

Cardiff Replacement LDP Examination – Hearing Session 6: Employment

Response on behalf of The Wholesale Fruit Centre (Cardiff) Limited – Representor No: 100

22 May 2026

Introduction

This Further Written Statement responds to Questions 4.1 and 4.5, which relate to the protected employment land and premises allocated through Policy EC3.

This Statement follows previous representations submitted on behalf of The Wholesale Fruit Centre (Cardiff) Limited relating to land allocated as a Housing Led Regeneration Area (H2.6). Part of the site also falls partly within the 'Penarth Road Area' Protected Employment Area (Ref: EC3.10).

By way of an update, Wales & West Housing Association (WWHA) is now close to exchanging contracts on the site. WWHA is looking to commence pre-application dialogue with Cardiff Council shortly, enabling the site to come forward for residential development early in the plan period.

4. Safeguarding and Loss of Employment Land

4.1 *What assessments have been undertaken to inform the safeguarding of sites under Policy EC3, and what do those assessments demonstrate about the likelihood of continued employment use at these sites in practice?*

4.5 *Taken as a whole, are Policies EC3, EC5A, EC5B and EC6 sufficiently robust and coherent to safeguard protected employment land effectively in the face of pressure for alternative uses?*

Given the reliance on brownfield sites to deliver the required number of new homes within the Plan period, it is essential that underutilised employment sites/premises can be repurposed for alternative uses, where appropriate. To ensure the brownfield led growth strategy is not undermined, the RLDP must allow sufficient flexibility for such sites to come forward for alternative uses. Sites should therefore only be safeguarded/protected for employment use were necessary.

A majority of the H2.6 allocation is not identified as a protected employment site in the adopted LDP. A small part of the site does, however, fall within the 'Penarth Road Area' (Ref: EC1.10).

A previous outline planning application relating to site H2.6 (and additional land to the east), proposed a residential led, mixed-use development of 230 – 250 dwellings (Ref: 10/01432/DCI). The application received a resolution to grant outline permission in 2011. As part of the determination of the application, it was accepted that the site was underutilised and the premises no longer met the needs of occupiers.

The 'Proposals Map' for the RLDP shows that part of the H2.6 Housing Regeneration Area (the frontage to Hadfield Road) also falls within the 'Penarth Road Area' Protected Employment Area (Ref: EC3.10). That part of the site would be subject to the provisions of Policy EC3, which protects sites for employment generating B Use Class (B1, B2, B8).

Other than the small area currently shown within EC3.10, the remainder of the allocation site does not fall an employment designation in the adopted or emerging LDP.

As per our previous representations to Policy EC3.10, the entirety of the H2.6 allocation should be removed from the protected employment area. Inclusion of part of the regeneration area within the designation is unnecessary and could unnecessarily impede the delivery of new residential development on the site. There is a risk that when considering future development on the site, the two policies will be at cross-purposes.

The boundary of Policy EC3.10 should therefore be amended, with the area that overlaps Policy H2.6 removed entirely from the Protected Employment Area designation. The revised boundary of Policy EC3.10 would run up to Hadfield Road along this section. This would provide a more logical designation and provide clarity for developers.

The area to be removed from the employment designation represents a very small proportion of the wider EC3.10 allocation. Its removal would not have any significant impact on the aims and objectives of the site allocation or the employment land supply for Cardiff as a whole.

Policy H2.6 allocates the site for housing led regeneration – with a mix of uses allowed for, where appropriate. The policy already allows flexibility for non-residential uses to be considered as part of any future housing led regeneration scheme. By removing the crossover with Policy EC3.10, there will be greater flexibility for an appropriate mix of uses (including non-B Class uses) to be considered through the masterplanning process and in response to market and local needs. If part of the site remains within the Policy EC3.10 designation, it could unduly restrict the redevelopment of the site.

The appropriate mix of uses will be considered by WWA and discussed with the Council through the pre-application and planning application process, which is due to commence imminently.

In summary, it is important that the boundary of the Protected Employment Area EC3.10 is amended. The H2.6 allocation should be removed entirely from the employment designation (rather than sit partly within it). This will enable the site to be brought forward for an appropriate housing-led development through the development management process.

As currently proposed, the two overlapping designations/allocations are not appropriate and could lead to confusion. This could result in a negative impact on delivery of the regeneration site and much needed housing. This could undermine the effectiveness of the Plan itself in delivering the required housing numbers and providing a coherent policy approach to the safeguarding/retention of employment land.

Contact

Gareth Barton



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