Cyfoeth Naturiol Cymru
Natural Resources Wales

Ein cyf/Our ref: CAS-321792-R7F1

Cardiff Council
County Hall
Atlantic Wharf
Cardiff
CF10 4UW

Dyddiad/Date: 04 November 2026

Annwyl Syr/Madam/Dear Sir/Madam,

Cardiff Replacement Local Development Plan 2021-2036 - consultation on matters arising from the examination hearing sessions

Thank you for consulting Cyfoeth Naturiol Cymru/Natural Resources Wales (NRW) about the above, which we received on 16 October 2026.

We have reviewed the additional information prepared on the range of matters arising from discussions at the examination hearing sessions and the Schedule of Proposed Changes to the Cardiff Replacement Local Development Plan Deposit Draft, dated October 2026.

Additional information

Schematic masterplans for North of Junction 33 on M4, LDP Strategic Site D and North East Cardiff, LDP Strategic Site F

While the schematic masterplans provide an overarching spatial framework for the sites, they are high-level plans and do not constitute comprehensive masterplanning. They do not provide sufficient detail to demonstrate how the environmental constraints and opportunities associated with the sites will be addressed. These matters will need to be considered in greater detail during the planning application stage. Therefore, the schematic masterplans do not materially alter our previous advice.

Cardiff and the Vale of Glamorgan Severn Estuary Recreation Mitigation Strategy 2026

NRW supports the Cardiff and the Vale of Glamorgan Severn Estuary Recreation Mitigation Strategy 2026 by Footprint Ecology, dated 29th September 2026.

Through our engagement with the Severn Estuary Partnership, NRW is aware that local authorities around the Severn Estuary have been working collaboratively to address the

potential impacts of increased recreational pressure on the Severn Estuary European sites.

As visitor surveys were not undertaken for the Cardiff and Vale of Glamorgan shorelines, a precautionary approach was adopted through the application of a 12.6 km Zone of Influence (ZoI), consistent with the approach taken in Monmouthshire.

We agree with the potential recreational impacts identified in paragraph 2.13 and the effects on wintering birds set out in paragraph 2.14. We particularly welcome the recognition that recreational disturbance can affect land and waterbodies that are functionally linked to the Severn Estuary Special Protection Area and Ramsar site, and that mitigation measures should take account of these wider ecological relationships.

Although we were unable to attend the workshop held on 26th August 2026, we welcome the location-specific concerns and opportunities identified in Appendix 2 and agree with the issues and priorities that have been identified.

We have reviewed the Strategic Access Management and Monitoring (SAMM) measures set out in Table 2 and consider these to be appropriate and proportionate. We welcome the proposed Mitigation Project Officer role, which will be responsible for overseeing and coordinating implementation of the mitigation strategy. We also note that financial contributions will support a dedicated full-time ranger post. We recommend that mitigation should be secured in perpetuity, which for practical purposes should be a minimum of 80 years and preferably longer, reflecting the approach adopted elsewhere for comparable recreation mitigation strategies. We therefore welcome the proposed 80-year funding commitment for this.

We note the reference in paragraph 3.10 to other authorities around the Severn Estuary seeking to establish ranger services under the Bird Aware Severn brand. We also note the statement in paragraph 3.11 that interpretation and engagement materials “could incorporate Bird Aware Severn messaging/branding to ensure consistent messaging estuary-wide.” We strongly support this approach and recommend continued engagement with the Severn Estuary Partnership to help develop and deliver a coordinated, estuary-wide programme of visitor education and awareness.

We understand that, unlike SAMM measures, which are required forms of mitigation, the provision of Suitable Alternative Natural Greenspace (SANG) would be considered and determined on a case-by-case basis, particularly for developments located near the estuary or involving larger numbers of dwellings. For larger developments, SANG may be capable of being delivered on-site through the provision of suitably designed and accessible green infrastructure included within masterplans. However, the strategy currently provides limited information on how SANG requirements would be addressed where on-site provision is not feasible. In such circumstances, further detail will be required to demonstrate how recreational impacts arising from these developments would be fully mitigated.

We support the statement in paragraph 4.15 that a single Severn Estuary-wide approach would ensure consistency of messaging, coordination, and effectiveness. We strongly support continued collaboration between local authorities, NRW, other relevant

stakeholders and the Severn Estuary Partnership in the implementation and ongoing refinement of these mitigation measures.

