cardiff Parkway aims to become a catalyst for growth, contributing to the regeneration of East Cardiff and the wider Cardiff Capital Region. The development of a new business park will provide up to 90,000 sqm. of business space and has the potential to support around 6,000 jobs, as well as becoming a transport hub that helps people to access other employment opportunities across the region.

25.8 The employment strategy is informed by an Employment Land and Premises Study undertaken by Hardisty Jones Associates (HJA) in partnership with Owen Davies Consulting and NP Linnells Property (RLDP 40). Further details on this are set out below in the response to question 27.

**26 Does the LDP allocate land for new employment development? If so, how has the requirement been defined? Have the allocated sites been subject to a sequential search?**

26.1 The employment strategy is informed by an Employment Land and Premises Study undertaken by Hardisty Jones Associates (HJA) in partnership with Owen Davies Consulting and NP Linnells Property (RLDP 40).

26.2 The Study contributed further to the LDP Review evidence base by not only identifying employment land requirements for the replacement LDP period (2021-2036) but also assessing the suitability of the existing employment land supply to meet these needs.

26.3 In quantitative terms the existing supply of office and research and development (R&D) floorspace across the range of contributing areas (current stock of vacant premises, confirmed pipeline and strategic site allocations) is more than sufficient to meet core requirements.

26.4 The surplus of supply provides for a range of typologies and locations, including substantial provision within the Central Business Area and Cardiff Bay Area, as well as out of town/business park provision.

26.5 There is also potential for reduced demand, or additional releases from the existing stock if higher levels of hybrid working are retained in the medium-long term. Furthermore, there is potential for higher levels of stock refurbishment in response to the need to reduce carbon emissions.

26.6 Identified Industrial and Warehousing supply falls below the lowest estimate of future requirements. The industrial market has exceptionally low rates of vacancy at present, and there are strong levels of reported market demand. Stakeholders have stated that limited supply has constrained growth in this sector.

26.7 Analysis suggests the LDP should provide for approximately 300,000 sqm of industrial and warehouse space. This is substantially greater than the available supply within the current pipeline and strategic site allocations. The requirement is in the order of 140,000 sqm of floorspace, equivalent to an estimated 35 hectares in land terms.

26.8 Given the predicted future employment land requirements, it is fundamental that the Strategy seeks to protect strategically and locally important existing business and industrial and warehousing land (B1b/c, B2 and B8 uses). There will also be a strong presumption in favour of retaining existing high quality and accessible office accommodation (B1a uses).

26.9 Further information is set out in the Economic Background Technical Paper (RLDP 13).

**27 Will the LDP provide protection for existing employment sites? If so, what protection will be afforded, and how have the sites been selected?**

27.1 The provision of a suitable range and choice of sites for industrial and business development in the city also involves the protection of existing employment sites from alternative development. Policy EC3 – Protected Employment Land and Premises, protects 25 existing employment sites for industrial and business development (Use Classes B1, B2 and B8).

27.2 The identification of the protected existing employment sites has been informed by the Employment Land and Premises Study (RLDP 40), which reviews the existing employment areas in the city for their on-going appropriateness for employment uses, having regard to factors such as condition of premises, vacancy rates, market attractiveness and location. The assessment methodology has also been used by the Council to assess the protection of a few new additions to the policy.

**28 What is the LDP's strategy for retail development? Does it take into account the envisaged growth in other sectors, particularly housing and employment, over the Plan period?**

28.1 Cardiff City Centre will remain the principal destination for main town centre uses, including retail. The City Centre is supported by a range of District Centres and smaller Local Centres. District Centres serve the retail needs of a wide local catchment and will be the primary focus for development and investment in main town centre uses outside the City Centre.

28.2 The RLDP is informed by a Retail and Leisure Study undertaken by Nexus Planning (RLDP 41). This concludes that there is no need to bring any further sites forward to accommodate convenience or comparison retailing during the plan period 2021 to 2036. The study also undertook a detailed health check of the city centre and the 11 district centres and 20 local centres.

