



# Local Development Plan

2021 > 2036

Cardiff Council - January 2025

## Deposit Plan

### Final Sustainability Appraisal Report



**Cardiff Council and Levett-Therivel Sustainability Consultants**

**Integrated Sustainability Appraisal and Strategic Environmental  
Assessment of the Cardiff Replacement Deposit Local Development  
Plan**

**Final Sustainability Appraisal Report**

**January 2025**

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## 0. NON-TECHNICAL SUMMARY

This is a summary of the Integrated Sustainability Appraisal of the Cardiff Replacement Local Development Plan.

### 0.1 The Cardiff Replacement Local Development Plan (RLDP)

The Cardiff RLDP identifies locations for development to 2036, and policies for managing that development. The RLDP policies are about:

- Strategy
- Housing
- Economy
- Design
- Retail
- Community facilities and safety
- Heritage
- Health, wellbeing and food
- Welsh language
- Countryside and landscape
- Biodiversity
- Transport
- Open space
- Play and informal recreation
- Energy and climate change
- Flood risk and water
- Pollution
- Minerals and waste

The RLDP proposes to develop sites at:

- Land at Church Farm; Land south of the M4 Motorway, West of Rudry Road; and Land north of Ty-Draw Road – Strategic Site F
- Land south of Llantrisant Road; Land at Llantrisant Road; and Land at Llwynioli Farm – Strategic Site D
- Former Gas Works, Ferry Road
- Land at Areas 9-12, St. Mellons
- Rookwood Hospital
- International Sports Village
- Whitchurch Hospital / Velindre
- Cardiff Gate Business Park West
- Roath Dock North
- Porth Teigr and Alexandra Head
- Hadfield Road
- Callaghan Square
- Cardiff Central Enterprise Zone
- Land south of St Mellons Business Park
- Pengam Green

### 0.2 Integrated sustainability appraisal (ISA)

ISA identifies the main social, economic, environmental and cultural impacts of the RLDP. It tries to minimise the bad impacts and maximise the good ones. It is legally required, and must include the following steps:

- A. **Scoping:** A discussion of other policies and plans that influence the RLDP, the current situation in Cardiff and the likely situation if the RLDP does not go ahead, existing problems, and a structure for assessing alternatives to the plan and policies/sites in the plan.
- B. **Assessment of alternatives:** assessment of different reasonable policies and different sites, using the structure agreed at Scoping.
- C. **Assessment of the RLDP,** using the structure agreed at Scoping; suggestions for minimising bad impacts and maximising good ones; preparation of this ISA report.

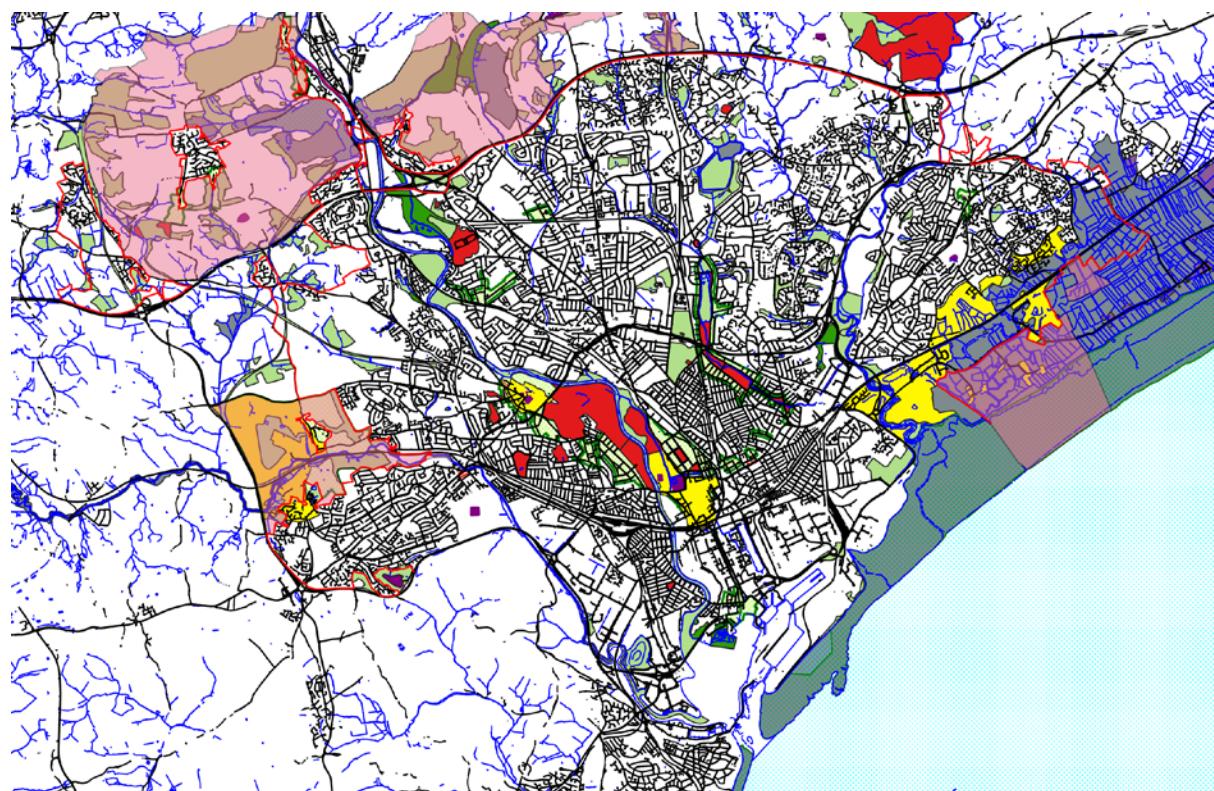
- D. **Consultation** on the draft RLDP and changes to the RLDP where appropriate; **examination** of the RLDP and ISA by an inspector; and **adoption** of the RLDP.
- E. **Monitoring** of the actual impacts of the RLDP.

