



Local Development Plan 2021 > 2036

Cardiff Council - March 2026

Cardiff Replacement LDP Examination

CD05 Council Response to
Comments and Questions
raised by the Inspectors in
ID04



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Procedural Matter

1. *During the course of the Hearing sessions, it may be necessary to discuss and agree changes to the LDP. To ensure this process is undertaken efficiently and without unnecessary delay, please confirm an officer, with delegated authority to make changes to the LDP and agree the preparation of additional evidence, will be present at all hearing sessions.*

Council Response

Yes, the Council confirm that an officer, with delegated authority to make changes to the plan and agree the preparation of additional evidence, will be present at all the hearing sessions.

Strategic Development Plan

2. *Policy 19 of Future Wales (FW) provides a framework for ‘Strategic Policies in Regional Planning.’ Can the Council confirm the policies and allocations contained in the LDP, in relation to housing, employment, transport and the Green Wedge (Policy SP16) would not have an adverse impact on the future formulation or delivery of the Strategic Development Plan for South East Wales?*

Council Response

The Strategic Development Plan for South East Wales is at a very early stage and policy development work is yet to commence. However, notwithstanding this it is considered that the policies and allocations contained in the plan in relation to housing, employment, transport and the Green Wedge will complement the emerging SDP strategy and provide a sound baseline for the SDP which will look forward beyond the end of the Replacement LDP plan period in 2036 to 2047.

Significantly in this respect Welsh Government have confirmed that the Replacement LDP is in conformity with the *National Development Framework 2040: Future Wales: The National Plan 2040* which will also provide the policy basis for the SDP. The Council has also undertaken a regional assessment of future growth and migration for the Cardiff Capital Region (CCR) (LDP 36) which looks at future housing and employment needs with other authorities in South East Wales. This confirms that the level of growth proposed in the plan sits neatly with neighbouring authorities in the region.

Policy 19 of *Future Wales: The National Plan 2040* sets the expectation that Local Development Plans should provide a strategic framework that aligns with, and does not prejudice, the future preparation of Strategic Development Plans (SDPs). The Council can

confirm that the policies and allocations contained within the plan have been formulated to be fully consistent with this requirement.

In preparing the plan, the Council has followed national policy set out in *Future Wales* and *Planning Policy Wales*, together with the evidence base underpinning the South East Wales region. The scale and distribution of proposed housing and employment growth, the transport strategy, and the designation of the Green Wedge (Policy SP16) have all been assessed against the strategic principles identified for the future South East Wales SDP.

Key points of alignment are as follows:

- **Housing:** The housing requirement and spatial strategy have been derived from robust evidence that reflects Cardiff's role as a Principal Settlement within the National Growth Area. The level of provision will support regional housing delivery without prejudicing the ability of the SDP to set longer-term regional distribution.
- **Employment:** The employment land allocations and associated policies respond to Cardiff's strategic economic role and the regional need for a diverse employment base. The level and location of employment land safeguard future flexibility and do not pre-empt regional decisions.
- **Transport:** The transport policies and site allocations are consistent with the regional transport context, including the Metro and wider mode-shift objectives. All major allocations are compatible with future regional connectivity strategies.
- **Green Wedge (Policy SP16):** The proposed Green Wedge designations have been reviewed to ensure they support the long-term form and function of the city without constraining strategic options that may be considered at SDP stage. The boundaries have been defined to be defensible, evidence-based, and non-prejudicial to future regional planning.

Overall, the plan has been prepared to ensure it sits comfortably within the framework established by *Future Wales*. The Council is satisfied that none of the policies or allocations within the RLDP would have an adverse impact on either the formulation or the successful delivery of the future Strategic Development Plan for South East Wales.

Collaborative Working

3. *The Development Plans Manual (DPM) requires local planning authorities to demonstrate they have exhausted all opportunities for joint working and collaboration on both plan preparation and the evidence base. The DPM goes on to say considering issues on a wider basis places local planning authorities in a much stronger position to resolve planning issues and, amongst other things, show their LDP is compatible with the plans of neighbouring authorities.*

4. *Cardiff Council shares a boundary with a number of local planning authorities. In the Preliminary Questions Statement you say 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.’ However, the Summary of Regional Collaboration only relates to a position statement between Cardiff and the Vale of Glamorgan. We note the comments in Section 6 of the Preliminary Questions Statement but would ask for more details on the collaboration with your other neighbours.*

Council Response

The Council recognises the requirements of the *Development Plans Manual (Edition 3)* to demonstrate that all opportunities for joint working and collaboration have been fully explored, both in plan preparation and in the development of the evidence base. The Council considers that the preparation of the plan has been undertaken in a manner that reflects strong, ongoing collaboration with neighbouring authorities and regional partners. This has ensured that cross-boundary issues have been properly understood, tested, and addressed, and that the Plan is compatible with the strategic direction of adjoining plans.

In addition to the position statement with the Vale of Glamorgan referenced in the Summary of Regional Collaboration (RLDP28), the Council has engaged constructively during the preparation of the plan with all neighbouring authorities. The key elements of this collaboration are summarised below.

Collaboration with Neighbouring Authorities

Rhondda Cynon Taf County Borough Council (RCT)

Regular meetings have taken place at both officer-level liaison and through regional planning groups (Planning Officers South Wales (POSW), the South-East Wales Planning Officer Society (SEWPOS) and South East Wales Strategic Planning Group (SEWSPG)). Discussions have covered transport connectivity (including Metro development), housing market interactions and employment land provision. RCT officers have been engaged in the development of relevant evidence, including the regional assessment of future growth and migration for the Cardiff Capital Region (CCR) (LDP 36) and the Strategic Flood Consequences Assessment (RLDP 43), to ensure cross-boundary implications are considered. The Council has also consulted the RCT at key stages in preparation of the plan and no objections have been received from RCT on the plan.

Caerphilly County Borough Council

Regular meetings have taken place at both officer-level liaison and through the regional planning groups. Discussion have focused on commuting flows, strategic transport corridors, and employment land provision. Caerphilly officers have been engaged in the

development of relevant evidence, including the regional assessment of future growth and migration for the Cardiff Capital Region (CCR) (LDP 36) and the Strategic Flood Consequences Assessment (RLDP 43), to ensure cross-boundary implications are considered. The Council has also consulted Caerphilly at key stages in preparation of the plan, and no objections have been received from Caerphilly on the plan.

Newport City Council

Regular meetings have taken place at both officer-level liaison and through the regional planning groups. Discussions have concentrated on shared infrastructure issues, particularly the M4 corridor, Metro Phase 2 connectivity, and wider regional economic alignment. Newport officers have been engaged in the development of relevant evidence, including the regional assessment of future growth and migration for the Cardiff Capital Region (CCR) (LDP 36) and the Strategic Flood Consequences Assessment (RLDP 43), to ensure cross-boundary implications are considered. The Council has also consulted Newport at key stages in preparation of the plan, and no significant objections have been received from Newport on the plan.

The Vale of Glamorgan

Regular meetings have taken place at both officer-level liaison and through the regional planning groups. As acknowledged in the Summary of Regional Collaboration, Cardiff and the Vale have maintained close and detailed engagement throughout the preparation of the plan. This has included commuting patterns, transport connectivity, housing market areas and employment land. A formal position statement was produced given the significant degree of interaction between the two local authority areas. The Council has also consulted the Vale of Glamorgan at key stages in preparation of the plan, and no objections have been received from the Vale of Glamorgan on the plan.

Wider Regional Collaboration

Beyond discussions with neighbouring authorities, as set out above the Council has participated actively in the following collaborative regional structures which include other local authorities across South East Wales, which have shaped the evidence base and strategic direction of the plan:

- **Planning Officers South Wales (POSW), South-East Wales Planning Officer Society (SEWPOS) and South East Wales Strategic Planning Group (SEWSPG):** Regular formal meetings addressing cross-boundary matters, data sharing, and methodological consistency across evidence studies.
- **Cardiff Capital Region (CCR):** Involvement in the regional transport work, the Metro programme, strategic economic assessments, and the development of the Strategic Development Plan.

- **Regional Technical Groups:** Participation in topic-specific groups relating to housing, minerals and waste, development viability and Gypsy and Travellers.

These activities have informed key elements of the plan, including growth options, the spatial strategy, transport priorities, and green infrastructure policies. This collaborative approach has ensured alignment with both emerging local plans in neighbouring authorities and the future transition toward a Strategic Development Plan for South East Wales.

The Council considers that the plan has been prepared in a manner that fully explores opportunities for joint working and is fully compliant with the expectations of the Development Plans Manual. The Plan reflects a comprehensive and ongoing programme of constructive cross-boundary engagement, and the Council is satisfied that it is compatible with, and supportive of, the strategic direction of neighbouring authorities. In this respect it is important to consider that no significant objections have been received from neighbouring authorities on the plan.

Infrastructure

5. *The DPM advises an Infrastructure Plan is an essential tool to evidence and summarise the infrastructure necessary to deliver the growth and allocations in a LDP. You refer us to studies relating to viability, flood risk, green infrastructure, health and well-being and waste but none include specific infrastructure necessary to unlock or facilitate the new development to be delivered through the LDP and its timing. Nor do we consider it appropriate to leave this to updated Planning Obligations Supplementary Planning Guidance. We, therefore, require the Council to produce an Infrastructure Plan. This could take the form of an updated version of Cardiff Infrastructure Plan produced to support the adopted LDP.*

Council Response

Comments noted - we confirm we will produce ahead of the Hearings an updated version of the Cardiff Infrastructure Plan which was produced to support the adopted LDP.

Green Wedge, Policy SP16

6. *PPW states, 'Green Belts and green wedges must be soundly based and should only be employed where there is a demonstrable need to protect the urban form and alternative policy mechanisms, such as settlement boundaries, would not be sufficiently robust.'*
 - *Why is a green wedge necessary when Policy SP17 restricts development in the countryside?*

- *Why is a green wedge necessary when the area it would cover appears to be within a Green Belt – Areas for Consideration in FW? FW, page 172, ‘areas shown for consideration for green belts should be treated as if they have been designated as green belts by a Strategic Development Plan.’*
- *Does the designation of a green wedge pre judge the consideration of the need for a green belt and its boundaries through the SDP? (FW Policy 34)*

Council Response

Planning Policy Wales (PPW) is clear that Green Wedges should only be designated where there is a demonstrable need to protect the setting, form and identity of settlements, and where alternative policy mechanisms such as countryside policies or settlement boundaries would not provide sufficient long-term protection. The Council considers the Green Wedge designation in Policy SP16 to be necessary, justified, and fully consistent with both PPW and *Future Wales*. This conclusion is confirmed by the findings of the Green Wedge Study undertaken by LUC on behalf of the Council ([RLDP45](#)). A response to each of the questions is included below:

Why is a Green Wedge necessary when Policy SP17 restricts development in the countryside?

