



Cardiff Council - January 2025

Background Technical Paper Number 10

## Deposit Plan

## Candidate Site Assessment



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# **Cardiff Replacement Local Development Plan Deposit Plan 2021 to 2036**

## **Background Technical Paper Number 10**

### **Candidate Site Assessment**

**January 2025**

## **1. Purpose of this Paper**

The purpose of this paper is to provide a summary of the assessment process that has taken place of the candidate sites received to determine whether they support the Replacement Local Development Plan Strategy and their suitability to be carried forward for inclusion into the Cardiff Replacement Local Development Plan (RLDP).

## **2. Background**

The Planning and Compulsory Purchase Act 2004 places a duty on each local authority in Wales to prepare an LDP. An important function of the LDP is to set out the Council's land use strategy and to identify the anticipated level of future development that may occur and allocate land for such development that may take place during the lifetime of the Plan. The LDP Manual (Welsh Government, March 2020) recommends that local planning authorities engage early in the process at the evidence gathering stage of the LDP process to obtain information about potential development sites that may be included in the plan. The aim of this is to help with the council's consideration of suitable sites for inclusion in the LDP and avoid a substantial number of unidentified sites coming forward at the examination stage and also to ensure that the LDP can be delivered in land use terms

To gather information on potential development sites the LDP Regulations require all Local Planning Authorities to request nominations for sites, called Candidate Sites, to be proposed for inclusion in the LDP. The call for Candidate Sites is an important part of plan making and is required to be undertaken at an early stage of plan preparation, in advance of the formal stages and before the draft Plan is prepared and consulted on at the Preferred Strategy stage.

## **3. Candidate Site Process**

### **The Call for Candidate Sites**

As part of the RLDP preparation process, the Council invited anyone with an interest in land including landowners, developers and the public, to put forward 'Candidate Sites' to be considered for development, redevelopment or protection in the Cardiff RLDP. The Call for Candidate Sites covered a 12-week period from the 28<sup>th</sup> May 2021 to 20<sup>th</sup> August 2021.

The purpose of inviting Candidate Site submissions at this stage was to assist the Council in understanding what land was available to inform the preparation of the RLDP. A total of 62 Candidate Sites were submitted for development/redevelopment and protection covering a range of uses including; residential, employment, active travel and recreation uses. Site proposers were required to submit a Candidate Site Submission Form to support their site.

### **Candidate Sites Register**

The Candidate Sites submitted during the Call for Candidate Sites were published in a Candidate Sites Register. The Register does not form part of the Replacement LDP and the inclusion of sites in the Register does not indicate a commitment that such sites will be taken forward into the Replacement LDP. Following publication of the Candidate Register additional sites that have

been submitted for as part of representations during RLDP consultation have been added to the Register.

### **Submission of New Sites at the Deposit Stage**

If you wish to submit a new or amended site to be considered with your representation please provide

- A plan of the site with clear site boundaries shown
- Details of the proposed use of the site
- Evidence that the site accords with the Replacement LDP Strategy and that the Plan would be sound if the site is included. A Guidance Note on some of the Key Assessments needed to support new candidate sites is available .
- A Sustainability Appraisal of the proposed site which must be consistent with the scope, framework and level of detail as set out in the Sustainability Appraisal for the Cardiff Replacement LDP available to view in the [Virtual Consultation Room](https://cardiffldp.consultation.ai/) <https://cardiffldp.consultation.ai/>

### **Candidate Site Assessment Methodology**

The Candidate Sites assessment process aims to identify sites that are suitable for allocation within the replacement LDP in line with the established need as set out in the Replacement LDP (RLDP) Strategy.

It is essential that the land to be allocated for development in the RLDP meets the objectives and requirements of the Plan and is suitable and capable of being developed. A Candidate Sites Assessment Methodology was prepared to ensure compliance with legislative requirements, national planning policy, as contained in Planning Policy Wales (Edition 11) and national guidance in the Development Plans Manual (Edition 3), as appropriate and to ensure that the identification of suitable sites for allocation is founded on a robust, transparent and credible assessment of the land submitted. The Candidate Site Methodology was consulted upon during the Call for Candidate Sites.

