



Local Development Plan 2021 > 2036

Cardiff Council - May 2026

Cardiff Replacement LDP Examination

Hearing Session 11
Heritage

CD18 Council Statement in
Response to Inspectors Questions
in ID08k



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Cardiff Council
Replacement Local Development Plan
Examination

Hearing Session 11 – 14.00-17.00, 18 June 2026

Virtual
Heritage

Issue - Whether the LDP's policy approach to heritage assets is appropriate.

1. Opening and introductions

2. Policy Approach

2.1 Non-designated historic assets do not enjoy statutory protection. Does the LDP seek to extend the statutory protection afforded to designated historic assets and their setting to non-designated heritage assets?

Response:

The Council confirms that the Plan does not seek to extend the statutory protection afforded to designated historic assets and their setting to non-designated heritage assets. It is considered that Policy SP14 appropriately distinguishes between designated historic assets and non-designated historic assets with regards to statutory protection.

Policy SP14: Protecting and Enhancing Built Heritage and Culture affords appropriate strategic policy protection for Cardiff's historic environment as required by legislation and Planning Policy Wales.

With regard to non-designated heritage assets Policy SP14 provides appropriate protection for locally listed buildings and other features of local interest that contribute to the visual and cultural distinctiveness of the city. Paragraph 6.115 further sets out that Policy SP14 identifies the significance of locally listed buildings have in forming the character of an area and refers to the guidance which sets out the weight their designation may have in the assessment of development proposals.

It is noted that the policy HE1 does not provide absolute clarity however, and therefore the Council propose the following amendments following amendments to criterion (1), (2) and (3) of Policy HE1 (additional text shown bold and underlined deletions shown as strikethrough). It is proposed that this amendment is included in the forthcoming Matters Arising Changes consultation.

*'1. Development that has an impact on a ~~heritage asset~~ **designated heritage assets or locally listed buildings** will be expected to preserve or enhance its*

significance and/or setting, and make a positive contribution to its character or appearance.'

*'2. Applications which affect the significance of any **designated** heritage asset will be required to provide sufficient information to demonstrate how proposals would contribute to the asset's conservation. This will be set out in a Heritage Impact Statement, following best-practice guidance within Cadw's Heritage Impact Assessment in Wales.'*

*'3. Substantial weight will be given to the conservation of the city's **designated** heritage assets **and locally listed buildings**. Any harm to the significance of a designated or ~~non-designated heritage asset~~ **locally listed building** must be justified. Proposals will be weighed against the public benefits of the proposal: whether it has been demonstrated that all reasonable efforts have been made to sustain the existing use, find new uses, or mitigate the extent of the harm to the significance of the asset, and whether the works proposed are the minimum required to secure the long-term beneficial use of the asset.'*

2.2 Policy HE1(2) refers to any heritage asset but Cadw's Heritage Impact Assessment in Wales does not require the submission of Heritage Impact Assessments for non-designated assets. Should the policy be amended to reflect that?

Response:

The Council note that the amendments made in response to question 2.1 above have been made to reflect this, with further explanation included within the next answer.

2.3 Is it appropriate to assess the demolition of locally listed buildings against the criteria applied to listed buildings? (Policy HE1(5)(v)).

Response:

The Council note that the Welsh Government has given powers to Local Authorities to create Article 4 Directions without referring to the Welsh Ministers, in part to protect Locally Listed Buildings from demolition, as set out in Section 4.3 of Cadw Guidance *Managing Lists of Historic Assets of Special Local Interest in Wales* as well as a letter by Deputy Minister for Arts and Sport, Dawn Bowden to LPA's dated 28 September 2022 on Local Listing of Historic Buildings (attached at Appendix 1).

TAN 24 section 6.13 requires the loss of buildings in Conservation Areas to be treated in the same way as proposals to demolish Listed Buildings, by following section 5.16 of TAN 24.

Section 1.16 of TAN 24 does not preclude the use of Heritage Impact Assessments (HIAs) for designated or non-designated assets, stating; *In addition, certain*

planning applications for development require a design and access statement. Requirements for design and access statements are prescribed by legislation, but could include certain types of planning application which could have an impact on historic assets. Planning authorities should provide advice to applicants on where these statements are required in order to assist in determining consent applications impacting on existing historic assets. When both a design and access statement and a heritage impact statement are required the planning authority should advise what is necessary for each to avoid duplication.