Policy SP17 provides an important level of control over development in the countryside, on land outside the settlement boundary but is not sufficient to maintain openness of this important backdrop to the City and therefore a Green Wedge is necessary because:

- PPW notes that Green Wedges provide long-term protection to prevent coalescence, safeguard the setting of settlements, and manage urban form in a way that general countryside policies cannot.
- Countryside policies are more permissive than Green Wedge policies and allow for a range of exception categories; therefore, they do not offer the same level of restraint in locations where preventing settlement coalescence is essential.
- The Green Wedge provides a clear and established spatial boundary that is more defensible at appeal and more durable over the plan period.

In this context, the Green Wedge designation provides stronger, more targeted, and more enduring protection than SP17 alone.

• *Why is a Green Wedge necessary when the area is within a Green Belt Area for Consideration identified in Future Wales?*

Future Wales identifies “Areas for Consideration” for a future Green Belt (Policy 34). However, these are not formally designated Green Belts. They indicate an illustrative broad area to be explored through the Strategic Development Plan (SDP), but:

- They do not have defined boundaries,
- They do not constitute a statutory Green Belt, and

- They do not remove the responsibility of local development plans to consider the need for Green Wedges where justified.

Future Wales advises that areas shown for consideration “should be treated as if they have been designated” for the purpose of strategic decision-making, but it also recognises that:

- LDPs remain responsible for managing local development pressures up to the point an SDP is adopted.
- Green Wedges continue to play an important role in the interim to protect critical gaps, control settlement form, and maintain openness in locations where pressures are immediate and specific.

To provide more clarity on the areas shown for consideration in *Future Wales* the 10 planning authorities in South East Wales commissioned LUC consultants in 2024 to undertake a study ‘*Evidence to assist in the definition of a new South East Wales Green Belt*’ to help inform the potential location of a new Green Belt in South East Wales.

The findings of this study informed the boundary for the proposed Green Wedge east of Tongwynlais allocated in the plan and the proposed Green Wedge allocated west of Tongwynlais was reviewed using the same methodology as was used for the regional study. It is therefore considered that the proposed boundaries would not impact on the delivery of the SDP or prejudge the consideration of the boundaries as part of the SDP preparation.

It is important to note that this study has no formal status, and it is considered that the allocation of a Green Wedge in the plan is necessary as the area for consideration shown in *Future Wales* experiences active development pressures that require a defined and enforceable local policy mechanism now, rather than waiting for the future SDP.

- *Does the Green Wedge designation pre-judge the SDP’s consideration of a Green Belt and its boundaries?*

The Council do not consider the Green Wedge pre-judges or constrains the future SDP for the reasons set out below:

- PPW states explicitly that Green Wedges and Green Belts serve different functions and operate at different spatial scales.
- Green Wedges are a local policy tool used to address specific areas where settlement coalescence risk or urban form issues are well evidenced.
- A Green Belt is a strategic policy designation, with boundaries determined at a regional level through the SDP.

The Council’s Green Wedge:

- Is based on localised evidence of settlement form, open land function, and development pressure.

- Does not assume or imply the eventual Green Belt boundary.
- Can be reviewed and adjusted by the SDP if required.

The designation supports the SDP process by maintaining openness in key locations until strategic decisions are made, thereby providing a stable context for future Green Belt consideration rather than pre-empting or prejudicing it.

The designation of the Green Wedge in Policy SP16 is:

- fully consistent with PPW requirements;
- necessary to protect the city's urban form and setting;
- does not duplicate countryside policy;
- complementary to, but not prejudicial of, the future strategic Green Belt designation under *Future Wales*; and
- an appropriate and justified local response to development pressures prior to the adoption of the SDP for South East Wales.

Supplementary Planning Guidance (SPG)

7. *The DPM warns LDPs should not delegate the criteria for decisions on planning applications to SPG which should only contain advice and guidance. The purpose and meaning of LDP policies should be clear and not require SPG to provide further interpretation. Please explain why Policy SP20 requires further interpretation? (paragraph 6.157).*

Council Response

Strategic policy SP20 complements detailed policy RE2 which sets out how new development on major or strategic sites will be assessed to achieve net zero development. Paragraph 7.471 under policy RE2 states that "*Further guidance in relation to energy assessments will be issued in the form of SPG. This will specify what is expected of developers to meet the requirement of policy RE2.*"

This guidance is the same guidance referenced in paragraph 6.157 and given this it is proposed that this paragraph is deleted to avoid confusion.

~~"6.157 Supplementary Planning Guidance will be developed with the industry to provide further interpretation of this policy."~~

8. *Paragraph 6.170 states management of Cardiff's green infrastructure network should be in place prior to development and implies this will be secured through SPG. Such a statement goes beyond advice and guidance and ought to be in Policy SP21 and not SPG or the reasoned justification.*

Council Response

Agreed – delete following sentence in paragraph 6.170 and amend the last paragraph of Policy SP21 as proposed:

~~“6.170 Management of Cardiff’s green infrastructure network should be in place prior to development, and appropriate planning obligations sought. Further information and guidance will be provided through the preparation of Supplementary Planning Guidance (SPG) to this policy.”~~

*“Development will be expected to maintain and enhance the integrity, extent, diversity, quality and connectivity of green infrastructure assets; provide multi-functional green spaces; provide “Net Benefits for Biodiversity”; and ensure the resilience of ecosystems can be maintained; **and ensure management arrangements for green infrastructure are in place prior to development, and appropriate planning obligations sought.** Green Infrastructure Assessment covering existing Green Infrastructure and future opportunities will be required for all significant development proposals.”*

9. *Land at Maes-y-Coed Road, Ocean Way/Moorland Road, Newport Road and Penarth Road are proposed to be brought forward as housing led regeneration areas through SPG (paragraph 7.9). Should these sites be allocated under Policy H2, not least to give development plan weight to the aim of maximising affordable housing?*

Council Response

Given the current status of these sites, it is considered further work is required before they can be brought into policy and to avoid confusion it is proposed that reference to them is deleted from the plan.

10. *Policies H6 and H7. What further information would be provided through SPG? (paragraphs 7.47 and 7.51).*

Council Response

The Council approved SPG on student accommodation in March 2019 linked to the adopted LDP and this can be viewed [here](#). This detailed advice and guidance setting out how the adopted LDP policy will be applied in particular circumstances or areas has proved very helpful for developers during a significant period of student accommodation construction in the city which is likely to continue.

It is proposed to review and update this advice and guidance so it consistent with the new Replacement LDP policy H6 relating to student accommodation.

Although the Council does not already have an approved SPG relating to co-living accommodation due to the significant growth in proposals for co-living schemes in the city it is considered that it would be helpful for developers for the Council to prepare detailed advice and guidance on the way policy H7 will be applied in circumstances or areas.

This SPG will be consistent with policy H7 and national planning guidance and will cover detailed matters amplifying the requirements set out in policy H7.

11. *Paragraph 7.267 states proposals for takeaway outlets providing high fat, energy dense foods, should be assessed against, amongst other things, their potential for creating a cumulative impact in terms of health. It goes on to say SPG will aid developers in meeting the requirements of Policy HF1. Policy HF1 supports a food retail environment that enhances access to healthy food choices but does not preclude against outlets providing high fat, energy dense foods. What would the SPG include, bearing in mind SPG may not make policy?*

Council Response

The Council recognise that SPG cannot introduce new policy or create additional policy tests. The SPG for Policy HF1 will therefore be limited to implementation guidance, providing clarity on how proposals will be assessed against policy HF1. It will consolidate and signpost existing evidence, offer consistent approach to how the Council will consider cumulative impacts, and set out proportionate information requirements for applicants so the Council can apply Policy HF1 transparently and consistently.

The Council confirm they will prepare and submit a draft version of the guidance to the Inspectors in advance of the Hearing Sessions for clarity and to enable the matter to be fully considered.

In addition, it is proposed that criterion (iv) of Policy HF1 is amended (see additional wording in bold) to better clarify the intention of the policy approach in relation to promoting healthy food environments.

*(iv) Provide a food growing and food retail environment that enhances access to healthy food choices and reduces inequalities **by resisting proposals for additional hot food takeaways where their number or proximity would lead to an over-concentration and undermine the creation of a healthy and balanced food environment.***

12. *Policy HF3, paragraph 7.286 contains a long list of considerations. What more is to be provided in SPG? (paragraph 7.287).*

Council Response

Agreed the considerations are fully considered - delete paragraph 7.287.

~~“7.287 This is not an exhaustive list of relevant considerations. The council will publish further Supplementary Planning Guidance to aid developers in meeting the requirements of this policy.”~~

Appendix A

Other matters on which the Inspectors require clarification or further information

Policy/paragraph	Question/comment
Policies SP3 & SP4	The focus and effectiveness of these policies is undermined by significant amounts of detail the reader has to wade through to understand their aims. The policies should be re drafted to set out the critical 'headlines' with explanation of what should be included in a master plan and the components of what makes good design in reasoned justification or SPG.
Council Response	The Council agree that Policies SP3 and SP4 can be redrafted to more clearly set out the 'critical headlines'. The preference would be to move the remainder of the text to the reasoned justification section so that it remains within the plan as opposed to moving it to an SPG.
Policy SP3(d)	The Town and Country Planning (Development Management Procedure) (Wales) Order 2012 requires planning applications for major development to be accompanied by a Design and Access Statement. Why is it necessary, therefore, to include such a requirement in policy?
Council Response	The Council confirm that the intention of SP3(d) is to set out what we would look for applicants to provide as part of the Design and Access Statement they will already need to produce as opposed to identify that there is a requirement for them to produce a Design and Access Statement.
Policy SP3(viii)	Will developers know what does this criteria requires? We don't.
Council Response	In response to this question the Council propose that the wording of criterion SP3(vii) be amended as follows (revised wording in bold):- <i>'vii. Reference key features of the planned urban form, townscape and landscape Show areas of character using illustrations and precedent images;</i>
Policy SP3(xii)	More detailed than what?
Council Response	In response to this question the Council propose that reference to 'more detailed' is deleted and criterion SP3 (xii) is amended as follows:-