## **4. Preferred Strategy Consultation and the Candidate Sites**

As part of the consultation on the Preferred Strategy stakeholders were given the opportunity to make comments on the submitted candidate sites and the comments received helped inform the next stage of assessment. Over 5000 responses to the Candidate Sites Register were received and have been fed into the site assessment process. In addition the Council published and consulted upon an initial high level assessment of the Candidate Sites. This Stage 1 of the Assessment involved an initial filtering process identifying sites that were

- below the threshold
- contained fundamental constraints that could not be mitigated e.g., sites in the open countryside
- for residential uses in a C2 flood risk zone
- raising deliverability issues
- not able to be brought forward within the plan period and/or.

- not evidence that the site is financially viable

However following the close of consultation on the Candidate Sites Register at the Preferred Strategy Stage it was decided that in the interest of fairness and completeness that all sites received would be subject to the same detailed level of assessment. This ensures that as the Plan and supporting documents are submitted for Examination all sites will have been treated fairly and equally.

As part of the consultation on the Preferred Strategy consultation on the Candidate Sites was undertaken with external statutory agencies and infrastructure providers, such as Dwr Cymru/Welsh Water and the National Grid, Natural Resources Wales, Glamorgan Gwent Archaeological Trust, Wales and West Utilities, and Western Power Distribution as new development can often place additional pressure on existing infrastructure, such as water supply, drainage, sewerage, power, and communications and community facilities such as schools, GP surgeries and recreation space.

In addition to undertaking a detailed assessment of the submitted candidate sites the outstanding existing allocations in the adopted LDP which have not been submitted as candidate sites and have been proposed for carry over into the Replacement LDP have also been included in this detailed assessment.

## **5. Deposit Stage and the Detailed Candidate Sites Assessment**

### **Potential to Support the Replacement LDP Strategy**

Each of the Candidate Sites has been assessed against the Replacement LDP Strategy to determine its potential to support the strategy.

- **Deliverable Growth**
- **Sustainable Development, Well Being and Climate Change**
- **Placemaking, Infrastructure and Cohesive Communities**
- **Environmental Qualities and Areas for Protection**

With regard to the Growth and Spatial Option three growth options were considered and assessed and the summary of findings was outlined in the Preferred Strategy which the Council consulted on during the Summer of 2023. The Preferred Growth Option (Option B) based on a policy led dwelling target of 1,600 dwellings per annum was considered to be realistic and reliable. In order to deliver the preferred level of growth eight alternative Spatial Options were considered and consulted on. The Preferred Spatial Option was considered to be a Sustainable Growth Strategy which was a hybrid option that builds on the approach set out in the brownfield strategic options. For further information on the Growth and Spatial Options please see the Cardiff Replacement LDP Deposit Plan which is available on the Virtual Table in the Virtual consultation Room.

In terms of the provision of new homes there is a substantial landbank of new homes already committed on a range and choice of brownfield and greenfield sites across the city which

provide for a range and choice of housing types and locations across the city. Such sites will be major regeneration and renewal areas, located within or adjacent to district or local centres or on transport nodes within the urban areas. These sites in combination with the substantial existing landbank of sites on greenfield sites around the edge of the city. The Sustainable Growth Strategy is therefore a brownfield strategy which in addition to commitments seeks to meet the majority of housing land required during the plan period to 2036 through a range of brownfield sites within the existing settlement boundary including the residual greenfield allocations from the adopted LDP Strategic sites (Policy H1A), the non-strategic housing allocations (Policy H1B) and Housing Led Regeneration Areas (Policy H2) proposed in the Deposit Plan. Given this it is considered that no new greenfield releases are necessary, and further housing growth during the plan period will be through a range of brownfield sites within the existing settlement boundary.

## Criteria for Assessing the Candidate Sites

### Assessment Against the Candidate Site Assessment Criteria

The following criteria, as set out in the Candidate Site Methodology paper, was used to assess the suitability of sites for inclusion in the RLDP.

