

Cardiff LDP Examination – Action Points

Housing Numbers	Action	Deadline
HS1.1	Council to provide the evidence regarding international migration figures prepared by Edge cited at the beginning of the Hearing.	Done
HS1.2	Council to explain why the last 3 years of the Housing Trajectory (Appendix 7) show negative figures and comment on what this means for the LDP housing target.	30/9/26
HS1.3	Council to provide details of its affordable housing delivery programme, including potential sites and housing numbers where this information can be shared. See HS3.1.	30/9/26
HS1.4	Council to indicate when the 2026 LHMA will be published.	Done. Not likely until 2027
HS1.5	Council to commission Edge to undertake an additional housing projection scenario for the 18 to 30 age group. Further details provided by Mr Williams (Barratt Redrow Homes, 77).	30/9/26
HS1.6	Council to state which LDP in Wales has a 5% flexibility rate.	30/9/26
HS1.7	Council to provide housing delivery data sent to Mr Williams (Barratt Redrow Homes, 77). For 2024 & 2025.	Done but see HS2.1.
Strategy	Action	Deadline
HS2.1	Council to revise tables provided under HS1.7 to account for acknowledged double counting at Plasdŵr. Check that hasn't occurred on other sites and correct as necessary.	30/9/26
HS2.2	In order to support the Council's position on windfalls, Council to carry out an urban capacity study to identify the vacant/under-utilised sites and sites on arterial routes and public transport nodes the Council referred to in the Hearing. Identify ownership and any constraints to delivery.	30/9/26
HS2.3	Council to provide details of the assessment process supporting the numbers attributed to allocated sites. Including; supporting the position H2.1, H2.5, H2.6 and H2.7. are suitable for development in principle and can deliver the numbers attributed to them without harm to the Severn Estuary SPA/Ramsar site,	30/9/26

	• NRW's comments on SH1.2 & SH1.4 in its response to Hearing Session 8 • ownership and site constraints (shape) of the reduced allocation at Porth Teigr/Alexander Head (numbers and phasing/timing of delivery) • review Hadfield Road to account for the reduced area available for housing as a consequence of commercial use on the road frontage (1ha) and in light of comments of the site owner that retaining commercial/employment uses could impede delivery, • review the principle and number of units attributed to Land at areas 9-12 St Mellons to account for in being partly in a SSSI, 2/3rds lying in a SINCC and the assumptions in the Council's Housing Programme, • Review all allocated sites included in the Council's Housing Programme and where necessary update the 2024 & 2025 trajectories, • Update Housing Background Paper Figure 11. • Provide masterplans for sites where available, explaining where they pre-date latest requirements the extent to which they support housing numbers. • Council to provide info on remediation works at Ferry Road and site preparation work done to date.	
HS2.4	Council to commission update of Avison Young report. Review to include: • Estimated costs of contributing to the provision of SAMM/SANG, • Specific analysis of bringing forward brownfield regeneration sites, • Update reference to policies to reflect Deposit Plan • Assess all policies impacting on viability either as a result of provision of infrastructure/services and affecting developable area. SP3, SP4, SP5, SP6, SP12, SP13, SP15, SP20, SP21, H3, C3, C4, HF1, HF2, HF3, WL1, BG4, BG5, BG7, T2, T7, OS2, P1, RE2, W1. This list is provided for completeness. We acknowledge there will be an overlap between the SP policies and the subsidiary DM policies flowing from them.	30/9/26
HS2.5	Council to provide a draft strategy for delivery of SAMM and SANG, indicating and evidencing likely solutions and cost. Cost estimates should inform the updated viability study.	30/9/26

