CARDIFF REPLACEMENT LOCAL DEVELOPMENT PLAN EXAMINATION

HEARING SESSION: 3rd December 2026

This Statement has been prepared on behalf of Associated British Ports (ABP) to respond to the "*Port Teigr: Information to support RLDP Allocation*" document prepared on behalf of Welsh Government (WG) by Carney Sweeney, dated September 2026.

In summary, the conclusion has been reached by ABP that it must regrettably continue to **object** to the allocation of Site 2.4. The submitted information, including the Concept Masterplan Option 05 (May 2024), and the Note on Viability (2026) fail to demonstrate that the site allocation meets the three core tenets of the development plan process, that an allocated site must be viable, feasible and deliverable.

However, ABP recognises the need for brownfield sites to be brought forward through the Plan process, and that the Port Teigr site is the final piece of undeveloped land within the wider Bay redevelopment area. ABP does not object to development taking place on the site, but to the lack of consideration to our interests and operations that have permeated this development process in the allocation and Masterplanning of the site.

As with the Deposit Draft, the information submitted has been prepared without any reference to ABP. This has resulted in a Masterplan set in the context of information that reduces confidence in the ability of the landowner to bring this scheme forward.

If the landowner and local planning authority had undertaken a collaborative approach to this allocation in conjunction with ABP, support for the scheme may have been forthcoming. It is the responsibility of the promoters of the allocation to rectify that approach. The key matters that ABP continue to have an issue with are:

1. The operational status of Roath Basin;
2. Access to and within the site;
3. The principles of the viability.

1. Roath Basin

Paragraph 2.6.1 of the WG submission claims that *"Only Roath Dock and Queen Alexandra still function for the same purpose that they were built for, around 100 years ago"*.

In addition to Roath Dock and Queen Alexandra Dock, Roath Basin retains its statutory, operational and functional role within the Port of Cardiff.

ABP is the statutory harbour authority (as set out in the Harbours Act 1964 and Transport Act 1981 *et al*) for Cardiff Harbour, including the operational docks at Roath Basin. The Harbours, Docks and Piers Clauses Act 1847 applies to the extent incorporated, and as modified, by the local legislation governing Cardiff Harbour and the former Bute Docks.

Importantly in the context of this allocation, ABP's statutory duties include the need to retain sufficient control over access to and use of Roath Basin to discharge its applicable statutory, operational, safety and maritime-security responsibilities. This includes ensuring maritime security through compliance with the International Ship and Port Facility Security (ISPS) Code, and maintaining the ability of HMS Cambria to operate effectively.

The only access for shipping to enter Roath Basin is via the channel from Roath Dock. The channel is bridged by the Tyneside Road Swingbridge which must open for all shipping, usually for a period of an hour at a time. In recent years, the channel has been used for up to 20 times per year.

The implications for Port traffic during the periods in which the channel is in use, and the swing bridge opened is significant, albeit there is another access for Port users via Rover Way. This would not be the case for residential traffic.

The dismissal of Roath Basin as an operational part of the Port is significant. It implies that the main access to the allocation site via the Tyneside Road Swingbridge is unfettered. This is absolutely not the case.

2. Access to the Allocation Site

The key objection from ABP is focused on the proposed access arrangements to the site and apparent access arrangements within the site.

The two external access points indicated on the submitted Concept Master Plan are suggested as a roundabout off Tyneside Road (northern access) and via Harbour Drive to the south. Both of these would rely on all vehicles accessing the site having to cross bridges: the Tynemouth Road Swing Bridge, and the Harbour Drive Bridge (Outer Lock Crossing). Both of these crossing points are within ABP's ownership.

Given this position, it is notable that at no stage of the Plan preparation process has there been any contact from the promoters of the site, the Masterplanners, the authors of the additional information submitted to the Examination or from Cardiff Council on the potential access arrangements. The significantly increased use of Tyneside Road has the potential to increase conflict between Port-related traffic and non-Port traffic.

As set out above, the Tyneside Road Swingbridge retains an important functional role within the Port. There is nothing to suggest that the Masterplan has considered the statutory operations of the Swingbridge and its implications for access to the allocation site, for traffic flow within the highway network, or the ability of emergency services to access the site. In summary, the principal of the use of Tyneside Road as the primary access to a 1300+ unit development is fundamentally flawed.

The Masterplan, and the WG submission (para. 2.3.3), suggests that access to the allocation site can also be gained via Cargo Road at two locations, one at the northern end of the site and the other at its southernmost point.

