



# Local Development Plan 2021 > 2036

Cardiff Council - May 2026

## Cardiff Replacement LDP Examination

~~CD06~~ Council Response to  
Comments and Questions raised  
on Gypsy and Travellers in ID04



[www.cardiffldp.co.uk](http://www.cardiffldp.co.uk)



02920 872087



[LDP@cardiff.gov.uk](mailto:LDP@cardiff.gov.uk)

Mae'r ddogfen hon ar gael yn Gymraeg/  
This document is available in Welsh



## **CD06: Council Response to Comments and Questions raised by the Inspectors on Gypsy and Travellers in ID04**

### **Gypsy and Travellers**

1. We have significant concerns regarding the Plan's approach to meeting the needs of Gypsies and Travellers in terms of the proposed quantum of provision, the allocation at Pengam Green, and the proposed extension to the Rover Way site.
2. Contrary to the advice in the Development Plans Manual (DPM) the evidence base does not include a site selection/assessment process. In response to our request for the site selection process, the Council stated it would produce a paper outlining the work done to demonstrate the proposed allocation at Pengam Green complies with national policy and is deliverable.
3. In producing its report the Council should consider the following matters in relation to the allocation at Pengam Green and the proposed extension to the Rover Way site. The Council's report should be produced to inform the Gypsy and Traveller hearing session, the deadline for submission is 15 May 2026.

### Number of pitches

4. The Housing (Wales) Act 2014 places a legal duty upon local authorities to ensure accommodation needs of Gypsies and Travellers are properly assessed and the identified need for pitches is met. Planning Policy Wales (PPW) requires local authorities to assess accommodation needs of Gypsy and Traveller families and allocate sites to meet the identified need. Where a Gypsy and Traveller Accommodation Assessment (GTAA) identifies unmet need, a planning authority should allocate sufficient sites to ensure that the identified pitch requirements for residential and transit use can be met (4.2.36).
5. The 2024 GTAA identifies a need for 117 permanent and 10 transit pitches. Since the publication of the GTAA 4 pitches have been granted planning permission adjacent the Shirenewton Gypsy and Traveller site.
6. No site is allocated to meet the identified need for transit pitches. The GTAA does not, as implied in paragraph 7.77 of the LDP, recommend the 10 transit pitches could or should be provided by other authorities in South-East Wales. Unless an agreement for the timely delivery of transit pitches in a suitable location to meet Cardiff's identified need has been reached with another authority in South-East Wales, the LDP would not comply with PPW.

7. Policy H11 allocates Pengam Green with, at best, 80 pitches, at least 33 short of the identified need. Further, this provision would only be temporary. Unless the Council can provide compelling evidence to the contrary, as drafted the LDP does not comply with the Housing (Wales) Act 2014 and PPW and fails the tests of soundness.

**Response:**

The Council acknowledges its statutory responsibilities under the Housing (Wales) Act 2014 and the requirements of Planning Policy Wales (PPW). The Replacement LDP has been prepared on the basis of the most recent Gypsy and Traveller Accommodation Assessment (GTAA) ([RLDP42](#)), and the authority remains committed to ensuring that identified needs are met over the plan period. PPW recognises that delivery can be achieved through a combination of allocations, planning permissions, and ongoing engagement with neighbouring authorities. The plan therefore adopts a balanced and deliverable approach consistent with national policy.

The 2024 GTAA identifies a need for 117 permanent pitches and 10 transit pitches. The Council has already begun addressing this requirement through a recent planning permission for 4 pitches adjacent to the existing Shirenewton Gypsy and Traveller site. This demonstrates that need is not solely dependent on strategic allocations and that windfall provision continues to play a meaningful role. The Replacement LDP reflects this pattern of delivery and provides a framework capable of responding to need as it arises through Policy H10 which sets out a framework for assessing proposals that come forward during the plan period.

With regard to transit provision, the Council continues to work collaboratively with neighbouring authorities through established regional mechanisms. PPW encourages such cross-boundary working, particularly where transit needs may be more effectively met at a regional scale. Welsh Government have commissioned Gypsy Traveller Wales to undertake research on transit provision across Wales which when published will help inform and strengthen the understanding of transit needs in Wales and inform ongoing discussions at a regional scale.

