



# Local Development Plan 2021 > 2036

Cardiff Council - May 2026

## Cardiff Replacement LDP Examination

Hearing Session 8  
Natural Environment

CD15 Council Statement in  
Response to Inspectors Questions  
in ID08h



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

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**Hearing Session 8 – 09.30 -13.00, 17 June 2026**

**Virtual**

**Natural Environment**

**Issue - Whether the Plan provides a clear, consistent and effective framework to protect, maintain and enhance biodiversity, including legally protected sites, habitats and species; and whether the Plan is in accordance with Planning Policy Wales Chapter 6.**

**1. Opening and introductions**

**2. Plan-wide approach**

2.1 Does the Plan, read as a whole, clearly and consistently require application of the step-wise approach to biodiversity and the delivery of a measurable net benefit for biodiversity, in accordance with Planning Policy Wales Chapter 6?

**Response:**

Yes, the Council consider that the Plan aims, objectives and strategy seek to protect and enhance Cardiff's natural assets, its green and blue infrastructure, its biodiversity and ensure the resilience of ecosystems through a 'step-wise approach' and the delivery of 'Net Biodiversity Benefit' (NBB).

Policy SP21 is clear that a Green Infrastructure Statement is required, this links back to Planning Policy Wales (PPW), in that a Green Infrastructure Statement is required to highlight how the 'step-wise approach' is being followed and NBB is met as part of that outcome.

Policy BG4, provides further guidance on the requirement for a Green Infrastructure Statement, NBB and all aspects under the 'step-wise approach' which is fundamental to the outcomes of PPW. This is further supported by BG1, BG2, BG3 and BG7, which feed into a Green Infrastructure Statement.

In the interests of clarity, the Council propose the following revisions to Policy SP21 (additional text shown in bold and underlined and deletion shown as strikethrough).

## **'SP21: MAINTAINING AND ENHANCING GREEN INFRASTRUCTURE AND BIODIVERSITY**

**Green (to include blue and aerial) infrastructure provides nature-based solutions to a range of environmental and societal issues, such as the climate emergency, nature emergency, flooding, air pollution, urban heat island effects, public health and mental well-being. Green infrastructure/ biodiversity assets are key to Cardiff's character, value, distinctiveness, and sense of place. Cardiff's green infrastructure assets include:**

- i. Undeveloped countryside and coastline.***
- ii. Non-statutory to statutorily protected nature conservation sites.***
- iii. Habitats and Species of Principal Importance~~Priority/protected habitats and species~~, and the general range of habitats and species across Cardiff.***
- iv. Landscape, geological and heritage features which contribute to the Cardiff's setting.***
- v. Hydrological networks including strategically important river valleys of the Ely, Taff, Nant Fawr and Rhymney, streams, lakes and ponds.***
- vi. Trees, woodlands and hedgerows. . Soils.***
- viii. Roadside verges, roundabout islands and screen planting along roads.***
- ix. Strategic recreational routes, cycleways and the public rights of way network.***
- x. A range of active and disused railway lines, providing habitat connectivity throughout.***
- xi. Parks, playing fields, green play areas and open green spaces with opportunities to play.***
- xii. Growing spaces including allotments, community orchards and private gardens.***
- xiii. Freshwater habitats such as Cardiff Bay, Llanishen and Lisvane Reservoirs, and a network of ponds throughout the city, The estuarine and marine environment; and***
- xiv. Holistic integrated surface water management systems.***

**Development will be expected to maintain and enhance the integrity, extent, diversity, quality and connectivity of green infrastructure assets; provide multi-functional green spaces; provide "Net Benefits for Biodiversity"; and ensure the resilience of ecosystems ~~can be~~ are maintained. A Green Infrastructure Assessment Statement covering existing Green Infrastructure and future opportunities will be required for all ~~significant~~ development proposals.'**

2.2 Does the Plan provide a clear and effective framework for demonstrating, securing, monitoring and managing these requirements through the development management process?

### **Response:**

The Council confirm that Policies BG1 to BG7 seek to extract baseline data, that then feeds into BG4, where the requirements of PPW regarding NBB and the 'step-

wise approach', have been included via the requirements of a Green Infrastructure Statement.

