Cardiff Replacement Local Development Plan
Additional Examination in Public Session - 2nd December 2026
Action Point HS2.3

Following our attendance of Hearing Session 2 of the Examination in Public, we understand the Inspector issued a number of Action Points to the Council for their completion, prior to the Examination now reconvening. Our Clients interests relate to the proposed allocations of Land at areas 9-12 St Mellons (Allocation H1.1) and Former Gasworks Site, Ferry Road (H1.7) and so the following relates to the responses given and additional information provided by the Council in response to the said Action Points.

Land at areas 9-12 St Mellons

The Inspector's Action Point in relation to the allocation in question was that the Council should " ... *review the principle and number of units attributed to Land at areas 9-12 St Mellons to account for in being partly in a SSSI, 2/3rds lying in a SINC and the assumptions in the Council's Housing Programme,".* The Council's response was that " ... *that this site allocation (H1.1) is deleted from the Plan*.".

As a result of the above, we understand that the Council now propose to remove Allocation H1.1 from the Replacement LDP, together with the anticipated 150 residential units it was to deliver. No specific response from the Council has been provided to demonstrate where these 150 'lost' units will be provided, but it is evident that their delivery is not to be provided through the allocation of deliverable replacement allocations, which is concerning. Instead, upon reading the Urban Capacity Study, there seems to be an over-reliance on 'potential' windfall sites. This level of uncertainty in our view risks the Plan being un-sound.

Former Gas Works, Ferry Road

The Inspector's Action Points in relation to the allocation in question were that the Council should "*Provide masterplans for sites where available, explaining where they pre-date latest requirements the extent to which they support housing numbers."* and *"Council to provide info on remediation works at Ferry Road and site preparation work done to date.".*

In terms of the first Action Point, the Council have submitted a Draft Master Plan document prepared by ARUP, dated 2022. The document provides high level detail on general layout and densities, but very little on constraints to the site's delivery. However, reference is made to the matter of flood risk, based on information and policy of the time.

Notwithstanding the above, the current situation with regards to flood risk is considerably different for the allocation in question since the preparation of the Draft Master Plan. Following the publication of new data and flood maps in May 2026 by NRW, the site is now almost completely within the Zone 3 flood risk area – an area where TAN15 advises residential development should not take place. As a result, it is clear that the allocation will not be able to deliver the anticipated 76 Townhouses and 472 Apartments the Draft Master Plan anticipates on this basis alone.

In response to the second Action Point, the Council have submitted a series of documents under the title "Gas Works Ferry Road Report 2", amounting to some 187 pages. However, in terms of the Inspector's Action Point, the only one of relevance appears to be that entitled "*Land Condition Summary Statement*" (LCSS) prepared by Advisian, dated 2016. The document's introduction begins with the lines "*This document provides a summary of environmental works undertaken at the former gasworks, Ferry Road, Grangetown, together with a brief outline of remediation works to address areas of significant contamination and unacceptable pollutant linkages.*"

Notwithstanding the above, the 'work's appear to relate to structures for the prevention of the leaking of contamination to the north and riverside. The document then goes on at Section 7 to make recommendations for further remediation works that should be undertaken to the interior of the allocation, which are as follows (our emphasis):

"Remediation works for the site are likely to comprise:

- *Removal of hydrocarbon-impacted soils from the south of the former Transco building (see Figure 2).*
- *Removal of identified spent oxide and foul lime deposits (see Figure 2).*

The exact scope of any remediation works would be based on robust risk assessment, and remediation would be undertaken on an as-required basis, minimising costs and maintaining a strong element of sustainability within the process.

Please note that remediation will not be undertaken to a development end use standard, and it is likely that further remediation/mitigation measures will be required to satisfy the Local Planning Authority, should the land be redeveloped."

The above highlights a number of points. Firstly, the document does not provide any confirmation or evidence of remediation of the proposed housing allocation at Ferry Road. Secondly, it does not provide full details of any suggested remediation of the site, and lastly, any recommendations for remediation "*... will not be undertaken to a development end use standard*.".

The above is alarming. The Council is gambling on the delivery of 500 units on a site that is not only at risk from flooding, but clearly facing unknown contamination risks, remediation costs and so in turn, any assurance of its viability or deliverability. The submitted information does not therefore answer the Action Points of the Inspector and the allocation should be removed from the Replacement LDP to avoid the document becoming unsound.