

Cardiff Replacement Local Development Plan Examination

Representor Number: 35

Representor: Asbri Planning

Date: 07th July 2026

Representation: Further comments relating to Council response to Inspectors question regarding objections to settlement boundary at Robin Hill

Introduction

The response from the Council in regards to the Inspectors request to respond to the points made in Asbri Planning's representation (*"particularly the allegations the settlement boundary at Robin Hill does not accord with the findings of the Cardiff Landscape Evidence Base Update Local Landscape Designations, 2025 and the Cardiff Green Wedge Assessment, 2025"*) has been reviewed. Asbri Planning's further comments in relation to the Council's response are provided below.

In summary, it is considered that Council's response provides no further objective justification as to their decision to deviate from the findings of the evidence base, and accordingly it is maintained that the settlement boundary at Robin Hill should be amended (in accordance with the evidence base) to include land at Robin Hill within the settlement.

Evidence Base

Significant queries are raised with regards to the evidence base upon which the Council has based its decision to exclude land at Robin Hill from the settlement boundary. The Council's response to the Inspectors Question cites a preference for not amending the settlement boundary at Robin Hill based upon what continues to be unsubstantiated reasoning, rather than on a robust, informed, and transparent evidence base. Based upon the Council's response to the Inspectors Question, the key reasons for not amending the settlement boundary are now understood to be as follows (it is noted that any such reasoning has not been stated within any evidence base document to date):

- Robin Hill provides a sympathetic transition from the urban arrangement along Cardiff Road.
- Robin Hill should be protected from a more urban arrangement.

Both points are considered unfounded from a planning perspective, which will be detailed further below.

However, fundamentally in relation to the soundness of the plan, no evidence has been provided by the Council to justify the above reasoning, and furthermore, it remains unclear as to why the Council have deviated from the evidence base that is in fact available to them (i.e. the 'Cardiff Landscape Evidence Base Update Local Landscape Designations, 2025' and the 'Cardiff Green Wedge Assessment, 2025').

The Council's response to the Inspectors Question refers to a 'review of settlement boundaries' as follows: *"The Council undertook a review of the settlement boundaries, the Green Wedge, and the Special Landscape Areas in the preparation of the Cardiff Replacement LDP Deposit Plan"*. The Green Wedge and Special Landscape Area review are clearly listed within the Council's evidence base. However, no standalone settlement boundary review document can be located within the evidence base (nor any specific commentary relating to the reasoning/justification/methodology behind the review of

settlement boundaries embedded within any other evidence base document). Therefore, the established published evidence base comprises the 'Cardiff Landscape Evidence Base Update Local Landscape Designations, 2025' and the 'Cardiff Green Wedge Assessment, 2025'.

Notwithstanding the above, it is the case that the Council have deviated from the specialist advice and recommendations provided in the evidence base documents, whilst at the same time providing no further evidence to robustly inform such a deviation. Not wishing to repeat our previous comments (as detailed fully within Asbri Planning's representation to the Deposit Plan consultation dated 9th April 2025), in short, the evidence base concludes as follows:

- The Special Landscape Area Assessment recommends that the boundary of the SLA is amended to exclude the Robin Hill site from the SLA.
- The Green Wedge Assessment specifies in no uncertain terms that land at Robin Hill *"can be considered part of the urban area"; and "makes no contribution to the green wedge purposes"*.

It continues to remain unclear (following the Council's response to the Inspectors Question) as to (a) why the Council have not followed the evidence base which categorically recommends that land at Robin Hill is included within the settlement boundary, and (b) where is the evidence to the contrary?

Purpose of Settlement Boundary

The Council's response to the Inspectors Question states that *"it was considered from the settlement boundary perspective that it was important to protect Robin Hill from a more urban arrangement such as the development along Cardiff Road including the adjoining Bryn Briallu"*. As established above, no evidence has been provided by the Council to justify this assertion, and furthermore, it is considered that such an assertion is entirely unfounded in planning terms.