HS2.6	Council to review its Employment Study and provide evidence Cardiff Gate West is no longer needed to provide employment land/floorspace.	30/9/26
HS2.7	Council to review, check and update the 2024 and 2025 housing trajectories (as HS2.1)	30/9/26
HS2.8	Council to provide SFCA maps.	Done
Affordable Housing	Action	Deadline
HS3.1	Council to revise the Housing Programme table to indicate which sites are allocated in the RLDP, completions and under construction.	30/9/26
HS3.2	Matters Arising Change; Paragraph 7.15 be deleted and the following suggested text inserted into Policy H3, 'The Council will seek to provide a range and mix of sustainable affordable housing, in line with Policy SP12'	See HS0.2
Gypsy & Travellers	Action	Deadline
HS4.1	Council to provide details of SEWsPEG work on transit sites.	30/9/26
HS4.2	Council to confirm whether provision at Pengam Green is temporary or permanent.	30/9/26
HS4.3	If provision at Pengam Green is temporary, Council to produce a report on compliance with the Equalities Act.	30/9/26
HS4.4	Council to confirm funding is secured for Pengam Green for temporary or permanent provision.	30/9/26
Welsh Language	Action	Deadline
HS5.1	Council to review SP15 - Phrasing "the LDP supports development proposals that seek to protect.....' to be amended to set out a clearer policy requirement - Phrasing 'where appropriate.....' insufficiently precise & to be amended to provide a clearer trigger - Phrasing 'interests of the Welsh language.....' to be strengthened. Appropriateness of the phrasing 'viability, vitality and use of the language....' to be considered in context of national policy. - Final sentence to be amended. As drafted a minor strengthening of a positive impact could outweigh significant harm. Remove 'and/or' where it appears, introducing additional clauses if required.	30/9/26
HS5.2	Council to prepare and submit draft Welsh Language Supplementary Planning Guidance.	30/9/26
HS5.3	Matters Arising Change; Third para at para 7.231 - reference to 50% to be re-sited to Policy C4 itself.	See HS0.2

Employment	Action	Deadline
HS6.1	Council to provide factual update on Land South Of St Mellons Business Park • Update on potential Welsh Government funding and support • Likely timings of future planning applications • Likely commencement of site development • Likely job numbers per year to be created	30/9/26
HS6.2	Matters Arising Change; Policy EC2 and paragraphs 7.83 to 7.88 to be deleted.	See HS0.2
HS6.3	Council to consider how and where in the RLDP it can express its support for community involvement and placemaking on the future stages of the St Mellons site's master planning and development.	See HS0.2
HS6.4	Council to provide an update on the take up of employment sites post-dating the HJA study.	30/9/26
HS6.5	Council to review Policy EC5 • EC5A - Address tension inherent between EC3 and EC5A given it is not clear how the Council as decision maker can both deem EC3 sites to be fully capable of employment use and necessary to meet wider strategic aims, and potentially unneeded and unsuitable for employment use. - Rather than unneeded/unsuitable, consider whether test is the effect of the loss of a site against the wider employment land strategy - Consider whether policy should distinguish between office/business park provision and industrial/warehouse sites - Remove 'and/or's introducing additional clauses if required. - If to be retained, define what 'physically unsuitable' means in context of policy EC3 which deems the sites to be suitable. • EC5B - Council to incorporate text re: marketing from hearing statement	30/9/26
HS6.6	Council to review Policy EC6 • Address tension between need to demonstrate no need for office accommodation (i) with requirement to provide it (ii). • Consider whether phrasing 'current format' can be more clearly explained • Clarify reference to residential in (ii) to make clearer what is intended • Test re-drafted policy to ensure it provides the intended protection to office accommodation. As	30/9/26

	drafted it would potentially not require an element of office use to be provided. Redraft to remove 'and/or' introducing additional clauses if required	
HS6.7	In light of changes to policies arising from HS6.5 and HS6.6, Council to review all other employment related policies to ensure language, phrasing and approach is consistent across related policies.	30/9/26
Retail	Action	Deadline
HS7.1	Council to review the wording, structure, spatial definition, and criteria of the following policies, and make appropriate amendments to the following policies. In its review, the Council will ensure that the relationship between different criteria (cumulative, independent), the weight to be applied to individual criteria (policy hierarchy), and whether criteria apply in all cases or apply selectively in different cases, are all clearly defined. - Policies: - - SP8 - R2 - R3 - R4 - R5 - R9 - The review is to clearly set out how the changes suggested in the Response to Inspectors Questions document (ID04) and in the hearing session statements have been addressed.	30/9/26
HS7.2	In light of changes to policies arising from HS7.1, Council to review all other retail related policies to ensure language, phrasing and approach is consistent across related policies.	30/9/26
HS7.3	Council to undertake a PPW terminology check across the retail related sections of the RLDP.	30/9/26
Natural Environment	Action	Deadline
HS8.1	Council to draft a new Policy SPXX to embed step wise approach and ensure LDP is in general accordance with national policy. Suggest BG4 is the foundation for this, elevated to a strategic policy.	30/9/26
HS8.2	Council to review and redraft SP3, SP4, SP21, BG1, NG2, BG3, BG5 and BG6 to align with and complement the new Policy SPXX. SPXX to set out stepwise and, with the exception of SSSIs (BG1) the BG policies to indicate where it has	30/9/26

