Cardiff Replacement Local Development Plan Examination: Consultation on Additional Information and Schedule of Proposed Changes

Representation on behalf of Lovell Partnerships: Housing Led Regeneration Site H2.3 – Land at Malthouse Avenue, Cardiff Gate

Introduction

These comments are provided on behalf of Lovell Partnerships in response to the consultation on the Additional Information submitted following the Examination Hearing Sessions and the October 2026 Schedule of Proposed Changes to the Cardiff Replacement Local Development Plan ("RLDP").

These representations relate specifically to the additional evidence and proposed changes arising from the Examination and do not seek to repeat or extend previous representations. In particular, they respond to

- AP2.3c(i) Cardiff Gate Report
- AP2.3c(ii) Cardiff Gate Placemaking Vision Booklet
- AP2.3e Revised Figure 11 Summary Housing Supply Table
- AP2.6 Action Point HS2.6
- PM7

Lovell strongly supports the continued identification of Land at Malthouse Avenue, Cardiff Gate as Housing Led Regeneration Site H2.3. The additional work undertaken since Hearing Session 2 materially strengthens the evidence supporting the allocation and directly addresses the matters raised by the Inspectors concerning capacity, accessibility, placemaking, compatibility with surrounding uses and the continued need for the land for employment development.

The Council's revised housing supply evidence now identifies H2.3 for 170 homes. This is consistent with the detailed concept masterplanning undertaken on behalf of Lovell and provides a considerably more site-specific basis for the housing assumption than the original indicative figure of 200 homes.

Lovell remains fully committed to the promotion and delivery of the site. Technical assessment and continued masterplanning are taking place in tandem with the RLDP Examination, with the intention of progressing the proposals through the development management process. The September 2026 Vision Booklet should therefore be regarded as a robust plan-making framework rather than the end of the design process. Further work will continue to refine matters including movement, ecology, green infrastructure, the relationship with surrounding uses and the detailed form of development.

This active promoter involvement is important to the third test of soundness – whether the Plan will deliver. H2.3 is supported by an active promoter, a tested concept capacity and an advancing technical evidence base. It therefore represents a realistic development opportunity rather than a theoretical allocation.

AP2.3c(i), AP2.3c(ii) and AP2.3e – Cardiff Gate capacity, placemaking and continued allocation

Lovell supports the Council's reliance on the Cardiff Gate Report and Placemaking Vision Booklet in response to Action Point HS2.3.

The evidence demonstrates how approximately 170 homes can be accommodated within a coherent residential-led framework, alongside green infrastructure, sustainable drainage, existing ecological features and a network of walking, cycling and public transport connections. The Vision explicitly seeks to integrate new homes with existing communities, employment, services and planned growth, creating a more mixed and sustainable place and enabling improved bus connections across North East Cardiff.

The site is well aligned with Future Wales Policy 2 – Shaping Urban Growth and Regeneration – Strategic Placemaking. H2.3 adds housing immediately alongside existing employment, education,

healthcare and services; increases population density on underused urban land; strengthens permeability between existing and planned communities; supports improved public transport and active travel; and uses green infrastructure as a structuring element of the development.

This is also consistent with PPW12, which requires placemaking to be embraced in both plan-making and development management and identifies the creation of sustainable places as the goal of the planning system.

Lovell therefore supports the revised capacity of 170 homes contained in AP2.3e. For clarity and internal consistency, we request that this figure is also carried through into the Policy H2 allocation schedule and any other references to the estimated capacity of H2.3 in the final Plan.

AP2.6 – Employment land requirement and marketing evidence

Lovell supports the Council's response to Action Point HS2.6.

The Inspectors required the Council to review its Employment Study and provide evidence that Cardiff Gate West is no longer needed to provide employment land or floorspace.

The Council has now concluded that the release of Plots 12 and 14 does not undermine Cardiff's ability to meet future employment land or office floorspace requirements. Even after the adjustment to supply, the Council identifies a substantial surplus above the assessed office requirement and expressly concludes that Cardiff Gate West is not required to meet Cardiff's future employment land and office floorspace needs over the Plan period.