Robin Hill is already urban in character, comprising an existing extensive detached dwellinghouse and associated residential curtilage and hardstanding. As a separate, but relevant point, it is the case that further built/urban development could be undertaken at Robin Hill under permitted development rights which would further build upon the (already existing) 'urban arrangement' in this location. For example, subject to the relevant limitations and conditions of the Town and Country Planning (General Permitted Development) Order 1995 (as amended), the residential curtilage at Robin Hill could be subject to the development of garden sheds, detached garages, various outbuildings e.g. home office, tennis courts, swimming pool, paving/hardstanding etc.

It is therefore the case that the purpose of the settlement boundary as intended by the Council (i.e. to protect Robin Hill from a 'more urban arrangement'), is defunct as the land in question is already urban in form and character (and could be further urbanised under Permitted Development Rights notwithstanding the positioning of the settlement boundary). The Green Wedge Assessment itself states that *"Green wedges are areas in which the retention of openness (freedom from built development, as opposed to visual openness) is considered necessary in order to manage urban form"* (Paragraph 1.2). The Robin Hill site is clearly not 'free from built development'; does not contribute to the retention of openness; and as per the documented conclusions of the evidence base, should not, therefore, be retained as Green Wedge.

Furthermore, no evidence is provided by the Council (within either their response to the Inspectors specific question on this matter, or within any other evidence/examination document) to demonstrate that Robin Hill would not be protected if included within the settlement boundary. In light of the existing urban character of Robin Hill, it is unclear as to why its inclusion within the settlement boundary would undermine settlement form.

In essence, the purpose of a settlement boundary is to define the extent of a settlement – it is not to protect an existing residential dwelling from neighbouring urban character. The pattern of built form does not simply stop at the southern extent of Bryn Briallu – it continues southwards to the abutment of the highway at Heol Pant Y Gored. The land at Robin Hill clearly does not, and cannot, perform the green wedge role on which the Council's argument for exclusion from settlement is based.

With regards to the Council's assertion that Robin Hill provides *"a more sympathetic transition from the urban arrangement of the adjoining development along Cardiff Road to the softer landscape of the adjoining countryside"*, again it is considered that this assertion is subjective and not founded on robust evidence. In fact, the evidence base that is in place (i.e. Green Wege Assessment) concludes to the contrary i.e. Robin Hill *"can be considered part of the urban area"* and *"makes no contribution to the green wedge purposes"*. The Council's own evidence base concludes that Robin Hill should no longer be treated as countryside, Green Wedge, or SLA land, yet the Proposals Map of the Replacement Plan retains the existing boundary (of both the settlement boundary and SLA). The Council's response to the Inspectors Question provides no further justification, only a generalised preference for a softer transition, and does not explain why the recommendation of its own assessment should be rejected.

Summary

It is considered that the Council's justification for departing from the established evidence base is inadequate in all respects. The Council's evidence base clearly identifies that land at Robin Hill is not fulfilling the functions that justify its current exclusion from the urban area. The Council's response does not identify any contrary evidence, but instead relies on a broad assertion that Robin Hill provides a transition to the countryside (which it clearly does not, in light of the urban form of Bryn Briallu i.e. detached residential dwellings, extending to Robin Hill, i.e. detached residential dwelling).

No objective assessment has been produced to explain why the conclusions of the Green Wedge and Special Landscape Area assessments should not be reflected in the settlement boundary in the Replacement Plan, and no logical planning purpose is served by excluding the existing dwelling from the settlement boundary.

Conclusion

Based on the above, Asbri Planning maintain that it has been established as part of the Council's evidence base that the site comprising Land at Robin Hill makes no contribution to the function of the Green Wedge. The positioning of the settlement boundary as presented within the Proposals Map of the Deposit Plan remains illogical, and it is requested that the Proposals Map is amended (in clear accordance with the evidence base) to allow for the inclusion of the Robin Hill site within the settlement boundary, and the associated de-allocation of the land from the Special Landscape Area and Green Wedge accordingly.