The results of the Scoping stage are in a [Scoping Report](#) of 2021. The assessment of draft plan vision and objectives for the RLDP was in late 2021. An [initial ISA report](#), including an update to the Scoping stage, was prepared in 2023. The coronavirus pandemic slowed down the development of the RLDP, and reduced the data available for the ISA.

### 0.3 Scoping

Figure 0.1 shows the main environmental, heritage and landscape constraints in Cardiff. Table 0.1 shows the main sustainability issues for Cardiff.

**Figure 0.1 Environmental and heritage constraints in Cardiff**



Nature conservation	
	Special Area of Conservation (habitats and species)
	Special Protection Area (birds)
	Site of Special Scientific Interest
	Local Nature Reserve
	Site of Importance for Nature Conservation

Heritage	
	Historic Parks & Gardens
	Archaeologically Sensitive Area
	Conservation Area
	Ancient Monument
Landscape	
	Special Landscape Area
	Historic Landscape

**Table 0.1 Key sustainability issues and main problems for Cardiff**

Key:	Good condition	Quite good condition	Intermediate condition	Quite poor condition	Poor condition	Unknown condition
<b>Topic</b>						<b>Current status</b>
<b>Access, equality and population:</b> The high cost of housing is stopping people on low incomes from buying homes. Cardiff has some of the most deprived areas in Wales, particularly in the 'southern arc'.						<b>Likely future without the RLDP</b>
<b>Air quality</b> in Cardiff is improving, but the city still has four areas of poor air quality.						
<b>Biodiversity:</b> The Severn Estuary's wetland birds are already harmed by recreational use and habitat loss.						?
<b>Climate change:</b> Cardiff aims to be carbon neutral by 2030. Carbon emissions are going down, but much too slowly to achieve this target. Walking, cycling and public transport have grown over time, but Cardiff's growing population will lead to more car journeys, air pollution, accidents and poor health. Many people from other parts of South East Wales commute into Cardiff.						
<b>Heritage:</b> Many of Cardiff's listed buildings are at risk.						?
<b>Economy:</b> Cardiff's workforce is split into highly-qualified and unskilled workers. There is high unemployment in parts of the city. Parts of the population have low education.						?
<b>Health and well-being:</b> The 'southern arc' of the city is generally deprived. The poorest people in Cardiff have a healthy life expectancy 20+ years less than the richest.						
<b>Land, soil and minerals:</b> Cardiff's ecological footprint exceeds the global 'fair share'. As a result of the current LDP, large areas of greenfield land are being built on.						
<b>Landscape:</b> Cardiff has about half of the usable per-person open space recommended by the Welsh Government, but has three times as much open space if all types of open space are included.						
<b>Waste:</b> Per-person waste has gone down sharply over the past 10 years. Most of Cardiff's non-recyclable waste goes to a waste-to-energy facility at Trident Park.						
<b>Water</b> quality in most of Cardiff's rivers is moderate (poor in River Ely). Water supplies are expected to be adequate over the RLDP period, although water efficiency measures are needed. Large areas of Cardiff are at flood risk because Cardiff is low-lying.						

Important national policies that the RLDP must comply with are the need to:

- Provide enough housing for people's needs
- Deliver new jobs and investment for Cardiff and the wider region
- Encourage active travel: walking, cycling and public transport
- Provide net benefits for biodiversity
- Address the climate and nature emergencies
- Support the well-being of future generations

Two sets of criteria were used to assess the impacts of the RLDP. Table 0.2 shows the framework used for plan alternatives and policies. A different framework based on distances to services (e.g. bus stops, GP) and constraints (e.g. nature conservation sites) was used for sites.

