



# Local Development Plan 2021 > 2036

Cardiff Council - May 2026

## Cardiff Replacement LDP Examination

Hearing Session 2  
Housing Strategy

CD09 Council Statement in  
Response to Inspectors Questions  
in ID08b



[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



**Cardiff Council**  
**Replacement Local Development Plan**  
**Examination**

---

**Hearing Session 2 – 09.30, 10 June 2026**

**County Hall**

**Strategy**

**Issue – Will the brownfield-first approach, only carrying over greenfield allocations, deliver?**

**1. Opening and introductions**

**2. Strategic**

2.1. Do the figures attributed to the allocations and assumed windfalls take account of plan requirements such as, open space, play areas, allotments, food growing space, SuDs, tree replacement, energy efficiency, securing good quality and sustainable design?

**Response:**

The Council confirms that the figures attributed to the allocations and assumed windfalls do take account of these policy requirements on the basis that each site must meet these requirements as they are embedded through the plan's policies and evidence base. Those larger greenfield allocations on strategic sites all either benefit from signed S106 agreements and/or are embedded through site masterplans. In this way all necessary transport and community infrastructure is not only identified, but secured through planning obligations.

The Plan sets out a wide suite of policies covering open space, play areas, allotments, food growing, SuDs, tree replacement, energy efficiency, and sustainable design. These appear across the plan's strategic and detailed policies, including sections on Open Space, Health, Wellbeing and Food, Biodiversity and Green Infrastructure, Net Zero and Climate Change, and Design.

This means the requirements are embedded through policy and the Plan assumes that developers will meet obligations such as:

- Open space and play provision
- Allotments and food-growing space
- SuDs and water management
- Tree replacement and green infrastructure
- Energy efficiency and net-zero design
- High-quality, sustainable design standards

These are secured through planning conditions, Section 106 agreements, and Supplementary Planning Guidance (SPG).

The plan's windfall allowance is based on historic delivery trends that already reflect development coming forward under similar policy requirements. The allowance is deliberately modest and has been subject to sensitivity testing to ensure that it remains robust even when accounting for the full suite of design, environmental and open-space standards. As such, the windfall contribution is not dependent on unrealistic densities or on sites that would be unable to meet policy expectations.

In conclusion the Plan assumes these detailed requirements will be secured at planning application stage through the planning policy framework set out above. For these reasons, the figures attributed to allocations and windfalls are sound, justified and deliverable, and they fully reflect the plan's requirements for open space, play areas, allotments, food-growing space, SuDs, tree replacement, energy efficiency and sustainable design.

2.2. Do the figures attributed to the allocations and assumed windfalls take account of viability, particularly on brownfield sites which may be contaminated and plan requirements such as affordable housing, public transport, infrastructure, education in addition to those above?

**Response:**

The Council confirm that the figures attributed to allocations and assumed windfalls in the Replacement Deposit LDP appropriately take account of viability at the plan-making level. The Council has prepared a comprehensive Viability Assessment (Avison Young, 2024) ([RLDP38](#)), which tests a range of development typologies, including brownfield sites that may involve contamination or abnormal costs. This assessment incorporates the cumulative impact of key policy requirements such as affordable housing, transport improvements, infrastructure and education contributions.

The approach is consistent with Planning Policy Wales and the LDP Manual, which require viability to be assessed strategically rather than through detailed appraisals of every individual site. The Council's methodology ensures that the overall housing strategy is realistic, with brownfield assumptions informed by both viability testing and Cardiff's strong historic record of brownfield delivery. The windfall allowance is similarly grounded in long-term evidence and reflects the city's established pattern of redevelopment.

The plan also includes appropriate flexibility for site-specific viability considerations to be addressed at application stage, ensuring that policy requirements can be applied pragmatically where justified. Where viability evidence is provided and

independently verified, developments will be considered on their planning merits, having due regard to the legally binding tests for obligations under the 2010 CIL Regulations.

Overall, the Council's evidence demonstrates that viability has been robustly considered and that the allocations and windfall assumptions are sound, deliverable and aligned with national guidance.

### 2.3. Should the LDP specify minimum densities? (Policy SP3(1c) & SP4(ix)).

#### **Response:**

The Council consider that the Plan should not specify minimum density standards. While the efficient use of land is an important objective, imposing fixed minimum densities would reduce flexibility, risk undermining design quality, and fail to reflect the varied character, constraints, and development contexts across Cardiff. The existing policy wording in SP3(ic) and SP4(v) already provides an appropriate strategic framework without the need for prescriptive numerical thresholds.

The Council consider that flexibility is essential to achieving good design and placemaking minimum density standards can inadvertently prioritise numerical output over context-responsive design, lead to over-development on constrained or sensitive sites, undermine the ability to create well-designed, mixed, and distinctive neighbourhoods and restrict the use of innovative layouts, typologies, and design solutions. PPW emphasises placemaking, not density maximisation. A rigid minimum density requirement risks conflicting with this core principle.