**29 What is the LDP's strategy/policy framework for the following areas:**

**a) Welsh language**

29.1 The RLDP is informed by a Welsh Language Impact Assessment (RLDP 26) and includes Strategic Policy SP15 and Detailed Policy WL1 which aim to secure and enhance opportunities to grow the Welsh language.

29.2 Policy SP15 designates the Cardiff Local Authority area is an Area of Linguistic Importance. In stating in this plan that Cardiff is an area of Linguistic Importance, in line with TAN 20 Planning and the Welsh language (2017) and PPW 12 (2024), means that land use infrastructure development and employment and community facilities proposals must conscientiously consider this element at an early stage in the planning process in the same way that other strategic subjects and themes are considered.

29.3 Further information is provided in the Welsh Language Background Technical Paper (RLDP 20).

**b) Air quality**

29.4 Air quality in the city generally meets current standards, although there are four Air Quality Management Areas (AQMAs) within the city, Cardiff City Centre, Ely Bridge, Stepheson Court, Newport Road and Cardiff Road, Llandaff. Detailed Policy PC1 – Air, Noise, Light Pollution and Contaminated Land, establishes the policy framework to assess the impact of development proposals on air quality. Where it is considered that a development proposal may impact upon an AQMA, or exacerbate an existing problem, developers will be required to provide an assessment of air quality impact, together with proposals for mitigation.

29.5 At a more strategic level, the RLDP seeks to minimise any polluting effects that might arise from new development in the city by ensuring development is sustainably located and well-connected to amenities, to encourage a modal shift in travel patterns.

29.6 The potential impact of the RLDP on air quality and the effectiveness of the policy framework in addressing the issue has also been assessed via the ISA (RLDP 23) and HRA (RLDP 24). Within the HRA, atmospheric pollution is identified as an 'impact pathway' linked to the RLDP, highlighting the European sites that are sensitive to atmospheric pollution, the policies that could (prior to the consideration of mitigation) result in Likely Significant Effects (LSE) on European sites and establishing recommendations for inclusion in the Plan.

**c) Biodiversity and ecological networks**

29.7 Cardiff has significant and distinctive green infrastructure (GI), landscape, biodiversity and nature resources, a number of which are of international and national importance, as well as numerous locally designated sites. The need to protect, enhance and manage these resources are key objectives of the RLDP.

29.8 Strategic Policy SP21 – Maintaining and Enhancing Green Infrastructure, seeks to ensure that development proposals maintain and enhance the integrity, extent, diversity, quality and connectivity of green infrastructure assets and provide multi-functional green spaces and “Net Benefits for Biodiversity”. This policy ensures that all those participating in the planning process follow evidence based Green Infrastructure Assessments and the step wise approach outlined in PPW and the Environment (Wales) Act 2016 in order to deliver green infrastructure and landscape benefits and assist in nature recovery and ecosystem resilience.

29.9 Strategic Policy SP21 is supported by a range of detailed policies BG1 – Designated Sites, BG2 – Ecological Networks and Features of Importance for Biodiversity, BG3 – Priority Habitats and Species, BG4 – Net Benefits for Biodiversity and the Green Infrastructure Statement, BG5 – Tress, Woodlands and Hedgerows, BG6 – Soils, BG7 Severn Estuary and Cardiff Beech Woods Recreational Pressure. Collectively they provide a positive policy framework towards biodiversity and ecological networks.

29.10 In addition, the RLDP is supported by a Green Infrastructure Assessment (RLDP 46), Special Landscape Area Study (RLDP 44) and Green Wedge Study (RLDP 45).

**d) The historic environment**

29.11 Strategic Policy SP14 – Protecting and Enhancing Built Heritage and Culture seeks to protect Cardiff’s historic environment as required by legislation and Planning Policy Wales (PPW). The historic environment is a finite, non-renewable and shared resource that enriches people’s lives - and the visual appearance of the city. It reflects the diversity and culture of the communities that have formed it over time, provides evidence of Cardiff’s past and helps define its present identity and character in both languages. An understanding of the historic and cultural significance of the city can provide a context for managing change and creates a backdrop for innovation in the design of new development to shape the future of the city. This strategic policy is supported by Detailed Policy HE1 which sets out detailed development management considerations.