Policy BG4 also states that '*Development will only be permitted where it can be evidenced*' which ensures the Green Infrastructure Statement will achieve the requirements of monitoring and management of Green Infrastructure/ecology assets before being able to comment positively or negatively on an application with regards BG4.

The above approach will be supported by Supplementary Planning Guidance to provide further guidance on this matter.

### **3. Policy structure and hierarchy**

3.1 Do the strategic and detailed policies, in particular Policies SP3, SP4, SP21 and BG1–BG7, clearly and consistently translate national planning policy's overarching biodiversity approach into decision-making, or are changes required to policy wording, structure or sequencing to ensure the step-wise approach and biodiversity net benefit are secured at the appropriate level?

#### **Response:**

Yes, the Council consider that the strategic and detailed policies subject to proposed amendments are considered to adopt national planning policies overarching biodiversity approach into decision making.

The Strategic policies set the scene for Cardiff setting out expectations, broad items of particular concern such as a Green Infrastructure Statements and the requirement for baseline information. The detailed policies provide further guidance on baseline information being determined/required, all of which feeds into Policy BG4. Policy BG4 links directly to PPW in that this pulls together all baseline information requested and the "mitigation", this being the hierarchy with (including compensation and enhancement, as per the 'step-wise approach'), which to state whether development proposals provide NBB.

### **4. Detailed policy matters**

4.1 Is it appropriate for Policy BG1 to address both statutory and non-statutory designations, and is the distinction between the approach to statutory sites (such as SSSIs and SACs) and locally designated sites (such as SINCs) sufficiently clear and unambiguous?

#### **Response:**

The Council propose the following additional policy on non-statutory designations to clarify the distinction between the approach to statutory sites and locally designated sites.

#### **'BGX: LOCALLY DESIGNATED SITES**

**Development will only be permitted if it does not cause direct or indirect harm to sites subject to local planning policy of local designation i.e., SINC sites or Local Nature Reserve (LNR) and may also include geological designation.**

**Where there is potential for harm (including indirect), developments will only be acceptable where mitigation and or compensation measures following the Step-wise Approach, remove that harm, so the overall nature conservation value remains/has the potential for designation in the future.**

**Development proposals covering the types of designated sites discussed will also be expected to demonstrate how they enhance the nature conservation and/or geological importance of the designations and where they are within the Zone of Influence.**

**All mitigation for such sites, will be realistic and achievable in line with best practice and available scientific evidence, if this is assessed as not the case, development would be refused.'**

In addition to this the Council propose the following revisions to Policy BG1 (additional text shown in bold and underlined and deletion shown as strikethrough).

#### **'BG1: DESIGNATED SITES**

**Development will only be permitted if it does not cause direct or indirect harm to sites of international, national nature conservation importance ~~or unacceptable harm to locally designated sites of nature conservation and/or geological importance.~~ Whether it's an SSSI or any other national designation, where there is potential for harm (including indirect), developments will only be acceptable where compensation and mitigation measures remove that harm so the overall nature conservation value remains.**

**Development proposals will be expected to demonstrate how they enhance the nature conservation ~~and/or geological importance~~ of the designations where they are within the Zone of Influence. For all sites where there is potential for harm, developments will only be accepted where appropriate and proportionate compensation and mitigation measures identify that there is no reduction in the overall nature conservation value of the area or feature. Statutory Nature Conservation Organisations will be consulted in consideration of any international and national sites. The consideration of a Habitats Regulations Assessment – including screening, appropriate assessment or derogations may also be required.**

**All mitigation for such sites, will be realistic and achievable in line with best practice and available scientific evidence.'**

4.2 Do Policies BG2 to BG6 adequately reflect national policy in their treatment of the respective issues they address in relation to biodiversity enhancement, trees,

woodlands, hedgerows and soils, including the primacy of avoidance and the requirement for compensatory provision where loss is permitted?

**Response:**

Yes, the Council consider that Policies BG2 to BG6 adequately reflect national policy subject to proposed minor amendments to Policies BG2, BG3 and BG4 set out below to provide clarity whereby development proposals are only permitted (see additional text bold and underlined and deletions as strikethrough).

