



Local Development Plan 2021 > 2036

Cardiff Council - May 2026

Cardiff Replacement LDP Examination

Hearing Session 4
Gypsy and Travellers

CD11 Council Statement in
Response to Inspectors Questions
in ID08d



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Cardiff Council
Replacement Local Development Plan
Examination

Hearing Session 4 – 14.00-17.00, 11 June 2026

County Hall

Gypsy and Travellers

Issue - Whether the LDP makes adequate and deliverable provision for Gypsy and Traveller accommodation.

The Council was given until 15 May to address our concerns regarding the LDP's approach to Gypsy and Traveller provision as set out in our Initial Comments and Questions. Consequently, this agenda may change.

1. Opening and introductions

2. Provision of Gypsy and Traveller Accommodation

- 2.1. 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. Policy H11 allocates Pengam Green with, at best, 80 pitches, at least 33 short of the identified need. Should additional sites be allocated to meet the identified need?

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.

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.

2.2. No site is allocated to meet the identified need for transit pitches, and the Council says these should be provided elsewhere in other County Boroughs.

- i. Is this approach appropriate?
- ii. What has the Council done to secure delivery of 10 transit pitches elsewhere in other County Boroughs?
- iii. If accommodation has been secured, is the location suitable to meet the identified need in Cardiff?

Response:

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 level.

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.

3. Pengam Green

3.1 Is the proposed site at Pengam Green suitable and can it accommodate 80 pitches?

Response:

The Council consider the site can deliver up to 80 pitches and this will be worked up as part of the detailed site design for the site which has been commissioned as part of the ongoing preparations for submission of a planning application for the site. The site is considered suitable as the Council now own this site and the wider Pengam Green area and preliminary studies have shown there are no significant constraints on the site in terms of flood risk, biodiversity and contamination and any impacts can be mitigated as part of the detailed design of the site.

3.2 Has the Council justified the choice of Pengam Green with regard to:

- i. Biodiversity - step-wise approach, including impact on the Severn Estuary Special Area of Conservation (SAC), Special Protection Area (SPA) and Ramsar site?

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.

The Council recognise 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).

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 SINC 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.

- ii. Location, is this site suitable for residential occupation?

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.

- iii. Design/numbers? Welsh Government guidance, *Designing Gypsy and Traveller Sites* states new sites should comprise 20 pitches or less.

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.

4. Action Points