	<i>'xii. Include a more-detailed design code and green infrastructure management strategy in a format to be agreed with the Local Planning Authority; and'</i>
Policy SP3, second (ii)	Should this be (ixx) and what does it mean?
Council Response	The Council confirm the numbering is correct and this criterion follows on from criterion i. (a ,b, c, d (I to xiii) so should be seen in the context of <i>'Plans for development sites which conform to these criteria should accord with(ii) Guidance set out in site-specific master planning frameworks, where prepared, and any subsequent design codes.'</i>
Policy SP4, last paragraph.	Whilst exceeding minimum standards is to be encouraged, if a development meets minimum standards, it complies with policy. A statement in an LDP policy cannot afford SPG guidance development plan status. Why is this paragraph necessary given all new development is required to be of the highest design quality by meeting criterion i to xiii?
Council Response	In response to this question the Council propose that the last paragraph of Policy SP4 is deleted:- <i>'Proposals will align with or exceed any minimum standards and should seek to accord with guidance set out separately in relevant SPGs.'</i>
Policy SP5, reference to 'current under provision'	Planning obligations may not be required to address existing shortfalls. Works and contributions must only address demand created by proposed development. Consequently 'and any current under provision' should be deleted.
Council Response	The Council agree and propose that the first paragraph of Policy SP5 is amended as follows:- <i>'New development will make appropriate provision for, or contribute towards, all essential, enabling and necessary infrastructure required as a consequence of the development in accordance with Planning Policy Guidance. Such infrastructure will be delivered in a timely manner to meet the needs of existing and planned communities and includes the following aspects which may be required having regard to the nature, scale and location of the proposed development and any current under-provision:'</i>
Policy SP5	Public art may be desirable but can it be said to be necessary to make a development acceptable in planning terms?
Council Response	The Council considers that public art is necessary as it contributes towards the delivery of high-quality design / placemaking. Artworks can be freestanding, incorporated into building design or form part of functional items (seating/wayfinding) and requests are considered /

	sought on a site-by-site basis based on the needs arising from the proposed development.
Policy SP6	Is this policy necessary given the requirements of Policy SP5?
Council Response	The Council considers that given the significance of Planning Obligations, it is important to continue with the approach in the adopted 2016 LDP and have a stand-alone Policy in the Replacement LDP so that it is clearly identifiable to users of the document.
Policy SP7	The value of community Placemaking Plans is not questioned but why is a policy in the LDP necessary? If it is, is a separate policy necessary when their production could be encouraged in Policy SP3?
Council Response	<p>The Council consider that Policy SP7 is necessary because it elevates Community Placemaking Plans from a general aspiration to a strategic, enforceable and monitorable part of the planning framework. SP3 alone cannot achieve this. The two policies serve different purposes SP3 sets the <i>principles</i> of placemaking, while SP7 provides the <i>mechanism</i> for communities to shape development in their areas.</p> <p>The Council is developing a <u>Regeneration Strategy</u> and this policy will provide the necessary policy hook for Placemaking Plans to be developed as SPG in order to be a material consideration in decision making.</p>
Policy SP8	Should the policy set out what are appropriate uses? What is enhanced retail?
Council Response	<p>The Council proposes the following amendments to Policy SP8 (additions shown in bold) to provide further clarification on appropriate uses and enhanced retail which is replaced with the term “<i>New and improved retail</i>”.</p> <p><i>‘SP8: SUPPORTING THE CENTRAL AND BAY BUSINESS AREA</i></p> <p><i>The following areas Active uses (use classes A1, A2, A3, B1, C1, C2, C3, D1, D2 of the use classes order or a sui generis uses normally found in centres are considered appropriate within the Central and Bay Business Areas:</i></p> <p><i>i. New offices, commercial leisure uses within the Central and Bay Business Areas;</i></p> <p><i>ii Residential uses above ground floor level and/or where it does not result in the loss of a ground floor commercial unit within the</i></p>

	<p><i>Central and Bay Business Areas; and</i></p> <p><i>iii. Enhanced New and improved retail, leisure and complementary facilities within the Central Retail and Commercial Area.; and</i></p> <p><i>iv. Other uses most appropriately located in city centres, including uses that support the night time economy and music scene.²</i></p>
Policy SP10	The indoor arena is under construction. Is this policy necessary?
Council Response	<p>The Council consider that delivering the multipurpose indoor arena is central to the next chapter in Cardiff Bay's Regeneration as identified in the Council Corporate Plan 2024-2027. Given the scale and expected regional and national draw the arena is a key component of regeneration plans for Cardiff Bay and a catalyst for the wider Atlantic Wharf redevelopment.</p> <p>The Council consider the inclusion in the strategic policy signals to investors and developers the Council's commitment to the arena's success and its integration with transport and other infrastructure.</p>
Policy SP11	What is the latest position on the application to deepen Tiffs Well Quarry referred to in paragraph 6.94?
Council Response	The Council confirm that this planning application was granted planning consent on 2 nd May 2025.
Policy SP11	Please update the Minerals Background Paper for the Hearings.
Council Response	The Council confirm that we will update the Minerals Background Technical Paper prior to the Hearings.
Policy SP13	Is this policy necessary given it duplicates requirements in other policies in the plan?
Council Response	<p>The Council note that the Strategic policies within the plan serve a distinct and essential purpose. They:</p> <ul style="list-style-type: none"> • Set out the high-level spatial direction and overarching development principles for the plan; • Provide the framework within which detailed policies operate; and • Ensure that key strategic issues, which cut across multiple policy areas, are captured in one place to provide clarity and consistency. <p>Taking this purpose into account policy SP13 is considered necessary for the following reasons:</p>

- Health is a statutory and national policy requirement. Health is not just a thematic consideration; it is a legal and national policy priority embedded within Welsh Government planning and public health legislation. The Wellbeing of Future Generations (Wales) Act and Planning Policy Wales places health at the centre of decision making. Having SP13 as a dedicated strategic policy shows the Plan has met this priority and demonstrates compliance in a way that dispersed references (to health in other policies) cannot; without SP13, reference to health (whilst welcomed in other policies) becomes 'diluted' across multiple sections. A strategic policy provides a firm basis for requiring evidence and design improvements from developers, as well as signalling to stakeholders that health is core to the spatial strategy.
- Policy SP13 provides a clear anchor for all health-related policy content. Whilst health is a cross-cutting theme across multiple topic areas (transport, placemaking, green infrastructure, etc). The strategic policy sets the overall clear strategic direction, holds the 'health' narrative together, defines expectations of developers, provides a clear reference point for how health is applied in practice across all policies, ensures consistency in decision making and supports effective monitoring and compliance. framework within which detailed policies such as HF1 operate and ensures consistency across topic areas (transport, design, GI, air quality, etc) which in turn allows developers to understand how issues relating to health will be applied in practice and allows monitoring and compliance.
- SP13 provides the strategic policy hook within which HF1 operates. Policy HF1 provides the detail, whilst policy SP13 provides the strategic policy hook: SP13 requires HIAs (to be part of early design process, links HIA outcomes to other policies), provides the basis for negotiating planning obligations related to health, supports decision that prevent worsening of health inequalities challenge proposals that worsen health inequalities.
- Health inequalities in Cardiff justify a dedicated strategic policy on health, not references to health in other policies - see [Health and Wellbeing Background Technical Paper Number 5](#) for evidence of health inequalities.

Given this the Council consider that policy SP13 is necessary for these reasons and importantly provides a strategic framework within which detailed policy HF1 will operate.

Policy SP21	What is aerial infrastructure? How is development expected ‘to maintain and enhance the integrity, extent, diversity, quality and connectivity’ of aerial infrastructure?
Council Response	<p>In response to these questions the Council propose that reference to aerial infrastructure is deleted from the policy and the first paragraph of Policy SP21 is amended as follows:-</p> <p><i>‘Green (to include blue and aerial) infrastructure provides nature-based solutions to a range of environmental and societal issues, such as the climate emergency, nature emergency, flooding, air pollution, urban heat island effects, public health and mental well-being. Green infrastructure/ biodiversity assets are key to Cardiff’s character, value, distinctiveness, and sense of place. Cardiff’s green infrastructure assets include:’</i></p>
Policy SP22(i)	In the absence of an up-to-date definitive map of agricultural land quality, how will safeguarding the best and most versatile agricultural land be ensured?
Council Response	<p>The Council proposes the following amendment to paragraph 6.171 to clarify this matter (additional wording in bold):-</p> <p><i>‘6.171 The best and most versatile agricultural land (Grades 1, 2 and 3a of the Agricultural Land Classification) is a finite resource. Once lost to development it is rarely practicable to return such land to best quality agricultural production. There is no up-to-date definitive map of agricultural land quality for Cardiff as a whole, but the best and most versatile agricultural land is known to exist in parts of the west, north and east of Cardiff. The Policy aims to protect such land from development, where the loss is not justified by other considerations, in line with Planning Policy Wales.’</i></p> <p>To ensure the best and most versatile agricultural land is safeguarded throughout the preparation of the plan consideration has been given to the plan’s impact on the best and most versatile agricultural land using the latest available information from DataMap Wales as set out in Background Technical Paper 8 (RLDP19). The Plan’s spatial strategy does not propose any new greenfield releases, apart from those currently allocated therefore not involving the loss of any additional agricultural land.</p> <p>Paragraph 6.171 as amended ensures that the best and most versatile agricultural land will be safeguarded using the latest information available.</p> <p>In addition, Policy BG6 (Soils) refers to the impacts on soils and the services and functions they provide and requires a Soil Resource Survey and Soil Management Plan to support applications.</p>

Policy SP23	Given that additional waste management, treatment and recovery facilities are likely to be required within Cardiff during the Plan period, should the Plan identify sites to meet this need?
Council Response	<p>Regional waste monitoring produced under TAN21 has not identified a need for any specific type of waste facility to be located within Cardiff in order to manage a particular waste stream. As no specific requirement has been identified by regional monitoring at present and there are no current planning applications or extant planning permissions for significant waste facilities within Cardiff, the Council do not consider it is necessary to identify sites for waste purposes within the Plan.</p> <p>However, as time progresses and technology advances it is accepted that it is likely that additional, or replacement, waste facilities will be required within the city. These facilities could manage new and emergent waste streams, or more effectively deal with existing waste arisings. The Council do not consider it would be prudent to identify specific sites for waste purposes at this stage, as the likely requirements of any waste facilities which might be required in the future are currently unknown. Factors such as site size, operating conditions, environmental sensitivity or the need for proximity to other installations are unknown, so the Council consider it would not be possible to identify specific sites as part of the Replacement Plan.</p>
Policy SP23	What are the implications for the employment land bank if sites are lost from general industrial use to waste facilities, particularly given that the identified Industrial and Warehousing supply falls below the lowest estimate of future requirements?
Council Response	<p>Given that no need for a regional waste facility, or other waste facility with a significant capacity, has been identified by regional monitoring, it is anticipated that waste sites which come forward within the Plan period would predominantly fall within 'B' use classes. These facilities would have locational requirements and operating conditions similar to other uses typically found within existing industrial and warehousing areas. Waste uses falling within 'B' use classes would be acceptable in land use terms in general industrial areas and, as employment uses, would have no detrimental impact upon the employment landbank.</p> <p>Waste uses falling within the 'unique' use class, or otherwise outside of the 'B' use classes, would be assessed against Policy EC5A 'Alternative Use of Protected Employment Land and Premises'. Provided that the criteria outlined within Policy EC5A were met then waste uses would be acceptable. Waste uses would also be acceptable on sites not identified for employment use where the criteria set out in EC8 'Employment Proposals on Land Not Identified for Employment Use' were met. These policies allow an element of</p>

flexibility to enable necessary waste land uses to be located within the County, subject to the site's ability to meet the Plan's other objectives.