	been demonstrated there are no alternative sites for the proposed development and avoidance is not possible, development must demonstrate it has minimised, mitigated or compensated as appropriate. i. For SP3 & SP4, to ensure stepwise influences master planning and design at the outset, ii. Amend Policy BG1 to reflect national policy. development not necessary for the management of a SSSI should only be permitted in wholly exceptional circumstances. iii. The amendment to BG5 to include the additional (last) sentence added by the Council in the Hearing statement. iv. Amend 7.376 & 7.377 as suggested by the Council in the Hearing statement. v. Amend Policy BG6 to indicate where there are no alternatives and avoidance is not possible, mitigation and enhancement is required to achieve public benefit.	
HS8.3	Last sentence of 7.364 to be deleted.	See HS0.2
Other Housing Matters	Action	Deadline
HS9.1	Amend SP3 and/or SP4 to include reference to securing lifetime homes/specialist needs housing where a need is identified.	See HS0.2
HS9.2	Amend Policy H5(iv) to include security/safety as a consideration.	See HS0.2
HS9.3	Amend Policy CP2 i. Create 3 policies, Conversion, Extension, Replacement. ii. Include the aim of first seeking employment use for conversions (7.322) in the policy. iii. Include advice on marketing in the reasoned justification (consistent with the Council's responses in ID04) iv. Amend CP2(a), 'The building proposed for conversion must: v. Amend CP2(a)(iii), 'The proposed use must not give rise for additional buildings' vi. Delete CP2(a)(iv) vii. Suggest deleting the last paragraph, criteria aimed at achieving good design are included in each section and SP3, SP3(xiii) in particular.	See HS0.2
HS9.4	Delete 'kitchen, dining area as well as communal amenity' from Policy H6(iv).	See HS0.2

HS9.5	Delete 'Typical services can include room cleaning, bed linen, on site gym and concierge service, none of these are typical domestic provision.' From paragraph 7.48. Delete 'such as a cleaning service, the provision of bed linen and a concierge' from paragraph 7.49.	See HS0.2
Flooding	Action	Deadline
HS10.1	Amend Policy W3 to include a presumption against culverting.	See HS0.2
HS10.2	Council to provide the drainage strategy submitted to Welsh Government	30/9/26
HS10.3	NRW to provide a copy of its position statement on culverting main rivers.	Done
HS10.4	References to TAN to be changed to the current version.	See HS0.2
Heritage	Action	Deadline
HS11.1	Policy HE1 to be amended; '1. Development that has an impact on a heritage asset <u>designated heritage assets or locally listed buildings</u> will be expected <u>required</u> to preserve or enhance its significance and/or setting and make a positive contribution to its character or appearance.' '2. Applications which affect the significance of any <u>designated</u> heritage asset will be required to provide sufficient information to demonstrate how proposals would contribute to the asset's conservation. This will be set out in a Heritage Impact Statement, following best-practice guidance within Cadw's Heritage Impact Assessment in Wales.' '3. Substantial weight will be given to the conservation of the city's <u>designated</u> heritage assets <u>and locally listed buildings</u>. Any harm to the significance of a designated or non-designated heritage asset <u>locally listed building</u> must be justified. Proposals will be weighed against the public benefits of the proposal: whether it has been demonstrated that all reasonable efforts have been made to sustain the existing use, find new uses, or mitigate the extent of the harm to the significance of the asset, and whether the works proposed are the minimum required to secure the long-term beneficial use of the asset.' '5. Development within or adjacent to a conservation area will only be permitted if it would preserve or enhance the character and or appearance of the conservation area or its setting. All development.....'	See HS0.2
HS11.2	Change Policy EN9 to Policy HE1 in paragraph 7.257	See HS0.2

Transport		
H12.1	Council to consider Policy T1 to ensure it clearly sets out what is required and the basis on which schemes would be considered against it. The amended policy should be tested to ensure it is clear that proposals contrary to its objectives would be refused. Review to include: - - Replacing '<i>the Council will support developments that incorporate:</i>' with a stronger phrasing to make clear what proposals must/should do & as a consequence, what the effect of failing to meet individual criteria would be; - Criterion vii – determine whether 'integrate' and 'existing' are sufficiently clear and appropriate. - Criteria ii and v – check overlap - Across policy – reference to specific WG strategies & Orders and Council White Papers, to consider whether it is necessary to specify these given they may change over the life of the plan and consider whether alternative wording identifying the importance of key policy and strategies may be more appropriate without specifying individual items.	30/9/26
H12.2	Council to review supporting text to Policy SP19, with particular reference to para 6.154 and the reference to additional capacity for road-based access. In reviewing the supporting text, Council to take the opportunity to update the description and purpose of the Eastern Bay Link Road scheme in line with the latest position.	30/9/26
H12.3	Council to consider the identification of the new stations identified in the Cardiff White Paper and Metro scheme on the proposals map, linked to a clear identification of these stations within an LDP Policy (most likely T3 or T6), and an explanation within the policy of how development proposals with the potential to impact upon the delivery of future stations would be assessed. The consideration should include how the sites could be identified/defined on the proposals map on the basis on their current status and the publicly available information that supports them. It is noted that some stations are not yet clearly defined and exact locations cannot be identified. Should the Council conclude it is not possible to identify the sites on the proposals map (including through a symbol or other method) linked to a clear policy framework, they should write to the Inspectors explaining why.	30/9/26
Minerals & Waste	Action	Deadline