Cardiff's development context is highly varied, Cardiff contains dense inner-urban areas, suburban neighbourhoods with established character, regeneration sites, and areas with heritage, landscape, flood risk, or infrastructure limitations. A single set of minimum densities cannot meaningfully or fairly apply across such diverse contexts. Site-specific design responses are essential, and these should not be predetermined through blanket density thresholds.

Many of Cardiff's future housing sites (especially windfalls) are brownfield, often with abnormal costs, fragmented ownership and infrastructure deficits. Imposing minimum densities could force schemes into forms that are not viable and delay delivery or deter investment. A flexible, case-by-case approach is more consistent with the Plan's viability evidence and delivery strategy.

The Plan includes requirements for open space and play provision, SuDs and green infrastructure, tree planting and biodiversity, high-quality design, active travel and transport integration and energy efficiency and climate-resilient layouts. These requirements often reduce net developable area. A minimum density standard could create policy conflict, forcing applicants to choose between meeting density targets and delivering essential placemaking and environmental outcomes.

The Council consider the existing policy framework is sufficient as Policies SP3(ic) and SP4(v) already require efficient use of land, optimised density, high-quality design and sustainable development patterns. This provides a clear strategic direction without imposing rigid numerical standards. Further detail can be addressed through design guidance, site-specific masterplans, development management and transport and accessibility assessments. This approach ensures flexibility, responsiveness, and context-appropriate outcomes.

In conclusion the Council consider the Plan should not specify minimum densities. A prescriptive approach would reduce flexibility, risk poor design outcomes, undermine viability on brownfield sites, create conflict with other policy requirements and fail to reflect Cardiff's diverse development contexts. The Council consider that the existing policy wording already provides a robust and appropriate framework for ensuring efficient land use while allowing site-specific design responses. Maintaining this flexible approach is essential to ensuring the Plan remains effective, deliverable, and aligned with placemaking principles.

#### 2.4. Have the requirements of Policy H8 informed the windfall estimate?

##### **Response:**

The Council's approach to windfall estimation is appropriate and justified. Windfall projections are correctly based on robust historic delivery trends, which already reflect Cardiff's long-standing policy environment, the predominance of brownfield development, and the typical constraints affecting small sites. Policy H8 Change of Use of Residential Land or Properties does not materially alter these underlying conditions and therefore does not necessitate a recalibration of the windfall estimate.

PPW and the Development Plans Manual is clear that windfall allowances should be based on compelling evidence of past delivery, they should reflect realistic expectations of future supply, and they should not rely on speculative assumptions about unknown sites. Cardiff's windfall estimate follows this guidance. Historic windfall delivery has been strong, consistent, and resilient, even under policy frameworks that already required high design standards, amenity protection, SuDs, Green infrastructure, parking and access requirements and energy efficiency measures.

The requirements in Policy H8 reflect long-established design principles, existing SPG guidance, national placemaking policy and requirements already applied through development management. As such, the policy does not represent a step-change in the regulatory environment for small sites. Historic windfall delivery has occurred within a broadly similar policy context, meaning past trends remain a reliable indicator of future performance.

Windfall development in Cardiff comes from a wide range of sources, including small brownfield plots, conversions and subdivisions, redevelopment of under-used land, changes of use and infill opportunities within established neighbourhoods. This diversity makes windfall delivery inherently resilient. Policy H8 does not constrain these sources; if anything, it provides greater clarity and consistency, which can support delivery rather than hinder it.

The Plan's viability assessment supports the windfall assumption and tests small-site typologies, demonstrates that development remains viable across the city and confirms that the cumulative policy burden is deliverable. This provides a sound basis for concluding that Policy H8 will not materially reduce the capacity or viability of future windfall sites.

Requiring the windfall estimate to be recalculated to reflect each element of Policy H8 would be disproportionate, introduce unnecessary complexity, risk double-counting policy impacts already captured in viability testing and provide no meaningful improvement in accuracy. The current approach is consistent with national guidance, evidence-based, and proportionate to the role of windfalls in the overall housing supply.

In conclusion the windfall estimate is sound, justified, and appropriate. While Policy H8 has not directly informed the numerical windfall allowance, this is entirely consistent with national guidance and with the established method for deriving windfall projections. Historic delivery trends remain a robust and reliable basis for forecasting future windfall supply, and the requirements of Policy H8 do not materially alter the conditions under which windfalls have historically come forward. The Council's approach should therefore be supported.

2.5. Has the requirement in Policy H9 to demonstrate no overriding need to retain the existing use on unallocated sites informed the windfall estimate?

**Response:**

The Council's approach to windfall estimation is appropriate and justified. The windfall estimate is correctly based on historic delivery trends, which already reflect the long-standing need to justify the loss of existing uses in Cardiff's urban area. Policy H9 Change of Use or Redevelopment to residential use on Unallocated Sites does not introduce a new or materially different test compared with existing practice and therefore does not necessitate recalibrating the windfall projection.