It is not possible to predict at this stage precisely which waste facilities are likely to come forward, the amount of land which would be required, or where proposals would be located. Given the existing waste framework and the range of waste streams which are already sufficiently dealt with within the County, it is not considered that future waste proposals are likely to have a significant detrimental impact upon the employment landbank.

Policy H1A For the Hearings, please update progress on LDP allocations, how many units delivered/left?

Council Response Please see table below which shows the position on the LDP Strategic sites as at the 1st April 2025 when completions on the sites were last monitored.

Strategic Site	Completions	Under construction	Not Started	Total Remaining
A - Cardiff Central Enterprise Zone	0	0	2500	2500
B - Former Gas Works, Ferry Road	0	0	500	500
C - Plasdwr - North-West Cardiff	1,130	100	5979	6079
D - North of Junction 33 on M4	454	56	1,315	1371
E - South of Creigiau	0	0	650	650
F North-East Cardiff	668	75	3,774	3849
G- East of Pontprennau Link Road	1,255	56	4	60
Total	3,507	287	14,722	15,009

Policy EC1 Should the policy set out what are appropriate uses? What is a knowledge based business?

Council Response The Council agree and propose the policy, and reasoned justification is amended as follows (amended wording shown in bold) to set out appropriate use and define knowledge-based business:-

'The Cardiff Central Enterprise Zone and Regional Transport Hub as shown on the Proposals Map is designated for the retention, development and redevelopment of land for employment opportunities, reflecting the area's role as the commercial driver of Wales.

The area is focused on knowledge based business and also supports, as part of, an integrated regional public transport hub high density residential units together with diversity of complementary mixed uses, including commercial, leisure and service uses where they support regeneration, renewal and enhancement and contribute to the vitality, attractiveness and viability of the CEZ.

Developments that support regeneration, renewal and enhancement and contribute to the vitality and viability of the CEZ as a regional and national economic and transport hub will be favoured and the following land uses are considered appropriate: B1 offices, complementary uses including hotels, food and drink uses, leisure uses and; high density residential uses where they form part of mixed use redevelopment proposals and do not undermine the primary function of the CEZ as an economic hub.

7.78 The Central Enterprise Zone (CEZ) was established in late 2011 and comprises a 56.7 hectare business district in the centre of Cardiff with a vision to facilitate the development of high value added employment that drives agglomeration and productivity growth, as well as providing jobs at scale in Wales's most sustainable and accessible business location.

*7.79 The CEZ comprises Callaghan Square/Canal Parade, Capital Quarter, Cardiff Central Station, Central Square, Cardiff Interchange, Central Quay, John Street and Dumballs Road Sites. The area is focussed on knowledge based business **(B1 offices)** and also supports as part of an integrated regional transport hub high density residential units together with a diversity of complementary mixed uses, including commercial, leisure and ~~retail~~ and food and drink uses.*

7.80 This policy seeks to build on the successful development of the CEZ to date through promoting and supporting opportunities for new mixed-use investment and development to further enhance the Zone's vibrancy, vitality and attractiveness and ensure Cardiff fulfils its role as the economic driver of the city region.

7.81 Major Grade A office schemes have been completed at Capital Quarter and Central Square and high-density residential schemes, including elements of mixed use and employment floorspace completed and or under construction in the vicinity of Dumballs Road.

	<p>7.82 <i>This policy will promote and support the future priorities and direction for the zone, including the completion of Central Quay, the delivery of the ‘Metro Central’ upgrade of the Cardiff Central Railway Station and interchange bus station, the Callaghan Square and Canal Parade redevelopment sites and the on-going redevelopment and regeneration of Dumballs Road.’</i></p> <p>7.83 (new paragraph to define knowledge-based industries)</p> <p><i>‘For the purposes of this policy knowledge-based business are defined as enterprises who primary outputs are generated through specialised expertise, innovation, digital technologies and professional services and typically include but not limited to financial and professional services, digital and creative industries and cyber security and data services.’</i></p>
Policy EC2	We do not consider the deletion of the only major strategic employment allocation to be a minor change and should be subject to consultation with any Matters Arising Changes.
Council Response	The Council agree that deletion of this policy/allocation will be included as part of the Matters Arising Changes consultation process.
Policy EC5a & EC5b	If no realistic prospect of employment use on a site is demonstrated, what is the basis for requiring new employment workspace to be provided as part of mixed-use schemes?
Council Response	<p>The Council consider that this policy framework will prevent the gradual, incremental loss of protected employment land.</p> <p>The Employment Land and Premises Study (ELPS) (RLDP 40) provides “an up-to-date objective assessment” of the employment land required to support Cardiff’s economic ambitions, identifying where protection and retention are necessary. The study shows strong demand for employment land, especially industrial and warehouse floorspace, with vacancy rates extremely low.</p> <p>The provision of modern workspaces will be essential to future supply. Economic regeneration and intensification will make an important contribution to the supply of employment land and premises in relation to market churn, over the plan period.</p> <p>Mixed-use redevelopment provides the most viable way of delivering new, modern employment workspace. Therefore, developers should be required to explore this approach. Incorporating an element of a higher value use (e.g. residential) can cross-subsidise the partial redevelopment of the site for employment uses. This will enable employment opportunities to be retained on the site.</p>

	<p>Mixed-use redevelopment therefore offers a practical way to maintain an appropriate overall employment supply and provide employment opportunities in tandem with new residential development. This approach will ensure that the city retains sufficient range, choice and flexibility in its employment land portfolio, even when more traditional formats on a given site are no longer viable.</p> <p>In summary citywide employment land pressures require new workspace to be secured through mixed-use schemes to protect long-term supply, range and choice.</p> <p>These themes are expanded upon in the Economic evidence base, and Employment Background Technical Paper.</p>
Policy E6	If lack of need is demonstrated how is a requirement to retain a significant element of office space justified?
Council Response	<p>Even where limited need is demonstrated for office use on an individual site, the Council consider that Policy EC6 (ii) is fundamental because the Central and Bay Business Areas serve a strategic, city-wide employment function.</p> <p>From a locational perspective the city centre and bay area will always have demand as they are the most sought-after areas for inward investment and growth businesses.</p> <p>The Replacement LDP <u>Economic Background Technical Paper Number 2</u> (RLDP13) identifies a clear “flight to quality”, with demand focused on modern, high-quality central offices, while weaker demand relates mainly to older secondary stock elsewhere. The <u>ELPS</u> Employment Land and Premises Study (ELPS) (RLDP40) also highlights the importance of maintaining a range and choice of office sites to support Cardiff’s key growth sectors.</p> <p>The Council consider mixed-use is an important solution in relation to the redevelopment of low quality office space. The policy aims to promote new or refurbished office stock coming to the market, when existing office floorspace is lost. The policy is fundamental in terms of focussing on the delivery of the projected jobs growth for the city. Requiring a significant element of office floorspace within mixed-use schemes safeguards the long-term role and competitiveness of the Central and Bay Business Areas, even where the previous office format in its entirety on a specific site is no longer viable.</p>
Policy EC9	What constitutes a suitable property? Should this be defined in the reasoned justification?
Council Response	The Council consider that suitable properties are clarified in paragraph 7.136. See below:

	<p><i>'7.136 The change of use of suitable properties to hotels or guest houses contributes to the range of accommodation available for tourists and other visitors to the city. Suitable properties are likely to be larger and vacant commercial premises and vacant space above existing commercial premises. In terms of both the proposed property and its location, importance will be attached to the need to safeguard residential amenity.'</i></p>
Policy EC9	Callaghan Square is allocated for 315 units but should the policy do more to outline the preferred balance between employment and leisure/service uses?
Council Response	This site is allocated as a housing led regeneration area under Policy H2.7 of the plan and in response to this question the Council note that paragraph 7.12 of the plan states that masterplans will be developed for these areas in accordance with the master planning principles set out in Policy SP3 Ensuring a Masterplanning approach. This process will define the preferred balance of uses on the site and in advance of this process it would be inappropriate for the policy to prejudice the outcome of this process.
Paragraph 7.137	Reasoned justification should explain the background to and reason for a policy. A presumption against change of use of hotels in residential areas to non-residential uses is policy not reasoned justification. Given Policy PC1 resists development which would cause harm, is paragraph 7.137 necessary?
Council Response	<p>In response to these comments and questions the Council proposes the following amendments to the plan:</p> <p>(1) Amend paragraph 7.134 as follows to explain the background to and the reason for the policy (additional wording shown in bold):-</p> <p><i>"7.134 This Policy directly relates to Policy SP10: Supporting Tourism recognising the importance of tourism to the Cardiff economy and the need to provide visitor accommodation to support the tourism and visitor economy and business travel. This</i>The policy identifies the most appropriate locations for new hotel development, either as a single use or as part of mixed-use development opportunities, including extensions and change of use to ensure that the negative impacts of visitor accommodation such as traffic congestion can be minimised. The sequential test will apply to proposals for major hotel developments such as those with conference and banqueting facilities proposed outside Central and Bay Business Areas of the city centre. "</p>