The Replacement LDP does not rule out provision within Cardiff; rather, it recognises that the most appropriate location for transit pitches may emerge through ongoing research and regional discussions. The plan therefore retains sufficient flexibility to accommodate transit provision should a Cardiff-based site ultimately be required.

Policy H11 provides a significant allocation at Pengam Green, capable of delivering up to 80 permanent pitches. This represents a substantial contribution towards meeting the identified need and significantly will meet the short-term need for 73 pitches identified in the 2024 GTAA.

The temporary nature of the allocation relates to the wider regeneration context of the Pengam Green area and does not undermine its ability to contribute effectively in the short to medium term. The wider regeneration of the Pengam Green area will enable

the existing Rover Way Gypsy and Traveller site to be improved and expanded to meet long term needs for Gypsy and Travellers. When considered in this context and the potential for additional sites to come forward, the Council considers that the LDP provides a sound and deliverable strategy that aligns with the Housing (Wales) Act 2014 and PPW.

### Site selection

#### *Biodiversity - step-wise approach*

8. In identifying sites Circular 5/2018, Planning for Gypsy, Traveller and Showpeople Sites sets out a number of considerations. These include, amongst other things, regard for areas of international, national and local importance for biodiversity.
9. The site lies wholly within the Pengam Moor Site of Importance for Nature Conservation (SINC). PPW recognises SINC's make a vital contribution to delivering an ecological network for biodiversity and resilient ecosystems and should be given protection in development plans (6.4.31). PPW Figure 13 indicates development proposed in SINC's must be subject to the step-wise approach. The first step is to avoid damage to biodiversity and, where harm may occur, decision makers will need to be satisfied that any reasonable alternative sites that would result in less harm, no harm or benefit have been fully considered.
10. In order to comply with national policy the site selection process must show the step-wise approach has been followed and demonstrate there are no reasonable alternative sites that would result in less harm, no harm or benefit. In looking at reasonable alternatives, we expect the site selection process to include meeting the identified need through the provision of smaller sites as advised in Welsh Government guidance, Designing Gypsy and Traveller Sites.

#### **Response:**

The Council recognises the need to take account of areas of biodiversity importance when identifying sites for Gypsy and Travellers.. These considerations have informed the site assessment process. The Circular does not preclude development within or adjacent to designated biodiversity sites; rather, it requires that such matters are appropriately assessed and that any potential impacts are understood and mitigated. The Council has undertaken initial ecological appraisal work to support the allocation, and work is ongoing on refining this evidence as part of the preparation of a detailed ecological assessment study in connection with the forthcoming submission of a planning application through the development management process.

In relation to the Pengam Moor Site of Importance for Nature Conservation (SINC) designation the Council note that PPW recognises the important role of SINC's in contributing to ecological networks, and the Council has approached the allocation with this in mind. The step-wise approach referenced in PPW Figure 13 has been

applied proportionately at the plan-making stage. Initial ecological assessments indicate that impacts can be managed and that mitigation and enhancement measures are achievable. The presence of a SINCC does not automatically preclude allocation; rather, it requires that impacts are understood and that reasonable alternatives are considered. The Council's evidence demonstrates that this process has been undertaken.

The site selection process has considered a wide range of potential locations, including smaller sites, in line with Welsh Government's *Designing Gypsy and Traveller Sites* guidance. The assessment concluded that smaller sites were either unavailable, undeliverable, or insufficient to meet the scale of need identified in the GTAA. The Pengam Green site represents the only realistic and deliverable option capable of meeting a substantial proportion of the identified need within the plan period. The Council is satisfied that reasonable alternatives have been examined and that the allocation reflects the most appropriate balance between deliverability, environmental considerations, and the statutory requirement to meet identified need.

*Biodiversity - Severn Estuary Special Area of Conservation (SAC), Special Protection Area (SPA) and Ramsar site*

11. The site lies within the core recreational catchment of the Severn Estuary SAC, SPA and Ramsar site. Policy BG7 resists development which would result in an increase in visitor pressure. LDP paragraph 7.395 indicates the best approach to mitigating recreation impacts is at a strategic level, likely through contributions to Strategic Access Management and Monitoring (SAMM) or Suitable Alternative Greenspace (SANG).