Policy H9 requires applicants on unallocated sites to demonstrate that there is no overriding need to retain the existing use; and that the proposed residential use is appropriate in planning terms. This is a continuation of established development management practice, reflecting national policy on protecting employment and community uses, existing LDP policies, long-standing SPG guidance and standard

evidence requirements for change-of-use proposals. It is not a new or restrictive policy that would significantly alter the supply of windfall sites.

Windfall delivery in Cardiff has historically been strong, consistent, predominantly brownfield and largely involving changes of use or redevelopment. Crucially, these historic windfalls have already been subject to the same type of justification now formalised in Policy H9. Applicants have long been required to demonstrate that existing uses are no longer viable, that alternative uses have been explored and that residential development is appropriate and justified. Therefore, the windfall estimate (based on past delivery) already incorporates the practical effect of this requirement.

The purpose of Policy H9 is to clarify the evidence expected, ensure consistency in decision-making and provide transparency for applicants. It does not introduce a new or more onerous test. By formalising existing practice, Policy H9 may even support windfall delivery by giving applicants clearer expectations and reducing uncertainty.

There is no evidence that Policy H9 will reduce windfall supply. The requirement to justify loss of existing uses has not constrained windfall delivery in the past nor does it introduce a materially different threshold that would reduce the number of sites capable of coming forward. Nor would the policy affect viability or deliverability in a way that undermines the windfall allowance. Given the diversity of windfall sources (conversions, small redevelopment sites, infill plots, and changes of use) the requirement in H9 is unlikely to materially affect overall supply.

Significantly the Council's approach aligns with national guidance which requires windfall estimates to be evidence-based, trend-led, realistic and not speculative. Recalculating the windfall estimate to reflect individual policy requirements (such as H9) would be disproportionate, methodologically unsound, inconsistent with national guidance and likely to introduce unnecessary complexity. The Council's approach is therefore proportionate and sound.

In conclusion the requirement in Policy H9 has not directly informed the windfall estimate, and this is entirely appropriate. Historic windfall delivery already reflects the practical effect of justifying the loss of existing uses, and Policy H9 does not introduce a materially different or more restrictive test. The windfall estimate remains robust, evidence-based, consistent with national guidance and appropriate for the Cardiff context. The Council's approach should therefore be supported.

2.6. Only two non-strategic sites are allocated and these are still large, 90 and 150 units. The Housing Led Regeneration Areas have allocations from 200 to 2,310 units. HBF and others argue allocating only large sites discriminates against SME builders. Further redeveloping brownfield sites presents challenges that may be beyond the resources of smaller firms.

**Response:**

The Council consider that the Plan's approach through allocating predominantly larger non-strategic and Housing-Led Regeneration sites is appropriate, justified, and consistent with Cardiff's spatial strategy. While HBF and others argue that this disadvantages SME builders, the evidence indicates that Cardiff's land supply is structurally dominated by large brownfield and regeneration opportunities, smaller sites continue to come forward reliably through windfalls, SMEs are not excluded, as the Plan provides a strong pipeline of small-site opportunities outside allocations, and the scale and complexity of regeneration in Cardiff necessitate larger allocations to deliver infrastructure, remediation, and placemaking that SMEs alone could not viably undertake. The Plan therefore does not discriminate against SME builders; rather, it reflects the realistic development context of a major UK city with limited greenfield land and extensive regeneration needs.

Cardiff is a compact, largely built-out urban authority with limited greenfield land, a high proportion of brownfield and previously developed land, major regeneration corridors and waterfront areas and complex infrastructure requirements. This means that deliverable development opportunities are inherently larger in scale. The Plan's allocations simply reflect the actual pattern of available land, not a policy preference for large developers.

The Housing-Led Regeneration Areas are long-standing regeneration priorities, located in areas requiring major infrastructure investment, dependent on coordinated land assembly, remediation, and master planning and critical to delivering active travel, public transport, and community infrastructure. These outcomes cannot be delivered through fragmented small-site development. Large allocations are therefore necessary to secure comprehensive regeneration and sustainable placemaking.

Although only two non-strategic allocations are between 90 and 150 units, the Plan provides substantial opportunities for SMEs through a robust and historically reliable windfall pipeline of supply, a high proportion of small brownfield plots, conversions, and infill sites, Policy H8, which supports small-site development subject to design and amenity criteria. Windfalls in Cardiff are not speculative; they are a proven, consistent source of supply that SMEs are well-placed to deliver.

The argument that allocating only large sites "discriminates" against SMEs is not supported by evidence because the Plan does not prevent SMEs from delivering windfalls or participating in larger schemes through subcontracting or parcel-based delivery, the structure of Cardiff's land supply (not the Plan's policy choices) results in larger available sites, SMEs typically specialise in small, opportunistic brownfield plots, which the Plan continues to support through its windfall allowance and the

Plan's approach is consistent with national policy, which allows windfalls to play a significant role where justified by evidence. The Plan therefore does not exclude SMEs; it simply reflects the realistic development pattern of a major urban authority.

