Cardiff Council

Replacement Local Development Plan

Examination

Additional Hearing Session 2a – 14:00-17:00, 2 December 2026

County Hall

Housing Strategy

Issue – Will the brownfield-first approach, only carrying over greenfield allocations, deliver?

1. Opening and introductions

2. Strategic Matters

2.1 Housing supply

a) Does the Plan provide sufficient deliverable housing supply and flexibility to meet its housing requirement by 2036, or are changes to the strategy or sources of supply necessary?

2.2 Windfall allowance

a) What justifies including the full urban capacity figure of 6,081 dwellings in the housing supply? What evidence demonstrates that this capacity can translate into completed dwellings by 2036, taking account of site availability, viability, constraints, lead-in times and build-out rates?

The following examples illustrate our concerns:

i. The Utilita Arena and the Adam Street car park account for 2,110 units. Both are in use. The Arena may be surplus to requirements after the opening of the Atlantic Arena but that won't be until 2028. In addition to demolition, representors point to potential issues with contamination and noise from adjacent roads and railway lines. Is it realistic to assume these sites will deliver 2,110 units by the end of the Plan period?
ii. The Urban Capacity Study treats SAMM and SANG as a cost to delivery rather than as a limit on capacity. Is this appropriate? (see below)

2.3 SAMM & SANG

a) The mitigation strategies for the Severn Estuary Special Area of Conservation and Special Protection Area (SAC & SPA) and Cardiff Beech Wood SAC principally rely on Strategic Access Management and Monitoring (SAMM). It states the need for Suitable Alternative Natural Greenspace (SANG) would be

determined on a case-by-case basis where development proposals have a high risk on their own, for example those in close proximity to the estuary or involving large numbers of dwellings in a single location.

i. Has the Council identified which allocated sites may require SANG?
ii. Has the Council identified which sites in the Urban Capacity Study it now relies on for large windfalls may require SANG?
iii. If not, why not given the implications for viability, developable area (if appropriate on site) and the provision of SANG off site on delivery?
iv. Would contributions to SAMM (and SANG) be caught by the 5-obligation limit? If so, how will they be funded?

b) Where SANG is required but on-site provision is not feasible, what demonstrates effective off-site or alternative mitigation is achievable? How would the recreational impacts arising from such developments be mitigated?

c) Do the capacity and viability assessments reflect the full land requirements and costs of mitigation? What are the implications for developable areas, housing yields and viability alongside other policy requirements?

3. Allocations

3.1 Porth Teigr and Alexandra Head (H2.5)

a) ABP raises significant concerns regarding the ability to access the site. Given:

i. Tyneside Road Swingbridge remains operational and is opened up to 20 times a year for up to an hour at a time, prohibiting access to all vehicles including emergency services,
ii. Harbour Road Bridge is restricted in width and is not open to general traffic,
iii. ABP states it will not permit the use of Cargo Road to access the site. The only vehicular access to Alexandra Head is via Cargo Road,

is residential development on this site appropriate?

b) How would development at Porth Teigr and Alexandra Head ensure prospective residents enjoy satisfactory living conditions whilst not prejudicing continued port operations?

c) What access arrangements and landowner agreements would be required, and what are the implications for the site's developable capacity, viability and delivery timetable?

d) Does the May 2024 Masterplan remain a reliable basis for assessing Porth Teigr's development potential, given the intended reduction in commercial floorspace and increase in housing? What are the implications of these changes for capacity and delivery?

e) What evidence supports the delivery of the proposed non-residential uses? If these are reduced or omitted, what would be the implications for the site's sustainability and the justification for its allocation?

f) Given the Viability Assessment's conclusion that the site's anticipated profit margins are below standard commercial levels, what evidence provides confidence development would attract the investment needed to proceed while meeting the Plan's policy and infrastructure requirements?

g) What evidence supports the delivery of 1,310 dwellings within the Plan period? Are the assumed lead-in times, phasing and build-out rates realistic?

3.2 Former Gas Works, Ferry Road (SH1.7)

a) Drawing on the Masterplan Report and Land Condition Summary Statement, what remediation and site preparation works have been completed, and what works remain necessary to enable residential development?

b) Are the site's contamination and ground-condition constraints sufficiently understood to assess its development potential? What further investigations are required, and what uncertainties remain?

c) The high-level LDP viability appraisal indicates that the development of a brownfield site in Grangetown for 500 dwellings is unviable in all tested scenarios, including those with no affordable housing provision. What site-specific evidence demonstrates that the proposed allocation would be viable, taking account of remediation costs and the Plan's policy and infrastructure requirements?

d) This site has been carried over from the last two Plans. What evidence supports the delivery of 500 dwellings within this Plan period?

3.3 Hadfield Road (H2.6)

a) The Council states that Wales and West Housing Association has purchased the site and is preparing a masterplan to inform a pre-application submission.

   i. Will the commercial uses on the Hadfield Road site be retained?
   ii. If so, what are the implications for delivering 200 units as indicated in the Summary Housing Supply table? (Figure 11)

3.4 Cardiff Gate Business Park (West) (H2.3)

a) Drawing on the Planning Statement and Placemaking Vision, could the Council outline the additional information provided in support of the site's allocation and explain how it addresses the matters previously raised?

4. Action Points