That conclusion is significant and strongly supports the soundness of H2.3.

The Council records that Plots 12 and 14 have remained undeveloped despite approximately 27 years of extensive and continuous marketing, including commercial agents, databases, dedicated websites, direct occupier engagement, advertising, PR activity and promotional events. The updated JLL report extends the evidence further and confirms continued marketing under JLL since October 2025.

The currently adopted Cardiff LDP Policy EC3 – Alternative Use of Employment Land and Premises permits alternative development where, amongst other matters, there is no realistic prospect of employment use or no need to retain the land having regard to demand and the need to maintain a range and choice of employment sites, subject to avoiding unacceptable effects on existing businesses. Its supporting text expressly identifies vacancy, active marketing and expressions of interest as relevant robust evidence.

The extent and duration of the Cardiff Gate marketing exercise, when read alongside the Council's conclusion in AP2.6 that these plots are not required to meet future employment needs, means there is a clear policy basis for residential development under the current adopted development plan, as well as the emerging RLDP.

Accordingly, continued progress towards a planning application does not depend solely on adoption of H2.3. The proposal is capable of complying with the existing employment safeguarding policy and SPG as well as the emerging policy framework. This materially reinforces the deliverability of the allocation.

PM7 – Proposals Map terminology

Lovell supports the proposed addition of a label for H2.3 to the Proposals Map under **PM7**. However, the current proposed wording refers to "H2.3 Cardiff Business Park (West)".

We recommend that the label instead reads:

"H2.3 – Land at Malthouse Avenue, Cardiff Gate"

This is consistent with the terminology used in the additional evidence submitted to the Examination and better reflects the intended future character of the allocation.

The change is more than presentational. Continued reference to the land as individual "business park plots" risks implying that their only logical long-term function is as part of a conventional office park. The updated Vision demonstrates a different spatial relationship: the land sits between Cardiff Gate, Pontprennau and the major planned communities of North East Cardiff and has the potential to become an integrated residential neighbourhood connecting those areas.

The revised name would therefore provide a clearer and more accurate description of the allocation.

Soundness and conclusion

Taken together, the additional evidence and proposed changes materially strengthen the case for H2.3.

In terms of the established soundness tests:

The Plan fits. H2.3 accords with Future Wales, PPW12 and national placemaking objectives. It promotes urban regeneration, an improved mix of uses, homes close to jobs and services, walking and cycling, improved public transport and integrated green infrastructure.

The Plan is appropriate. The allocation is supported by increasingly detailed site-specific evidence. The current 170-home figure derives from actual masterplanning rather than a theoretical density assumption; sustainable accessibility has been tested; and the Council has now demonstrated that the land is not required to meet future employment floorspace needs. The long-term marketing evidence provides a particularly strong and unusual evidential basis for release from employment use.

The Plan will deliver. Lovell remains actively engaged in promoting the site and is continuing technical assessment and masterplanning in parallel with the RLDP Examination. Work is progressing towards a planning application. The site therefore has an identified promoter, a realistic concept, a clear route through the employment policy framework and an established mechanism for addressing ecological and recreational mitigation.

The allocation is also capable of delivering benefits beyond its own boundary. In particular, it can help facilitate the strategically important sustainable transport corridor between North East Cardiff and Cardiff Gate and potentially onwards towards Pontprennau, St Mellons Road and St Edeyrn's Village. The residential allocation is therefore part of the mechanism for achieving a more connected and sustainable pattern of development in North East Cardiff.

For these reasons, Lovell strongly supports the continued positive identification of H2.3 and considers that the additional information and proposed changes make the RLDP more robust and assist it in satisfying the tests of soundness.

We respectfully request that the Inspectors retain **H2.3 Land at Malthouse Avenue, Cardiff Gate** within the RLDP with an indicative capacity of **170 homes**, and that the final Plan and Proposals Map incorporate the consequential wording and site-specific clarification identified in these representations.