**'BG2: ECOLOGICAL NETWORKS AND FEATURES OF IMPORTANCE FOR BIODIVERSITY**

***Development proposals will only be permitted if they do not cause unacceptable harm to:***

***i. Features of importance for wild flora and fauna, including green infrastructure connectivity and 'stepping stones' which enable the dispersal, reproduction and genetic viability of protected and priority species;***

***ii. Green infrastructure of importance, fulfilling biodiversity and resilience of ecosystems duties and green infrastructure which contributes to overall landscape value (which includes more "abundant" "common" habitats and species).***

***Particular priority will be given to the protection, enlargement, connectivity, enhancement and management of retained semi natural habitats. Where the need for the development outweighs the overall nature conservation/ecological importance of the site, it will be clearly demonstrated that there is no satisfactory alternative location for the development and long term mitigation / compensatory provisions following the step wise approach secured through proposals.'***

**'BG3: PRIORITY HABITATS AND SPECIES**

***Development proposals, that would have a significant adverse effect on the continued viability of habitats and species which are legally protected of principal importance , or otherwise of significant value to Cardiff based on known distribution or population size, will only be permitted where:***

***i. The need for development outweighs the nature conservation/ecological importance of the ~~site~~ habitat/species taking in to account the Step-wise Approach;***

***ii. The developer clearly demonstrates that there is no satisfactory alternative location for the development which avoids nature conservation impacts; and***  
***iii. Mitigation measures that are considered both self-sustaining and sustainable financially are provided by the developer. Where harm is unavoidable it will be minimised by effective mitigation/compensation to ensure that there is no reduction in the overall nature***

***conservation/ecological value of the area or species/group. Where this is not possible compensation measures designed to conserve, enhance, manage and, where appropriate, restore natural habitats and species will be provided. This will ensure Net Benefits for Biodiversity are met.***

***'BG4: NET BENEFITS FOR BIODIVERSITY AND THE GREEN INFRASTRUCTURE STATEMENT***

***Development will only be permitted where it can be evidenced through a Green Infrastructure (GI) Statement, that Net Benefits for Biodiversity (NBB), via the step wise approach, can be achieved. This should take into account such important aspects as: the cumulative effects of development, ecological resilience and avoidance of impacts on designated sites (national or local), habitats and species as set out as by the first step, in the Step-wise Approach to maintain and enhance biodiversity.***

4.3 Does the location, sequencing and status of Policy BG4 adequately embed the step-wise approach and the requirement to deliver a net benefit for biodiversity, so that these principles shape the interpretation and application of other relevant policies?

**Response:**

Yes, The Council consider that Policy BG4 aims to ensure that development delivers NBB with the requirement for a Green Infrastructure Statement to demonstrate this in line with national policy. We note that it supports national policy and that under national policy to achieve NBB you must follow the 'step-wise approach' which is in effect the mitigation hierarchy. All of which feeds into what a Green Infrastructure Statement needs to cover.

4.4 The Council have previously responded to a question regarding the 'clearly defined public amenity benefits' referred to in Policy BG5 and have explained that these are the multiple benefits set out in paragraph 7.375. Can the Council confirm that in accordance with Policy BG5, proposals which result in the permanent removal of and/or significant harm to trees, woodlands and hedgerows will not be permitted unless it is clearly shown that this can be mitigated and/or will achieve the benefits multiple listed in paragraph 7,375?

**Response:**

The Council proposes to amend Policy BG5, and supporting text, in the interests of clarity (additional text is shown in bold and underlined and deletions as strikethroughs).