We note the intention to establish a steering group to oversee delivery of the strategy. We would welcome the opportunity to participate in this group and contribute to the development, implementation, and monitoring of the mitigation programme. Please contact our Marine Area Advice and Management Team about this: marine.advice@cyfoethnaturiolcymru.gov.uk

Cardiff Beech Woods Special Area of Conservation Recreation Mitigation Strategy 2026

NRW supports the Cardiff Beech Woods Special Area of Conservation (SAC) Recreation Mitigation Strategy 2026 by Footprint Ecology, dated 28th September 2026, but recommends the following additional SAMM measure.

Whilst we consider the strategy to be appropriate, increased recreational pressure associated with new development may, over time, result in localised damage to woodland habitats through trampling, informal path creation, vegetation loss, and other forms of disturbance. While the proposed ranger service and path maintenance measures are likely to play a vital role in managing visitor behaviour, a dedicated woodland management and restoration element would provide an additional mechanism to maintain and enhance the condition and resilience of the SAC's qualifying features.

Therefore, we recommend the inclusion of an additional SAMM measure relating to woodland management and restoration. This measure could take the form of a dedicated annual budget to support management and restoration activities within the SAC, including, but not limited to:

- installation, maintenance and repair of fencing and other infrastructure to help direct visitors away from sensitive habitats
- management and control of invasive non-native species
- targeted vegetation management to maintain and enhance qualifying habitats
- management of dead, dying and diseased trees where required to ensure public safety and maintain site resilience
- habitat restoration works where recreational pressures have contributed to localised degradation

Incorporating this measure would help ensure that any adverse effects arising from increased recreational use can be addressed proactively and that opportunities for habitat recovery and enhancement can be delivered where appropriate. Such a measure would complement the wider mitigation package and contribute to the long-term conservation of the SAC.

Potential delivery partners could include Cardiff Council and NRW, with funding used to support both preventative management and targeted restoration works where monitoring identifies a need for intervention.

This approach would provide greater confidence that the mitigation strategy can respond adaptively to future recreational pressures and maintain the integrity of the SAC over the lifetime of the plan.

Proposed plan changes

Reference PPC1: Non-Strategic Housing Sites - H1.1 Land at Areas 9-12, St Mellons

NRW supports the proposed removal of site H1.1.

The proposed removal of the site addresses our previous concerns regarding the site's ecological designations, including the presence of the Site of Special Scientific Interest.

Reference PPC11: New Policy SPXX: Step-wise Approach, Green Infrastructure and Net Benefit for Biodiversity

NRW supports the intention of the revised policy but recommends the following amendment to provide further clarity as to what is required.

We note that proposed Policy SPXX: Step-wise Approach, Green Infrastructure and Net Benefit for Biodiversity includes the requirement:

> "6 The provision of a long-term management [plan] that covers all steps outlined above."

In the context of the above, and recognising the potential typographical error, we recommend that criterion 6 be amended as follows to provide greater clarity regarding the outcomes required and the mechanisms for securing their delivery. This would also address the matters raised in our Hearing Statement.

> "6. Ensuring the delivery of robust and appropriate long-term management and maintenance of biodiversity, ecological features, and green infrastructure, covering all steps outlined above, and secured through appropriate funding mechanisms and planning obligations."

Reference PPC11: Revise Policy BG1: Designated Sites to BG1: Recreational Pressure on the Severn Estuary and Cardiff Beech Woods

NRW supports the intention of the revised policy but recommends the following amendments to ensure consistency with the requirements of the Habitats Regulations and the supporting Recreation Mitigation Strategies.

We note that revised Policy BG1: Recreational Pressure on the Severn Estuary and Cardiff Beech Woods states:

> "Development proposals that would result in an increase in visitor pressure on Cardiff Beech Woods SAC and the Severn Estuary SAC, SPA, Ramsar or functionally linked land associated with those sites, will only be permitted where it can be demonstrated that no adverse impacts on the integrity of the sites will occur or where appropriate strategic mitigation measures are secured in accordance with the Council's approved mitigation strategy and supporting guidance."

Under the Habitats Regulations, development should only be permitted where it can be demonstrated, through the Habitats Regulations Assessment process, that there will be no adverse effect on the integrity of the site, either alone or in combination with other plans and projects, unless permitted through the derogations process.