**e) Minerals**

29.12 In accordance with national and regional policy requirements, the RLDP encourages a sustainable approach to minerals planning. Strategic Policy SP11 – Maintaining a supply of Minerals, establishes the overarching policy approach to minerals management, addressing safeguarding of resources, land-bank requirements and the efficient use of mineral resources. This is supported by a range of detailed policies that provide the policy approach to specific areas, including Policy MW1- Mineral Limestone Reserves and Resources, MW2 – Preferred Order of Mineral Resource Release, MW3 Quarry Closures and Extension Limits, MW4 Minerals Buffer Zones, MW5 Restoration and After-use

of Mineral Workings, MW6 Sand Wharf Protection Areas and MW7 Safeguarding of Sand and Gravel, Limestone Resources and High Specification Aggregates.

29.13 The Regional Technical Statement for the North Wales and South Wales Regional Aggregate Working Parties – Second Review (RTS2) (RLDP 55) sets out the contribution that each constituent local authority should make towards meeting the regional mineral requirements. At a local authority level, when compared against the apportioned requirement set out in the RTS2, Cardiff has a shortfall of 7.475 million tonnes which should be met by 2041. The Minerals Background Technical Paper sets out how this shortfall will be addressed through recent planning permissions to extend Taffs Well Quarry and the allocation of a 'Preferred Area' adjacent Ton Mawr Quarry (RLDP 17).

29.14 The RTS2 introduces a new requirement for all Local Planning Authorities (LPAs) to agree Statements of Sub-Regional Collaboration (SSRC) in respect of its contribution to the future provision of land won primary aggregates.

29.15 Cardiff forms part of the Cardiff City Sub-Region with Caerphilly, Vale of Glamorgan, Rhondda Cynon Taff, Bridgend, Merthyr Tydfil and Brecon Beacons National Park local authority areas. These LPAs have worked collaboratively to prepare a Statement of Sub-Regional Collaboration (SSRC) (RLDP 54). This confirms that Brecon Beacons National Park, Merthyr Tydfil, Bridgend, Vale of Glamorgan and Caerphilly have sufficient permitted reserves at existing sites to meet their apportionment, so no further allocations are necessary within their RLDP's. RCT has a requirement for an additional 9.295 million tonnes and Cardiff has a requirement for an additional 7.475 million tonnes to meet its apportionment up to 2041.

#### **f) Waste management**

29.16 The waste policies set out in the RLDP have been written to accord with national planning policy set out in Planning Policy Wales (PPW) and Technical Advice Note (TAN) 21: Waste. Strategic Policy SP23 – Managing Waste, sets out the overarching policy principles required to facilitate the delivery of sustainable waste management. These include accordance with the waste hierarchy, supporting an integrated and adequate network of waste management infrastructure and ensuring provision of adequate waste management measures in new developments.

29.17 PPW and TAN 21: Waste, establish regional monitoring arrangements to inform the preparation of LDPs and assist in the determination of planning applications. The 2018-2019 South East Wales Waste Monitoring Report (published 2020) concludes that there is currently no need for additional landfill capacity within the South-East Wales region and no specific need for such waste management

facilities has currently been identified at a regional level. Further information is set out in the Waste Background Technical Paper (RLDP 18).

29.18 It is anticipated that applications for a variety of waste management facilities will be submitted during the Plan period. With the aspirations to move to a more circular economy and the need to move the management of waste further up the waste hierarchy, proposals for waste management are likely to cover a wide range of facilities with differing impacts. Proposals may include facilities for the checking and cleaning of waste; preparation for reuse; processing, refurbishment and recovery of waste; waste transfer; recycling; energy from waste proposals; and disposal. The policy supports the provision of a wide ranging and diverse waste infrastructure which meets identified needs, subject to the suitability of the proposed location.

29.19 The need for waste proposals will be assessed against the Collections, Infrastructure and Markets Sector Plan and the capacity requirements established through regional monitoring, as set out in TAN 21.

