Cardiff Council

Replacement Local Development Plan

Examination

Additional Hearing Sessions

Detailed issues to be explored in Hearing Sessions

To assist the Council, the Inspectors intend to explore the following detailed issues at the relevant Hearing Sessions. These questions are not exhaustive and should be read alongside the Hearing Session Agendas. The Council should ensure that it is prepared to address these questions fully at the relevant Hearing Sessions.

Where individual policies are to be discussed, the Council will be required to explain how each policy is intended to operate, the reasons for its wording, the relationship between its criteria, and how it would be applied in the development management process.

In making arrangements for attendance, the Council may wish to consider whether those with detailed knowledge of the issues, including those who prepared the updated evidence, should attend.

For All Sessions

- The Council has undertaken substantial work over the summer. In some cases, it is not clear how the updated studies relate to one another or how their findings have informed the existing evidence base and the policies derived from it.
- Notwithstanding the new evidence, the Council has not proposed changes to key elements of the Plan, including the overall housing provision, the annual housing requirement, affordable housing percentages or assumptions about the deliverability of large and complex brownfield sites.
- How has the Council assessed the updated studies together and addressed any differences between their findings and the existing evidence base? How does the evidence, taken as a whole, support maintaining key elements of the Plan as initially proposed, particularly in light of changed circumstances or new information about the capacity, viability or deliverability of individual sites?

Session 1a – Housing Numbers

- Lightwood Strategic, Redrow Homes South Wales, Persimmon Homes, Taylor Wimpey and Mr Andrew Evans are critical of the Council's evidence relating to housing requirement and supply. The Council should be prepared to address the detailed points made, supported by expert witnesses if necessary.

Session 2a – Housing Strategy

Supply

- Redrow Homes say the Council has significantly overestimated its housing supply by at least 5,000 homes. They identify issues in the updated evidence in relation to completion and landbank figures, windfall allowances, and strategic sites H1a and H1b. What is the Council's response to these comments? Have relevant numbers been correctly tallied, and is there any double counting across figures?

Windfall

- The development densities assumed in the Urban Capacity Study appear high. What evidence demonstrates that they are appropriate and realistically achievable, having regard to site context, design quality, policy requirements, viability and market demand? How sensitive are the capacity estimates to lower densities, and what would be the implications for housing delivery by 2036? How realistic is it that all these sites will come forward by 2036?

SAMM & SANG

- It seems unlikely it would be possible to create SANG on brownfield sites. NRW say that '*the strategy currently provides limited information on how SANG requirements would be addressed where on-site provision is not feasible'*. What is the Council's response to this?
- Why does the viability appraisal not use the costs per dwelling identified in the mitigation strategies? What are the implications of this?
- How has the Council assessed the potential implications of on-site mitigation for site capacity; delays in providing mitigation; and any failure to secure and maintain required off-site mitigation for the necessary duration? What are the implications for the housing numbers and delivery timescales anticipated in the Plan?

Session 3a – Affordable Housing

Updated Viability Testing

- The updated viability testing presents a less favourable picture, including for brownfield development. This is significant given the Plan's reliance on some large and complex brownfield sites and its objective of delivering affordable housing to meet identified needs. What would delayed or reduced delivery from

these sites mean for achieving the Plan's affordable housing target, and how has the Council assessed and allowed for these risks?

- How much of the Plan's affordable housing provision is expected from allocated sites, as distinct from other sources? What evidence supports delivery of that contribution within the Plan period, particularly from sites with marginal viability?
- Litchfields say that the benchmark land value for Clos Chwe Erw (Llantrisant Road) referenced in the updated viability testing is incorrect and has resulted in a significant underestimate of the BLV for Radyr / Morganstown. Is this correct and, if so, what are the implications for the results and conclusions of the updated viability testing?

Session 4a - Gypsy & Travellers

- It is important that there is no ambiguity about the type of provision proposed at each site, when it will be available for occupation, how it will meet the needs of existing and newly forming households, and how any household movements between new and existing sites will affect overall provision. Is the Council in a position to confirm these points? If these details are uncertain, the Council should state this.
- The Council must explain clearly how each site will be funded and delivered, including how any costs ineligible for Welsh Government funding would be met and the implications of any funding shortfall for delivery. Is the Council in a position to confirm these points? If these details are uncertain, the Council should state this.

Session 8a - Natural Environment

- Combining different types of environmental designation within a single policy risks obscuring the distinct legal and policy requirements that apply to each. Why has the Council chosen this approach?
- The Council's proposed strategic policy on the step-wise approach would be a helpful addition to the Plan. Is its relationship with the amended BG policies clearly defined? Do references in the BG policies to the step-wise approach, or to individual steps within it, create unnecessary duplication or scope for differing interpretations?