	<p>(2) Amend policy EC9 so presumption against change of use of hotels in residential areas to non-residential uses is in the policy not the reasoned justification (additional text shown in bold):-</p> <p><i>“EC9: Hotel Development</i></p> <p><i>Proposals of hotel development, including extensions and changes of use of suitable properties will be favoured:</i></p> <p><i>i. Within the Central and Bay Business Areas of the city centre;</i></p> <p><i>ii. Within designated centres subject to the proposal being of a scale appropriate to the centre and subject to satisfying the criteria of Policy R4: District Centres and Policy R5: Local Centres;</i></p> <p><i>Outside of these locations, proposals for major hotel development, including extensions and changes of use will be assessed against Policy R1: Town Centre First Approach.</i></p> <p>iii. Proposals for the change of use of hotels in residential areas to uses other than residential uses or uses acceptable in a residential area will be assessed against Policy PC1: Air, Noise, Light Pollution and Land Contamination.”</p> <p>(3) Delete paragraph 7.137 as presumption against change of use of hotels in residential areas to non-residential uses is now proposed be included in Policy EC9.</p> <p>“7.137 Proposals for the change of use of converted hotels in residential areas to uses other than residential or uses acceptable within residential area will be resisted.”</p>
Policy EC10	Last paragraph. What is a similar use? Should this be defined in the reasoned justification?
Council Response	The Council can confirm that similar use refers to alternative leisure, entertainment of cultural use and as set out in the response to the question below it is proposed that Policy EC10 is amended to clarify this.
Paragraphs 7.142 & 7.143	Policy EC10 favours leisure uses etc in the areas listed but paragraphs 7.142 and 7.143 place restrictions on such uses. Should these caveats be included in Policy EC10 or should Policy EC10 cross reference to the criterion in Policies R2 and R3?
Council Response	In response to this question the Council proposes the following changes to Policy EC10 (additional wording shown in bold):-
	“EC10: NIGHT-TIME AND CULTURAL ECONOMY

	<p><i>Proposals for leisure, entertainment, and cultural uses that protect, promote, diversify, and revitalise the city’s evening and night-time economy will be favoured in: -</i></p> <ol style="list-style-type: none"> I. The City Centre (Central Business Area) <i>assessed against Policy R2 and R3;</i> II. The inner harbour/waterfront area of Cardiff Bay (Bay Business Area); III. The International Sports Village; IV. Atlantic Wharf; and V. District and Local Centres (of a scale and nature appropriate to the centre), <i>assessed against Policy R4 and R5.</i> <p><i>The loss of Use Class D2 venues and public houses (Use Class A3) will be resisted unless it is demonstrated that the use is no longer viable, and the premises cannot accommodate another similar an alternative leisure, entertainment or cultural use. “</i></p>
Paragraph 7.145	The last sentence includes a policy statement. Given Policy PC1 resists development which would cause harm, is this sentence necessary?
Council Response	<p>In response to the question the Council proposes to amend paragraph 7.145 to read (additional wording shown in bold):-</p> <p><i>‘7.145 The council will also protect and support existing evening and night-time cultural venues. The ‘agent of change’ principle will be applied to new development near existing evening and late night-time cultural venues. The Council may refuse development proposals that have not be unduly impacted by the development of new noise-sensitive uses. and proposals will be assessed against Policy PC1.</i></p>
Policy D1	The focus and effectiveness of the policy is undermined by the details. The policy should be re drafted to set out the critical ‘headlines’ with the detailed explanation of what should be considered set out in the reasoned justification.
Council Response	The Council agrees that the policy can be redrafted to set out the critical ‘headlines’, with the detailed explanation set out in the reasoned justification.
Policy D1	The inclusion of ‘or significantly taller’, in the definition a tall building outside the in the city centre is vague. Given the policy requires good design and resists adverse impact on, amongst other things, historic or neighbourhood character, is a definition of what constitutes a tall building necessary?
Council Response	The Council propose that reference to ‘ <i>or significantly taller in terms of actual height and number of floors.</i> ’ Is deleted from the second paragraph of Policy D1 as follows:-

	<p><i>'A tall building in the city centre or Cardiff Bay will be 8 storeys or more or over 25 metres in height. Outside the city centre they are any building which is double or more the height of surrounding properties or significantly taller in terms of actual height and number of floors.'</i></p> <p>The Council consider it necessary to include a definition of what constitutes a tall building (i.e. 8 storeys or more) in Policy D1 for clarity and to avoid a debate on each application as to what is considered to constitute 'tall'.</p>
Policy D1	In the heavily built up city centre and on constrained sites tightly bound by neighbouring buildings, is it realistic to require trees and green infrastructure?
Council Response	The Council considers that this requirement is realistic as some schemes have green roofs or can accommodate green infrastructure (trees) on roof top external amenity spaces. Some tall buildings have soft landscaped areas within their site boundaries and others undertake public realm improvements / highway works around the boundary of their sites that may have the opportunity to include tree planting.
Policies R1, R4 & R5	B1 includes a wide range of employment uses, should the policies refer to B1(offices)?
Council Response	In response the Council agrees and for clarification proposes to change reference to B1 (offices) in policies R1, R4 and R5.
Policies R2 & R3	Is the wording sufficiently robust to prevent harm? Should they be clearer on how proposals will be judged against these criteria? Policy R6, for example, says proposals <i>'...will only be permitted where.....'</i>
Council Response	The Council note that Policies R2 and R3 have been carried forward from the adopted 2016 LDP and it is considered that, in combination, they have been sufficiently robust in addressing the balance of shop to non-shop uses.
Policy R3	Should the policy include a percentage figure to help applicants and decision makers understand when the balance may be tipped? (similar to HMOs). Regarding distribution, should the policy include a similar limit as Policy R4 of no more than 3 non-retail units in a row?
Council Response	<p>The Council note that Annual Monitoring Report OB1 EC11 (Protected Shopping Frontages) for the adopted 2016 LDP applied an indicator of the proportion of protected city centre shopping frontages with over 50% Class A1 (shop) units. Given this it is proposed that paragraph 7.165 be reworded to state (additional wording in bold):</p> <p><i>'7.165 Proposals will be assessed in terms of their impact cumulatively with other existing and committed non-shop uses.'</i></p>

	<p><i>Where the application frontage is closely related to surrounding frontages (e.g. in narrow or pedestrianised streets or arcades) it will be appropriate to consider the proposal's impact on both the application frontage and surrounding frontages. Consideration will be given to whether the balance of shop (Class A1) to non-shop uses would remain at or above 50%.</i></p> <p>Regarding distribution, the Council notes that Policy R3 (Protected Shopping Frontages) has been carried forward from the adopted 2016 LDP and it is considered that this has been sufficient in addressing the balance of shop to non-shop uses.</p>
Policy R3	Should Dominions Arcade be included within the protected shopping frontages?
Council Response	The Council consider that Dominions Arcade does not need to be included as a Protected Shopping Frontage (PSF). The units fronting Queen Street are covered by an existing PSF and the remainder of the arcade is predominantly a hotel (Class C1) use. The arcade is not a prominent frontage / pedestrian route and the three small retail units to the rear (northern end of the arcade) would be captured by Policy R2 (Development in the Central Retail and Commercial Area).
Policy R4(i)	How do applicants and decision makers know what is appropriate scale and function?
Council Response	<p>The Council propose that the R4 (i) be amended to clarify the role and function of centres as follows (additional wording in bold):-</p> <p><i>'(i) The proposal being of a scale and function appropriate to the district centre as defined in Policy R1: Retail Hierarchy and Town Centre First Approach.</i></p>
Policy R4	Should 'Unacceptable harm' be replaced with a neutral statement, 'Impact of development on the vitality and viability of a district centre will take account of'? As this section advises on how impact should be assessed, should it be in reasoned justification rather than policy?
Council Response	<p>The Council agree with the proposed changes and propose to delete reference to "<i>unacceptable harm</i>" and move this section of policy R4 to the reasoned justification, so paragraph 7.169 of reasoned justification reads as follows (additional wording in bold):-</p> <p><i>'7.169 This policy seeks a balance between retaining an appropriate range and choice of retail uses (A1) to meet local shopping needs and allowing other beneficial supporting uses which complement and are appropriate to the scale and function of the centre. Priority will be given to promoting and supporting shopping, other main town centre</i></p>

	<p><i>uses, and community uses, although uses which do not readily fall into either of these categories, sui generis uses normally found in shopping centres, or any mixed use comprising one or more of these use classes can be accepted where they would be complementary and beneficial to the vitality, viability, and diversity of a centre.</i></p> <p><i>The impact on the vitality and viability of a district centre will take account of:</i></p> <ul style="list-style-type: none"> • <i>The existing level of non-retail, leisure or community uses within the centre;</i> • <i>The size of the retail unit in relation to the overall size of a centre or a specific group of frontages;</i> • <i>The distribution and proximity of non-retail, leisure or community use within a frontage.</i> <p><i>Proposals that result in, or add to a continuous stretch of non-retail, leisure or community uses (3 or more units in a row) will be less favourably considered and applications for such uses will be considered against the following:</i></p> <ul style="list-style-type: none"> • <i>The vacancy rate in the centre and/or specific frontage.</i> • <i>Whether, and for how long, the premises have remained vacant whilst being actively marketed for their existing or previous use.'</i>
Paragraph 7.174	<p>Would a range of 6 to 12 months provide applicants and decision makers sufficient certainty as to what period of marketing is necessary to demonstrate whether an A1 use is viable? Is 6 months sufficient? Should there be an option of an ad in an agency window or national marketing over a wide range of media? Just doing the former would comply with policy but may not be an adequate test of the market. Would it be better to require marketing for 12 months across a range of platforms?</p>
Council Response	<p>The Council agree to reword paragraph 7.174 to state:-</p> <p><i>'7.174 The change of use of an active A1 unit is less likely to be supported and applicants will be expected to provide details of marketing for a period of 12 months at a realistic value and qualify how they have actively marketed the property over a range of platforms including a national marketing campaign across a wide range of media, including digital platforms. This policy'</i></p>

Policy R5(i)	How do applicants and decision makers know what is appropriate scale and function?
Council Response	To clarify the role and function of local centres the Council proposed the following changes to R5(i) (additional wording in bold):- <i>'(i) The proposal being of a scale and function appropriate to the particular local centre as defined in Policy R1: Retail Hierarchy and Town Centre First Approach.'</i>
Policy R5	Should 'Unacceptable harm' be replaced with a neutral statement, 'Impact of development on the vitality and viability of a district centre will take account of'? As this section advises on how impact should be assessed, should it be in reasoned justification rather than policy?
Council Response	The Council agree with the proposed changes and propose to delete reference to " <i>unacceptable harm</i> " and move this section of policy R5 to the reasoned justification and replace paragraph 7.180 of reasoned justification, so it reads as follows (revised wording in bold):- <i>'7.180 The impact of development on the vitality and viability of a local centre will take account of</i> <ul style="list-style-type: none"> • <i>The existing level of non-retail, leisure or community uses within the centre as a whole;</i> • <i>The size of the retail unit in relation to the overall size of a centre or a specific group of frontages;</i> • <i>The distribution and proximity of non-retail, leisure or community uses within a frontage.</i> <p><i>Proposals that result in, or add to a continuous stretch of non-retail, leisure or community uses (3 or more units in a row) will be less favourably considered and applications for such uses will be considered against the following:</i></p> <ul style="list-style-type: none"> • <i>The vacancy rate in the centre and/or specific frontage.</i> • <i>Whether, and for how long, the premises have remained vacant whilst being actively marketed for their existing or previous use.'</i>
Paragraph 7.183	Would a range of 6 to 12 months provide applicants and decision makers sufficient certainty as to what period of marketing is necessary to demonstrate whether an A1 use is viable?

