

Examination of Cardiff's replacement Local Development Plan

Natural Resources Wales - representor number: 118

Statement for hearing session 8: natural environment

Wednesday 17 June 2026

1 Introduction

- 1.1 Natural Resources Wales (NRW) submitted representations to the Deposit Cardiff Replacement Local Development Plan (RLDP) under consultation reference CAS-274882-J6C3 (15 April 2025). Those representations raised matters relating to several proposed housing allocations and Plan-wide policy issues relevant to biodiversity, ecological resilience, and the delivery of resilient ecological networks.
- 1.2 NRW's comments are made in the context of national planning policy, including Planning Policy Wales (PPW), Future Wales – The National Plan 2040, and statutory duties under section 6 of the Environment (Wales) Act 2016.
- 1.3 This hearing statement focuses on matters of relevance to Hearing Session 8. It addresses both site-specific matters previously raised by NRW in relation to allocations H1.1, SH1.2, SH1.4, and SH1.5, and Plan-wide and policy issues raised by the Inspector in the Hearing Session Agenda.
- 1.4 Within their Final Consultation Report Addendum - Appendix 11 Summary of Deposit Representations and Recommended Responses (November 2025), Cardiff Council acknowledges NRW's comments on these allocations. However, no substantive detail is provided as to how the points raised by NRW will be addressed or resolved through the Plan. As such, NRW considers that uncertainty remains as to whether these allocations can be delivered in a manner consistent with national planning policy, ecological

resilience requirements, and statutory environmental duties, without further clarity or evidence.

2 Site-specific matters raised by NRW

2.1 H1.1 Land at Areas 9-12, St Mellons

- 2.1.1 In addition to the comments previously submitted (see Appendix), NRW wishes to highlight the relevance of the Gwent Levels Resilient Ecological Network (REN) mapping, which has been prepared by NRW and adopted by Welsh Government, and the emerging policy direction for the Gwent Levels National Natural Resource Area (NNRA)¹.
- 2.1.2 Welsh Government is currently consulting on draft Strategic Planning Guidance for the Gwent Levels NNRA, which supplements Policy 9 of Future Wales – The National Plan 2040. This guidance seeks to provide clarity on how the distinctive and important landscape of the Gwent Levels should be considered within the planning system.
- 2.1.3 The proposed allocation at Areas 9–12, St Mellons sits partly within the mapped REN for the Gwent Levels and contains habitat suitable for shrill carder bee (*Bombus sylvarum*), as well as potential dormouse habitat and Section 7 habitats. The site is therefore potentially an important component of the wider ecological network associated with the Gwent Levels NNRA.
- 2.1.4 While the NNRA guidance is currently in draft, NRW considers there is a clear policy direction recognising the importance of the Gwent Levels landscape and its ecological function. NRW considers this policy context should be considered when assessing the suitability and deliverability of this site.
- 2.1.5 Future Wales Policy 9 seeks to ensure the enhancement of biodiversity, ecosystem resilience, and green infrastructure by safeguarding ecological networks and ensuring they are not unduly compromised by development. In NRW's view, any proposals for this site should be assessed explicitly against

¹ [Strategic planning guidance for the Gwent Levels National Natural Resource Area \(Future Wales Policy 9\) \[HTML\] | GOV.WALES](#)

Policy 9, the mapped REN, and the objectives of the emerging NNRA to ensure compatibility with these policy requirements.

- 2.1.6 Given the known biodiversity interest and historic use of the wider Trowbridge Meadows area for ecological compensation, NRW considers there is a risk to the deliverability of the estimated development quantum unless appropriate green infrastructure provision and ecological compensation are clearly addressed at plan level.

2.2 SH1.2 Land south of the M4 Motorway, West of Rudry Road, Lisvane (part of adopted LDP Strategic Site F)

- 2.2.1 NRW understands that this allocation forms part of Strategic Site F, which was previously allocated in the adopted Cardiff LDP. Whilst the site has therefore already been through the development plan process, it has not yet progressed to formal planning application stage.