**Table 0.2 ISA framework for alternatives and plan policies**

ISA objective	Example Sub Objectives: Will the vision/objective/alternative/policy...
1. Help deliver equality of opportunity and access for all	<ul style="list-style-type: none"> <li>• Meet the need of Cardiff's population for homes, jobs and community facilities</li> <li>• Support the regeneration of deprived areas</li> </ul>
2. Maintain and improve air quality	<ul style="list-style-type: none"> <li>• Reduce the need to travel</li> <li>• Avoid locating new development in areas of poor air quality</li> </ul>
3. Protect and enhance biodiversity, flora and fauna	<ul style="list-style-type: none"> <li>• Maintain and achieve favourable condition of international, national and local sites of nature conservation importance</li> <li>• Help to provide a net benefit for biodiversity</li> </ul>
4. Reduce emissions of greenhouse gases and adapt to the effects of climate change	<ul style="list-style-type: none"> <li>• Support energy conservation and energy efficient design</li> <li>• Promote renewable energy generation</li> <li>• Reduce vulnerability of the built environment to the effects of climate change</li> </ul>
5. Protect and enhance historic and cultural heritage, including the Welsh Language	<ul style="list-style-type: none"> <li>• Protect and enhance historic and cultural assets including scheduled ancient monuments, listed buildings, historic parks and gardens, historic landscapes and conservation areas</li> <li>• Support the use of the Welsh Language</li> </ul>
6. Help deliver the growth of a sustainable and diversified economy	<ul style="list-style-type: none"> <li>• Increase the number and range of employment opportunities</li> <li>• Support and enhance the role of Cardiff as a key economic driver of South East Wales city region</li> </ul>
7. Improve health and well-being	<ul style="list-style-type: none"> <li>• Reduce health inequalities</li> <li>• Encourage and facilitate walking and cycling</li> <li>• Protect, and improve access to, open space</li> </ul>
8. Use soils and minerals efficiently and safeguard their quality	<ul style="list-style-type: none"> <li>• Re-use derelict and other previously developed land</li> <li>• Remediate contaminated and unstable land</li> <li>• Safeguard soil quality</li> </ul>

ISA objective	Example Sub Objectives: Will the vision/objective/alternative/policy...
9. Protect and enhance the landscape	<ul style="list-style-type: none"> <li>• Protect and enhance the landscape</li> <li>• Promote high quality design</li> </ul>
10. Minimise resource use and waste, increase re-use and recycling	<ul style="list-style-type: none"> <li>• Reduce Cardiff's ecological footprint</li> <li>• Promote resource efficiency and the use of recycled materials</li> <li>• Promote waste reduction, re-use, recycling and recovery</li> </ul>
11. Maintain and enhance water quality and resources, and manage flooding	<ul style="list-style-type: none"> <li>• Conserve water resources and increase water efficiency</li> <li>• Improve water quality in rivers, lakes etc.</li> <li>• Ensure new developments have adequate sustainable drainage systems</li> </ul>

## 0.4 Alternatives

Four types of alternatives/options were considered and appraised in the ISA: growth levels, alternatives for providing for growth; other strategic options; and development sites.

Three **growth levels** were assessed:

ISA objective Options for growth levels	1. Equality	2. Air	3. Biodiversity	4. Climate	5. Heritage	6. Economy	7. Health	8. Soils	9. Landscape	10. Resources	11. Water
A. About 19,000 new homes and 30,000 new jobs	+	-	-	-	-?	+	+/-	-	-	-	-
B. About 24,000 new homes and 32,300 new jobs	+/ ++?	-/- --	-/- --	-/- --	-? --?	+/ ++	++/ --	-/- --	-/- --	-/- --	-/- --
C. About 30,500 new homes and 43,000 new jobs	+/ ++?	--	--	--	--?	++	++/ --	--	--	--	--

Option B is the preferred option. Option C is unrealistic and not consistent with evidence on actual population growth in Cardiff. It also has major environmental and capacity impacts, particularly relating to transport. Option A would not deliver enough new homes and jobs, and is not consistent with Future Wales and Cardiff's role as the centre of a thriving city-region.

Eight options were considered for **where the growth should take place**:

ISA objective	1. Equality	2. Air	3. Biodiversity	4. Climate	5. Heritage	6. Economy	7. Health	8. Soils	9. Landscape	10. Resources	11. Water
<b>Options for how growth should take place</b>											
1. Further extension of existing strategic sites	++ ?	-	-	-	-?	+?	+/-	--	-	-	-
2. Urban intensification on brownfield (previously developed land) only	?	-	-?	-	0	+?	+/-	0	-	-	-
3. Renewal and regeneration based on brownfield mixed use sites	++ ?	-	-?	-	0	++	+/-	0	+	-	-
4. Growth based around district and local centres	?	-	0?	-	0	++	+/-	0	-?	-	-
5. Growth based around transport nodes	?	-/-	-	-/-	0	+?	+/-	0?	-	-	-
6. Strategic public transit growth corridors	+	-/-	--	-/-	-?	+?	+/-	--	-/-	--	--
7. Dispersed greenfield growth areas	++ ?	--	--	--	-?	+?	+/-	--	--	--	--
8. Dispersed combination of brownfield and greenfield	+	--	-?	--	-?	+?	+/-	-?	-?	--	-?

The preferred option combines Options 2, 3, 4 and 5: most of the housing land not already allocated in the current plan would be on brownfield sites in existing settlement boundaries. Most of the sites will be major regeneration and renewal areas, located in or next to existing or proposed transport hubs.