In conclusion the reliance on larger allocations in the Plan is justified, proportionate, and necessary to deliver the city's regeneration, infrastructure, and housing needs. While only two non-strategic sites are allocated and both are relatively large, this does not disadvantage SME builders, who continue to benefit from a strong and reliable windfall pipeline. The Plan's approach reflects the actual availability of land, supports comprehensive regeneration, ensures infrastructure delivery, and maintains opportunities for SMEs through continued small-site development. The Council's strategy is therefore sound and should be supported.

2.7 Does the size of the allocations and the challenge of redeveloping complicated brownfield sites limit the number of developers able to contribute to meeting the housing targets? Should consideration be given to allocating a range of smaller sites to provide flexibility in sources of delivery?

**Response:**

The Council considers that the Plan's approach is appropriate and sound. The size of the allocations and the brownfield-led strategy do not unduly limit the number of developers able to contribute to housing delivery. Cardiff's development context is characterised by large regeneration opportunities, and the Plan appropriately reflects this. A significant and reliable supply of small windfall sites continues to provide opportunities for SME builders, ensuring diversity in delivery sources without the need to allocate additional small sites. The Plan therefore provides a balanced, flexible and realistic framework for delivery.

Cardiff is a compact, largely built-out urban authority with limited greenfield land, a high proportion of brownfield and regeneration land, major redevelopment corridors (Bay, central areas) and Infrastructure requirements that necessitate coordinated delivery. As a result, the sites capable of making a meaningful contribution to the housing requirement are inherently larger. The Plan's allocations reflect the actual availability of land, not a policy preference for large developers.

The Housing-Led Regeneration Areas are essential to delivering active travel and public transport improvements and community infrastructure, remediating contaminated land, achieving comprehensive placemaking and supporting climate-resilient neighbourhoods. These outcomes cannot be achieved through fragmented small-site development. Large allocations are therefore necessary and justified.

While brownfield redevelopment can involve abnormal costs, complex ownership and infrastructure deficits these challenges are better addressed at scale, where cross-subsidy and coordinated delivery are possible. This does not prevent SMEs

from participating through sub-contracting, parcel delivery, or partnership arrangements and reflects Cardiff's structural land supply, rather than a policy barrier. Breaking large sites into smaller allocations would increase risk, reduce viability, and delay delivery.

Although only two non-strategic allocations fall below 150 units, SMEs are not excluded. Cardiff has a long and consistent history of small-site windfall delivery, a diverse supply of infill plots, conversions, and small redevelopment sites, Policy H8, which provides a supportive framework for small-site housing and a windfall allowance that is evidence-based and robust. SMEs have historically delivered a significant proportion of completions in Cardiff without needing allocations. Allocating additional small sites would therefore add little value, as the market already brings forward such sites organically.

Allocating a range of smaller sites would not improve delivery and could duplicate supply already delivered through windfalls, divert resources away from strategic regeneration priorities, introduce uncertainty into the trajectory and require the allocation of sites that are either constrained, marginal, or already expected to come forward as windfalls. The current approach (large allocations plus strong windfall delivery) provides flexibility, diversity and resilience.

In conclusion the Council considers that the size of the allocations and the challenges associated with brownfield redevelopment do not limit the number of developers able to contribute to meeting Cardiff's housing targets. The Plan's reliance on larger sites is a realistic reflection of the city's land supply and regeneration needs. A broad and reliable windfall pipeline ensures that SME builders remain fully engaged in housing delivery. Allocating additional small sites is not necessary and would not materially improve flexibility or delivery performance. The Council's approach is therefore sound, justified and appropriate.

2.8. The core recreational catchment of the Severn Estuary Special Area of Conservation (SAC), Special Protection Area (SPA) and Ramsar sites and Cardiff Beech Wood SAC are 12.6km and 6km respectively. 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 at a strategic level, likely through contributions to Strategic Access Management and Monitoring (SAMM) or Suitable Alternative Greenspace (SANG). NRW point out a number of allocations are within the core recreation areas, SH1.2, SH1.4, SH1.5, H1.1, H2.2 & H2.3 and it is likely many windfalls will be too.

- i. When will a SAMM or SANG strategy be developed?

**Response:**

The need to mitigate recreational impacts on the Severn Estuary SAC/SPA/Ramsar and Cardiff Beech Wood SAC is recognised in Policy BG7. The Council's approach

through requiring mitigation at project stage and committing to a strategic solution is appropriate, proportionate and consistent with Habitats Regulations requirements. A SAMM or SANG strategy will be developed in parallel with the Plan's implementation, and this does not prevent the delivery of the proposed allocations or undermine the windfall allowance.