## **'BG5: TREES, WOODLANDS AND HEDGEROWS**

***Development proposals should help protect and enhance a sustainable urban forest. ~~Proposals which result in the Permanent removal of and/or significant harm to trees, woodlands and hedgerows will not be permitted unless it is clearly shown that this can be mitigated and/or will achieve significant and clearly defined public amenity benefits and losses are compensated in accordance with National Planning Policy.~~***

*'7.376 A sustainable urban forest, **which includes land both inside and outside the settlement boundary**, will contain a diverse but balanced age range and species mix of trees, though large, long-lived trees will be favoured for protection and planting due to the increased benefits they offer in mitigating the predicted impacts of climate change. The selection of appropriate species for planting will be dependent on the local context – for example, in semi-natural contexts, locally native trees are likely to take precedence, whereas in highly urbanised contexts, non-native trees better adapted to climatic extremes may be more appropriate. A sustainable urban forest is key to the ambition to achieve 25% canopy cover by 2030.'*

*'7.377 To help determine if removal of and/ or significant harm to trees, woodlands or hedgerows within or bounding a site will achieve significant and clearly defined public ~~amenity~~ benefits, applicants must assess them in accordance with the current British Standard.'*

*'5837, the Hedgerows Regulations 1997 and as part of wider Green Infrastructure Assessment in accordance with Planning Policy Wales Chapter 6. The assessments must inform rather than be informed by design. The Cardiff Council Green Infrastructure Supplementary Planning Guidance (Trees and Development Technical Guidance Note) provides further guidance on determining if removal of and/or significant harm to trees, woodlands or hedgerows within or bounding a site will achieve significant and clearly defined public ~~amenity~~ benefits.'*

To clarify paragraph 7.375 sets out the multiple benefits provided by trees, woodlands and hedgerows. Policy BG5 refers to the permanent removal of and / or significant harm to trees, woodlands and hedgerows not being permitted unless it is clearly shown that the development will achieve significant and clearly defined public benefits. With regards to 'significant and clearly defined public benefits' as set out in Planning Policy Wales it is not considered appropriate to define or provide a list as flexibility is required and each application would need to be assessed.

- 4.5 In circumstances where loss of trees, woodlands and hedgerows would be permitted for significant public amenity benefits, does Policy BG5 ensure that compensatory provision is required?

**Response:**

The Council proposes to amend Policy BG5 in the interests of clarity. Please see question 4.4 above for proposed changes.

Policy BG5 as amended ensures that where significant harm or loss of trees, woodlands or hedgerows is permitted compensation in line with Planning Policy Wales is required.

- 4.6 The Council have previously responded to a question regarding the ‘clearly defined public amenity benefits’ referred to in Policy BG6 and have explained that these are the multiple benefits set out in paragraph 7.382. Can the Council confirm that the permanent removal of, sealing of and/ or significant harm to the functionality of soils will not be permitted unless it is clearly shown that this will achieve the multiple benefits set out in paragraph 7.382?

**Response:**

The Council proposes to amend Policy BG6 and supporting paragraphs, in the interests of clarity (additional text is shown in bold and underlined and deletions as strikethroughs).

**‘BG6: SOILS**

***Development proposals shall clearly evidence how they will protect and enhance important soil resources for the multiple benefits they afford. Permanent removal of, sealing of and/ or significant harm to the functionality of soils will not be permitted unless it is clearly shown that this will achieve significant and clearly defined public amenity benefits.’***

To clarify paragraph 7.382 sets out the multiple benefits provided by soils. Policy BG6 refers to the permanent removal of, sealing of and/ or significant harm to the functionality of soils will not be permitted unless it is clearly shown that this will achieve significant and clearly defined public benefits. With regards to the ‘significant and clearly defined public benefits’, as referred to in Planning Policy Wales it is not considered appropriate to define or provide a list as flexibility is required and each application would need to be assessed.

- 4.7 Is the terminology used in the supporting text to Policy BG7 accurate and consistent with national policy, including whether the reference to “national sites” should instead be to “European Sites”?

**Response:**

The Council confirm that the terminology in paragraphs 7.391, 7.394 and 7.400 of the supporting text to Policy BG7 should refer to ‘*European Sites*’, not ‘*National sites*’, in order to be accurate and consistent with national policy in Wales. It is proposed that this change is included in the forthcoming Matters Arising Changes consultation.