- When will a SAMM or SANG strategy be developed?
- What is the impact of the need to produce a SAMM or SANG strategy on the delivery of the proposed allocation at Pengam Green in terms of timing and financial viability?

NB; these questions apply equally to the proposed extension to the Rover Way site and other allocated sites within the core recreational catchments of the Severn Estuary and Cardiff Beech Wood designations.

**Response:**

The Council recognises that the site lies within the core recreational catchment of the Severn Estuary SAC, SPA and Ramsar site defined in the Habitat Regulations Assessment (HRA) of the Replacement LDP. Policy BG7 is designed to ensure that development does not lead to unmitigated increases in recreational pressure on these internationally designated sites. The Replacement LDP acknowledges that the most effective means of addressing such impacts is through a strategic approach, including potential contributions to Strategic Access Management and Monitoring (SAMM) and/or the provision of Suitable Alternative Natural Greenspace (SANG).

Work on a strategic mitigation framework is already underway through ongoing collaboration with Natural Resources Wales and neighbouring authorities. This reflects the cross-boundary nature of recreational impacts and the need for a consistent regional approach. The development of a SAMM or SANG strategy will be aligned with the early phases of the plan period to ensure that mitigation is in place ahead of, or alongside, delivery of the Pengam Green allocation.

In terms of timing and viability, the Council's position is that the requirement for SAMM or SANG does not prevent the allocation from coming forward. The scale of the allocation allows for mitigation costs to be factored into delivery, and the Council will continue to refine viability evidence as part of the plan's monitoring and implementation framework. The same approach applies to the proposed Rover Way extension and other allocations within the relevant catchments. The Council is confident that strategic mitigation can be secured without undermining deliverability.

12. LDP Policy BG1 resists development that would cause harm to designated sites. The Habitats Regulations Assessment (HRA) supporting the LDP states the planning application for the proposed use would need to be supported by surveys and, if habitat within or adjacent to the site supports significant populations of designated bird species, avoidance measures and mitigation will be required. A site specific HRA is likely to be needed to ensure the proposed use would not result in adverse impacts on the integrity of the Severn Estuary designations (paragraph 7.76). Without these surveys and a site specific HRA, how can we be certain the site is suitable for development and can deliver 80 pitches in the identified timescales? (PPW, 4.2.36).

**Response:**

Policy BG1 requires that development does not cause harm to designated sites, and the Habitats Regulations Assessment (HRA) has been undertaken in accordance with the Conservation of Habitats and Species Regulations. The HRA identifies that a project-level assessment will be required at the planning application stage, supported by appropriate ecological surveys. This is standard practice for allocations located within ecological catchments and does not indicate that the site is unsuitable; rather, it reflects the need for detailed, seasonally appropriate survey work that cannot be completed meaningfully at the plan-making stage.

The requirement for a site-specific HRA does not prevent the allocation from being considered sound. The plan-level HRA has concluded that, with appropriate mitigation, the allocation is capable of being delivered without adverse effects on the integrity of the Severn Estuary designations. The detailed surveys and mitigation measures will be secured through the development management process, ensuring compliance with PPW paragraph 4.2.36. The Council is satisfied that there is no evidence to suggest that the site cannot deliver the anticipated number of pitches within the plan period.

As set out above the detailed survey work is already underway to inform the forthcoming submission of a planning application through the development management process.

### *Location*

13. Welsh Government guidance, Designing Gypsy and Traveller Sites states if a location is considered inappropriate for conventional housing on the grounds of health and safety, it should also be considered inappropriate for a Gypsy and Traveller site. Further, a Gypsy and Traveller site should not be located in areas which will have a detrimental effect on the general health and well-being of residents (3.21).

### **Response:**

The Council is aware of the guidance in Designing Gypsy and Traveller Sites, including the principle that locations unsuitable for conventional housing on health and safety grounds should also be considered unsuitable for Gypsy and Traveller accommodation. This guidance has informed the site assessment process. The presence of nearby industrial uses does not automatically preclude allocation; rather, it requires that potential impacts are understood and that appropriate mitigation can be secured. It is also noted that the site is located adjacent existing residential development. The Council's evidence indicates that these matters can be addressed through detailed design and development management controls.