A SAMM/SANG strategy will be prepared following adoption of the Plan in partnership with NRW and neighbouring authorities, and will be informed by the HRA recommendations, which identify the need for a strategic mitigation framework. This timing is appropriate because the Plan establishes the policy requirement for mitigation (Policy BG7), the HRA identifies the principle and scope of required mitigation and the detailed design, costing and governance of SAMM/SANG are implementation matters, not prerequisites for plan-making.

This approach is consistent with practice across Wales and England, where SAMM/SANG frameworks are frequently finalised post-adoption but before the determination of relevant planning applications.

- ii. What is the impact of the need to produce a SAMM or SANG strategy on the delivery of the proposed allocations within the core recreation areas in terms of density, timing and financial viability?

**Response:**

There is no material impact on the deliverability of the allocations in terms of density as SAMM and SANG mitigation does not require changes to site densities, does not reduce developable area, and is typically delivered through financial contributions, not on-site land-take. Therefore, the density assumptions underpinning the allocations remain robust.

In terms of timing mitigation can be secured through planning obligations at application stage using interim measures where necessary (e.g., SAMM contributions) without delaying the commencement of development. The requirement for SAMM/SANG does not impose a moratorium on development.

In terms of financial viability SAMM/SANG contributions are expected to be modest and proportionate, consistent with other authorities' experience. There is no evidence that such contributions would undermine viability or delivery.

- iii. Has this been factored into the estimates of windfalls?

**Response:**

Windfall estimates are based on historic delivery trends, which already reflect Cardiff's long-standing proximity to the Severn Estuary SAC/SPA/Ramsar, existing requirements to assess recreational impacts under the Habitats Regulations and

the need for mitigation on a case-by-case basis. Policy BG7 and future SAMM/SANG arrangements do not introduce a new constraint that would materially alter the pattern of small-site delivery.

Windfalls in Cardiff are predominantly small brownfield plots, conversions and infill development within established urban areas. These sites typically generate low recreational pressure, and mitigation can be secured through standardised contributions without affecting viability or deliverability. Therefore, the windfall allowance remains sound and robust.

In conclusion the Council note a SAMM/SANG strategy will be developed post-adoption, in line with standard practice. The requirement for strategic mitigation does not affect densities, viability or delivery timing for the allocations within the core recreation catchments and the windfall estimate remains appropriate, as the need for recreational mitigation has long been a feature of Cardiff's development context and does not represent a new constraint. The Council's approach is therefore sound, justified and consistent with the Habitats Regulations.

### **3. Allocations**

#### **H2.3 – Cardiff Gate Business Park (West)**

3.1. The northern parcel is bounded on 3 sides by commercial uses. Prospective residents would need to drive through an employment area and the site appears divorced from any facilities or services. Part of the northern parcel is used as a car park.

- i. Is the northern parcel suitable for residential use and does the allocation comply with LDP Policies SP4(iv & xii) and PC1?

#### **Response:**

The Council consider that the northern parcel is suitable for residential use and represents a logical sustainable opportunity to introduce residential development into an area undergoing long-term diversification linked to the wider strategic housing site to the east at North East Cardiff. Whilst historically dominated by employment uses, Cardiff Gate Business Park has evolved into a mixed-use environment, with hotels, leisure facilities and food outlets. Residential development would complement this emerging pattern and support the wider strategic aim of creating balanced, sustainable communities. It would also be consistent with the Council's aspirations for connectivity within the wider area. This includes a bus and active travel connection from the business park to the North East Cardiff strategic housing site, and also in the south east of the business park to St Mellons Road and on to St Edeyrns Village.

The Council considers the allocation complies with Policy SP4 (iv) accessibility and permeability as the parcel is within walking distance of food retail, cafes and convenience shopping at Cardiff Gate Services and bus services operate along adjacent routes, providing public transport connectivity to Cardiff and Newport. These bus services are set to be improved with the Council's aspirations to provide a bus and active travel connection through the site from the North East Cardiff strategic housing site to the St Edeyrns Village development as outlined above.

The site is also well positioned relative to the strategic highway network, supporting efficient access to employment, education, and health services. While it is acknowledged that residents would pass through an employment area, this is not unusual in modern mixed-use business parks and does not preclude sustainable living patterns. The proximity of employment opportunities is itself a benefit, reducing commuting distances and supporting active travel.

The Council also considers the allocation complies with Policy SP4(xii) relating to the need to ensure high quality residential amenity and Policy PC1 relating to air, noise and light pollution, as the parcel can accommodate residential development with appropriate mitigation to avoid unacceptable environmental effects. These matters can be addressed at the detailed master planning and application stage.

- ii. Would the southern parcel be accessed off St Mellons Road or Malthouse Avenue? If the latter, does having to drive through an employment area comply with the principles of good placemaking?

**Response:**

As set out above the Council's aspirations for connectivity within the wider area include a bus and active travel connection from the business park to the North East Cardiff strategic housing site, and also in the south east of the business park to St Mellons Road and on to St Edeyrn's Village.