The strategic mitigation measures identified within the Recreation Mitigation Strategies are part of the mitigation package through which adverse effects on site integrity can be avoided and ruled out. As such, securing mitigation is not an alternative to demonstrating no adverse effect on site integrity; rather, it forms part of the evidence and mitigation package that enables that conclusion to be reached.

We therefore recommend that the wording "…or where appropriate strategic mitigation measures are secured in accordance with the Council's approved mitigation strategy and supporting guidance." be amended or removed to avoid implying that development could be permitted solely on the basis that mitigation has been secured, irrespective of the conclusions of the Habitats Regulations Assessment.

Revised Policy BG1 also states:

> "The Severn Estuary SAC, SPA and Ramsar Site and the Cardiff Beech Woods SAC are internationally important nature conservation sites protected under habitat legislation."

For clarity and precision, we recommend that the specific legislation is explicitly referenced, namely The Conservation of Habitats and Species Regulations 2017 (as amended).

Finally, revised Policy BG1 also states:

> "The Recreation Mitigation Strategies consists of two elements
>
> - Strategic Access Management and Monitoring (SAMM) consisting of measures related to managing recreation pressure on and around the Severn Estuary and the Cardiff Beech Woods
> - Green Infrastructure and Suitable Alternative Green Space (SANGs) to reduce recreation pressure on and around the Severn Estuary and the Cardiff Beech Woods"

The Recreation Mitigation Strategies identify SANG provision as a measure to be considered on a case-by-case basis, rather than a mitigation requirement that will apply to all development proposals within ZoI. As drafted, the policy could imply that SANG forms a universal component of the mitigation package for qualifying development.

We therefore recommend that the wording is amended to reflect the approach set out in the Recreation Mitigation Strategies and clarify that SANG may only be required in specific circumstances where it is necessary to adequately mitigate recreational impacts. This amendment would ensure consistency between the policy and the supporting mitigation strategies and provide greater clarity for decision-makers and applicants.

Reference PPC11: Revise Policy BG3: Priority Habitats and Species and rename Protected Habitats, Species and Habitats and Species of Principal Importance

NRW supports the intention of the revised policy but recommends the following amendments to ensure the policy accurately reflects the legal requirements relating to protected species and provides greater certainty regarding the delivery and long-term management of biodiversity measures.

The second bullet point of the revised Policy BG3: Protected Habitats, Species and Habitats and Species of Principal Importance states:

> "The favourable conservation status of species and the ecological integrity of supporting habitats will be maintained."

We recommend this bullet point be amended to:

> "There will be no detriment to the maintenance of the favourable conservation status of species, and the ecological integrity of supporting habitats will be maintained."

This wording more accurately reflects the legal tests that apply to protected species. Many protected species are not currently at favourable conservation status and, therefore, requiring their favourable conservation status to be maintained is not always appropriate. The proposed amendment clarifies that development should not adversely affect the maintenance of favourable conservation status and better reflects the relevant legislative and policy requirements.

The fifth bullet point of revised Policy BG3 states:

> "The stepwise approach has been applied by seeking to avoid impact, minimising, mitigation/restoring and, where necessary, compensating, enhancement and long term management."

We recommend this bullet point be amended to:

> "The stepwise approach has been applied by seeking to avoid impacts, minimise impacts, mitigate and restore impacts and, where necessary, deliver compensation, enhancement and long-term management; and arrangements and funding for the long-term management and maintenance of all measures is secured through planning obligations or other appropriate mechanisms."

This amendment would provide greater clarity regarding the application of the stepwise approach and ensure that biodiversity, ecological features, and green infrastructure measures are maintained and managed in the long term. It would also provide greater certainty that the necessary funding and delivery mechanisms are secured for the lifetime of development.

We trust our comments on the matters arising consultation are clear and help further shape the RLDP.

We are happy to continue engaging with you on this advice and other relevant matters, as necessary.

If you have any queries about the above, please do not hesitate to contact us.

Yn gywir / Yours faithfully,

Sarah Lund

Cynghorydd - Cynllunio Datblygu/Advisor - Development Planning

Cyfoeth Naturiol Cymru/Natural Resources Wales

E-bost/E-mail: [redacted]

Croesewir gohebiaeth yn Gymraeg a byddwn yn ymateb yn Gymraeg, heb i hynny arwain at oedi./Correspondence in Welsh is welcomed, and we will respond in Welsh without it leading to a delay.