



Local Development Plan 2021 > 2036

Cardiff Council - May 2026

Cardiff Replacement LDP Examination

CD07 Council Response to
Inspectors Supplementary
Questions on Regional
Collaboration in ID09



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Cardiff Council

Replacement Local Development Plan 2021 to 2036

Examination

Inspectors' supplementary questions

1. We have reviewed the Council's responses to our initial questions and comments that are provided in '*CD05 Council Response to Comments and Questions raised by the Inspectors in ID04*'. This note is addressed to the Council and sets out matters on which we require further information or clarification.
2. Not all the matters we wish to explore are set out in this note. The Hearings programme sets out the topic areas we will cover through the examination, and the Hearings agendas set out further questions in relation to these topics.

Regional Working and Collaboration

3. We note the Council's answers regarding a future Strategic Development Plan (Question 2) and Collaborative Working (Questions 3 and 4); and we have reviewed the supporting evidence referred to by the Council including the '*Regional assessment of future growth and migration for the Cardiff Capital Region*' (LDP 36), the '*Summary of Regional Collaboration*' (RLDP 28), and the '*Strategic Flood Consequences Assessment*' (RLDP 43).
4. Whilst we acknowledge the work undertaken by the Council in this area and the regional collaborative structures that have supported discussions and work on regional issues, we are not clear how this work has shaped the strategic and the spatial choices made in the LDP.
5. We wish to better understand the relationship between regional evidence, collaboration and the spatial choices made in the Plan, and what those choices may mean in practice for the wider Cardiff Capital Region. This will assist us in understanding how the Plan reflects Cardiff's role within the region, and that the Council has demonstrated that it has exhausted all opportunities for joint working and collaboration on both plan preparation and the evidence base.
6. Against that background, we would be grateful if the Council can please explain:
 - a. how they have considered the implications of the Plan's spatial strategy for the wider Cardiff Capital Region, including consideration of matters such as the distribution of housing, employment, retail, leisure and other strategically significant uses on neighbouring authorities in relation to matters including

population change, housing, economic activity, transport movements, congestion, environmental considerations and infrastructure;

Response:

The Council has considered the implications of the Plan's spatial strategy for the wider Cardiff Capital Region through the following ways:

- **Aligning the Plan with regional and national policy and regional evidence** - The Plan's spatial strategy aligns with *Future Wales* and the identification of Cardiff within a national growth area. In this respect it is important to note that Welsh Government have confirmed the plan is in 'general conformity' with *Future Wales*. The Council has also used regional demographic, and economic evidence prepared at Cardiff Capital Region (CCR) scale (RLDP36) (e.g. population and migration projections, labour market analysis) to understand how its growth assumptions interact with neighbouring authorities in terms of population/jobs growth, travel patterns and how the growth in population and jobs aligns with *Future Wales* and recently adopted or emerging LDP strategies.
- **Using a brownfield-focused housing and employment strategy to manage regional growth and migration** - The Plan focuses new housing on brownfield land, existing commitments and regeneration areas, with no new strategic greenfield allocations beyond the existing sites identified in the adopted LDP. This is intended to accommodate a fair share of regional growth within Cardiff and reduce pressure for overspill onto neighbouring authorities' greenfield land. By planning for an "ambitious but realistic" level of growth, the Council has considered how under or over-provision in Cardiff would affect migration, affordability and displacement of demand to other CCR authorities.
- **Reinforcing regional economic and retail roles** - The Plan reinforces Cardiff's regional economic role by focussing employment land in accessible, central and regeneration locations, supporting Cardiff's function as the regional economic hub while complementing, rather than duplicating, neighbouring authorities' employment strategies. Retail and leisure policies maintain Cardiff as the primary regional centre but are underpinned by retail capacity/impact work to avoid undue harm to neighbouring town centres (RLDP41). This shows explicit consideration of regional shopping patterns and cross-boundary trade draw.
- **Assessing cross-boundary transport implications** - The transportation evidence base (RLDP15) assesses commuting flows, including cross-boundary movements within the CCR. Growth is directed to locations that can be served by rail, bus and active travel, supporting the South Wales Metro and aiming to limit car-based commuting from/to neighbouring authorities.
- **Appraising cumulative environmental effects** - The Integrated Sustainability Appraisal (RLDP22) and Habitats Regulations Assessment (RLDP23) consider

