



Local Development Plan 2021 > 2036

Cardiff Council - May 2026

Cardiff Replacement LDP Examination

Hearing Session 7
Retail

CD14 Council Statement in
Response to Inspectors Questions
in ID08g



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Cardiff Council
Replacement Local Development Plan
Examination

Hearing Session 7 – 14:00-17:00, 16 June 2026

Virtual

Retail

Issue - Will the LDP strategy and retail policies maintain and enhance the vitality and viability of the Central, District and Local Centres?

1. Opening and introductions

2. Strategic Policies

2.1 How does the Council anticipate the retail sector will change over the plan period; and what would be the implications of those changes for Central, District and Local Centres?

Response:

The retail sector has undergone significant and sustained structural change driven by technological advancement, macroeconomic shocks, including Brexit, the Covid-19 pandemic, and geopolitical instability and evolving consumer behaviour. These factors have combined to fundamentally reshape retail dynamics and reduce the long-term role of traditional comparison retail in centres.

A principal driver of this change has been the growth of e-commerce, which has materially reduced the need for physical retail floorspace, particularly for comparison goods; a trend accelerated by the Covid-19 pandemic and contributing to declining footfall, increased vacancy, and changes in retailer requirements, including portfolio rationalisation by national operators.

Economic conditions have further compounded these structural changes. Inflation and the cost-of-living crisis have constrained household spending, particularly on discretionary goods, while retailers face rising operating costs, including wages, energy, rents, and supply chain pressures. These factors have reduced profitability and limited demand for additional retail floorspace.

Consumer behaviour continues to evolve in ways that reinforce these structural pressures with a shift towards value and convenience, additionally experience - led uses that cannot be replicated online. There is also evidence of increasing consumer awareness of the environmental and ethical implications of their purchases and a

preference for sustainable, locally sourced products, although this is variable and does not consistently translate into reduced demand for mass produced goods such as fast fashion.

The Retail Study provides clear quantitative evidence of these structural trends identifying that by 2036 there is estimated to be a negative capacity for comparison floorspace across the city between -14,621 sq m net and -9,304 sq m net and a net negative capacity for convenience goods floorspace of between -44,755 sq m net and -32,907 sq m net. This range suggests limited growth potential over the plan period and indicates that the issues facing the retail sector is not lack of provision but a need to respond to a potential emerging oversupply, particularly in the comparison goods sector.

The impacts of structural changes on the retail sector are expected to continue to evolve and shape the retail sector over the plan period. While the growth of online retail is likely to moderate as the market matures, its impact will continue to have implications for some bricks and mortar retailers. Physical retail will continue to play a key role, particularly as part of an integrated omnichannel offer which is increasingly becoming the norm across the industry where customers buy online and collect in store. However, demand for retail floorspace, particularly for comparison goods is expected to remain limited as even stores operating with omnichannel have a reduced need for retail floorspace as they no longer need to display their full product range in store.

The plan period is likely to continue to experience limited demand for growth in retail due to the continued pressure on consumer spending with customers remaining price sensitive combined with the ongoing cost pressure on retailers of rising wages and operating costs resulting in tighter profit margins and consumer behaviour with a focus on value, convenience and experience is unlikely to revert. As such, the plan period will be characterised by stabilisation or contraction of retail floorspace rather than expansion and policy needs to focus on making the best use of existing floorspace and supporting managed diversification.

The impact of these changes is uneven across the sector. Comparison goods retailing has been the most affected due to its discretionary nature and compatibility with online shopping. By contrast, convenience retail has demonstrated greater resilience, reflecting the necessity, frequency and immediacy of such purchases and the importance of local provision. However, even these more resilient sectors are subject to cost pressures and consumer expectations.

The Retail Study identified that investing in the consumer experience (for example what is not at home or online) will be the key to the success in securing the future resilience of centres and future proofing centres against ongoing uncertainty. This supports a shift towards more diverse, multifunctional centres.

Implications for the Central Retail Area

The Central Retail Area will remain at the head of the retail hierarchy and continue to serve as the primary comparison retail destination in the region. However, its role is evolving beyond a traditional retail function towards a broader mix of leisure, hospitality, and cultural activities.

The centre has a high concentration of comparison goods retailers (32.9%, Retail Study 2023) occupying large footprints leaving it exposed to structural change and economic instability. This has resulted in large voids in parts of the Central Area.