	<p>Is 6 months sufficient? Should there be an option of an ad in an agency window or national marketing over a wide range of media? Just doing the former would comply with policy but may not be an adequate test of the market. Would it be better to require marketing for 12 months across a range of platforms?</p>
Council Response	<p>The Council agree to reword paragraph 7.183 to state (additional wording in bold):-</p> <p><i>'7.183 The change of use of an active A1 unit is less likely to be supported and applicants will be expected to provide details of marketing for a period of 6-12 months at a realistic value and qualify how they have actively marketed the property, for example, local marketing such as agency windows or whether it has been subject to a national marketing campaign across a wide range of media, including digital platforms over a range of platforms including a national marketing campaign across a wide range of media, including digital platforms. Loss of...'</i></p>
Paragraph 7.188	<p>What evidence is there to demonstrate that a 200m² outlet would not harm district or local centres, particularly given the explanation of their sensitivity in paragraph 7.192?</p>
Council Response	<p>The Council agree and propose that the last paragraph of 7.188 which references small scale proposals of 200m² or less is deleted so it reads as follows:-</p> <p><i>'7.188 The aim of the policy is to control the nature and size of out-of-centre retail development to minimise harm to and protect and enhance the vitality, viability and attractiveness of the Central Retail and Commercial Areas and the District and Local Centres identified in the retail hierarchy (Policy 1) and promoting sustainable communities and sustainable travel patterns. Small scale proposals of 200m² or less meeting local need or providing a complementary/ancillary use for employees in an employment area could be exempt from this test. These stores an play an important role in sustaining local neighbourhoods and reducing the need to travel and would be unlikely to significantly harm existing centres.'</i></p>
Paragraph 7.189	<p>Should a district or local centre precede edge of Central Retail and Commercial Area in the sequential test?</p>
Council Response	<p>The Council agree and propose that the order of preference in paragraph 7.189 is amended as follows:-</p> <ul style="list-style-type: none"> • <i>Within the Central Retail and Commercial Area</i> • <i>Within a District or Local Centre</i>

	<ul style="list-style-type: none"> • <i>On the edge of the Central Retail and Commercial Area</i> • <i>On the edge of a District or Local Centre</i> • <i>An out-of-centre location accessible by a choice of means of transport.</i>
Paragraph 7.192	Rather than a two stage approach with a Retail Impact Statement being required only once a need is identified, would it not be better to seek a combined assessment for all developments above 2,500m ² ?
Council Response	<p>The Council agree and propose that to delete ‘<i>once need has been identified</i>’ from paragraph 7.192 so it reads as follows:-</p> <p><i>‘7.192 Retail Impact Statements will be required for all retail planning applications of 2,500sq meters or more gross floorspace that are proposed on the edge of our outside designated centres once a need has been identified. Due to the sensitivity of district and local centres to harmful impacts even from relatively small proposals, development within the catchment areas of these centres will require a proportional retail impact assessment or statement. These will be assessed on a case-by-case basis and developers should seek pre - application advice for more information about specific requirements relating to the precise location, scale and form of development proposed.’</i></p>
Policy R9 & Paragraph 7.209	Shops and offices would have been built with no requirement for amenity space, is it reasonable and realistic to expect amenity space to be provided when converting to residential?
Council Response	<p>The Council agree and propose to delete paragraph 7.209 with cross reference to Policy H4: Conversion to Flats.</p> <p><i>‘7.209 The conversion to residential will be assessed with regard to the amenity and space standards outlined in Policy H4: Conversion to Flats.’</i></p>
Policy C1	Does this policy apply everywhere or just outside district and local centres? If it applies everywhere, should it cross reference to limitations in Policies R4 and R5?
Council Response	<p>Yes, the Council can confirm the policy applies to all development within the settlement boundary, inclusive of District and Local Centres. Para 7.214 favours community uses in these centres stating, ‘where appropriate’.</p> <p>The Council propose a cross reference to Policies R4 and R5 is added here, in regard to the policies limitations as suggested.</p>
Policy C2(iii)	Why are educational, cultural and sporting opportunities limited to school pupils, why not everyone?

Council Response	Policy C2(iii) highlights school pupils because the Council has clear legal duties to safeguard their access to educational, cultural and sporting opportunities, which must be local, safe and curriculum-compliant. This requires separate recognition in the policy. The wider community is still fully recognised in relation to their access to sport, culture and educational uses within Policy C1 and other plan policies, including those on open space, health and wellbeing and placemaking.
Paragraph 7.217	How do applicants and decision makers know what constitutes an extended period?
Council Response	The Council confirm that this would be a minimum of 12 months, if active marketing took place immediately from when the community facility became vacant.
Paragraph 7.219	How do applicants and decision makers know what constitutes substantive evidence?
Council Response	The Council agree, this is ambiguous. This Council propose that the sentence is rephrased to reference the marketing requirement suggested in Paragraph 7.217.
Paragraph 7.225	How do applicants and decision makers know the type of use for which crime prevention of fear of crime would be a material consideration? Isn't crime prevention covered Policy SP4?
Council Response	<p>In response the Council note that any development that affects layout, access, lighting, movement routes, or the distinction between public and private space will generally raise community-safety issues, making these matters material to the decision. This includes residential schemes, student accommodation, tall buildings, commercial and evening-economy uses, mixed-use developments, public-realm works, transport infrastructure, schools and community facilities, and major regeneration projects.</p> <p>In summary, when a proposal creates spaces people will use, community safety and the fear of crime become material considerations under Policy C3, with the level of relevance depending on the type and context of the development.</p> <p>This text could be integrated into the reasoned justification to Policy C3 to provide more clarity.</p> <p>Furthermore, Policy C3 requires early engagement with South Wales Police to ensure applicants recognise when community safety issues arise.</p> <p>While Policy SP4 provides the strategic focus and includes safety as an integral part of good design, C3 remains the detailed development-management policy that expands on this requirement by setting out specific measures, principles and consultation</p>

	processes. It also includes counter-terrorism aspects in design where appropriate.
Paragraphs 7.226, 7.227 & 7.228	The implication of the advice in these paragraphs are measures to mitigate the occurrence and effects of terrorism may be significantly different to requirements for community safety (Policies SP4 & C3). Should Policy C3 be amended to reflect this?
Council Response	The Council agree and propose that Policy C3 is amended, and it is proposed an additional criterion (vi) is added stating: <i>‘(vi) Where appropriate, incorporate proportionate counter-terrorism measures within the design and layout of development, particularly for venues, public spaces and other locations with high levels of footfall, including consideration of site planning, access control, movement routes, crowd management, vehicular stand-off, and the use of appropriate materials and structural design’.</i>
Paragraph 7.233	Second bullet point. If investment is needed to accommodate additional pupils, surely the school does not currently have the capacity to accommodate them? What is meant by suitable?
Council Response	To clarify this the Council, propose that the second bullet in paragraph 7.233 is amended to read (additional wording in bold):- <i>‘there is a surplus capacity in such schools to accommodate some or all of the projected number of pupils generated from the proposed development, but investment is required to make it a suitable standard for educational use.’</i>
Paragraph 7.235	How do applicants and decision makers know what constitutes a limited exception? Whatever they are, should they be specified in Policy C4?
Council Response	Further guidance on thresholds and exceptions is set out Section 7 of the Planning Obligations SPG. It is proposed that the revised Planning Obligations SPG produced to support the Replacement LDP will roll forward this guidance.
Paragraph 7.267	Policy HF1 supports a food retail environment that enhances access to healthy food choices but does not preclude against takeaways. If there is to be a preclusion against fast food outlets on grounds of the type of food they sell, it should be in policy and justified by evidence and material planning considerations. Is there tension between this aim and Policy R8?
Council Response	The Council recognise that SPG cannot introduce new policy or create additional policy tests. The SPG for Policy HF1 will therefore be limited to implementation guidance, providing clarity on how proposals will be assessed against policy HF1. It will consolidate and

	<p>signpost existing evidence, offer consistent approach to how the Council will consider cumulative impacts, and set out proportionate information requirements for applicants so the Council can apply Policy HF1 transparently and consistently.</p> <p>The Council confirm they will prepare and submit a draft version of the guidance to the Inspectors in advance of the Hearing Sessions for clarity and to enable the matter to be fully considered.</p> <p>In addition, it is proposed that criterion (iv) of Policy HF1 is amended (see additional wording in bold) to better clarify the intention of the policy approach in relation to promoting healthy food environments.</p> <p><i>‘(iv) Provide a food growing and food retail environment that enhances access to healthy food choices and reduces inequalities by resisting proposals for additional hot food takeaways where their number or proximity would lead to an over-concentration and undermine the creation of a healthy and balanced food environment.’</i></p> <p>The Council consider that the aims of Policies HF1 and R8 are compatible as neither duplicates the tests of the other. Policy R8 assesses, frontage contribution, clustering, amenity effects, and centre role and HF1 assesses whether there are identifiable cumulative health-related impacts relevant to the proposal’s location.</p>
Policy HF2	Is it reasonable to require a contribution to providing or improving allotments for brownfield redevelopments, residential conversions or flats in tall buildings in the city centre well away from existing or proposed allotments? How is such a requirement directly related to the development or fairly and reasonably related in scale?
Council Response	The Council considers that any residential development that results in an increase in population is likely to generate extra demand for allotments and therefore it is reasonable to require provision/off-site contribution. In this context it is important to note that local authorities have a legal obligation to provide allotments on request.
Policy HF2	The CIL regulations place a 5 obligation limit on planning obligations designed to collect pooled contributions to fund a specific project/infrastructure. It is unlawful to give weight to additional obligations even if willingly proffered by developers. Is the Council confident the provision of new allotments or schemes to improve existing ones will not fall foul of the 5 obligation rule?
Council Response	The Council confirm that they have worked with the 5 obligation rule since it was introduced and are confident that the provision of new