Alternatives considered were for **other issues**:

- Affordable housing target and delivery
- Achieving reduction in car journeys to work
- Reducing energy use, generating renewable energy and resilience to climate change
- Areas of deprivation
- Open space
- Design

More than 70 sites were considered for possible development, in addition to sites already allocated for development in the current plan. The ISA tested how they would affect nature conservation, heritage and landscape constraints, and how far they are from existing services. The planning team has taken the ISA findings on board when developing the RLDP.

## 0.5 Plan appraisal

The ISA appraised the impact of the RLDP vision, objectives, policies and sites, using the framework from Table 0.2 (and an equivalent framework for sites). Sometimes the appraisal led to changes in the policies, and they were then re-assessed. The ISA report and appendices show the full assessment results. Table 0.2 summarises the impacts of the plan.

**Table 0.2 Overall impacts of plan policies and sites**

	<b>Overall impacts of plan policies</b>	<b>Overall impacts of site allocations</b>
1. Equality	++ The plan supports jobs, affordable housing, healthy lifestyles, walking and cycling, public transport, community facilities, and children's play. These all help to reduce inequality.	+/- Most of the sites are in the least deprived areas of Cardiff, although adjacent to more deprived areas. Pengam Green would provide about 80 gypsy and traveller pitches.
2. Air quality	+/- The plan supports walking, cycling and public transport which are less polluting than the private car. It also supports local centres and community facilities, which reduce the need to travel. However the plan is for 26,400 new homes and 32,300 new jobs, which will increase air pollution.	- Many of the sites are difficult to access other than by car, and so are likely to generate air pollution.
3. Biodiversity	- The plan includes policies that protect biodiversity. However, it also promotes housing and jobs development, shopping centres, community facilities, transport projects and waste management projects that could harm biodiversity.	-- Two sites at St. Mellons are in a nationally-important nature conservation area. Several sites could jointly affect the internationally-important Severn Estuary. All of the strategic housing sites are either on or next to locally-important nature conservation sites.
4. Climate	+\nSee 2. Additionally the plan policies strongly aim to reduce greenhouse gas emissions	- See 2.
5. Heritage	-? The plan protects Cardiff's heritage and promotes the Welsh language. However several of the sites in the plan are in areas with heritage assets. Other development, such as shopping centres and transport projects, could also have heritage impacts.	- Two sites at St. Mellons are in a historic landscape and an area with possible archaeology. Rookwood Hospital and Whitchurch Hospital / Velindre are in historic parks and gardens. Cardiff Central Enterprise Zone (EC1) contains several heritage designations
6. Economy	++ The plan strongly supports economic growth. The housing policies are for 26,400 homes, and the economic policies are for 32,300 jobs. Policies on transport, shopping, and minerals and waste also support the economy.	+\nCardiff Central Enterprise Zone and Land South of St. Mellons Business Park would both provide employment, as would the 25 employment sites protected by the plan.

	<b>Overall impacts of plan policies</b>	<b>Overall impacts of site allocations</b>
7. Health	<p>+</p> <p>The plan includes policies on health and food, open space and safety. It supports walking and cycling, and children's outdoor play. The plan may have some negative health impacts where development affects open space and biodiverse areas, or increases traffic.</p>	<p>+</p> <p>The development sites most likely to encourage walking, cycling and public transport are Former Gas Works, Land at Areas 9-12, Rookwood Hospital, Whitchurch Hospital/Velindre, Hadfield Road and Callaghan Square. The 80 pitches at Pengam Green would support the health of gypsies and travellers.</p>
8. Soils	<p>-</p> <p>The plan aims to protect local food growing, soil quality, and local production of minerals. However, it would involve building on 105 hectares of greenfield land</p>	<p>--</p> <p>The strategic sites from the current LDP - together involve developing 60 hectares of greenfield land. Additional greenfield sites are Land at Areas 9-12, Cardiff Gate Business Park West, and Land South of St. Mellons Business Park.</p>
9. Landscape	<p>-</p> <p>The plan aims to protect the landscape, promotes good design, sets criteria for tall buildings, and protects open spaces. However overall the plan will lead to 105 hectares of greenfield land being built on.</p>	<p>-/-</p> <p>Creigiau Quarry is in a Special Landscape Area (SLA). Land at Llantrisant Road and Land south of Creigiau are next to a SLA. Three other sites are near a SLA. All of Land South of St. Mellons Business Park and about 15% of Land at Areas 9-12 are in a historic landscape.</p>
Resources	<p>0</p> <p>The plan says little about resources.</p>	No site allocation related issues
11. Water	<p>-</p> <p>The plan aims to protect water quality and resources, and minimise flood risk. However 26,400 new homes and 32,300 new jobs, and development on 105 hectares of greenfield land will increase water use, increase runoff, and increase flood risk.</p>	<p>-</p> <p>Roath Dock North, Porth Teigr and Alexandra Head, and Velindre are in areas of flood risk. Most of the sites in the plan are next to water bodies or include water bodies.</p>

The plan's main **short term** impacts would be building 26,400 new homes, building sites for 32,300 new jobs, and building shopping areas and community facilities. The plan's main **long term** impacts would be an increase in population; economic growth; more journeys made by walking, cycling and public transport; better energy efficiency of the city's homes and businesses; and development of 105 hectares of greenfield land. The plan's main **indirect** impacts would be fewer per-person greenhouse gas emissions; improved health for Cardiff's residents; increased use of the Welsh language; but also harm to nature, soil, water and the landscape because of the development of 105 hectares of greenfield land.