This would mean vehicular access would be via Malthouse Avenue which is considered acceptable and consistent with good placemaking. The Council consider that accessing the southern parcel through the business park presents an opportunity to create a legible, high-quality residential gateway through design interventions such as landscaping, traffic calming, and public realm improvements. PPW encourages integration of uses, not segregation. Passing through an employment area is therefore not inherently negative; it can support vibrancy, natural surveillance, and sustainable travel patterns.

**H2.4 – Roath Dock (North side)**

- 3.2. ABP own the site and has no intention to develop the site for housing. As housing cannot be delivered on this site should the allocation be deleted? If so should land be found to replace the estimated 316 units that would be lost?

3.3. Notwithstanding the above, is Roath Dock (North side) suitable for residential development given the proximity of the port? (Policy MW6).

- i. Would developing this site for residential use comply with LDP Policies SP4(iv & xii) and PC1? Will the noise limits set out in paragraph 7.521 be achieved? Has any regard been given to air quality?
- ii. What regard has been given to the operating conditions of existing businesses and the port? Would residential use undermine the LDP's aim of supporting the port and safeguarding wharves? (Policies SP9 & MW6).

**Response:**

The Council propose that this site is withdrawn from the plan due to representations made by Associated British Ports (ABP), Breedon Trading Limited and the Mineral Products Association (MPA). Statements of Common Ground have been agreed between the Council and these parties to this effect. These changes to the plan will form part of the forthcoming Matters Arising Changes consultation.

**H2.5 - Porth Teigr and Alexandra Head**

3.4. ABP own 7ha of the site and has no intention to dispose of it for redevelopment. Furthermore, ABP argue the developable area is around 11ha not 27ha (Figure 8 ABP's deposit representation).

- i. Should the boundary of the allocation be changed to reflect this?

**Response:**

In response to representations raised by Associated British Ports (ABP) the Council have agreed a revised boundary for the allocation which excludes all land within the operational port. A Statement of Common Ground between the Council and ABP has been agreed to reflect this.

- ii. What would be the revised estimate of units if ABP's land is taken out of the allocation/not released for housing?

**Response:**

The Council have agreed a revised boundary for the allocation with ABP taking out the land within their ownership. This results in developable area of 11 hectares. The Council consider that this remaining land could still deliver a significant proportion of the 2,310 units. The precise reduction would depend on master planning, density, and infrastructure configuration, but the site would still represent a major regeneration opportunity. It is also important to note that the Plan notes the site will be delivered on a phased basis and only assumes 1,000 units will come forward during the Plan period to 2036. This scale of development is considered realistic within this time period.

- iii. What would be the revised estimate of units be if ABP is correct regarding the developable area being 11ha compared to 27ha?

**Response:**

The Council note that urban waterfront regeneration sites typically achieve high densities and the precise reduction would depend on master planning, density, and infrastructure configuration. It is also important to note that the Plan notes the site will be delivered on a phased basis and only assumes 1,000 units will come forward during the Plan period to 2036. This scale of development is considered realistic within this time period.

- iv. If the site cannot deliver 2,310 units, should land be found to replace the units that would be lost?

**Response:**

The Council note that the site will be delivered on a phased basis and only assumes 1,000 units will come forward during the Plan period to 2036. This scale of development is considered realistic within this time period and given this there is no need to find land to replace any reduction in overall numbers.

- v. Land was allocated for residential development here in the 1996 and 2016 plans but did not come forward. What evidence is there it will come forward now?

**Response:**

The Council confirm that there is now stronger evidence of deliverability than in previous plan periods. Significant infrastructure has been delivered since the last plan with completion of the dock side walkway around Roath Basin and market demand for waterfront living in Cardiff has increased substantially. The area is now a mature regeneration location, not an emerging one and the Plan provides a clearer framework for mixed-use development. The Council consider the failure to deliver in earlier plan periods reflects timing and market maturity, not a lack of suitability.

- vi. Would developing this site for residential use comply with LDP Policies SP4(iv & xii) and PC1? Will the noise limits set out in paragraph 7.521 be achieved? Has any regard been given to air quality?

**Response:**

The Council considers the allocation complies with Policy SP4 (iv) accessibility and permeability as the site is highly accessible, served by public transport and close to services, employment and leisure uses. The site is also well positioned relative to the strategic highway network, supporting efficient access to employment, education, and health services.

The Council also considers the allocation complies with Policy SP4(xii) relating to the need to ensure high quality residential amenity and Policy PC1 relating to air, noise and light pollution, as the site can accommodate residential development with appropriate mitigation to avoid unacceptable environmental effects. These matters can be addressed at the detailed master planning and application stage through high quality design which can address noise (through acoustic design, layout, façade treatments), air quality (through modelling, landscaping, EV infrastructure) and amenity (through orientation, open space, buffers). There is no evidence that noise or air quality constraints cannot be mitigated to meet policy requirements.