It is therefore considered reasonable to extend the requirement for HIAs to Locally Listed Buildings where an Article 4 is applied as an appropriate and proper way to assess impact. Similarly, the provision of section 6.13 TAN in assessing demolition of a building in a Conservation Area also indicated that this is an appropriate criteria to also be applied in the exceptional situations (highlighted in *Managing Lists of Historic Assets of Special Local Interest in Wales* *Managing Lists of Historic Assets of Special Local Interest in Wales*.) where an Article 4 direction has been applied to remove the PD for demolition.

3. Matters Arising Changes

3.1. Change policy EN9 (current plan) to Policy HE1 in paragraph 7.257?

Response:

The Council agree and will include this in the forthcoming consultation on the Matters Arising Changes.

4. Action Points

Appendix 1: Letter from Deputy Minister for Arts and Sport, Dawn Bowden dated 28 September 2022 on Local Listing of Historic Buildings

Dawn Bowden AS/MS
Dirprwy Weinidog y Celfyddydau a Chwaraeon, a'r Prif Chwip
Deputy Minister for Arts and Sport, and Chief Whip



Llywodraeth Cymru
Welsh Government

Leaders and Chief Executives of all Local Authorities in Wales

Chairs and Chief Executives National Park Authorities in Wales

Heads of Planning, Local & National Park Authorities in Wales

28 September 2022

Dear Sir / Madam,

LOCAL LISTING OF HISTORIC BUILDINGS

I am writing to you about the protection of buildings of special local interest in Wales, and the importance of ensuring that such buildings receive proper consideration in the planning system in Wales.

Historic buildings are a precious part of our heritage. They help to create Wales's distinctive character and contribute to our identity and sense of place. They are also important to our quality of life, help us to understand our history and are a resource for future generations to enjoy and appreciate. However, there are increasing examples of locally important historic buildings being demolished often in the face of concerns and objections from local communities.

Buildings that are of special architectural or historic interest at the national level are protected by Cadw through listing under the Planning (Listed Buildings and Conservation Areas) Act 1990. However, there are many other historic buildings that do not meet this national threshold, but which are nevertheless significant locally. These buildings are often held in high regard by local communities for their contribution to local character and memory. The rate of loss of these locally important historic buildings is of concern to me. Too often I receive requests to intervene from local communities who are seeking to protect buildings that are important to them and where they feel their voices are not being heard. As a national body, it is right that Cadw has responsibility for identifying buildings of special interest at a national level, but it is appropriate for the identification and protection of locally important buildings to be provided at the local level by local authorities.

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Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

[Planning Policy Wales \(PPW\)](#) sets out the Welsh Government's national planning policy for the protection of the historic environment and provides local planning authorities with the ability to identify historic assets of special local historic interest through local lists. PPW outlines how local planning authorities can identify and give greater protection to those assets through the planning system by developing local lists and appropriate policies for their conservation and enhancement in Local Development Plans (LDPs), which can be a powerful tool for the protection of local character. Importantly, local listing also provides an opportunity for a community to have a voice in the identification of historic assets of special local interest and in caring for them appropriately. Cadw has provided helpful guidance at the following web link [Historic assets of special local interest | Cadw \(gov.wales\)](#). Furthermore, the demolition of buildings that are included on such a "local list" can be regulated by the local authority making an "Article 4 direction" under the Town and Country Planning (General Permitted Development) Order 1995.

We cannot continue to lose these buildings through permitted development rights without any proper democratic scrutiny. Retaining, and possibly adapting, such buildings can add to the value and quality of the places within which we live and avoid what can sometimes be perceived as inferior and unimaginative modern development. These buildings tell the story of Wales, and the evolution of our way of life, and highlighting them for special consideration can also contribute to our Climate Change Strategy.

We have a particular responsibility to future generations to ensure that owners do not destroy, without proper scrutiny, a legacy of historic buildings that illustrate important aspect of our past lives. These locally important historic buildings represent what makes our communities special and include physical evidence of our past achievements and activity. Therefore, I strongly encourage each authority in Wales to take up the option of "local listing" so that we can rely on local democracy as the mechanism to decide what happens to these buildings in the future. It is also important that such lists are kept up to date and that we make use of the statutory provisions, like Article 4 Directions, to regulate the indiscriminate demolition of such buildings.

My officials in Cadw are ready to meet your conservation teams to discuss how all this may be achieved.

I look forward to your reply.

Yours sincerely,



Dawn Bowden AS/MS

Dirprwy Weinidog y Celfyddydau a Chwaraeon, a'r Prif Chwip
Deputy Minister for Arts and Sport, and Chief Whip