cumulative and cross-boundary effects on air quality, climate, biodiversity and flood risk, recognising that these impacts extend beyond Cardiff's boundary. In addition, retaining green wedges and avoiding new strategic greenfield sites helps protect the landscape setting, ecological networks and separation between Cardiff and neighbouring settlements.

- **Engaging with neighbouring authorities** - preparation of the RLDP has involved structured engagement with neighbouring authorities, regional bodies and Welsh Government. Through this, Cardiff has discussed housing numbers, employment roles, transport and infrastructure so that the spatial strategy works as part of a coherent CCR-wide pattern of growth.
 - b. how regional-level evidence and collaborative work (including LDP36, RLDP28 and other relevant regional evidence) has been used to identify, understand and respond to the regional impacts arising from **Cardiff's spatial and land-use choices;**

Response:

The Council has used regional-level evidence (including LDP36, RLDP28 and other relevant regional evidence) and collaborative working with neighbouring authorities and Welsh Government to identify and understand the regional implications of the Plan's spatial strategy. This evidence has directly shaped a brownfield-focused, sustainable travel-oriented approach that supports Cardiff's regional role while managing cross-boundary impacts on neighbouring authorities.

The Plan's spatial strategy has not been developed in isolation. It is explicitly framed within Future Wales which identifies Cardiff within a National Growth Area and is informed by regional evidence listed above.

The Council has used Cardiff Capital Region wide demographic modelling (LDP36) to understand population/jobs growth, travel patterns and how the growth in population and jobs aligns with Future Wales and recently adopted or emerging LDP strategies across the region. This reinforces the decision to pursue an ambitious but realistic growth level that accommodates Cardiff's fair share of regional demand whilst avoiding overspill pressures on adjoining authorities.

The Council has drawn on economic evidence to identify Cardiff's role as the regional employment centre, understand labour market catchments and cross-boundary commuting patterns, ensure employment land provision complements, rather than competes with, neighbouring authorities' economic strategies and supports a spatial strategy that focuses jobs on public-transport-oriented locations, reducing regional congestion impacts. This ensures that Cardiff's employment land choices strengthen the Cardiff Capital Region economy.

The Council has drawn on retail evidence (RLDP41) to maintain Cardiff's role as the primary regional retail centre, assess trade draw and potential impacts on neighbouring town centres and ensure that major retail/leisure proposals do not undermine the vitality of centres in adjacent authorities. This demonstrates consideration of cross-boundary economic effects.

The Council has drawn on transport evidence (regional transport planning, Metro planning, RLDP15) to understand the cross-boundary commuting flows, congestion hotspots and network capacity, the role of the South Wales Metro and regional bus/rail corridors and how concentrating growth in central and corridor locations can reduce car dependency across the Cardiff Capital Region. This evidence directly shapes the Plan's sustainable transport orientated spatial strategy.

The Council has used environmental assessments to evaluate (The Integrated Sustainability Appraisal (RLDP22), Habitats Regulations Assessment (RLDP23) and Strategic Flood Consequence Assessment (CD02)) cross-boundary ecological networks and protected sites and flood risk interactions with neighbouring authorities. This ensures that Cardiff's land-use choices do not export environmental or infrastructure pressures to adjoining authorities.

The use of the evidence set out above has directly influenced the Plan's spatial strategy which proposes a brownfield-led housing strategy, reducing pressure on neighbouring authorities' greenfield land, high-density, mixed-use growth in accessible locations, supporting regional transport objectives, protection of green wedges and settlement gaps, safeguarding regional landscape and ecological functions, employment land consolidation in strategic, well-connected areas, and reinforcing Cardiff's regional economic role without undermining neighbouring centres.