- vii. What regard has been given to the operating conditions of existing businesses and the port? Would residential use undermine the LDP's aim of supporting the port and safeguarding wharves? (Policies SP9 & MW6).

**Response:**

The Council confirm that the revised allocation has been assessed in full regard to impact on the operating conditions of existing businesses and the port. The detailed master planning of the site will incorporate appropriate mitigation, avoid constraining lawful port operations, maintain access and operational flexibility and respect safeguarded wharves under MW6.

The Council consider the allocation does not conflict with SP9 or MW6 because:

- It does not propose redevelopment of safeguarded wharves.
- It does not require displacement of port activity.
- It supports the wider regeneration of the Bay without undermining port functionality.

The Council note that residential and port uses have already co-existed successfully in Cardiff and many UK waterfront cities.

The Porth Teigr and Alexandra Head allocation remains sound, deliverable and appropriate. The site is a long-term regeneration opportunity, and the LDP provides the appropriate framework for phased delivery, partnership working and mitigation of environmental and operational constraints.

In conclusion the Council note that even with a reduced developable area, the site remains a major regeneration opportunity. The housing estimate is indicative, and the Plan contains sufficient flexibility and there is credible evidence that the site can come forward in this plan period. Noise, air quality and business operations can be mitigated,

and the allocation does not undermine port safeguarding policies. The Council consider H2.5 as amended remains a sound, justified and deliverable allocation.

## **H2.6 – Hadfield Road**

3.5. The site lies in a commercial area and is bounded on 3 sides by commercial uses.

- i. Would developing this site for residential use comply with LDP Policies SP4(iv & xii) and PC1? Will the noise limits set out in paragraph 7.521 be achieved? Has any regard been given to air quality?

### **Response:**

The Council consider that the proposed allocated use of the land for residential purposes is considered acceptable and is considered to accord with the LDP Policies SP4(iv & xii) and PC1 subject to detailed considerations.

The site adjoins an existing residential area, City Gardens, and is reasonably well located in relation to public transport facilities (bus stops and Grangetown train station).

The site (together with additional land to the east) benefits from a resolution to grant outline planning permission for a residential led, mixed use development (Ref: 10/01432/DCI). The proposals included between 230 and 250 dwellings and 5,800 sqm of mixed commercial uses (predominantly Class B1, with some Class A uses). The principle of redevelopment for residential use is therefore firmly established, despite this application now being withdrawn.

Planning conditions can secure a scheme of sound insulation to all proposed habitable rooms, where required, to control the amount of noise that prospective occupiers would be subject to.

Any other potential adverse amenity impact resulting from the development can be mitigated by appropriate conditions. Furthermore, the allocation is reduced in area from the original consent and no longer directly adjoins the Post Office Depot site.

Given the existing use of the site there is potential for some contamination within the site. This matter was considered as part of the previous planning application and was not deemed to be a constraint to development (subject to appropriate planning conditions). The nature of the use of the site has not changed significantly since the previous application.

As part of a redevelopment, proposed commercial uses retaining the commercial frontage along Hadfield Road (within the employment protection boundary - EC3.10) should predominantly be within the B1 use class (which includes offices, light industry

and small-scale studio development) but can also include ancillary A type uses (local shops, café etc). This can be clarified with an additional paragraph in the reasoned justification to Policy H2: Housing Led Regeneration Areas. This would be in the interest of the amenity of future residents.

The site also complies with Policy PC1. Noise assessments will be required at planning application stage. The site is capable of meeting the required internal and external noise standards through acoustic, glazing, mechanical ventilation where necessary, boundary treatments and setbacks and layout design. There is no evidence that noise limits cannot be achieved.

Air quality has been considered at a strategic level through the Plan evidence base. The site is not within an Air Quality Management Area, and residential use typically generates less HGV traffic than commercial uses. Mitigation (landscaping, layout, EV charging) can be secured at application stage. There is no air-quality constraint that would prevent residential development.

- ii. What regard has been given to the operating conditions of existing businesses?

The Council confirm that appropriate amenity safeguards will need to be set out in the proposed design and layout of any residential development at the detailed planning application stage. This will ensure an acceptable standard of residential amenity without compromising the operating conditions of existing enterprises. The Pollution Control Team will recommend appropriate conditions that would secure a scheme of sound insulation to all proposed habitable rooms, where required, to control the amount of noise that prospective occupiers would be subject to. In this respect it is important to note, a residential scheme was considered acceptable on amenity grounds up to the boundary with the Post Office Depot. The allocation no longer directly adjoins the Depot.

- iii. Why is this site not included in EC3.10, Penarth Road Area (includes Hadfield Road and Bessemer Road) Protected Employment Land and Premises?

The Council confirm that this site was put forward as a Candidate Site 32, by The Wholesale Fruit Centre (Cardiff) Ltd for C3 Residential Use.

This site is not included in the current Adopted LDP (2006 to 2026): Existing Employment Land. EC1.10: Penarth Road Area (includes Hadfield Road, Sloper Road, Bessemer Road).