The Annual Monitoring Report (2025) reflects the current situation and identifies a retail vacancy rate of 17.4% (Q4 2024) in the Central Shopping Area (Central Retail and Commercial Area) suggesting the challenges facing the centre are structural rather than temporary.

As a result, there is a need to manage a transition from a retail -dominated centre to a more diversified and resilient environment. The repurposing of surplus retail floorspace is already underway in the Central Retail Area, including the redevelopment of former department stores. The redevelopment of the former Debenhams site is in progress and will provide a city square, comprising play areas and open space for events. Similarly, proposals for the redevelopment of the former House of Fraser department store will secure the long-term future of a Grade II listed building while creating a mixed-use development comprising residential, hotel, commercial space, and a public square.

Independent businesses including those on offer in Cardiff Market and the Arcades will continue to contribute to the distinctive and experiential retail offer of the centre. While they play an important complementary role it does not offset the structural reduction in demand for large format comparison retail.

Policy Response: Central Retail Area

Policy R1: Retail Hierarchy and Town Centre First Approach and its supporting policies Policy R2 and Policy R3 provides a framework to respond to these structural changes and seeks to support the long term resilience of the centre, recognising and supporting its role and enabling the centre to diversify to create a vibrant, attractive and viable centre and allows for the inclusion of a range of active compatible and complementary uses in the centre where they enhance vibrancy, attractiveness and viability of the centre, rather than compete with retail or displace shops and support regeneration, renewal and enhancement of the centre.

Policy R1 encourages new development or redevelopment in the centre to provide an active ground floor frontage for retail/commercial use to attract new occupants and increase the centre's vibrancy, attractiveness and viability.

Policy R1 also encourages new residential development at the upper floors of properties and on underused and vacant space away from commercial frontages. This provides a valuable contribution to the city's housing stock and positively contributes to the creation of sustainable communities where people live, shop and work. Centres remain busy beyond business hours, increasing surveillance and providing a market for uses associated with the nighttime economy.

Policy R2 Development in the Central Retail and Commercial Area seeks to monitor and manage the diversity of uses in the centre and allows for uses other than retail that enhances the attractiveness, viability and vibrancy of the centre and supports regeneration, renewal, and enhancement of the centre.

Policy R3 Protected Shopping Frontages ensures that the most viable, commercially key areas remain retail focussed where retail continuity and critical mass is preserved and this allows for greater flexibility in secondary areas thereby reducing vacancies, buildings are occupied and active frontages are maintained.

Overall, the policy framework seeks to balance flexibility and protection. This is necessary to ensure that diversification supports, rather than undermines the viability, vibrancy, and attractiveness of the centre.

Implications for District and Local Centres

District centres and Local centres have demonstrated greater resilience to structural retail change due to their focus on convenience goods and essential services and non-retail services such as hairdressers/barbers and beauty salons that are not online. This is evidenced in the Annual Monitoring Report (2025) identifying an average vacancy rate of 9% across all District and Local centres. These centres benefit from frequent, needs-based trips and provide important local functions. While there is competition from larger out-of-centre supermarkets, in an unstable economy spending becomes more local with reduced trips and a focus on nearby centres to make multiple small purchases rather than a large discretionary trip, suggesting that District Centres and Local Centres will become more important for convenience shopping especially for those who cannot access facilities further afield.

The centres, however, are not immune from rising costs and reduced consumer spending and their long-term viability will depend on their ability to adapt and diversify and accommodate additional active uses such as leisure, community uses, workspaces and education uses where they do not displace A1 retail use.

Policy Response District and Local Centres

Policy R1: Retail Hierarchy and Town Centre First Approach and supporting policy , Policy R4 and Policy R5 responds to structural retail change and provides a flexible but managed approach to changes of use in District and Local Centres to reinforce the role and function of the centre as the heart of sustainable communities and provides an opportunity to consider the individual impact of proposals and afford weight to proposals for other uses that positively contribute to the viability, vibrancy and attractiveness of District Centres.

Policy R4 and Policy R5 provide for a conditional and proportionate allowance for non-A1 uses that do not result in unacceptable harm to the vitality, viability and attractiveness of a centre or a frontage resulting in the displacement of an A1 unit or an overconcentration of non-retail, leisure or community uses.

The flexibility provided by Policy R4 and Policy R5 allows for managed diversification. avoids prolonged vacancy and dead frontage and help sustain active, occupied, and vibrant centres. Policy R5, however recognises that Local centres are smaller and more residential in nature than District Centres and proposals other than A1 retail are more difficult to accommodate than in District Centres.