Areas that would be particularly affected by the RLDP are:

- Creigiau, where Land south of Llantrisant Road, Land at Llantrisant Road, and Land at Llwynioli Farm would complete adopted LDP Strategic Site D (and would help to provide facilities and services at those sites) but would be near a Special Landscape Area. With Strategic Site E, this would more than double the size of Creigiau.
- Wentloog, where a 44 hectare business park, train station and park and ride at Land at Areas 9-12, St. Mellons, plus a 4 hectare housing development at Land at Areas 9-12 would affect national-level heritage, landscape and nature conservation designations. The business park is expected to be a regional-scale employment generator.
- Cardiff Bay, where Porth Teigr and Alexandra Head (2310 homes), Roath Dock North (316 homes) and the International Sport Village (1000 homes) would all be located, with possible impacts on landscape, water quality and biodiversity.

## 0.6 Mitigation

Mitigation means changes made to the plan to avoid, reduce or balance out any negative impacts of the plan. The ISA informed many minor changes in policy wording to make the plan clearer. Larger mitigation has included:

- New policies on tall buildings, tourism and the Welsh language
- A complete rewriting of the plan policies on biodiversity benefits, net zero development and managing transport impacts
- The choice of Pengam Green as a Gypsy and Traveller site over another, less sustainable site
- New information about how soils can be improved; encouraging businesses to co-locate so that one business's waste can be used as a resource by another business; and supporting walking and cycling.

The ISA also proposes mitigation measures for each development site.

## 0.7 Monitoring

The impacts of the plan will be monitored every year. The ISA proposes a structure for this monitoring, to make sure that the plan's actual impacts are identified.

## 0.8 Next steps

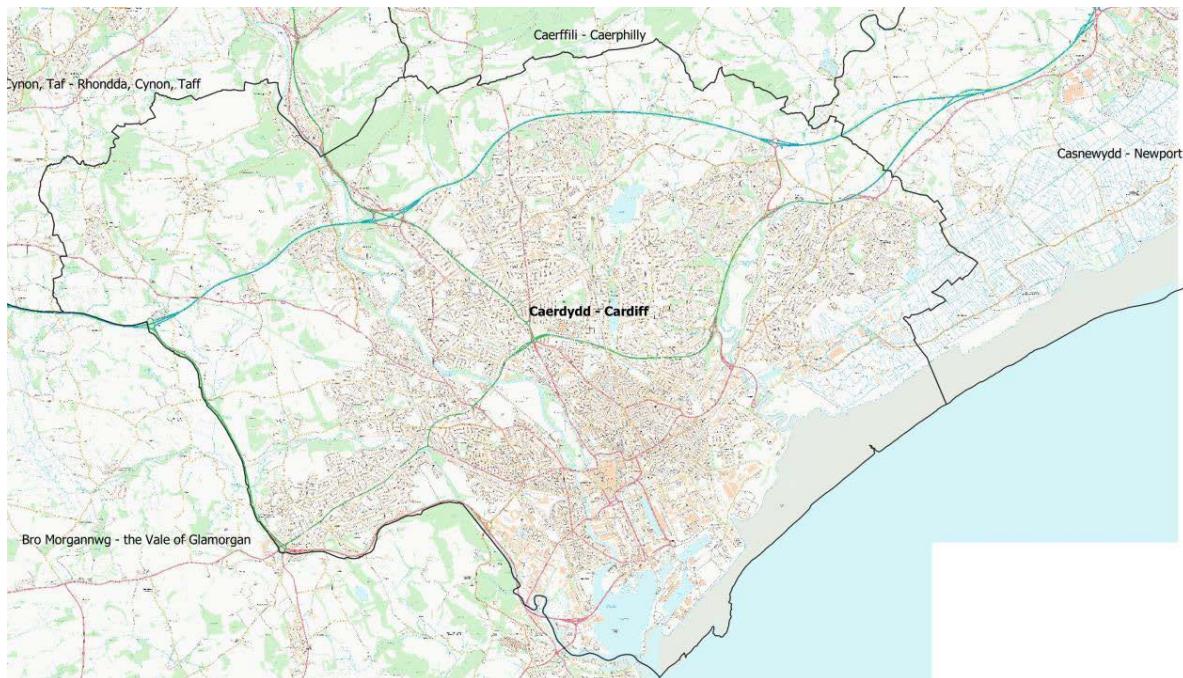
Any comments on the plan and this ISA report should be sent, by 15 April 2025, to [LDP@Cardiff.gov.uk](mailto:LDP@Cardiff.gov.uk) or LDP Team, Strategic Planning, Cardiff Council, Room 206, County Hall, Atlantic Wharf, Cardiff CF10 4UW. The plan may be changed after this consultation, and expected to go to examination in 2025.