This is a further inaccuracy that is significant to the ability to deliver this allocation: Cargo Road is a private road owned by ABP. It is a busy operational access and internal distribution road that is not available to the developers. There is no current access point from the allocation site, and there is no intention to facilitate one.

This issue of vehicular access to the site would be less significant if the allocation site was well located in the context of public transport provision. Accessing the Cardiff Bay Railway Station from the closest proposed residential properties at the southern part of the site involves a walk of 900m. From the closest properties at the northern part of the site, this is closer to 1,500m.

Despite the additional information referring to a bus service from the Roath Lock Studios (para. 2.3.14), this service has not run for several years. The closest current active bus service (no. 6) stops at the Wales Millenium Centre, a walk of some 700m from the closest proposed residential property.

The Background Technical Paper 10 Candidate Site Assessment is similarly unhelpful to the justification of this allocation. The Masterplan does little to demonstrate that the "*Criteria for Assessing the Candidate Sites*" can be met by this site in respect of:

- Availability, Infrastructure and Deliverability;
- Accessibility and Transportation Context;
- Neighbourhood, Community and Placemaking; and
- Economic and Other Benefits.

The associated summary of the assessment of sites (Appendix 1 of Background Paper 10) reflects this conclusion and it is incumbent on the promoters of the site to consider how these reservations and limitations can be addressed within the strategic planning system.

This leads towards a conclusion that the allocation is inherently unsustainable and the Masterplan has not sought to address the Placemaking principles that should be at the heart of site allocations and Masterplanning.

In summary, the conclusion is reached that there are significant issues in the ability to deliver a functioning development site of this scale when there is no guarantee that a sustainable and viable access to the site can be achieved. ABP is prepared to work with the promoters to resolve this position.

3. Viability

ABP does not intend to challenge the Viability Assessment in any detail. However, the assessment suggests a very marginal site, and that appears to be without taking into account the access and ownership issues set out within this document.

This is reflected in the history of the site. It has been allocated for residential-led mixed use (or similar) since the 1996 Cardiff Local Plan, and despite a planning permission for

Port Teigr (the northern part) being granted in 2008, development has not been forthcoming.

Further concern is raised because of the doubt expressed within the Viability Assessment about the delivery of non-residential elements of the Masterplan. The current conceptual land uses suggest a "buffer" between ABP operations and the residential elements, formed by the BBC Studios, and proposed non-residential uses along the northern boundary of Cargo Road.

However, para 3.2 of the Viability Assessment correctly identifies the challenging current market conditions that cast the delivery of the non-residential development into doubt. ABP has experienced "residential-creep" at other Ports in which mixed-use Masterplans become residential schemes as they are built out and the proposed commercial development becomes undeliverable. This process has already begun here as explained in paragraph 3.1.3 of the WG submission.

ABP can place no reliance on the implementation of the Masterplan as submitted.

4. Other Matters

There are several other aspects of the submitted information that raise concerns about the process that has been deployed to justify the allocation of this site:

- The Masterplan excludes the southern part of the allocation leading to uncertainty about its prospects for development;
- The Masterplan is dated 2024. At the Examination (Hearing Session 2) in June 2026, CC claimed that there was no Masterplan available;
- The townscape context is incorrect (para 2.4.2). The site is not a mosaic of industrial uses and historic warehouses, and it ignores the presence of the 5 storey Gloworks building;
- The noise survey dates from 2019 and appears to only relate to the southern part of the allocation site. The nature of the cargoes within the Docks have changed significantly since that date, most notably an increase in the handling of scrap metals and steel products (from approx. 5% of cargoes by tonnage in 2019 to some 65% in 2025). The environmental profile of the Docks has changed significantly over that period; and
- The summary of the flooding position is at odds with our interpretation from the NRW Flood Map for Planning. The mapping shows that residential blocks F, G, H, I, J, K, P and R are all located predominantly within Flood Zone 2 and 3, and that blocks A, B and C are on the fringes of the indicative Zone 3.

These matters are capable of being resolved, but collectively they add to the questionable deliverability, viability and feasibility of this allocation.

Closure

The conclusion reached by ABP following a review of the additional information submitted is similar to that in the statement considered at the June Hearing:

"ABP was not party to any engagement or consultation by Cardiff Council prior to the publication of the Deposit Plan in respect of its existing or future operations in relation to the allocation. Since then, ABP has not been party to any technical assessment or consideration in respect of the potential impacts of the proposed mixed-use development within the currently proposed boundary.

It continues to be ABP's case that the allocation (even as amended) will have the potential to impact on the LDP's stated aim of supporting the Port. ABP's position on the appropriateness of the allocation remains as above and as set out in the Deposit Plan Consultation Response."