Conclusion

The Retail Study and AMR 2025 provide evidence that structural change in the retail sector is ongoing and evident in centres; demand for comparison goods floorspace is declining and repurposing of surplus retail floorspace in the Central Retail Area is underway.

The retail policy framework responds directly to this evidence. It does not assume continued retail growth and provides a mechanism to manage change, including contraction and diversification.

Directing development to centres remains appropriate given their existing role in the retail hierarchy. At the same time managed flexibility is required to ensure centres can adapt to changing market conditions.

There is a risk that excessive diversification could undermine the core retail function of centres if not carefully managed. The policy framework addresses this through the protection of protected frontages in the Central Retail Area to maintain a critical retail mass; a managed approach to changes of use across all centres and allowing change of use where retail vacancy and weak demand is evident and; supporting the repurposing of surplus retail floorspace where it supports regeneration, renewal and enhances vibrancy and attractiveness of a centre while maintaining the core retail function of centres.

Ongoing monitoring through future AMRs will be critical to ensure the balance between flexibility and protection remains appropriate. Key indicators will include vacancy rates, proportion of A1 and non-A1 uses and change in use class composition.

The evidence demonstrates that the traditional model of retail led centres is no longer sustainable in isolation. The Central Retail Area will continue to function as the primary retail destination but will increasingly operate as a mixed-use, experience-led environment that better reflects the needs of residents, employees and visitors. District and Local Centres will maintain their core retail function while allowing for non-retail uses that are compatible and complementary to their role as mixed-use activity hubs at the heart of sustainable communities.

The long-term viability of all centres will depend on their ability to adapt to reduced retail demand and evolving consumer behaviour, and this requires a managed transition to multifunction places, supported by a flexible but robust policy framework.

2.2 Is there a need for additional retail floorspace over the plan period, and what evidence supports the Council's position?

Response:

Retail and Commercial Leisure Study (2023) produced by Nexus evidence there is no need for additional retail floorspace over the plan period.

The study calculated a negative capacity for convenience floorspace with a quantitative capacity for the County between minus 44,755 sqm net and minus 32,907 sqm net in 2036 and a negative capacity for comparison floorspace with a quantitative capacity for the County between minus 14,621 sqm net and minus 9,304 sqm net in 2036.

The study concluded:

- The quantitative assessment of capacity found there to be no capacity to support further convenience goods floorspace across the City when considered as a whole, by 2036. It is not recommended that any sites are brought forward to accommodate convenience retailing. █
- The quantitative assessment of capacity found there to be no capacity to support further comparison goods floorspace across the City when considered as a whole, by 2036. It is not recommended that any sites are brought forward as part of the Local Plan to accommodate comparison retailing.

2.3 Are the boundaries of the Central, District and Local Centres justified and evidence-based, and is there evidence that each centre is viable, attractive to retail businesses, and accessible to shoppers?

Response:

The boundaries of the Central, District and Local Centres are justified, proportionate, and based on a robust, up-to-date and consistent evidence base.

Methodology

The boundaries are informed by the Retail and Commercial Leisure Assessment Study (2023), prepared by Nexus, which provides a comprehensive assessment of retail and leisure provision across the authority area.

The Study includes detailed health checks of:

- the Central Shopping Area
- 11 District Centres
- 20 Local Centres

These centres align with the adopted retail hierarchy.

Health checks have been undertaken in accordance with TAN 4 and apply a consistent methodology across all centres. They assess a wide range of quantitative and qualitative indicators, including:

- retail composition (convenience and comparison)
- leisure and service provision
- vacancy rates
- environmental quality
- accessibility by all modes
- rental levels and yields
- commercial demand
- turnover and market share (informed by household survey data)
- qualitative perceptions from household survey responses

This ensures a robust, transparent, and consistent basis for assessing the role, function, and performance of each centre.

Retail Hierarchy

Each centre has been assessed against defined Retail Hierarchy Indicators, including scale (number of units), market share, presence of anchor food stores, and provision of community and service use.

The hierarchy is broadly characterised as:

- Central Shopping Area: 500+ units
- District Centres: 50–200 units
- Local Centres: up to 50 units

Whilst St Mellons and Thornhill District Centres fall below the typical unit threshold, both perform a clear district role due to the presence of large supermarkets and the market share for centres broadly supports the retail hierarchy in the Adopted LDP with most centres having convenience and comparison goods market share more than Local Centres.

Based on the assessment no amendments to the adopted Retail Hierarchy were recommended.