- **Land** – Planning Policy Wales emphasises the importance of re-using brownfield sites. Therefore, previously developed land will rank higher than greenfield sites. The proximity to existing settlements will also be a consideration.
- **Availability, Infrastructure and Deliverability** – The Council will need to have a reasonable degree of confidence that the site will be delivered and there are no legal obstacles to delivery; that there are no site utility constraints, physical constraints and the site provides scope for renewable energy solutions and infrastructure deliverability.
- **Accessibility and Transportation Context** - The importance of reducing the need to travel and new developments having access to a range of key services is set out in national policy. The transportation context and the potential for sustainable transport will be assessed.
- **Environmental** – Potential impact on Biodiversity/geology, landscape, the historic, cultural and built environment, natural resources and contaminated land will need careful consideration, including impact on the following designations: - o Special Area of Conservation (SAC) o Site of Specific Scientific Interest (SSSI) o Ramsar Site o Special Protection Area (SPA) o Sites of Important Nature Conservation (SINC) o Loss of protected woodland/trees and hedgerows will need to be avoided as much as possible, and schemes which have an impact on air quality will need to demonstrate appropriate mitigation.
- **Physical** – The existence of physical constraints, such as flood risk and topographical constraints will be a factor, along with agricultural land and mineral safeguarding areas. Careful consideration will be given to existing flood risk and the potential to manage flood risk.
- **Neighbourhood, Community and Placemaking** – certain development schemes may bring about additional improvements for the local neighbourhood, improve community facilities, local connectivity and provide sustainability and design benefits.

- **Economic and Other Benefits** – Certain development schemes may bring about additional benefits to a locality, for example, provision of employment opportunities in an area of high unemployment.
- **Sustainability Factors** – does the proposal improve air quality and health and wellbeing.

## 6. Integrated Sustainability Assessment

In addition to the LDP Assessment of the Candidate Sites the Statutory process of Sustainability Appraisal and Strategic Environmental Assessment (SA/SEA) undertook an assessment of the Candidate Sites, undertaken as a broader Integrated Sustainability Assessment (ISA), including wider areas of assessment for example Health Impact Assessment, Welsh Language Impact Assessment and Equality Impact Assessment. The Candidate Sites have been assessed against the Integrated Sustainability Assessment (ISA) Framework which helps to ensure that the sites contribute towards achieving the overall objectives of the plan. The ISA process determined if a site had a positive, neutral or negative impact in relation to the objectives of the ISA. The ISA assesses all reasonable options for the inclusion of a submitted site within the RLDP. A summary of the ISA assessment of sites is set out in Appendix 1. The full Final Integrated Sustainability Assessment is available to view together with the Deposit Plan in the Virtual Consultation Room on the Virtual Documents Table

## 7. Next Stages

To provide an opportunity for stakeholders to comment on the candidate sites the Council are consulting formally on the submitted candidate sites alongside the Deposit Plan. To support, object or comment on the Candidate Sites Register please complete the feedback form on our website at [Candidate sites - Cardiff Council - Local Development Plan](#). Comments received on the Candidate Sites will be submitted to the Planning Inspectorate as part of the examination into the soundness of the Replacement LDP.

Please note that comments made cannot be treated as confidential and only comments made at this Deposit stage consultation will be forwarded onto the Planning Inspector for consideration as part of the Examination into the soundness of the RLDP. Comments made at previous stages do not get forwarded on to the appointed Planning Inspector.

## Appendix 1: Summary of the ISA Assessment of Sites

In international level designation	In UK/Wales level designation	Inaccessible other than by car (may overlap with international and UK/Wales designations)	In local level designation
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## Appendix 2: Candidate Sites Which Support the RLDP Strategy

### Candidate Sites Carried Forward into the Deposit Plan. Including Sites Not promoted as Candidate Sites

- Strategic Housing Sites SH1.1 to SH1.6 form the residual parts of the Strategic Sites allocated in the adopted LDP. It is considered important to take forward these sites in the RLDP to ensure the masterplans and community infrastructure associated with these sites can be delivered. The masterplans will need to take into account the mitigations outlined in table 8.4 of the Integrated Sustainability Appraisal (ISA).
- Non Strategic Housing Sites are considered to form an important part of the land bank and it is considered necessary that these sites are allocated in order to secure the protection of the land for its future use for the provision of housing. As recommended by the Habitats Regulations Assessment (HRA) of the Deposit Plan, any future application for H1.1 Land at areas 9-12 St Mellons will be required to provide evidence that the development will not result in adverse effects on the integrity of the Severn Estuary SPA / Ramsar regarding its qualifying bird species. To demonstrate this, a survey will be required to determine the habitats and current site use to verify if the land parcel is indeed suitable for supporting a significant population of designated bird species. Where habitats are suitable, non-breeding bird surveys will be required to determine if the site and neighbouring land constitute a significant area of supporting habitat. Bird surveys will need to be undertaken during autumn, winter and spring. If habitat within the site or adjacent land are identified to support significant populations of designated bird species, avoidance measures and mitigation will be required, and the planning application will likely need to be assessed through a project specific Habitats Regulations Assessment to ensure that the development does not result in adverse effects on integrity.
- Housing Led Regeneration Areas. In accordance with national guidance Housing Led regeneration areas are areas of land that are either vacant, under used or the subject of redevelopment proposals, or have future potential to provide an opportunity for high density, sustainable, mixed use development.