The site has a history of planning consent for mixed use redevelopment, subject to section 106 agreement (subsequently withdrawn), Application ref 10/01432, detailed in question (i).

The site is currently in mixed use, including wholesale and industrial/warehouse activities. However, the Wholesale Fruit Centre no longer performs a primary or strategic employment role. Parts of the site are vacant or under-used, and there is no realistic prospect of intensifying or increasing employment in its current form. The site and its premises no longer meet the needs of future additional occupiers.

The proposed allocation recognises that the brownfield site, which falls within the settlement boundary, is suitable to provide for a high density, sustainable mixed-use development which can contribute to meeting the Plans housing requirements.

According to representations on behalf of the site owners, it is expected that a contractual position will be agreed in the short term, enabling the site to come forward early in the plan period. The site is therefore capable of making an important contribution to housing delivery over the plan period.

With the Council seeking to retain an employment frontage along Hadfield Road, through designating the land as Protected Employment Land :EC3.10 Penarth Road Area (includes Hadfield Road, Sloper Road, Bessemer Road), the allocation will deliver a more intensive and efficient use of the site, delivering both residential development and new employment opportunities, which will increase the level of employment compared to the present situation.

In conclusion the Council note that the site is suitable for residential development and can comply with Policies SP4 and PC1. Noise and air-quality standards can be met through standard mitigation, existing businesses can continue to operate without constraint, and the site is not part of the protected employment cluster, and its allocation for housing is justified. The allocation is therefore sound, deliverable and appropriate.

### **SH1.7 – Former Gas Works, Ferry Road**

3.6. This site was allocated for residential development in the 2016 plan but, with the exception of a temporary permission for 52 units which expires in 2030, has not come forward. What evidence is there it will come forward now?

#### **Response:**

The Council confirm that the site is owned by the Council and included within the Council's Housing Partnership Programme as part of the Council's plans to deliver 4,000 new homes including 2,800 Council homes. Site access and services have already been provided to the site through the temporary use of part of the site for modular accommodation. Given this it is considered that the site is capable of being brought forward once a comprehensive scheme is consented.

- i. Given its former use, what evidence is there the allocation of 500 units is deliverable and can provide 20% affordable housing, open space,

allotments and meet the other requirements such as education contributions required by the LDP?

**Response:**

The Council consider that the allocation is deliverable and the numbers reflect the outcome of high-level master planning of the site undertaken in connection with the adopted LDP. As the site is owned by the Council and in the Housing Partnership programme it is anticipated that the percentage of housing will be higher on the site than 20% and the precise percentage will be determined at the detailed application stage which will also ensure S106 contributions for other requirement such as education.

- ii. Is the site in Flood Zone 3 and, if so, what are the implications for the principle of allocating this site and delivery?

**Response:**

The Council note the Stage 2 Strategic Flood Consequence Assessment confirms that flood risk from both fluvial and tidal sources can be managed to acceptable levels and meet the acceptability criteria set out in TAN15. This is confirmed by Natural Resources Wales in their comments on the Deposit Plan where they advise that this site is suitable as allocation for residential development within the plan subject to detailed matters (design/layout) being addressed at the planning application stage.

### **H1.1 Land at areas 9-12 St Mellons**

3.7. This site was allocated for residential development in the 2016 plan but has not come forward. What evidence is there it will come forward now?

**Response:**

The Council confirm that the site is owned by the Council and included within the Council's Housing Partnership Programme as part of the Council's plans to deliver 4,000 new homes including 2,800 Council homes. Given this it is considered that the site is capable of being brought forward once a comprehensive scheme is consented during the plan period up to 2036.

- i. According to NRW's Flood and Coastal Erosion Risk Map flood risk from the sea is low and flood risk from rivers is under review. What is the current situation?

**Response:**

The Council note the Stage 2 Strategic Flood Consequence Assessment (SFCA) identifies the primary risk of flooding to this site is from tidal sources. The SFCA confirms the site is predicted to be flood free in a defended scenario.

- ii. Part of the site lies in Hendre Road Site of Importance for Nature Conservation. How has the step-wise approach informed the decision to carry over this allocation from the 2016 plan?

**Response:**

The Council confirms that a step-wise approach will be applied and acknowledge this may influence the eventual quantum of development and its layout and design. This and the need for any compensatory offsite provision will be considered at the detailed planning application stage.

- iii. The allocation lies within the core recreational catchment of the Severn Estuary Special Area of Conservation (SAC), Special Protection Area (SPA) and Ramsar sites. What are the implications for the principle of developing this allocation for housing and, if it is deemed appropriate, its delivery?

**Response:**

As set out in the response to 2.8 (ii) above the Council will develop a SAMM or SANG strategy in parallel with the Plan's implementation, and this site will need to provide mitigation in accordance with this strategy. This and any other material considerations will be considered at the planning application stage.

#### **4. Action Points**