Empirical household survey work did not find any notable market shares derived from other centres beyond the 32 centres in the retail hierarchy that would justify their inclusion in the retail hierarchy as a district or local centre.

Furthermore, no significant gaps in retail provision which would be evidenced by expenditure leakage outside of centres which might justify a geographic intervention were identified.

As such no new centres were suggested for inclusion in the retail hierarchy.

Boundary Definition

In relation to the spatial extent of centres, given the negative projected capacity for future floorspace the study concluded there is no pressure to expand centre boundaries to cater for new development.

Based on the health checks, no centre was found to have declined to such an extent that it is no longer viable or had any prospect of retaining or attracting investment to justify its removal from the hierarchy. Similarly, no centre boundaries required rationalisation because of decline and where regeneration initiatives are thought unlikely to be successful to justify boundary changes.

All centres were assessed as functioning and performing their intended role.

The study concluded that for most centres the adopted boundaries are appropriate and reflect the functional extent of each centre and no changes are required.

Boundaries have been defined using a consistent and policy-compliant approach to:

- include areas of active town centre uses.
- exclude peripheral, residential uses.
- avoid over-extension which could dilute policy effectiveness.
- support the application of the sequential and impact tests.

This approach is consistent with TAN 4, including its guidance on defining centres and edge-of-centre locations.

The Retail Study proposed a limited number of minor boundary amendments. These are:

- evidence-led and site-specific
- limited in scale
- necessary to correct anomalies (e.g. inclusion of established uses or removal of areas no longer in active commercial use)

Viability and Attractiveness

The health checks demonstrate that all centres remain viable and attractive and capable of fulfilling their intended role within the hierarchy.

Key findings include:

- the Central Shopping Area continues to operate as a dominant regional destination, albeit transitioning towards a more diverse, mixed-use role
- District Centres perform effectively as accessible convenience and service hubs.
- Local Centres continue to provide essential day-to-day services within neighbourhoods.

The evidence suggests that changes in retail composition, particularly the shift from traditional retail (Class A1) towards food, drink, leisure and service uses represent market adaptation rather than decline. Centres with a broader mix of uses show stronger occupancy levels and resilience, indicating that they remain attractive to operators where there is footfall, accessibility, and appropriate rental levels.

No centre is identified as failing, nor is any centre considered to be at risk of structural decline such that intervention through boundary change or de-designation would be justified.

Accessibility

Accessibility has been robustly assessed and forms a key component of the health check methodology.

The evidence confirms that:

- the Central Shopping Area benefits from excellent accessibility by all modes of transport
- District Centres are located within or adjacent to high-density residential areas and benefit from strong walk-in catchments and public transport provision.
- Local Centres are embedded within residential areas and provide highly accessible and walkable to the catchments they serve.

The Retail Study proposes place specific interventions for public realm improvements and measures to improve ease of movement for pedestrians within centres aimed at raising viability, attractiveness and accessibility to retailers and shoppers but do not necessitate boundary changes.

Conclusion

The evidence demonstrates that the boundaries of the Central, District and Local Centres are:

- justified, based on proportionate and robust evidence.
- effective, providing a clear framework for decision-making.
- consistent with national policy, including TAN 4

The Retail and Commercial Leisure Assessment Study confirms that:

- all centres are viable and performing their intended role.
- centres remain attractive to businesses, notwithstanding changes in use composition.
- centres are accessible and continue to serve their catchments effectively.

No evidence has been identified to justify:

- the designation of additional centres
- the removal of existing centres
- or substantive expansion or contraction of boundaries

Accordingly, the defined boundaries are sound, proportionate and evidence-based and ensures robust, transparent and consistent basis for assessing the role, function and performance of each centre.

2.4 Does Policy SP8 give sufficient weight to the role of retail within the Central Business Area, in the context of wider city centre objectives?

Response:

Policy SP8 gives sufficient and appropriate weight to the role of retail within the Central Business Area (CBA), when read alongside the retail-specific policies in the Plan. Policy SP8 positions retail as one component of a broader, multifunctional Central Business Area aligned with wider economic, social and place-making objectives.

The primary purpose of the CBA, as set out in Policy SP8, is to function as the focus for employment, commercial activity, leisure, culture, and civic uses. Within this context, retail is recognised as an important supporting use that contributes to vibrancy, footfall and activity, but it is not identified as the sole or dominant function.