Candidate Site Reference	Ward	Candidate Site Name	Site Size (ha)	Proposal	Comment
3	Butetown	Land at Callaghan Square	3.36	Housing Led regeneration area	Housing Led Regeneration Area H2.7
4	Butetown	Porth Teigr and Alexandra Head	27	Housing Led regeneration area	Housing Led Regeneration Site H2.5
8	Butetown	Queensgate	3.67	Port, Port related uses and mixed Use	Housing Led Regeneration Site H2.4

19	Pentyrch and St Fagans	Land to the South of Llantrisant Road (Part of Site D)	13	Residential	Strategic Housing Site SH1.4
21	Pentyrch and St Fagans	Land Adjacent Llantrisant Road (A4119), Capel Llanilltern. (Spicer, Jenkins and Pink Land)	8.73	Residential	Strategic Housing Site SH1.5
32	Grangetown	Wholesale Fruit Market, Bessemer Road	4.8	Residential	Housing Led Regeneration Site H2.6
33	Lisvane and Thornhill	Land to South of the M4 motorway, West of Rudry Road, Lisvane	4.96	Residential	Strategic Housing Site SH1.2
34	Lisvane and Thornhill	Land at Church Farm	14.16	Residential	Strategic Housing Site SH1.1
37	Llandaff	Rookwood Hospital	3.4	Residential	Non-Strategic Housing Site H1.2
45	Pentyrch and St Fagans	Ton Mawr Quarry	12	Extension to quarry	Allocation in the adopted LDP
52	Pontprennau and Old St Mellons	Cardiff Gate Business Park	6.4	Mixed Use	Housing Led Regeneration Site H2.3
57	Pontprennau and Old St Mellons	Land to the north of Ty-Draw Road	15.33	Residential	Strategic Housing Site SH1.3
76	Whitchurch and Tongwynlais	Velindre Cancer Centre	4	Mixed Use	Housing Led Regeneration Site H2.2
78	Whitchurch and Tongwynlais	Whitchurch Hospital	22.2	Mixed Use	Housing Led Regeneration Site H2.2
81	Pentyrch and St Fagans	Land at Llwynioli Farm, North of Junction 33	3.4 ha	Residential	Strategic Housing Site SH 1.6

### Sites Not Submitted as Candidate Site Carried Forward into the Plan

RLDP Site Reference	Ward	Candidate Site Name	Site Size (ha)	Proposal	Comment
H1.1	St Mellons	Land at Areas 9-11, St Mellons	3.98	Residential	Non-Strategic Housing Site H1.1
SH1.7	Grangetown	Former Gas Works Ferry Road	3.98	Residential	Strategic Housing Site SH1.7
H2.1	Butetown	International Sports Village	5.88	Residential	Housing led Regeneration Area Site H2.1
EC1	Butetown	Central Enterprise Zone	56.7	Mixed uses	
H11	Splott	Proposed extension to Rover Way	6.8	Gypsy and Traveller site	

### Sites which support the RLDP Strategy but Have Not Been Carried Forward into the Plan

Brownfield candidate sites located within the settlement boundary which in principle support the RLDP Strategy but have not been carried forward into the Deposit Plan can be considered via the development management process.

Candidate Site Reference	Ward	Candidate Site Name	Site Size (ha)	Proposal
6	Butetown	Land south of Cardiff Central Station (Car Park)	1.0	Mixed Use
10	Butetown	Bute East Dock	9.52	Mixed Use

30	Gabalfa	Land south of Mynachdy Road, Gabalfa	1.8	Mixed Use
65/68	Splott	Image House, East Tyndall Street	0.33	Mixed Use / Affordable Housing
66	Splott	Land at Rover Way, Pengam Green	21	Employment