# 1. The Replacement Local Development Plan (RLDP) and Integrated Sustainability Appraisal (ISA)

This is the Integrated Sustainability Appraisal (ISA) report for Cardiff's Deposit Replacement Local Development Plan (RLDP). This section first discusses the RLDP and then the ISA process.

## 1.1 Cardiff Replacement Local Development Plan

Cardiff is the capital of Wales and its largest city, with a population of about 383,500. It is the main commercial centre of Wales, the seat of the Welsh Government, home to many national cultural institutions, and a popular tourist destination. Figure 1.1 shows Cardiff Council, which is the area covered by the Cardiff RLDP.



**Figure 1.1 Cardiff and surrounding counties**

The Deposit RLDP includes a vision, 11 objectives, 23 strategic policies, and 80 development policies. The Deposit RLDP's **vision** is:

*To create a fair, bilingual, healthy, more liveable, sustainable, and low carbon city by:*

- *Creating a greener, fairer, and stronger city that enhances the health of the current population and wellbeing of future generations;*
- *Meeting future needs for new low carbon homes, jobs and infrastructure;*
- *Developing a high accessibility city that reshapes movement around a core of active travel and public transport usage;*
- *Using placemaking, high quality design, sustainability management and working with local communities to create a thriving city centre and local neighbourhoods;*
- *Protecting and enhancing our natural, historic and cultural assets;*

- *Placing Cardiff at the forefront of cities showing leadership and bold action to tackle climate change;*
- *Building a truly bilingual city where the Welsh Language thrives.“*

The Deposit RLDP's **objectives** are:

1. To provide a variety of quality low carbon homes to address the housing crisis and future housing needs.
2. To provide space for more jobs and maximise Cardiff's role as the Capital City of Wales and the economic driver of South East Wales to improve the prosperity of the region.
3. To ensure the adequate and timely provision of new infrastructure to support communities and future growth.
4. To respond to the climate emergency so Cardiff becomes more resilient and maximises opportunities for energy efficient solutions in line with the One Planet Cardiff Strategy to become a carbon neutral city by 2030.
5. To make the city easier to move around with a focus on sustainable and active travel.
6. To create healthier environments, reduce inequalities and improve wellbeing.
7. To ensure a vibrant, thriving mixed-use city centre and develop Cardiff Bay's full potential as a core destination for Cardiff and beyond, whilst ensuring vibrant and thriving district and local retail centres at the heart of local neighbourhoods.
8. To ensure that the city positively adapts to the new challenges posed by the implications of the pandemic.
9. To use the placemaking approach to create sustainable places, improve the city centre and neighbourhoods, maximises regeneration opportunities, enhance the role of public spaces, ensure that future growth can be effectively managed and deliver developments of high quality design.
10. To ensure the resilience of ecosystems by protecting and enhancing Cardiff's green and blue Infrastructure, its biodiversity and other natural assets.
11. To protect and enhance Cardiff's historic and cultural assets together with supporting sustainable tourism and cultural sectors.

The Deposit RLDP's **strategic policies** are:

- SP1: Providing for sustainable growth
- SP2: Sustaining economic growth and resilience
- SP3: Ensuring a masterplanning approach
- SP4: Securing good quality and sustainable design
- SP5: Securing new infrastructure
- SP6: Securing planning obligations
- SP7: Supporting Placemaking Plans
- SP8: Supporting the Central and Bay business area
- SP9: Supporting the role of Cardiff port
- SP10: Supporting Tourism
- SP11: Maintaining a supply of minerals
- SP12: Delivering sustainable neighbourhoods, social cohesion and affordable housing
- SP13: Securing health and wellbeing and resilience
- SP14: Protecting and enhancing built heritage and culture
- SP15: Welsh language
- SP16: Protecting the setting of the city through a green wedge
- SP17: Managing spatial growth through settlement boundaries
- SP18: Delivering sustainable transport and active travel

- SP19: Securing new transportation infrastructure
- SP20: Securing climate resilience, de-carbonisation and renewable energy in new developments
- SP21: Protecting, compensating and enhancing green infrastructure and biodiversity
- SP22: Minimising impacts on natural resources
- SP23: Managing waste

The Deposit RLDP's **detailed policies** are:

### **Housing**

- H1A: Strategic housing sites
- H1B: Non-strategic housing sites
- H2: Housing led regeneration areas
- H3: Affordable housing
- H4: Conversion to flats
- H5: Houses in multiple occupation
- H6: Student accommodation
- H7: Co-living accommodation
- H8: Change of use of residential land or properties
- H9: Change of use or redevelopment to residential use on unallocated sites
- H10: Sites for Gypsy and Traveller caravans
- H11: Gypsy and Traveller site