Policy SP8 supports retail development that complements the overall role of the CBA, particularly where it:

- Contributes to street-level activity and vibrancy.
- Supports footfall for businesses, leisure and cultural attractions.
- Reinforces the city centre’s role as a destination; and
- Integrates effectively with employment, residential and transport uses.

The policy’s flexibility ensures that retail is not displaced or marginalised, but rather integrated into mixed-use schemes where it can best perform its role. This approach allows retail floorspace—particularly smaller-format, convenience and experiential retail—to support workers, residents and visitors while avoiding negative impacts on the viability of retailing in the Central Retail and Commercial Area.

Importantly, Policy SP8 operates alongside the plan’s retail-specific policies, including the retail hierarchy and centre-based policies (e.g. Policies R1, R2, R4, R5 and R7). These provide the primary mechanism for directing retail development—particularly

larger-scale or retail-led proposals—to the most appropriate locations, including the Central Retail Area and Commercial Area and defined centres.

The policy also aligns with the objective of creating a flexible and adaptable city centre. While not over-prescribing retail provision within the CBA, Policy SP8 enables development management to respond to changing market conditions and still supporting retail uses that enhance vibrancy, viability and activity at ground level.

In summary, Policy SP8 gives sufficient weight to role of retail within the Central Business Area, in the context of wider city centre objectives, recognising its contribution to vibrancy and place-making within the Central Business Area, while ensuring that it does not compromise the viability and attractiveness of the Central Retail Area. The policy strikes an appropriate balance between supporting retail and delivering a resilient, vibrant and attractive multi-functional Central Business Area.

2.5 How does the vacancy rate in the Central Retail and Commercial Area compare with the UK average, and does this indicate an oversupply of retail units?

Response:

Savills 19th February 2026 article 'Spotlight: Shopping Centre and High Street – Q4 2025' (https://www.savills.co.uk/research_articles/229130/387975-0) provides the following data for high street vacancy rates in Q4 2025:

“According to Green Street analysis, high street vacancy fell to 13.4% in Q4 2025 and shopping centre vacancy declined to 16.9% — their lowest levels since Q3 2020. This gradual, sustained improvement reflects an underlying momentum in the occupational market; there continues to be marginally more acquisitions than disposals, and demand for the best-located, best-configured space remains firm”.

The 2025 Cardiff City Centre Landuse and Floorspace Survey identifies a vacancy rate of 16.5% within the Central Shopping Area (Central Retail and Commercial Area) at Q4 2025. This figure represents a continuing improvement in vacancy levels over the past four years, having reduced from a post-covid 20.9% in 2021.

Whilst above the 13.4% average, the Central Shopping Area (CSA) does contain a number of large shopping centres, so vacancy rates should be considered in this context against the national average of 16.9%. In addition, a number of vacant units in the CSA form part of areas that are subject to wider regeneration proposals and, if discounted, would reduce the vacancy rate from 16.5%.

It is considered that vacancy levels are comparable with the national average and that the scale and distribution of units within the Central Shopping Area (Central Retail and Commercial Area) provide an appropriate range and choice for retail uses (A1) to meet

shopping needs whilst allowing other commercial uses which complement and are appropriate to the scale and function of the city centre.

The evidence does not indicate a harmful oversupply of retail units requiring contraction of the Central Retail Area boundary, although it does support continued diversification and repurposing of some floorspace.

2.6 How will the retail development described in Policy SP12, which is intended to help achieve liveable, efficient, well-balanced and cohesive communities in Cardiff, be secured and delivered in practice?

Response:

The retail development described in Policy SP12 will be secured and delivered through a combination of the spatial strategy, development management policies, and implementation mechanisms.

Firstly, delivery is embedded within the spatial strategy, which directs retail development to established centres and growth locations (paragraph 6.23 and the Key Diagram). This ensures that new retail provision is aligned with planned housing and population growth, particularly within committed strategic sites and regeneration areas.

Secondly, Policy SP12 is implemented through the retail policy framework, notably Policies R1, R2, R4, R5 and R7. These policies:

- direct retail development to appropriate locations within the defined retail hierarchy (Policy R1), including the Central Retail and Commercial Area, District and Local Centres.
- ensure proposals are of an appropriate scale and function to serve their catchment.
- protect the vitality and viability of centres; and

Together, these policies provide a clear decision-making framework to guide the location, scale and type of retail development.