- 2.2.2 This site is likely to require significant environmental provision, including buffers to existing woodlands and robust ecological corridors to maintain connectivity to the wider landscape. Functional separation between public open space and areas for biodiversity compensation may also be required.

- 2.2.3 NRW considers that a comprehensive masterplanning exercise is needed to demonstrate how habitat connectivity and ecosystem resilience will be delivered across the site, and how site-level green infrastructure will integrate with surrounding habitats. This is necessary to ensure that development can maintain and enhance biodiversity in accordance with PPW and the Environment (Wales) Act 2016.

2.3 SH1.4 Land south of Llantrisant Road and SH1.5 Land at Llantrisant Road (A4119) (both part of adopted LDP Strategic Site D)

- 2.3.1 NRW understands these allocations form part of Strategic Site D, which was previously allocated in the adopted Cardiff LDP. Like Strategic Site F, they have not yet been taken forward to application stage.

- 2.3.2 Environmental constraints identified at the adjacent Junction 33 site include the presence of dormice, great crested newt, and rare woodland bats. As a result, these sites will need to deliver a significant proportion of green infrastructure and robust ecological connectivity both within the sites and in association with adjoining development.
- 2.3.3 NRW advises that these allocations should be brought forward through a combined masterplan alongside the Junction 33 development. This would allow a coordinated approach to the maintenance and enhancement of nature conservation interests and enable a strategic assessment of habitat connectivity and ecosystem resilience at the appropriate scale.
- 2.3.4 Without such an approach, NRW considers there is a risk that biodiversity outcomes may be compromised or that development aspirations may prove difficult to deliver in practice.

3 Conclusion

- 3.1 NRW considers it essential that the Plan clearly demonstrates how biodiversity, ecological connectivity, and ecosystem resilience will be safeguarded and enhanced, both plan-wide and at site level.
- 3.2 NRW does not seek to conclude that the allocations considered render the Plan unsound, but reiterates the importance of clearer policy wording, stronger plan-level application of the step-wise approach, and early masterplanning to ensure deliverability and compliance with national policy and statutory duties.

4 Hearing session 8 agenda questions – NRW responses

4.1 Plan-wide approach

- Q 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?

A NRW considers that while the Plan includes references to maintaining and enhancing biodiversity and green infrastructure (notably through SP21 and the BG policy suite), the step-wise approach required by PPW Chapter 6 is not consistently or clearly embedded across the Plan as a whole. NRW's site-specific advice on allocation H1.1 demonstrates that reliance is still placed on development management rather than the Plan itself clearly prioritising avoidance and minimisation. Greater consistency and stronger policy wording would help ensure delivery of measurable net benefits for biodiversity.

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

A NRW considers that the framework is partially established but not yet sufficiently robust. While NRW supports the use of Green Infrastructure Statements and welcomes the Strategic Green Infrastructure Assessment, clearer policy expectations are required around evidencing biodiversity outcomes, securing long-term management, and monitoring delivery. Without this, delivery risks being inconsistent.

4.2 Policy structure and hierarchy

Q 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?

A NRW broadly supports the structure of the Plan but considers that stronger alignment would enhance the Plan. NRW has advised that SP3 and SP4 would benefit from clearer references to biodiversity features at the outset of masterplanning, and that SP21's reasoned justification requires amendment to accurately reflect statutory duties. Clearer sequencing and cross-referencing between strategic and detailed policies would help embed the step-wise approach into decision-making.

4.3 Detailed policy matters

- Q 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?
- A NRW has advised that while a single policy may address both, statutory sites are already protected through national policy and legislation. Where such sites are included in BG1, distinctions between statutory and non-statutory designations should be clear and accurate.
- Q 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?
- A NRW broadly supports these policies but has recommended targeted amendments to improve clarity and consistency, particularly in relation to avoidance, mitigation, compensation, and long-term management.
- Q 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?
- A NRW supports BG4 but advises that its effectiveness would be improved by explicit reference to the Strategic Green Infrastructure Assessment and any forthcoming Supplementary Planning Guidance, ensuring these principles influence other policies.
- Q 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?

A N/A – This question seeks confirmation from the Council.

Q 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?