### **Economy**

- EC1: Cardiff Central Enterprise Zone and regional transport hub
- EC2: Land south of St. Mellons Business Park
- EC3: Protected employment land and premises
- EC4: Complementary facilities for employees in business, industrial and warehousing developments
- EC5A: Alternative use of protected employment land and premises
- EC5B: New workspace in mixed use development
- EC6: Protecting offices in the Central and Bay business areas
- EC7: Alternative use of employment land and premises not identified within policy EC3 (protected employment land) or policy EC6 (protecting offices in the Central and Bay business area)
- EC8: Employment proposals on land not identified for employment use
- EC9: Hotel development
- EC10: Night-time and cultural economy

### **Design**

- D1: Tall buildings

### **Retail**

- R1: Retail hierarchy and town centre first approach
- R2: Development in the central retail and commercial area
- R3: Protected shopping frontages
- R4: District centres
- R5: Local centres
- R6: Town centre first approach
- R7: The creation of new centres
- R8: Food and drink uses
- R9: Conversion to residential

### **Community facilities and safety**

- C1: Community facilities
- C2: Protection of community facilities
- C3: Community safety / creating safe environments

C4: Planning for schools

**Heritage and the historic environment**

HE1: The historic environment

**Health, wellbeing and food sustainability**

HF1: Health, wellbeing and development

HF2: The provision of allotments

HF3: Provision of food growing space in new developments

HF4: The protection of existing food growing enterprises and allotments

**Welsh language**

WL1: Welsh language

**Countryside, landscape protection and river valleys**

CP1: Countryside protection

CP2: Conversion, extension and replacement buildings in the countryside

CP3: Landscape protection

CP4: River corridors

**Biodiversity and green infrastructure**

BG1: Designated sites

BG2: Ecological networks and features of importance for biodiversity

BG3: Priority habitats and species

BG4: Net benefits for biodiversity and the green infrastructure statement

BG5: Trees, woodlands and hedgerows

BG6: Soils

BG7: Severn Estuary and Cardiff Beech Woods recreational pressure

**Transport**

T1: Prioritising walking and cycling

T2: Strategic rapid transit, bus corridors and bus enhancements

T3: Rail transport

T4: Managing transport impacts

T5: Transport interchanges

T6: Cardiff City Region 'Metro' network

T7: Electric vehicle charging

**Open space**

OS1: Protection of open space

OS2: Provision for open space, outdoor recreation, children's play and sport

**Play**

P1: Play and informal recreation

**Net zero, renewable energy and climate change**

RE1: Climate emergency: renewables & low carbon energy development

RE2: Zero carbon development

**Flood risk and managing water resources**

W1: Water sensitive design

W2: Protection of water resources

W3: Flood risk

**Air, noise, light pollution and contaminated land**

PC1: Air, noise, light pollution, and land contamination

**Minerals and waste**

MW1: Mineral limestone reserves and resources

MW2: Preferred order of mineral resource release

MW3: Quarry closures and extension limits

MW4: Minerals buffer zones

MW5: Restoration and after-use of mineral workings

- MW6: Sand wharf protection areas
- MW7: Safeguarding of sand and gravel and limestone resources
- MW8: Sites for waste management facilities
- MW9: Provision for waste management facilities in development

Figure 1.2 shows the RLDP key diagram.