Thirdly, delivery is secured through masterplanning and site-specific requirements. Retail provision is expected as part of strategic and large-scale developments, including sites of 100+ homes or phased schemes. In these cases, retail—particularly convenience and local services—is planned as an integral component of

neighbourhood design, ensuring provision is aligned with housing delivery and supports walkable communities.

Fourthly, implementation is supported through planning conditions, legal agreements and infrastructure planning, including:

- phasing requirements to ensure retail provision is delivered alongside housing.
- Infrastructure Delivery Plans and viability evidence to ensure provision is realistic and timely; and
- ongoing partnership working with developers, landowners and infrastructure providers.

Finally, Policy SP12 incorporates a degree of flexibility to respond to changing retail formats and consumer behaviour, supporting a mix of retail and service uses to maintain viability and long-term occupancy.

In summary, retail development is secured through:

- the spatial distribution of growth.
- a clear retail hierarchy and policy framework.
- site-specific masterplanning requirements; and
- delivery mechanisms including phasing, conditions and infrastructure planning.

This ensures that retail provision is not only delivered but delivered in a coordinated manner that supports the creation of liveable, efficient, well-balanced and cohesive communities.

3. Detailed Policies

3.1 How will the core retail function of District and Local Centres identified in Policy R1 be maintained, given the range of potential non-A1 uses permitted under the policy?

Response:

Policy R1 maintains the core retail function of District and Local Centres by clearly establishing them in the retail hierarchy as retail-led destinations that meet the day-to-day needs of their catchments. Policy R1 does not provide an open-ended permissive approach to non- A1 uses. Non- A1 uses are supported where they contribute to maintaining the vitality, viability and diversity of centres and this is consistent with objectives in PPW12 to encourage vibrant, viable and attractive centres with a diversity of activity and uses that contribute towards a centre's wellbeing.

Proposals for non-A1 uses are assessed through a robust criteria-based framework, provided by Policies R4, R5 and R8. This framework enables effective control over the scale, type and location of non-A1 uses, including consideration of cumulative impacts. This ensures that A1 retail is not displaced to an extent that would erode critical mass or fragment the continuity of a retail frontage. Accordingly, A1 retail remains the primary and preferred use, with alternative uses required to demonstrate that they support, rather than detract from, the retail function of the centre.

Where non-A1 uses are proposed in units currently or were last in use for A1 retail evidence must accompany an application to demonstrate that units have been actively marketed for A1 use for a continuous period of 12 months ensuring that retail use is genuinely no longer viable.

The range of alternative uses identified in Policy R1 are those that complement the retail function of centres. Such uses can enhance overall centre vibrancy and viability, through generating additional footfall, extending trading hours, and increasing linked trips, thereby supporting the performance of remaining retail units. Other uses, such as B1 offices that are not open to members of the public are permitted above the ground floor. Similarly, new residential development is permitted above ground floor and on underused and vacant space away from commercial frontages.

The flexibility provided by the range of potential non-A1 uses under Policy R1 allows centres to adapt in a controlled manner to the reality of changing retail conditions and consumer behaviour and avoids prolonged vacancy and decline that can arise from overly restrictive policies. By enabling limited and appropriate diversification, the policy framework helps reduce vacancy, maintain active frontages and supports the vibrancy and the long-term health and resilience of district and local centres.

3.2 Does Policy R2 provide a clear, logically structured and effective framework for assessing development proposals within the Central Retail and Commercial Area? In particular, is sufficient clarity provided on how the policy's criteria are intended to operate, interact and be weighted in decision-making? As drafted, for

example, whilst proposals are to be assessed on whether they allow for, or retain, the effective use of upper floors, it is not clear what consequence would follow where this is not achieved, or how this consideration should be balanced against the other criteria.

Response:

Given the wide range of types of premises (units) and existing land uses within the Central Retail and Commercial Area, not all criteria (i-iv) within Policy R2 will be relevant to each planning application. In this regard, it is not considered that the criteria should be weighted.

Regarding retaining the effective use of upper floors, where this has been present in the Local Development Plan 2006-2026, it is considered to have been effective in providing an early indication to applicants of the need to meet this criterion and has been used to inform application discussions. Were a proposal to preclude the effective use of upper floors, the application would be considered on this basis.

3.3 Similarly, is Policy R3 sufficiently clear on how its criteria are to be applied and balanced when assessing proposals involving the loss of Class A1 uses within Protected Shopping Frontages, and should Policy R3 be clearer on the nature and timeframes for marketing requirements?