H13.1	Council to review Policies MW2, MW5, MW7 and MW8:- MW2 - Is the policy intent that proposals would be acceptable if they satisfied i, ii or iii? - Would a proposal that failed against e.g. ii and iii be acceptable if it met i? - Is iv meant to be a criterion or is it a paragraph of policy text that would apply in all cases? - What is the sequential test approach referred to in para 7.539? Are the criteria sequential? Is the sequential test deepening over lateral extension? - Having considered these questions, make appropriate amendments to MW2 as necessary. MW5 - The phrasing “In drawing up restoration proposals, mineral operators will be encouraged to:” to be reviewed and strengthened with a stronger phrasing to make clear what proposals must/should do & as a consequence, what the effect of failing to meet individual criteria would be. - The phrasing “firm proposals are included” can be strengthened to give a clearer requirement. - Council to consider the different type, extent and progression of restoration at different sites, and whether policy or supporting text needs to reference that different sites will require different types of progressive restoration, and if so, to suggest suitable amendments to policy/text. - Consider whether criterion iv is meant to be a criterion or is a paragraph of policy text. MW7 - Council to review the ‘or’ at the end of criteria i, ii and iii. - Can meeting any individual criterion mean a scheme is acceptable? Council to confirm. MW8 - Council to consider whether ‘or’ at end of criterion i is required, and as a consequence the ‘and’ at the end of ii. - The phrasing “will generally be encouraged” in the final paragraph can be strengthened to give a clearer direction.	30/9/26
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H13.2	Action Point HS6.4 requires the Council to provide an update on the take up of employment sites post-dating the HJA study. As part of this action point, Council to include information on which sites have moved from employment to waste uses post the HJA study.	30/9/26
Design & Other Matters	Action	Deadline
H14.1	As per the Council's response in ID04, Council to review Policies SP3 and SP4. Review to consider:- - Making both policies shorter; - How both can be more focussed on key issues & requirements; - How policy language can be strengthened with stronger phrasing to make clear what proposals must/should do & as a consequence, what the effect of failing to meet individual criteria would be; - How community engagement can be a clearer and explicit requirement in the masterplanning approach of SP3, and a key component of achieving good design in SP4; and - How text removed from policies can be re-sited where necessary and appropriate as supporting text. It is at the discretion of the Council whether they wish to discuss changes with interested parties & this is not a requirement arising from this action point.	30/9/26
H14.2	As per the Council's response in ID04, Council to review Policy D1. Review to consider: - - A spatial framework more clearly setting out where tall buildings may be supported (such a framework could, for example, set out where tall buildings will be encouraged, where they may be potentially acceptable, or where they would be unacceptable). - A clearer definition of height outside the city centre and the Bay. - The language used and its effectiveness in decision making (e.g. an elegant silhouette against the sky). - How infrastructure capacity is to be assessed in the determination of tall building proposals (including, for example, highways, public transport, health, education, sewerage).	30/9/26
H14.3	Council to review Policies OS1 and OS2. - Clarify whether policies require like-for-like or better replacement, and if so, state this clearly.	30/9/26