	allotments or schemes to improve existing ones will not fall foul of the 5 obligation rule.
Policy HF2	The policy applies to residential development and does not discriminate by type. Can a contribution from Purpose Built Student Accommodation be said to be directly related to the development?
Council Response	<p>The Council agree there should be exemption for Purpose Built Student Accommodation and proposed that paragraph 7.269 be amended as follows to clarify (additional wording in bold): -</p> <p><i>‘7.269 This policy sets out the requirement for new large residential developments (Use Class C3) to provide allotment space for residents and the wider protection and retention of these sites as valuable community and green infrastructure assets.’</i></p>
Policy HF3	The policy says it applies to all residential development but paragraph 7.278 states it is required for appropriate residential development. Which is it? What is long term occupation?
Council Response	<p>In response to these questions the Council propose that policy HF3 and paragraph 7.278 are amended as follows (additional wording in bold):-</p> <p><i>‘HF3: PROVISION OF FOOD GROWING SPACE IN NEW DEVELOPMENTS</i></p> <p><i>All new major residential developments intended or permanent or long-term occupation are expected to provide suitable space for on-site food growing by residents.</i></p> <p><i>New space for food growing as part of a development will be expected to</i></p> <ul style="list-style-type: none"> <i>i. Be of an appropriate size and quality, with larger developments providing appropriately scaled food growing opportunities and/or planting.</i> <i>ii. be be appropriately designed to be safe, usable, accessible to all residents and integrated into the development site.’</i> <p><i>‘7.278 Whilst policy HF2 sets out the requirement for large residential developments to make provision or a contribution to formal allotment provision this policy sets out the requirement for major appropriate residential development to provide more informal on-site space for food growing by residents.’</i></p> <p>In order to align with these proposed changes it is noted that reference to ‘all scales’ will need to be deleted from paragraph’s 7.280, 7.282 and substituted with ‘major’.</p>

Policy HF3(i)	How do applicants and decision makers know what constitutes a larger development or what is appropriate in scale and quality?
Council Response	As set out in the response to the previous question the Council proposes that criterion HF3 (i) is deleted from the policy.
Paragraph 7.282	Is it reasonable and practical for developments to include flexible space suitable for growing food which can be used as or when need or interest arises? What if there is no interest? What happens to the space then?
Council Response	In response to these questions the Council note that the flexible space could literally be some containers which if not needed for growing could have planting. Most of the Council's housing schemes have growing opportunities, either by way of a garden in houses or containers/raised beds in communal areas of a block of flats.
Policy HF4	The policy does not, as alleged in paragraphs 7.288, 7.290 and 7.291, protect existing food growing enterprises, it only resists the loss of active allotments.
Council Response	In response to this question the Council propose the following amendment to Policy HF4 (additional wording in bold):- <i>'HF4: FOOD GROWING ENTERPRISES AND ALLOTMENTS</i> <i>Development that increases the availability of locally grown food will be supported where it is consistent with other policies within the plan.</i> <i>Development which would result in the loss of active allotments, food growing enterprises or which would have harmful impact on their community food growing role will not be permitted.'</i>
Policy WL1(iv)	Should this be stronger and require bilingual signage?
Council Response	The Council propose Policy WL1 is amended as follows based on cultural considerations in Planning Policy Wales (additional wording in bold):- <i>'Where relevant, new development should promote, protect and strengthen the interests of the Welsh language and the city as an area of linguistic importance to support a Bilingual Cardiff and a thriving Welsh language by ensuring proposals:</i> <i>i. Contribute meaningfully to Welsh Government's Cymraeg 2050: A Million Welsh Speakers ambition.</i> <i>ii. Provide more opportunities to grow and retain young Welsh speakers in the city in terms of housing, work and community (including education and training) facilities.</i> <i>iii. Provide opportunities for the increasing number of older Welsh speakers in the city so that there are more opportunities to speak Welsh at community level for all ages.</i>

	iv. Promote <i>bilingual development signage and other relevant information such as marketing material, health and safety notices etc, and also utilise the use of Welsh in development naming practice to encourage daily use of the language and a sense of ‘place’.</i>
Policy CP1	How do applicants and decision makers know what constitutes a significant development requiring a landscape assessment?
Council Response	To enable flexibility ‘significant’ is not specifically defined in the policy. Whilst applications for major developments submit a landscape assessment the Council consider that local developments which can be more visually intrusive by virtue of their nature, scale/size or location or impact within more sensitive landscapes may require a landscape assessment.
Paragraph 7.311	What tests are referred to in the last sentence? Should they be set out in the policy?
Council Response	The Council propose the reference to Planning Policy Wales is deleted so paragraph 7.311 reads as follows:- <i>‘7.311 Close proximity to a large urban population brings many pressures to Cardiff’s countryside, including outdoor recreation. Whilst its importance for local recreational purposes and tourism is accepted, it is essential to ensure that both these uses, and any built development associated with them, do not cause unacceptable harm to the character and quality of the countryside. Small scale, low impact development associated with activities which need to be located in the countryside, or encourage access to and enjoyment of the countryside, may be acceptable. subject to the tests set out in national guidance.’</i>
Policy CP2(a)	See Appendix B for suggested alterations to the text but conversion to residential in the countryside is usually limited to traditional barns/buildings. As written this policy would, in principle, allow the conversion of modern farm buildings. Should a criteria be added to only allow conversion of traditional buildings to residential?
Council Response	With regards to separating the policies the Council consider it should remain as one policy as it is not just a design consideration but the impact of the on the countryside. In terms assessing an application for the conversion of a modern farm building to residential it is considered that Policy CP2 (a) criteria i to iv (i.e. whether it is structurally sound and capable of being made so without major alterations or materially changing the existing character of the building, does not give rise to additional buildings and is suitable for the proposed re-use) and other policies

	<p>of the plan provide sufficient protection to control the inappropriate conversions to residential.</p> <p>In addition, not all traditional buildings are appropriate.</p>
Policy CP2(a)(iii)	Might there be occasions where a traditional barn is no longer suitable for modern agricultural practices/vehicles and a new building is necessary for the efficient operation of the enterprise?
Council Response	The Council consider that the policy framework as set out enables existing farms or rural enterprises to provide necessary new buildings where older traditional barns are no longer suitable.
Policy CP2(a)(iv)	How do applicants and decision makers know what constitutes a suitable building?
Council Response	The Council notes that Policy CP2(a)(iv) requires applicants to demonstrate that the building proposed for conversion is suitable to be converted to the proposed new use - for example is the building suitable for residential use.
Policy CP2(b)	Although under the umbrella of countryside protection, the criteria relate to extensions anywhere.
Council Response	Whilst it is noted that CP2 (b) criteria i and ii would also relate to extensions anywhere as it relates to design the Council consider it is important within this policy in terms of its countryside and landscape setting.
Policy CP2	The last paragraph is repetitious, is it necessary?
Council Response	The Council consider that although there may be some overlap in the final paragraph it sets out an important overall conclusion to the policy.
Policy CP3	Under what circumstances could development on the mainland cause unacceptable harm to Flat Holm? Is the inclusion of Flat Holm necessary?
Council Response	Flat Holm is within the Cardiff administrative area and was included in the original Landscape Assessment and was assessed as having a highly distinctive visual character with an overall outstanding value to justify designation as a special landscape area (SLA). The Special Landscape Area Study (RLDP44) prepared to support the Replacement plan takes these recommendations forward. The Special Landscape Area designation seeks to protect Flat Holm from inappropriate development on the island.
Policy CP4	We assume the function of a river corridor referred to in the third paragraph is the green infrastructure function set out in the second paragraph? If so, would it improve understanding to repeat that in the third paragraph. If not, what function is being referred to?
Council Response	For clarity the Council propose that the 3 rd paragraph of Policy CP4 is amended as follows (additional wording in bold):-

	<i>'Development proposals will need to demonstrate that the green infrastructure function of a river corridor remains unimpeded, provides appropriate mitigation and ensures access does not lead to unacceptable harm.'</i>
Paragraph 7.342	Planning obligations may only be required to address issues/shortcomings arising from the proposed development, not for improvements not directly related to the proposed development. The paragraph should be amended to reflect this.
Council Response	For clarity the Council proposed that paragraph 7.342 be amended as follows (additional wording in bold):- <i>'7.342 New development within, or adjacent to the river corridors may be required to contribute to projects to improve the river corridors. Where appropriate, planning obligations may be required to address issues arising from the proposed development in accordance with policies relating to the provision of new infrastructure.'</i>
Policy BG1	Is it necessary to say who you will consult?
Council Response	The Council agree and propose the deletion of the following wording from the third paragraph of policy BG1: <i>'Statutory Nature Conservation Organisations will be consulted in consideration of any international and national sites. The consideration of a Habitats Regulations Assessment – including screening, appropriate assessment or derogations may also be required.'</i>
Policy BG5 & paragraph 7.377	How do applicants and decision makers know what constitutes a clearly defined public amenity benefit?
Council Response	The Council confirm that in terms of trees, woodlands and hedgerows the benefits are listed as: <ul style="list-style-type: none"> • Visual amenity. • Defining a sense of place. • As important cultural heritage or natural heritage monuments. • Providing places for relaxation and recreation. • Supporting biodiversity. • Improving health and wellbeing • Intercepting and storing pollutants. • Intercepting and storing water. • Carbon sequestration. • Accretion of soil and soil organic matter. • Protecting against soil erosion. • Microclimatic amelioration. • Mitigating the predicted impacts of climate change.