Response:

Given the wide range of types of premises (units) and existing land uses within Protected Shopping Frontages, not all criteria (i-vi) within Policy R3 will be relevant to each planning application. Applications will be considered against the criteria in Policy R3 relevant to the details of each site.

Regarding timeframes for marketing – Agreed. A two-year timescale could be added, which would be consistent with that sought for vacant office premises (Policy EC6). Suggested wording to be added in bold below:

‘Class A1 (shop) premises that, despite active marketing, have remained unoccupied for over two years will be considered more favourably for changes of use to other, appropriate uses’.

3.4 Noting the Council's proposed changes to Policies R4 and R5, should the reference to a continuous stretch of 3 or more units, vacancy and marketing be retained in the policies rather than their reasoned justifications?

Response:

Agree - the following reference to 3 or more units, vacancy and marketing will be retained in Policy R4 and R5 rather than in their reasoned justifications.

Proposals that result in, or add to a continuous stretch of non-retail, leisure or community uses (3 or more units in a row) will be less favourably considered and applications for such uses will be considered against the following:

- ***The vacancy rate in the centre and/or specific frontage.***
- ***Whether, and for how long, the premises have remained vacant whilst being actively marketed for their existing or previous use.***

3.5 What evidence supports the limited use of protected shopping frontages outside the Central Area, particularly in District Centres?

Response:

Protected Shopping Frontages are currently applied only within the defined Central Retail Area. This approach is supported by the findings of the Cardiff Retail and Leisure Study (Nexus), which provides the principal evidence base for retail policy.

The Study includes a comprehensive health check assessment of centres within the retail hierarchy, considering indicators such as retail composition, vacancy rates, footfall, and overall vitality and viability. This assessment concludes that the Central Retail Area continues to perform strongly across these indicators and retains a critical mass and concentration of retail uses sufficient to justify the continued application of Protected Shopping Frontages.

By contrast, the evidence demonstrates that District and Local Centres do not exhibit the same volume or concentration of retail activity that would necessitate the inclusion of a protected frontage. Retail uses within these centres are typically more dispersed and form part of a broader mix of services, including food and drink, community uses, and other non-retail functions. As such, the Study does not identify any centres outside the Central Retail Area where the proportion or continuity of retail uses would warrant the designation of primary or secondary shopping frontages and suggested it is unnecessary to unduly constrain the availability of potentially beneficial and footfall generating uses by defining Primary or Secondary Shopping Frontages too widely if, indeed, they are required at all.

This approach is further supported by wider structural changes in the retail sector. As set out in Section 4 of the study, the continued growth of online shopping, alongside behavioural changes accelerated by the COVID-19 pandemic, has reduced the need for traditional retail floorspace and increased the importance of flexibility within centres. In this context, an overly restrictive approach to protecting retail uses at ground floor level—particularly in smaller centres—risks undermining their ability to adapt and maintain vitality.

Allowing a broader mix of uses in District Centres can support footfall and activity throughout the day and evening, contributing positively to their resilience and long-term viability. Importantly, where proposals involve a change of use, they remain subject to planning control ensuring that the Council retains the ability to manage harmful impacts on the character or function of centres.

The limited application of Protected Shopping Frontages is also consistent with national planning policy, as set out in Planning Policy Wales (PPW), which emphasises the need to support town centre diversification. PPW recognises that primary and secondary retail areas should be identified where appropriate but does not require their designation in all centres.

Overall, the evidence indicates that while Central Retail Area justifies a protective approach due to its scale and retail function, a more flexible policy framework is appropriate for District and Local Centres. The absence of Protected Shopping Frontages outside the Central Retail Area is therefore proportionate, evidence-based, and aligned with national policy, while enabling centres to adapt to ongoing structural changes in the retail sector.

3.6 Is the Plan's use of the term 'vitality' consistent with current Planning Policy Wales terminology, and if not, does the Council consider any change necessary?

Response:

The Deposit Plan's use of the term '**vitality**' is not fully aligned with the terminology in Planning Policy Wales Edition 12, and a modification is necessary to ensure consistency with national policy.

PPW12 retains limited reference to the term 'vitality' in relation to retail and commercial development. PPW12 consistently refers to vibrancy alongside viability and attractiveness in relation to sustaining and enhancing retail and commercial centres.

In this context, 'vitality' may be interpreted as a narrower, more traditional concept, focused on measurable indicators such as footfall, occupancy rates and retail performance. By contrast, PPW12's use of the term 'vibrancy' recognises retail and commercial centres as hubs of social and economic activity and the focal point for a range of services which support the need of local communities. This encompasses a wider range of considerations, including:

- diversity of uses beyond retail;
- cultural, leisure and evening economy activity;
- social interaction and sense of place; and
- the overall attractiveness and experience of centres.