14. We have viewed the proposed allocation and question whether it is acceptable to allocate a site for residential directly opposite a large steel works, which due to its age, we assume has no limits on hours of operation. Further, during our brief visit we observed a number of HGVs delivering to the steelworks and other businesses off Seawall Road.

### **Response:**

The proximity of the steelworks and associated industrial activity has been considered as part of the site assessment. The Council acknowledges that the proximity of the steelworks operates and the HGV movements that occur along Seawall Road. Initial assessments indicate that these factors do not, in principle, prevent residential occupation, provided that appropriate mitigation is incorporated. The plan-making stage is not intended to replicate the level of detail required for a planning application; however, the Council is satisfied that the site is capable of accommodating development subject to further technical work at the planning application stage.

15. Has the site been tested for contamination?

**Response:**

The Council has undertaken preliminary desk-based assessments of potential contamination risks. These indicate that contamination can be addressed through standard investigation and remediation procedures at the planning application stage. This is consistent with national policy and common practice for brownfield allocations. There is no evidence to suggest that contamination constraints would prevent delivery of the site.

16. Developing this site for residential occupation would appear to conflict with LDP Policies SP4(xii), PC1, H9(ii) (iii) and H10(i)(ii)(iii), the latter being the criteria based policy relating to new Gypsy and Traveller sites. We acknowledge the advice relating to noise sensitive development in paragraph 7.519 is directed at transport infrastructure but the same principles apply. Will the noise limits set out in paragraph 7.521 be achieved? Has any regard been given to air quality?

**Response:**

The Council does not consider that the allocation conflicts with Policies SP4, PC1, H9 or H10. These policies require that issues such as noise, air quality, and amenity are appropriately assessed and mitigated. These issues will be addressed through detailed layout, design and acoustic treatment as part of the ongoing preparations for submission of a planning application. Air quality has also been considered, and the site is not located within or adjacent to an Air Quality Management Area. As set out above detailed assessments will be required at the planning application stage, but the Council is satisfied that the site can meet the relevant policy requirements.

17. In addition to biodiversity, Circular 5/2018 requires consideration to be given to access to health and education services and accessibility by modes other than the private car. Due to their nature, Seawall Road and Rover Way are not conducive to walking or cycling.

**Response:**

Circular 5/2018 requires consideration of access to services and sustainable travel. The site is located within reasonable proximity of health, education and other essential services, and is accessible by public transport. While Seawall Road and Rover Way present challenges for walking and cycling, the Council will explore opportunities for improved pedestrian and cycle connections as part of the site's development and wider master planning of the Pengam Green area. The allocation does not preclude such improvements and provides a basis for securing them through the planning process.

18. We have significant concerns regarding the suitability of this site for residential accommodation. We would expect the site selection/assessment process to have taken account of these matters in reaching a conclusion Pengam Green is the most suitable place to meet the identified need.

**Response:**

The Council acknowledges the concerns raised regarding the suitability of the site for residential occupation. These matters have been considered through the site selection and assessment process, which examined a wide range of potential locations. The assessment concluded that Pengam Green represents the most realistic and deliverable option capable of meeting a substantial proportion of the identified need. Significantly this location is supported by the majority of the Gypsy and Traveller community who want to locate within this area due to proximity to family members and established access to healthcare, education and community facilities. The Council is satisfied that, with appropriate mitigation and further technical work at the planning application stage, the site is suitable for allocation and capable of delivering the required pitches within the plan period.

*Design*

19. Welsh Government guidance, *Designing Gypsy and Traveller Sites* states new sites should comprise 20 pitches or less, other than in exceptional circumstances and where consultation and engagement have taken place with all stakeholders. *Gypsies and Travellers Wales (41)* say they are not clear what engagement there has been with the Gypsy and Traveller communities. However the guidance goes on to state a high level of unmet need does not necessarily suggest sites in excess of 20 pitches should be developed and local authorities should explore other avenues to develop smaller sites in the first instance.
20. We expect the site selection process to have explored meeting the identified need on a number of smaller sites, including the proposed extension to Rover Way.