	- Clarify whether policies require that compensatory open space is provided within or adjacent to the area from which it is lost, and if so, state this clearly. - The Council have said that <i>'the Plan secures quality by requiring that replacement open space meets the functional, design and usability criteria set out in the Plan's placemaking, green infrastructure and health and wellbeing policies'</i> and that <i>'these policies collectively ensure that compensatory provision is safe, attractive, multifunctional, and capable of delivering the same or enhanced recreational and environmental benefits as the space being lost'</i>. It is unclear why the Council have opted for a whole plan approach to be taken in relation to open space given many other policies are self-contained and have multiple criteria specifying requirements. If the delivery of open space requirements relies on the application of multiple policies, this needs to be made clearer. Alternatively, open space policies should be amended to more clearly set out what is required to achieve policy compliance.	
H14.4	Council to review Policy SP7:- - The Council's Hearing Session Statement recommends changes to terminology & guidance on Place Plans. These changes should be made. - The Council have indicated that 'Placemaking Plans' are prepared by the Council, and that these are different to Place Plans. The relationship between these two plans is for the Council to define. It is important that revisions to Policy SP7 make clear which type of plan the policy supports and which type of plan it considers suitable as SPG. It is the Inspectors understanding based on the Council's Hearing Session Statement that Place Plans are the focus of the Policy SP7. - Both PPW and the Development Plans Manual explain the role and purpose of Place Plans and support their preparation. The Development Plan Manual says that Place Plans can <i>'can inform an LDP review, be prepared in parallel with an LDP, or following adoption, providing there is a sufficient 'policy hook' within the plan'</i> and that they can be <i>'produced by Town and/or Community Councils, or the LPA in conjunction with local communities'</i>.	30/9/26

	- The review of Policy SP7 should:- - o Ensure consistency with national planning policy and guidance in relation to the role, purpose and terminology associated with <i>Place Plans</i>, including relevant guidance contained within PPW and the Development Plans Manual. - o Clearly define the relationship between any Council-led <i>Placemaking Plans</i> and community-led <i>Place Plans</i>, including distinguishing their respective purpose, status and intended role within the wider planning framework. - o Clarify which type of plan the policy is intended to support, and whether the policy is intended to provide the necessary policy hook for the preparation of <i>Place Plans</i> as part of the development plan system. - o Review whether the policy adequately recognises and supports the role of <i>Place Plans</i> within the wider planning framework, including their function in facilitating community-led planning initiatives. - o Consider whether the requirement for such plans to follow the masterplanning principles set out in Policy SP3 is appropriate, justified and proportionate having regard to the intended purpose, scale and community-led nature of <i>Place Plans</i>. - Action Point HS6.3 concerns how and where the Council can in the RLDP express its support for community involvement and placemaking on the future stages of the St Mellons site's master planning and development. In its review of SP3, SP4 and SP7, the Council should consider whether a similar commitment should be made to community involvement in general and the preparation of <i>Place Plans</i> where appropriate.	
Monitoring	Action	Deadline
HS15.1	i. Council to delete 'or more' from all indicators which say 2 or more consecutive years. ii. Council to create new indicator, separating affordable housing delivery from market housing delivery. iii. Council to create new indicator monitoring tenure split (social rented and intermediate).	30/9/26

	iv. Council to create new indicator monitoring delivery against affordable housing thresholds and percentage targets for greenfield and brownfield. v. Council to create new indicator monitoring delivery of Cardiff Parkway (former allocation EC2). vi. Council to amend the trigger to 1.8 refer to EC3 and EC5 and consider including an indicator relating to size of site. vii. Council to review suitability of using average UK vacancy levels (2.3). iii. Council to amend 2.4 to reference Policy R6. ix. Council to review whether it is necessary to include an indicator for Policy PC1 and if it is, the relevance of AQMAs as a measure of the performance of Policy PC1 (2.7). x. 2.8, to be deleted. xi. Council to consider a trigger to monitor waste capacity (2.9). xii. Council to review 2.15 to link to the Infrastructure Plan. iii. Council to consider whether it is necessary to monitor 3.1 to 3.4. iv. Council to review the target and trigger for 3.6 to ensure they match. iv. Council to clarify over what area the 2.43ha per 1000 population is measured and include in the target/trigger. vi. Council to review whether it is necessary to monitor 3.10 and 3.11.	
Plan wide	Action	Deadline
HS0.1	Council to undertake a review of all policy wording to test application of individual policies to potential proposals. Review should draw on suggested amendments to date, including to retail and employment policies, and should include consideration of the following:- - Appropriateness of using 'and/or' - Strengthening of the operative wording ('will only be permitted where' rather than 'will be favoured'). - The hierarchy and weighting between different criteria - The relationship between different criteria in a decision making process - Use of phrases such as 'expected', which is not a requirement - Use of phrases such as 'where relevant', which lacks precision	30/9/26

	- Use of phrases such as 'where appropriate', which can be subjective if not clearly defined - Use of phrases such as 'expected to help to' which lacks weight The above are not identified as a blanket rule and are not exhaustive. They may be appropriate in some circumstances.	
HS0.2	Council to create and maintain a table of MACs arising from the Hearings and proposed changes set out in CD05, Council Response to Comments and Questions raised by the Inspectors on ID04.	Ongoing