To ensure consistency with PPW12 and fully reflect the multi-functional role of centres where appropriate, policy wording will be updated to refer to vibrancy, viability and attractiveness.

3.7 Noting the Council's proposed change to Policy HF1, has the Council considered the appropriateness of restricting hot food takeaways in proximity to schools through Policy R8, and what evidence supports the Council's position?

Response:

The Council has considered the restricting hot food takeaways near schools through Policy R8, but the evidence base led to the conclusion that school-based exclusion zones are not the most appropriate or effective mechanism for Cardiff. Instead from a review of national and local evidence, the controlling hot food takeaways guidance paper identifies a clear public health rational and preferred approach for Cardiff.

The evidence reviewed recognises that children and young people can be exposed to hot food takeaways during the school day and on journeys to and from school. However, it also indicates that the relationship between hot food takeaway proximity to schools and health outcomes is not straightforward, with wider factors such as neighbourhood deprivation, local food environments, travel patterns, household circumstances and the overall concentration of outlets also influencing exposure and behaviour.

While exclusion zones around schools can address specific, localised exposure, they would not tackle the wider issue of over-concentration and clustering that has been identified across Cardiff, particularly in areas of higher deprivation.

For Cardiff, the evidence points to a broader planning concern than proximity to schools alone. The local issue is the cumulative impact of hot food takeaway clustering within centres and neighbourhoods, and the way this can reinforce unhealthy food environments in communities already experiencing greater health inequalities. A school buffer would not address this wider spatial pattern.

The preferred approach therefore focusses on managing concentration and clustering of hot food takeaways through Policy HF1, providing a more comprehensive, flexible and equitable planning response (than relying solely on school exclusion zones would allow). This enables the Council to address the broader food environment, better manage cumulative health impacts and inequalities, prevent clustering in local centres, and support a healthier and more diverse mix of retail uses in line with Policy R8.

Policy R8 remains relevant to maintaining the role, vitality and diversity of centres. However, Policy HF1 is considered the more appropriate mechanism for managing hot food takeaway uses where the evidence identifies concentration, clustering and cumulative impact as the key concerns.

3.8 Does Policy R9 require space above commercial premises to be vacant, and how will proposals be assessed where that space is occupied or partially occupied?

Response:

For clarification the reference to 'vacant' has been deleted and references to the loss of offices and community facilities added to the policy (see text in bold below). The revised policy prioritises vacant/underused space. Occupied/partially occupied space is addressed through Policies EC6 and C2.

'R9: CONVERSION TO RESIDENTIAL

Within the Central and Bay Business Area, District and Local Centres, the conversion of suitable ~~vacant~~ space above commercial premises to residential use will be favoured where:

- i. The ground floor frontage is retained in commercial use;*
- ii. Adequate servicing and security can be maintained to the existing commercial use(s);*

- iii. *Appropriate provision can be made for parking, access, pedestrian access, amenity space, green infrastructure and refuse disposal together with any appropriate external alterations and;*
- iv. *The residential use does not compromise the ground floor use and result in unacceptable impact on the operating conditions of existing businesses.*

Proposals for the conversion of suitable space above commercial premises to residential use will be supported in principle, subject to compliance with the criteria above.

Proposals that result in the loss of offices will be assessed against Policy EC6: Protecting Offices in the Central and Bay Business Areas.

Proposals that result in the loss of community facilities will be assessed against Policy C2: Protection of Community Facilities.'

'7.206 The conversion of suitable ~~vacant~~ space above ~~shops~~ commercial premises to residential use provides a valuable contribution to the city's housing stock and provides much needed homes. It also positively contributes to the creation of vibrant, mixed-use communities where people live and shop. Centres remain busy and populated beyond business hours, increasing surveillance, and providing a market for ancillary uses associated with the night-time economy.'

'7.207 New homes are vulnerable to existing sources of pollution such as noise. Existing businesses, venues, and facilities should not have unreasonable restrictions placed on them because of development permitted after they were established. The responsibility for addressing the impact of noise is on the new development in accord with the 'agent of change' principle. Where new developments are proposed close to existing noise-generating uses, such as music and nighttime economy venues, developments must be designed to protect the new occupiers from noise impacts so that the existing use is not threatened.'

4. Action Points