**Response:**

The Council recognises the guidance in *Designing Gypsy and Traveller Sites*, which advises that new sites should generally comprise no more than 20 pitches unless exceptional circumstances apply and appropriate engagement has taken place. The scale of the identified need in Cardiff is substantial, and the Council considers this to constitute an exceptional circumstance requiring a strategic response. The guidance does not prohibit larger sites; rather, it requires that their justification is clearly evidenced. Significantly larger sites are not unique to Cardiff given the scale of need in the city and the Council already has a proven track record of successfully managing a large site at Shirenewton which comprises 59 pitches.

As set out above the Council has undertaken engagement with Gypsy and Traveller communities through the GTAA process, ongoing liaison with representative groups, and targeted consultation. Significantly this location is supported by the majority of the

Gypsy and Traveller community who want to locate within this area due to proximity to family members and established access to healthcare, education and community facilities. This engagement will continue as the site progresses towards the planning application stage and delivery. The Council's position is that the scale of the Pengam Green allocation is justified by the level of unmet need and the limited availability of suitable alternative sites.

The site selection process did consider the potential for meeting need through a number of smaller sites. However, the assessment concluded that smaller sites alone could not deliver the scale of provision required within the plan period. Many smaller sites were unavailable, undeliverable, or constrained to the extent that they could not meaningfully contribute to the identified need. The Pengam Green allocation therefore represents the only realistic and deliverable option capable of addressing a significant proportion of the requirement. The Council remains open to smaller sites coming forward through the development management process, but the evidence demonstrates that reliance on smaller sites alone would not meet statutory obligations under the Housing (Wales) Act 2014 or PPW.

#### *Ownership and delivery*

21. In its representation, Welsh Government (62) raise ownership of Pengam Green as an issue. If the Council does not own the site, what discussions have taken place with the landowner, are they willing to sell/lease and what progress has been made in securing the site for the proposed use?

#### **Response:**

The Council can confirm that the site is now in its ownership having been purchased from Welsh Government in 2025.

22. What progress has been made in firming up proposals to extend and improve the Rover Way site, realigning Rover Way and master planning the Pengam Green area?

#### **Response:**

The Council note that the proposed extension and improvement of the Rover Way site, the realignment of Rover Way, and the wider master planning of the Pengam Green area are interrelated components of a broader regeneration strategy for this part of the city. Work on these elements is progressing in parallel with the Replacement LDP process and Cabinet agreed in July 2025 that consultants be commissioned to prepare a masterplan for the recently acquired Pengam Green site.

The realignment of Rover Way is being explored as part of ongoing transport and infrastructure planning, with the intention of improving safety, connectivity and access to key development sites. The Pengam Green master planning work is at an early but

active stage, with the aim of ensuring that future development—including the proposed Gypsy and Traveller allocation—comes forward in a coordinated and coherent manner.

The Council's position is that these parallel workstreams do not prevent the allocation from being delivered within the plan period. Rather, they provide a framework for ensuring that development is integrated with wider infrastructure improvements and long-term regeneration objectives.

#### Conclusion – Gypsy and Travellers

23. The LDP fails to make provision to meet the identified need for permanent and transit pitches. No sites are proposed to meet transit need. The proposed allocation at Pengam Green (Policy H11) would, at best, provide temporary accommodation for 80 pitches against an identified permanent need of 117.
24. The site is in a SINC. Without evidence of a site selection process, we cannot be satisfied the allocation complies with the step-wise approach.
25. In the absence of surveys/HRA, we cannot be satisfied developing the site would not have an adverse effect on the Severn Estuary SAC, SPA and Ramsar site.
26. Given the proximity of the steel works and heavy industrial traffic along Seawall Road, we are concerned regarding the suitability of this site for residential occupation which would appear to conflict with LDP Policies SP4, H9, H10 and PC1.
27. In the absence of a site selection process we are unable to conclude the Council has explored other avenues to develop smaller, permanent sites to meet the identified need.
28. For the reasons given above, we do not consider the LDP's approach to the allocation of sites to meet the identified need of gypsy and travellers meets the tests of soundness.