## Appendix 3 Candidate Sites That Do not successfully Respond to the RLDP Strategy

In view of the Strategy there is no need to identified Greenfield sites, outside the settlement boundary located within the Green Wedge as identified in the adopted LDP and the RLDP Green Wedge and an adopted LDP and reviewed RLDP Special Landscape Area

Candidate Site Reference	Ward	Candidate Site Name	Site Size (ha)	Proposal
13	Pentyrch and St Fagans	Land at the Old Forge Capel Llanilltern	1.2	Residential
15	Pentyrch and St Fagans	Robin Hill, Creigiau	0.4	Residential
20	Pentyrch and St Fagans	Land off Brummell Drive, Creigiau	10.5	Residential
22	Pentyrch and St Fagans	Land East of Heol Pant-Y-Gored Creigiau	5.3	Residential
35	Lisvane and Thornhill	Land to the West of Graig Road and North of the M4	13.2	Residential
43	Pentyrch and St Fagans	Land at Tynewydd, Main Road, Gwaelod y Garth	0.4	Residential
62	Rhiwbina	Land to the East and West of Thornhill Road and to the North and South of Capel Gwilym Road	164	Residential
80	Radyr and Morganstown	Land at Cwm Farm, Morganstown	29.22	Residential
84	Whitchurch and Tongwynlais	Land off Forest Road, Tongwynlais	7	Residential

In view of the Strategy there is no need to identified Greenfield sites, outside the settlement boundary which do not support the Strategy

Candidate Site Reference	Ward	Candidate Site Name	Site Size (ha)	Proposal
14	Pentyrch and St Fagans	Land at Llanfair, Junction 33	9	Residential
17	Pentyrch and St Fagans	Land at Henstaff Court	41	Residential
21	Pentyrch and St Fagans	Land Adjacent Llantrisant Road (A4119), Capel Llanilltern. (Spicer, Jenkins and Pink Land)	22.27 ha	Residential - Remainder of the candidate site which lies outside of the adopted LDP Strategic Housing Site D.
23	Pentyrch and St Fagans	Plasdŵr Uchaf	144	Residential
24	Ely	Land at Archer Road, North Ely	4.7	Residential
48	Pontpennau and Old St Mellons	Land at Tyla Farm, Tyla Lane	5.3	Residential
50	Pontpennau and Old St Mellons	Land north of Druidstone Road	1.6	Residential
51	Pontpennau and Old St Mellons	Land north-west of Druidstone Road	5	Residential
54	Pontpennau and Old St Mellons	Land at Goitre Farm, St Mellons	13	Mixed use
55	Pontpennau and Old St Mellons	Land at Bridge Road, Old St Mellons	8.3	Residential
56	Pontpennau and Old St Mellons	Land North of Bridge Road, Old St Mellons, Cardiff	1.2	Residential



58	Pontprennau and Old St Mellons	Land to the rear of Charters, North of Druidstone Road	0.7	Residential
59	Pontprennau and Old St Mellons	Land to the rear of Mainbrace, Druidstone Road	0.9	Residential
61	Radyr and Morganstown	Goitre Fawr, Plasdŵr	57	Mixed Use
70	Trowbridge	Land off Clos Medwy, Old St Mellons	0.6	Residential
83	Trowbridge	Land at Wentloog	14.6	Employment
86	Pentyrch and St Fagans	Land adjacent to Dwrllyn Cottage, Capel Llanilltern	0.3	Residential

## Appendix 4 : Candidate Sites More Appropriately Considered Under Separate Mechanisms

### Settlement Boundary Proposals

Proposals for Settlement boundary amendments are more appropriately considered in accordance with national policy and considered as part of the settlement boundary review undertaken to inform the Deposit RLDP.

Candidate Site Reference	Ward	Candidate Site Name	Site Size (ha)	Proposal
49	Pontprennau and Old St Mellons	Land adjacent to Cefn Eurwg, Druidstone Road	0.1	Amend settlement boundary to include site for residential
53	Pontprennau and Old St Mellons	Land adjacent to Began House	0.1	Amend settlement boundary to include site for residential
82	Pontprennau and Old St Mellons	The Manor, Druidstone Road	0.44	Amend Settlement boundary to include site for residential

### Sport / Recreation and Open Space/Community Green Space Proposals

Proposals for Sport and Recreation Facilities will be included in the Replacement LDP in accordance with national policy and will be subject to their own separate assessments.