## 5. Spatial and thematic issues

5.1 How will the Plan address the disparity in access to green spaces across different parts of the city?

**Response:**

The Council consider that the city benefits from a strong baseline of open space, river corridors, and natural assets that contribute significantly to the city's character and environmental quality. The Plan recognises the importance of these existing green and blue corridors and seeks to protect them through robust policies that safeguard open space, enhance biodiversity, and maintain the integrity of the city's strategic green infrastructure network.

Crucially, the plan also requires developers to provide new open space and incorporate green infrastructure as part of any new development. This ensures that growth contributes positively to the city's green network, particularly in areas that currently have less access to open space and natural environments. By combining protection of existing assets with targeted provision in areas of deficiency, the plan supports a more equitable and resilient distribution of green space across the city.

5.2 How will the Plan address the protection and enhancement of the Gwent Levels, taking account of their recognised ecological importance?

**Response:**

*Future Wales* identifies the Gwent Levels as a National Natural Resource Area under Policy 9, recognising their exceptional ecological, landscape and historic importance, and their role in biodiversity, flood alleviation, carbon storage and food production. This is reinforced by emerging strategic planning guidance for the Gwent Levels, which expects development plans to safeguard and enhance resilient ecological networks across the Levels and to avoid otherwise unacceptable development.

Within this context, the Council consider that the Plan addresses the protection and enhancement of the Gwent Levels in the following ways.

Firstly, the Plan's vision and "Greener" objectives acknowledge Cardiff's nationally important coastal and wetland assets, including the Gwent Levels, as key to nature recovery, climate resilience and landscape character. This aligns the Plan with Future Wales Policy 9 and Planning Policy Wales requirements to protect nationally important landscapes and ecological networks.

Secondly the Plan includes policies that resist inappropriate development in the open countryside and protect locally and nationally important landscapes. For the Gwent Levels, this means a strong presumption against development that would

harm their openness, historic landscape character and setting, or undermine the integrity of the reen network and field pattern.

The Plan's biodiversity and green infrastructure policies require no net loss of biodiversity and, wherever possible, measurable net gain, protection of designated sites (SSSIs and international designations associated with the Severn Estuary) and supporting habitats, including functionally linked land and maintenance and enhancement of ecological connectivity, which is particularly relevant to the linear reen and ditch systems of the Levels.

Together, these policies ensure that the recognised ecological importance of the Gwent Levels is a material constraint on development and that any proposal must demonstrate that adverse effects on designated features and ecological networks are avoided, then minimised, and only as a last resort mitigated/compensated.

Thirdly the Plan includes detailed policies on flood risk and water management which are directly relevant to the Gwent Levels as a low-lying, defended coastal plain. Development is steered away from areas of highest flood risk unless it can clearly satisfy national tests of justification and consequences and must incorporate sustainable drainage and water-sensitive design. By requiring development to maintain existing drainage patterns, avoid culverting and protect water quality, the Plan supports the continued functioning of the reen and ditch network that underpins both the ecological value and the flood management role of the Levels. This is consistent with national guidance that emphasises the need to maintain and enhance these watercourses as key ecological corridors.

Finally, the Plan is supported by an Integrated Sustainability Appraisal and Habitats Regulations Assessment, which identify the Gwent Levels and associated designations as critical components of Cardiff's ecological network. Development proposals affecting the wider Gwent Levels area are expected to deliver green infrastructure that strengthens reen corridors, field margins and wetland habitats, provide habitat creation or restoration (e.g. wet grassland, reedbeds, pollinator-rich margins) that supports the qualifying species and habitats of the SSSIs and the Severn Estuary designations and integrate long-term management arrangements to secure these enhancements over the lifetime of the development.

In conclusion the Council consider the Plan addresses the protection and enhancement of the Gwent Levels by:

- Embedding their nationally recognised ecological and historic importance in the Plan's vision and spatial strategy.
- Applying strong countryside, landscape and biodiversity policies that resist harmful development.
- Using flood risk and water management policies to safeguard the reen system and the Levels' role in climate resilience.

- Requiring biodiversity net gain, strengthened ecological networks and targeted habitat enhancement.

Taken together, these measures demonstrate that the Plan has had proper regard to the Gwent Levels recognised ecological importance and provides a robust framework for both their protection and positive enhancement over the Plan period.

## **6. Action Points**