	Assessments of trees in accordance with BS 5837, hedgerows in accordance with the Hedgerows Regulations and with the overarching GI Statement as per PPW 12 ought to provide objective data to determine whether a clearly defined amenity benefit is met.
Policy BG6	As drafted this policy would apply to domestic extensions over lawns, leading to permanent sealing of soils. Is that the intention?
Council Response	The Council can confirm the policy applies to all scales of sites so we would expect applicants to be demonstrating how the loss of soil/soil functionality is mitigated where unavoidable. For example, by planting a tree/hedges/woody shrubs or de-sealing a currently sealed area of garden and converting it to a soft landscaped garden area.
Policy BG6	How do applicants and decision makers know what constitutes a clearly defined public amenity benefit?
Council Response	<p>The Council confirm that in terms of soils, the benefits are listed as:</p> <ul style="list-style-type: none"> • A habitat for organisms. • Climate regulation. • Nutrient cycling. • Provision of construction materials. • Carbon sequestration. • Flood regulation. • Water purification and contaminant reduction. • Foundation for human infrastructure. • Protection of cultural heritage. • Provision of food and fuel. <p>Assessments of trees in accordance with our Soils and Development TGN (i.e. Soil Resource Survey and Plan or 'Basic Soil Assessment' to an agreed methodology for small scale sites) should give objective data.</p>
Policy T1(iv)	Given the speed limit in most urban streets is 20mph is this requirement necessary? What measures are envisaged to minimise vehicle speed? Should this be explained in the reasoned justification?
Council Response	The Council confirm there are various measures to minimise vehicle speed to 20mph on urban streets and spaces where pedestrians will be present following the Welsh Governments order and strategy to give priority to pedestrians and cyclists. The Council propose the following amendments to criterion T1(v) and update to paragraph 7.405 to reflect the Council is no longer pursuing the Streets for Health initiative (revised wording shown in bold):-

	<p>'v. Safe, convenient, direct and attractive walking and cycling connections to existing developments, neighbourhoods, schools, jobs and services forming part of a sustainable neighbourhood urban streets and spaces that are designed to minimise vehicle speeds and give priority to movements by pedestrians and cyclists;</p> <p>7.405 As detailed in the Cardiff Transport White Paper 2019, Cardiff aims to deliver a complete cycle loop around the city centre which will connect to each of six cycleways, which are planned for several districts across the city. The Council will also roll out a 'Streets for Health Initiative', so that streets are reclaimed as healthy public spaces for the public to enjoy, including default 20pmh limits across the city. Slower speeds are critical to reducing risk and supporting movements on foot and by bicycle. The default speed limit on urban roads in Wales changed from 30mph to 20mph in 2023. It is therefore essential that roads, streets and public spaces provided as part of new developments are designed in a way that minimises vehicle speeds, encourages adherence to the speed limit and provides an environment where people feel it is safe to walk and cycle.'</p>
Policy T2	Arguably any development which creates new housing/accommodation, employment, leisure at any scale adds to demand on public transport. Financial contributions are to be applied proportionately but should this policy relate to major development rather than all development?
Council Response	In response to this question the Council note that there are developer contributions that may be appropriate at any level of development depending on circumstances and need for mitigation. Any financial contributions requested would meet the tests required of Section 106 agreements. Therefore, the policy should not be limited by size of development.
Policy T7	The policy encourages installation of charging points in strategic locations but does not, as stated in paragraph 7.434, require new development to make provision for them. Should the requirement for charging points in new development be included in Policy T7?
Council Response	<p>The Council consider that Policy T7 does not need to be amended, as paragraph 7.434 indicates that new developments would need to make such EV provision as detailed in the prevailing SPG. Therefore, new development should make adequate provision for electric vehicle charging points.</p> <p>The <u>Managing Transportation SPG (2018)</u> includes details of how this should be achieved, and specific guidance on the charging requirements for each type of development." The EV charging points within new developments require that a minimum of passive</p>

	<p>provision for each dwelling with a dedicated residential parking space, within communal residential car parks, within any commercial development car parks, and public car parks. Additional EV charging points are also sought at any on-street visitor parking spaces within a new development site. Policy T7 also includes the retrospective provision of EV within existing areas, such as terraced streets where no dedicated off-street parking is available for residents, so long as these do not impede accessibility.</p>
Policy OS1(i)	Should a geographic area within which any deficiency of open space would be assessed be specified?
Council Response	The Council assess open space provision within the distance thresholds set out in the <u>Planning Obligations SPG</u> (i.e. 600m play areas, 1000m informal open space, 1500m formal space) and compare against the adopted standards (ha per 1000 population). It is proposed that the revised Planning Obligations SPG produced to support the Replacement LDP will roll forward this approach.
Policy OS1 (ii) & (iii)	In what circumstances does open space have no value or quality? Open space serves a number of purposes, sport, leisure, visual, ecological and seems unlikely an area of open space would have no good qualities. This criterion ought to specify what is meant by quality or be deleted.
Council Response	<p>In response to these questions the Council propose the following amendments to policy OS1 (additional wording in bold):-</p> <p><i>'POLICY OS1: PROTECTION OF OPEN SPACE</i> <i>Development will not be permitted on areas of open space unless:</i></p> <p><i>I. It would not cause or exacerbate a deficiency of open space in accordance with the most recent open space study;</i> <i>and</i> <i>II. The open space has no functional or amenity value ; and.</i> <i>III. The open space is of no quality has no significant amenity value or</i> <i>IV. The developers make satisfactory compensatory provision; and, in all cases;</i> <i>The development has no adverse impact upon green infrastructure/ecology and/ or areas of historic conservation importance.'</i></p>
Paragraph 7.439	In light of the comments above does what constitutes a functional open space need to be defined?
Council Response	The definition of functional open space set out in paragraph 5.4 of the <u>Planning Obligations SPG</u> . It is proposed that the revised Planning Obligations SPG produced to support the Replacement LDP will take forward this definition.

Policy OS2	<p>S106 contributions should only be sought where there is insufficient capacity to accommodate the proposed development. On this basis does a blanket requirement for all developments of 5 or more units comply with the CIL regulations? Seeking funding for improvements on the other side of the city from the proposed development would also be contrary to the regulations. The policy should be amended to reflect this.</p> <p>Has any consideration been given to the 5 obligation rule?</p>
Council Response	<p>In response to these questions the Council note that the <u>Planning Obligations SPG</u> at Chapter 5 (Provision of Functional Open Space) identifies that contributions will be sought ‘where the need arises as a result of the proposed development’ and the Council propose to carry this forward to the updated version of the Planning Obligations SPG for the Replacement LDP. In addition, at paragraph 7.450 of the RLDP it is identified that ‘Consideration will also be given to the availability and adequacy of existing functional open space within the surrounding area’.</p> <p>The Council confirm they have worked with the 5 obligation rule since it was introduced and are confident that the provision of open space can continue to be provided within this context.</p>
Paragraph 7.452	What is ‘necessary’ open space? Is some open space unnecessary?
Council Response	The Council confirm that ‘necessary’ refers to provision based on the adopted standard i.e. 2.43ha per 1000 population.
Policy RE1(vi)	Is it necessary to state proposals must be consistent with other policies? That should be taken as read and it’s not included in other policies.
Council Response	The Council agree and propose that criterion (vi) is deleted from policy RE1.
Policy RE2	Why isn’t incorporating on site renewable energy generation required to be included in energy statements? Would this weaken the plan’s ability to deliver renewable energy through Policy SP4(vi)?
Council Response	<p>The Council agree this should be referenced in policy RE2 and propose amending second bullet in policy to read:</p> <p><i>‘Examines the full range of measures, technologies and opportunities available, including on site renewable energy generation to achieve Net Zero Development.’</i></p>
Paragraph 7.492	Should a presumption against culverting be in Policy W3?
Council Response	<p>To provide further guidance and clarity on this issue it is proposed to amend paragraph 7.492 as follows (revised wording in bold):-</p> <p><i>‘7.492 Cardiff Council in general are opposed to the culverting of watercourses because of the adverse ecological, flood risk and other effects that are likely to arise. Culverting can exacerbate the risk of flooding and increase the maintenance requirements for a</i></p>

	<p>watercourse. It also destroys wildlife habitats, damages a natural amenity and interrupts the continuity of the linear habitat of a watercourse. It is recognised there are various reasons why in some instances landowners, developers and local authorities believe that open watercourses should be culverted. However, Cardiff Council considers any benefits are usually outweighed by the potential problems in managing the system, the loss of habitats and difficulty in pollution detection. Cardiff Council considers it beneficial for watercourses to remain in an open state for both flood risk management and environmental purposes. Cardiff Council encourage and promote the removal of culverts in order to restore a more natural watercourse environment however understand there are occasions when culverting is required. Cardiff Council will therefore only approve an application to culvert a watercourse if there is no reasonably practicable alternative or if the detrimental effects of culverting would be so minor they would not justify a costly alternative. In instances where culverting is permitted under Section 23 of The Land Drainage Act 1991 adequate mitigation must be provided for any damage caused. Wherever practical Cardiff Council will seek to have a culverted watercourse restored to an open channel state. Further guidance on this is available in Cardiff Council Local Flood Risk Management Strategy (LFRMS) and Culverting Policy. ‘</p>
Paragraph 7.515	Should the quiet areas be on the Constraints Plan?
Council Response	The Council confirm these will be added to the adopted version of the Constraints Map.
Policy MW1	Have the planning permissions referred to in this policy been implemented? If not, is there a potential scenario where they may lapse?
Council Response	The Council confirm that the planning permissions have all been implemented at the sites listed under criteria (i) to (iv) listed in the policy.
Policy MW7	Given that PPW paragraph 5.14.7 says that it is important that both mineral resources and the minerals related infrastructure to deliver these resources are safeguarded, should policy MW7 seek to safeguard related infrastructure?
Council Response	<p>The Council agree that this requirement needs to be referenced in the plan but consider Policy SP11 and MW6 are the most appropriate place to reference this as the resources safeguarded under policy MW7 have no infrastructure associated with them as they are not being actively worked and are protected for future generations.</p> <p>Given this it proposed to amend the plan as follows (additional wording shown in bold):-</p> <p>Amend criteria (ii) and (v) of policy SP11 to state:</p>

	<p><i>‘(ii) Protecting existing mineral reserves and related infrastructure and safeguarding potential resources of limestone and sand and gravel from development that would preclude their extraction;’</i></p> <p><i>“(v) Safeguarding wharves and related infrastructure from development that would prevent their use for landing marine dredged sand and gravel; and”</i></p> <p>Amend first sentence of policy MW6 to state:</p> <p><i>“The sand wharves and related infrastructure shown on the proposals map will be protected against development which would prejudice their ability to land marine dredged sand and gravel.”</i></p>
Policy MW8	Would waste uses be acceptable on protected employment land and premises?
Council Response	<p>In response the Council note that with a move to a more circular economy, the movement of materials up the waste hierarchy and the promotion of the re-use and recovery of existing materials, many modern waste facilities fall within the B2 and B8 use classes.</p> <p>In practice, waste facilities may be no different in terms of operating impact and appearance from many other industrial facilities and processes typically found within existing industrial areas.</p> <p>Given this, applications for waste facilities would be assessed against the economic policies in the same way that other general industrial uses would be. Provided that the criteria outlined in the policies were met, many waste uses would be acceptable on protected land and premises.</p>
Policy MW8	How would sites proposed for waste facilities be assessed under policies EC5A, EC5B and EC7?
Council Response	The Council confirm that proposed waste management facilities would not be considered an alternative use of protected industrial land and premises for the reasons set out above so these policies would not be relevant.