

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.	28/8/26
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.	28/8/26
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).	28/8/26
HS1.6	Council to state which LDP in Wales has a 5% flexibility rate.	28/8/26
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.	28/8/26
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.	28/8/26
HS2.3	Council to provide details of the assessment process supporting the numbers attributed to allocated sites. Including; <ul style="list-style-type: none"> 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, 	28/8/26

	<ul style="list-style-type: none"> • 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	<p>Council to commission update of Avison Young report. Review to include:</p> <ul style="list-style-type: none"> • 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. <p>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.</p>	TBC
HS2.5	<p>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.</p>	TBC

HS2.6	Council to review its Employment Study and provide evidence Cardiff Gate West is no longer needed to provide employment land/floorspace.	28/8/26
HS2.7	Council to review, check and update the 2024 and 2025 housing trajectories (as HS2.1)	28/8/26
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.	28/8/26
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: <ul style="list-style-type: none"> i. work by SEWsPEG on transit provision in the region; ii. a statement from SEWsPEG confirming whether the regional approach to transit provision being considered would support the identified need in Cardiff being met on a wider regional basis. 	TBC
HS4.2	Council to clarify whether the proposed site at Pengam Green will be permanent or temporary. <ul style="list-style-type: none"> i. If temporary, the Council to produce a paper on whether providing temporary accommodation complies with the Equalities Act. ii. If temporary, the Council to set out how permanent accommodation will be secured. iii. The Council to confirm funding remains available, including for temporary provision. 	TBC
Welsh Language	Action	Deadline
HS5.1	Council to review SP15 <ul style="list-style-type: none"> • 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 	28/8/26

	<p>‘viability, vitality and use of the language....’ to be considered in context of national policy.</p> <ul style="list-style-type: none"> • 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. 	
HS5.2	Council to prepare and submit draft Welsh Language Supplementary Planning Guidance.	28/8/26
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	<p>Council to provide factual update on Land South Of St Mellons Business Park</p> <ul style="list-style-type: none"> • 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 	28/8/26
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.	28/8/26
HS6.5	<p>Council to review Policy EC5</p> <ul style="list-style-type: none"> • EC5A <ul style="list-style-type: none"> - 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 <ul style="list-style-type: none"> - Council to incorporate text re: marketing from hearing statement 	28/8/26

HS6.6	<p>Council to review Policy EC6</p> <ul style="list-style-type: none"> • 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 drafted it would potentially not require an element of office use to be provided. • Redraft to remove 'and/or' introducing additional clauses if required 	28/8/26
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.	28/8/26
Retail	Action	Deadline
HS7.1	<p>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.</p> <ul style="list-style-type: none"> • Policies: - <ul style="list-style-type: none"> - 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. 	28/8/26
HS7.2	In light of changes to policies arising from HS7.1, Council to review all other employment related policies to ensure language, phrasing and approach is consistent across related policies.	28/8/26
HS7.3	Council to undertake a PPW terminology check across the retail related sections of the RLDP.	28/8/26
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.	28/8/26
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 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.	28/8/26
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)	See HS0.2

	<ul style="list-style-type: none"> 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. 	
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	28/8/26
HS10.3	NRW to provide a copy of its position statement on culverting main rivers.	Done
HS10.4	References to TAN to changed to the current version.	See HS0.2
Heritage	Action	Deadline
HS11.1	<p>Policy HE1 to be amended;</p> <p>'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.'</p> <p>'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.'</p> <p>'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</p>	See HS0.2

	<p>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.'</p> <p>'5. Development within or adjacent to a conservation area will only be permitted if it would preserve or enhance the character and <u>or</u> appearance of the conservation area or its setting. All development.....'</p>	
HS11.2	Change Policy EN9 to Policy HE1 in paragraph 7.257	See HS0.2
Plan wide	Action	Deadline
HS0.1	<p>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:-</p> <ul style="list-style-type: none"> - 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 - 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 <p>The above are not identified as a blanket rule and are not exhaustive. They may be appropriate in some circumstances.</p>	28/8/26
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