- c. how consideration of regional impacts and relationships has informed specific spatial and land-use decisions made in the Plan, and where this is evidenced in the Plan or its supporting documents;

Response:

Cardiff's spatial and land-use choices have been directly shaped by the need to manage cross-boundary impacts on housing markets, commuting flows, economic activity, retail patterns, environmental assets and infrastructure across the CCR. These influences are explicitly evidenced throughout the Plan and its technical papers.

Regional demographic evidence (reinforced the decision to pursue an ambitious but realistic growth level that accommodates Cardiff's fair share of regional demand whilst avoiding overspill pressures on adjoining authorities.

Regional transport planning and Metro planning showed that focusing growth in areas with strong regional rail/bus connectivity would reduce car-based commuting into and out of Cardiff. This supports regional mode-shift objectives and reduces congestion

impacts on neighbouring authorities. This is evidenced in the Plan strategy which places an emphasis on sustainable transport orientated development, the Transportation Background Paper (RLDP15) and *Future Wales* Policy 33 which relates to regional connectivity and Metro integration.

Regional economic evidence (RLDP36) identified Cardiff as the Cardiff Capital Region's primary employment centre, with a labour market extending well beyond the city boundary. The Plan therefore protects existing employment land and focuses new employment in accessible locations to support the regional economy without undermining neighbouring authorities' employment allocations. This is evidenced in the Plan strategy and economic policies.

The retail evidence showed that Cardiff functions as the primary regional retail centre (RLDP41). The Plan therefore supports the city centre while managing out-of-centre retail to avoid negative cross-boundary impacts. This is evidenced in the Retail Background Technical Paper (RLDP14) and the Plan strategy and retail policies.

To manage growth the Plan retains green wedges and avoids new greenfield strategic sites to prevent coalescence and protect regional ecological networks. This is evidenced in the Green Wedge Study (RLDP45) and Special Landscape Area Study (RLDP44).

Finally, air quality, carbon emissions, flood risk and biodiversity impacts extend beyond Cardiff's boundary. The Plan's sustainable transport oriented, brownfield-focused strategy is designed to reduce regional emissions and protect shared environmental assets. This is evidenced in the Integrated Sustainability Appraisal (RLDP22) and Habitats Regulations Assessment (RLDP23).

- d. to what extent Cardiff and its regional neighbours have considered whether regionally significant needs or uses (such as for example major employment or leisure development) could be met elsewhere within the wider Cardiff Capital Region, and how this consideration has informed the spatial strategy set out in the Plan; and

Response:

The Council and regional neighbours have considered whether regionally significant needs or uses could be met elsewhere in the CCR, through regional evidence, joint working, and consideration of policy alignment with *Future Wales*. This has directly shaped the Plan's spatial strategy.

Future Wales identifies Cardiff as the primary economic and service centre for the region, the main focus for higher-order employment, retail and leisure uses and a key location for high-density, sustainable transportation-oriented growth. Neighbouring authorities have complementary roles (e.g., strategic industrial land in Rhondda Cynon

Taf, logistics in Newport, aerospace/advanced manufacturing in the Vale of Glamorgan). This regional role-sharing forms the baseline for deciding where regionally significant uses should go.

The Employment Land Review ([RLDP36](#)) and Cardiff Capital Region economic evidence examined the distribution of strategic employment sites across the region, labour market catchments and commuting flows and the suitability of different authorities for different employment types. This concluded that large-scale industrial/logistics uses are often better located in Rhondda Cynon Taf, Newport or the Vale of Glamorgan, where land availability and motorway access are stronger but high-density office, knowledge-based and service-sector employment is most appropriately located in Cardiff, given its regional transport accessibility and labour market draw. Given this the plan focuses on this type of employment, consistent with its regional economic role.