Candidate Site Reference	Ward	Candidate Site Name	Site Size (ha)	Proposal
16	Pentyrch and St Fagans	Land east of Croft y Genau Road and south of Pentrebane Road	6.1	Playing Fields
29	Gabalfa	Flaxland Wood	0.25	Community Green Space
75	Whitchurch and Tongwynlais	Whitchurch Tennis Club	0.67	Sporting facility, community facility, open space

	Butetown	Red House Meadows, ISV		Retain SNIC and integrate the site into the wider strategic plan
	Llandaff	The Fram		Protect for community health and well being
	Grangetown	The Marl		Public open space
	Butetown	Brittainia Park		Vital public open space and tree canopy
	Butetown	Hamadryad Park		Vital public open space and tree canopy
		Nant Fawr Woods and Meadows		Protect for biodiversity and health and well being
	Danescourt	Danescourt Woods and Meadows		Protect for biodiversity and health and well being
	Ely	Ely Recreation Ground		Community health and well being
	Gabalfa	Gabalfa Woods		Community resource and wildlife corridor
	Splott	Moorland Park		Vital public open space and tree canopy
	Maindy	Maindy Park and Velodrome		Open Space and recreation
	Pentwyn	The Hawthorns		Open Space
	Riverside	Penhill Copse		Biodiversity and air quality
	Radyr	Goetre Fawr		Biodiversity and health and wellbeing
	Splott	Willows High School		Community forest

## Transportation Proposals

Transportation proposals will be included in the Replacement LDP in accordance with national policy and will be subject to their own separate assessments and consultations.

Candidate Site Reference	Ward	Candidate Site Name	Site Size (ha)	Proposal
5	Butetown	Land at Pierhead Street (Porth Teigr)	0.9	Safeguarding corridor for future possible extension of Bay line
11	Canton	Land at Ely Mill and Victoria Park	0.25	New Station, platforms and access
39	Llandaff North	Llandaff Station Car Park	0.5	Mixed Use
60	Radyr and Morganstown	Radyr Station Car Park	0.9	Mixed Use
69	Sploitt	Eastern Bay Link	80	Active travel route
74	Trowbridge	Wentloog Levels – Rhymney and Peterstone SSSI	5700	Biodiversity and active travel
79	Whitchurch and Tongwynlais	Velindre Station	1	New Metro station

## Sites More Appropriately Dealt as Policy Considerations

Site for Port Related and Mixed Use

Candidate Site Reference	Ward	Candidate Site Name	Site Size (ha)	Proposal
9	Butetown	Cardiff Port	289.3	Port, Port related uses and mixed use

### Site Seeking More Flexibility

Candidate Site Reference	Ward	Candidate Site Name	Site Size (ha)	Proposal
85	Heath	Allied Bakeries, Maes y Coed Road	2.7	Seek on going protection for employment but seek flexibility for long term potential to redevelop the site

### Sites with Extant Planning Consent

Candidate Site Reference	Ward	Candidate Site Name	Site Size (ha)	Proposal	Comment
1	Cathays	Land at Customhouse Street	0.009	Mixed Use	
7	Butetown	Land north of Loudon Square	0.25	New Station, platforms and potential ancillary uses (Classes A1/A3)	Construction underway
18	Pentyrch and St Fagans	Land to the south of Creigiau	38.9	Residential	Site Part of Strategic Site A in the adopted LDP
44	Pentyrch and St Fagans	Taffs Well Quarry	4.6	Extension to quarry	

73	Trowbridge	Land south of St Mellons Business Park : Hendre Lakes	80.2	Employment (Business Park), transport hub and ancillary uses	Following Call In by Planning Ministers site Granted Consent
77	Whitchurch and Tongwynlais	Northern Meadows	9.3	Community greenspace	Planning permission was granted for the replacement Cancer Centre in March 2018 and construction is underway

### Site recently refused Planning Permission

Candidate Site Reference	Ward	Candidate Site Name	Site Size (ha)	Proposal	Comment
38	Llandaff	Land Accessed from De Braose Close, Danescourt	2.88	Residential	In view of the application for residential development at this site (20/00187/MJR) being refused due to its location within an identified area of open space, exacerbating existing deficiencies within the Llandaff ward and causing unacceptable harm to the established character and appearance of the mature woodland and the public footpath network which cannot be mitigated and the lack of connectivity providing a safe and legible route for cycle and walking to local shops and facilities.