A NRW considers compensatory provision to be essential where loss is permitted and advises that clearer policy wording would help ensure compensation is consistently secured and proportionate.

Q 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?

A N/A – This question seeks confirmation from the Council.

Q 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”?

A NRW has advised that SACs and SPAs should continue to be referred to as European sites, in line with UK legislation, even though they now collectively form the National Site Network. We advise supporting text should be amended accordingly.

4.4 Spatial and thematic issues

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

A NRW welcomes the Strategic Green Infrastructure Assessment, which identifies inequities in green space provision and links to deprivation and

health outcomes. NRW considers effective implementation of SP21, supported by Green Infrastructure Statements and masterplanning, will be key to addressing these disparities

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

A NRW has consistently highlighted the importance of the Gwent Levels, including their role within RENs and Area Statements. Strong policy protection, careful consideration of hydrology and connectivity, and application of the step-wise approach are essential where development may affect the integrity of the Gwent Levels.

Appendix: Extract of Natural Resources Wales's consultation response CAS-274882-J6C3 (15 April 2025) on the Deposit Plan

H1.1 Land at Areas 9-12, St Mellons

Ecology

31. We understand this area of land was not within the candidate site list we provided comments on as part of our response to the preferred strategy. As such we have not made any comments on this site previously.
32. This area is known to have significant biodiversity interest, including a population of shrill carder bees (*Bombus sylvarum*) which is a feature of the adjacent Gwent Levels: Rumney and Peterstone SSSI. While the site falls outside of the SSSI boundary, development could have an impact on the population of shrill carder bee. In addition, the site likely contains Section 7 habitat of neutral grassland.
33. If development proceeds on this site, it will need to be considered through PPW's stepwise approach, which planning authorities must follow to maintain and enhance biodiversity, build resilient ecological networks and deliver net benefits for biodiversity.
34. Further assessment should be provided which considers how connectivity to, and resilience of, the SSSI will be affected by development. We consider the policy advice set out in the stepwise approach steps 1 and 2 is particularly relevant at this site. This may influence the eventual quantum of development (including green infrastructure) and its layout and design. If offsite compensation is required, this will need to be considered and demonstrated with the RLDP.
35. As we're uncertain whether ecological assessment has been carried out to support this allocation, it is difficult for us to advise you further on the likelihood of this site being able to deliver the estimated 150 units.
36. Further, we note the wider Trowbridge Meadows area, including this site, has been suggested as ecological compensation for multiple planning proposals in the past. If this site is allocated, it must be clear in the Plan that its green infrastructure and any necessary offsite ecological compensation is managed solely for this site and should not be earmarked for use on other proposals. Our initial view is it is likely an area of Trowbridge Meadows will need to be managed as ecological compensation for this development to proceed. It should also be noted this will need to be balanced against European protected species (dormice) requirements, which may not align with management for shrill carder bee. Please also see our comments below in relation to *EC3.12 Wentloog Road (North of railway line)*. We consider strategic green infrastructure for this site should be designed with EC3.12.

SH1.2 Land south of the M4 Motorway, West of Rudry Road, Lisvane (Part of adopted LDP Strategic Site F)

Ecology

29. This site will likely need significant environmental provision, including buffer to the woodlands on site and robust ecological corridors to ensure site remains linked to wider environment and safeguards habitats for protected species. The site may need functional separation of public open space and areas for biodiversity compensation. Therefore, a masterplan should demonstrate how habitat connectivity and resilience will be provided both across the site and to the wider landscape.

SH1.4 Land south of Llantrisant Road and SH1.5 Land at Llantrisant Road (A4119) both (Part of adopted LDP Strategic Site D)

Ecology

30. Given the environmental constraints established at the adjacent Junction 33 site, which is known to support dormice, great crested newt and rare woodland bats, these sites will need to deliver a significant green space element and robust ecological connectivity in association with adjacent sites. Therefore, we advise these sites are subject to a combined masterplan along with the Junction 33 development to demonstrate how nature conservation interests will be maintained and enhanced. The masterplan should demonstrate how habitat connectivity and resilience will be provided both across the site and to the wider landscape.