29.20 Waste facilities will generally be encouraged towards existing general industrial areas (use class B2), unless it can be demonstrated that the proposal could be acceptably located elsewhere, or unless an assessment of the proposal indicates that more onerous locational standards should apply.

29.21 Annex C of TAN 21: Waste sets out the specific planning considerations that need to be considered in assessing planning applications for new waste management facilities. In addition, Policy MW8 – Sites for Waste Management Facilities, sets out the RLDP criteria for consideration in the determination of waste management proposals.

**g) Renewable and low carbon energy**

29.22 The Council has itself declared a climate emergency and has pledged to becoming carbon neutral by 2030. Responding to climate emergency is a core national and local priority and is reflected in the RLDP's issues, vision, objectives, strategy and policy framework. Strategic Policy SP20 – Securing Climate Resilience, De-Carbonisation and Renewable Energy in New Developments sets out a policy framework to mitigate the causes of climate changes and to adapt to the effects of climates change. The policy requires development proposals to follow the energy hierarchy and demonstrate how they have worked towards:

- Preventing development that places an additional de-carbonisation burden on the city;
- Following the Energy Hierarchy principles, reducing construction and operational carbon emissions to the lowest viable means having assessed a full range of options;
- Protecting and increasing carbon sinks through protection of soils and vegetation and increasing tree planting;

- Adapting to the implications of climate change at both a strategic and detailed design Level;
- Increasing energy efficiency and the supply of renewable energy;
- Preventing development that increases flood risk; and
- Reducing the impact of heat.

29.23 This strategic policy is supported by a detailed development management policies RE1 - Renewable and Low Carbon Energy Development and RE2 – Net Zero Development setting out how applications will be considered.

29.24 In preparing the RLDP, Cardiff Council has undertaken a Local Area Energy Plan (LAEP) (RLDP 47). The LAEP identifies the preferred combination of technological and system changes needed to the local energy system, to decarbonise heat and local transport and realise opportunities for local renewable energy production.

#### **h) Transport, and**

29.25 Strategic Policy SP18 – Delivering Sustainable Transport and Active Travel, sets out a strategy to encourage sustainable modes of transport. This includes a target to achieve 75% of all journeys by sustainable transport modes by 2030 as detailed in the Cardiff Transport White Paper (RLDP 50). The strategic policy is supported by a range of detailed policies T1 – Prioritising Walking and Cycling, T2 Strategic Rapid Transit, Bus Corridors and Bus Enhancements, T3 Rail Transport, T4 Managing Transport Impacts, T5 Transport Interchanges, T6 Cardiff City Region ‘Metro’ Network and T7 Electric Vehicle Charging. Further information is provided in the Transportation Background Technical Paper (RLDP 15).

#### **i) Planning obligations.**

29.26 The RLDP recognises the need to ensure that appropriate infrastructure is already in place or can be provided to accommodate the level and locations of growth identified in the RLDP. New development will, therefore, be required to provide or contribute towards the provision of necessary infrastructure and satisfy the requirements of Strategic Policy SP5 – Securing New Infrastructure and SP6 – Securing Planning Obligations, which will be delivered/implemented through the Development Management process and secured via agreements entered into under Section 106 of the Town and Country Planning Act 1990.

**30 Does the LDP provide a monitoring framework that will enable the LPA to track the implementation of the strategy and policies on an annual basis and, if necessary, trigger a review?**

- 30.1 A Monitoring Framework has been developed and included within Appendix 6 of the RLDP. This will be used to assess whether the Plan's strategy, policies and proposals are being delivered. The Monitoring Framework comprises a series of indicators, targets and triggers for further action in relation to strategic and detailed policies and will form the basis for assessing the effectiveness of the policy themes.
- 30.2 In addition, Section 9 of the ISA (RLDP 22) identifies the indicators that will be used to monitor progress of sustainability issues and more specifically sustainable development. The Monitoring Framework and the ISA monitoring indicators will form the basis for the Annual Monitoring Report (AMR).