The retail and Leisure study ([RLDP41](#)) concluded that Cardiff remains the primary regional retail and leisure centre, but growth must be managed to avoid harming other centres given this the Plan supports city centre focused retail/leisure, not out-of-centre expansion.

Regional transport planning and Metro planning assessed where major trip-generating uses should be located to minimise regional congestion. This concluded that high-density, regionally significant uses should be located where regional rail/bus connectivity is strongest. Given this Plan concentrates major employment and mixed-use development in central Cardiff.

- e. how the Council has engaged with neighbouring authorities specifically on the regional and cross-boundary implications of Cardiff's spatial strategy, and what evidence there is, beyond the absence of representations, that those authorities understand, support or align with the spatial and land-use choices made in the Plan and their potential effects.

Response:

The Council has undertaken structured, ongoing engagement with neighbouring authorities at each stage of preparation of the Replacement LDP (RLDP), specifically to address the regional and cross-boundary implications of its spatial strategy. This engagement goes beyond statutory consultation and is evidenced through joint working, shared evidence base studies, regional forum and formal responses from neighbouring authorities.

The Council participates in regular CCR planning, transport and economic development groups. These forums have been used to share emerging demographic,

economic and transport evidence and ensure alignment with the emerging Strategic Development Plan (SDP). The Council holds bi-monthly meetings with neighbouring authorities through the South East Wales Strategic Planning Group (SEWSPG). This enables discussion of cross-boundary issues such as housing markets, commuting, retail hierarchy, green wedges and transport corridors and sharing and commissioning joint evidence.

Neighbouring authorities have been involved in several jointly commissioned regional studies, which have informed Cardiff's spatial strategy. These include the regional assessment of Future growth and migration for the Cardiff Capital Region ([RLDP36](#)). This defines Cardiff's role as the primary regional employment centre and identify complementary roles for other. This alignment shows that neighbouring authorities support Cardiff focusing on high-density, service-sector employment rather than exporting major employment uses.

Regional transport planning and Metro planning have been developed collaboratively through Transport for Wales and CCR partners. Neighbouring authorities therefore understand the need for Cardiff to concentrate growth in sustainable transport locations, the regional benefits of reducing long-distance car commuting and the cross-boundary implications of Cardiff's transport choices

The question asks specifically for positive evidence, not just "no one objected". The Council can point to several forms of affirmative alignment.

- Welsh Government confirmed that the Plan is in 'general conformity' with *Future Wales*, which sets out a regional strategy for South East Wales. This implies that Cardiff's spatial strategy aligns with the regional roles and relationships set out for all CCR authorities.
- Newport and the Vale of Glamorgan confirmed in their responses to the Preferred Strategy confirmed they had no objection to the proposed level of growth and spatial strategy.
- Several CCR authorities adopted or emerging LDPs reinforce Cardiff's role as the regional centre and plan for complementary employment functions. This demonstrates strategic coherence.

Cardiff's spatial strategy reflects regional engagement by focusing major employment and leisure uses in Cardiff, consistent with regional roles, avoiding new strategic greenfield allocations that would create cross-boundary sprawl, concentrating growth in sustainable transport locations to reduce regional congestion and ensuring housing provision meets Cardiff's share of regional need. These choices directly respond to issues raised in regional discussions.

7. In seeking this information, we emphasise that we are not examining a Strategic Development Plan, nor are regional-level spatial strategies or alternative regional land-use options before us. Our examination is focused on Cardiff's Replacement Local Development Plan, and on understanding how the spatial and land-use choices it makes for Cardiff have been informed by regional evidence, collaboration and the context provided by Future Wales, and how their implications for the wider Cardiff Capital Region have been considered. Our aim is to clarify the relationship between Cardiff's Plan and the wider regional framework, and it is not to assess or determine a regional spatial strategy.
8. The Council should provide a response no later than 15 May 2026.

A Thickett

Inspector

G Hall

Inspector