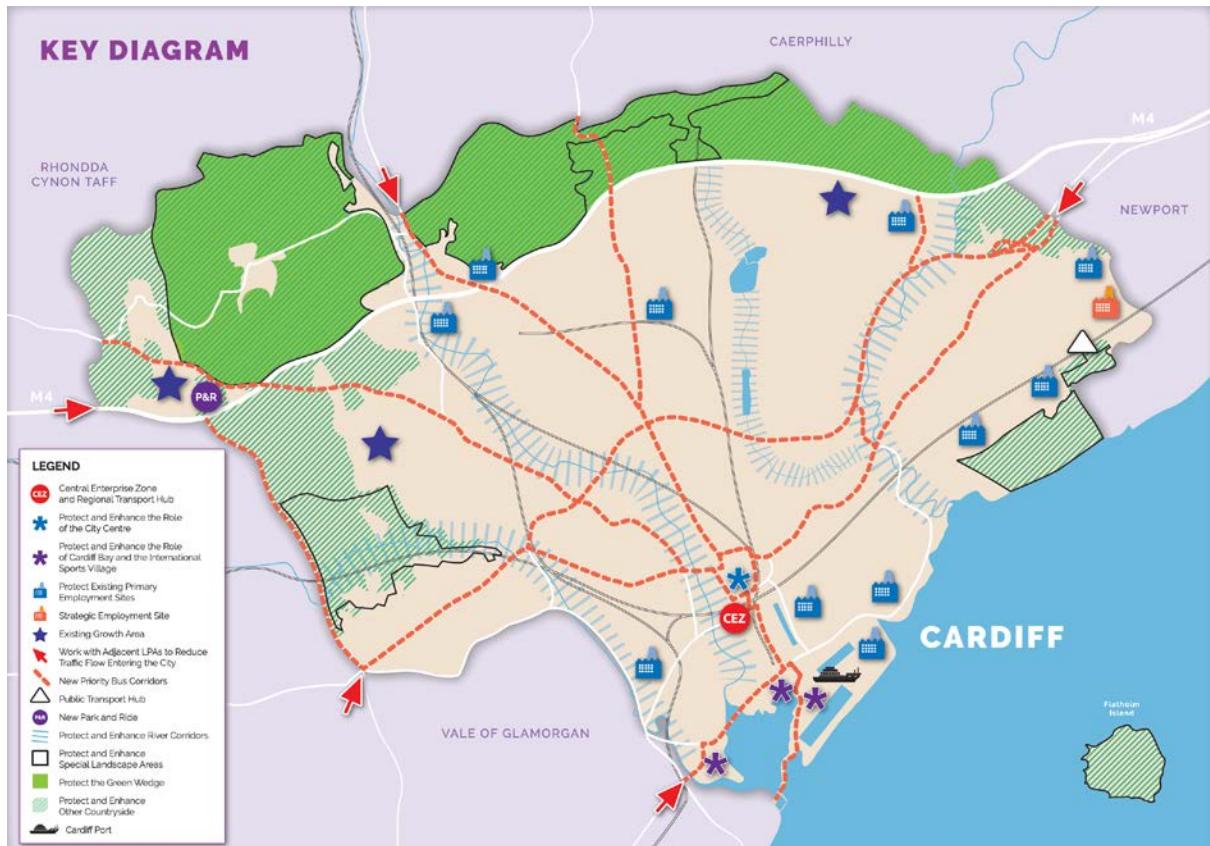


Figure 1.2 RLDP key diagram

The RLDP makes the following site allocations:

- Land at Church Farm; Land south of the M4 Motorway, West of Rudry Road Lisvane; and Land north of Ty-Draw Road – Part of adopted LDP Strategic Site F
- Land south of Llantrisant Road; Land at Llantrisant Road; and Land at Llwynioli Farm – Part of adopted LDP Strategic Site D
- Former Gas Works, Ferry Road
- Land at Areas 9-12, St. Mellons
- Rookwood Hospital
- International Sports Village
- Whitchurch Hospital / Velindre site
- Cardiff Gate Business Park West
- Roath Dock North
- Porth Teigr and Alexandra Head
- Hadfield Road
- Callaghan Square
- Cardiff Central Enterprise Zone
- Land south of St Mellons Business Park
- Pengam Green

## 1.2 Integrated sustainability appraisal

Integrated sustainability appraisal (ISA) aims to identify the likely significant economic, social, environmental and cultural effects of the Deposit RLDP, and to suggest measures to minimise any negative effects and maximise the positive ones. ISA helps to foster a more inclusive and transparent process of producing a development plan, and to ensure that the plan is integrated with other policies.

Sections 2 - 5 of the Well-being of Future Generations Act 2015<sup>1</sup> place a duty on all public bodies to carry out sustainable development and work in accordance with the sustainable development principle. Section 39 of the Planning and Compulsory Purchase Act<sup>2</sup> requires that the body producing a LDP must contribute to achieving sustainable development; and Section 19(5) requires local planning authorities to appraise the sustainability of their plans.

This ISA covers:

- **Sustainability appraisal / strategic environmental assessment** (SA/SEA) as required under the Environmental Assessment of Plans and Programmes (Wales) Regulations 2004<sup>3</sup> ('SEA regulations') and the Planning and Compulsory Purchase Act 2004;
- **Equalities assessment** as required by the Equalities Act;
- **Welsh Language Impact Assessment** carried out by Bilingual Cardiff; and
- **Health Impact Assessment**.

It also refers to the **Habitats Regulations Assessment** required under the Conservation of Habitats and Species Regulations 2017.

Figure 1.3 shows the links between the ISA process and the development of Local Development Plans.

The stages of ISA are:

- A. Scoping
- B. Assessment of alternatives
- C. Assessment of the RLDP and preparation of the Sustainability Report
- D. Consultation, examination and adoption of the plan
- E. Monitoring.

The ISA for the Cardiff RLDP has had the following timeline and outputs:

Date	Plan stage	ISA stage
March 2021	Launch of RLDP	
May 2021		<a href="#">Scoping report</a> (Stage A)
June – Oct 2021	Preparation of Strategic Options	Appraisal of draft plan vision and objectives, published as an appendix to a Cabinet report
Nov 2021 – Feb 2022	Engagement on strategic options	Appraisal of options for housing and jobs growth and possible ways of providing for growth
March 2022 – May 2023	Preparation of RLDP Preferred Strategy	<a href="#">Initial ISA report, including updated scoping report</a> (Stage B)
Summer 2023	Consultation on RLDP Preferred Strategy	
Sep 2023 – Dec 2024	Preparation of RLDP Deposit Plan	This ISA report (Stage C)

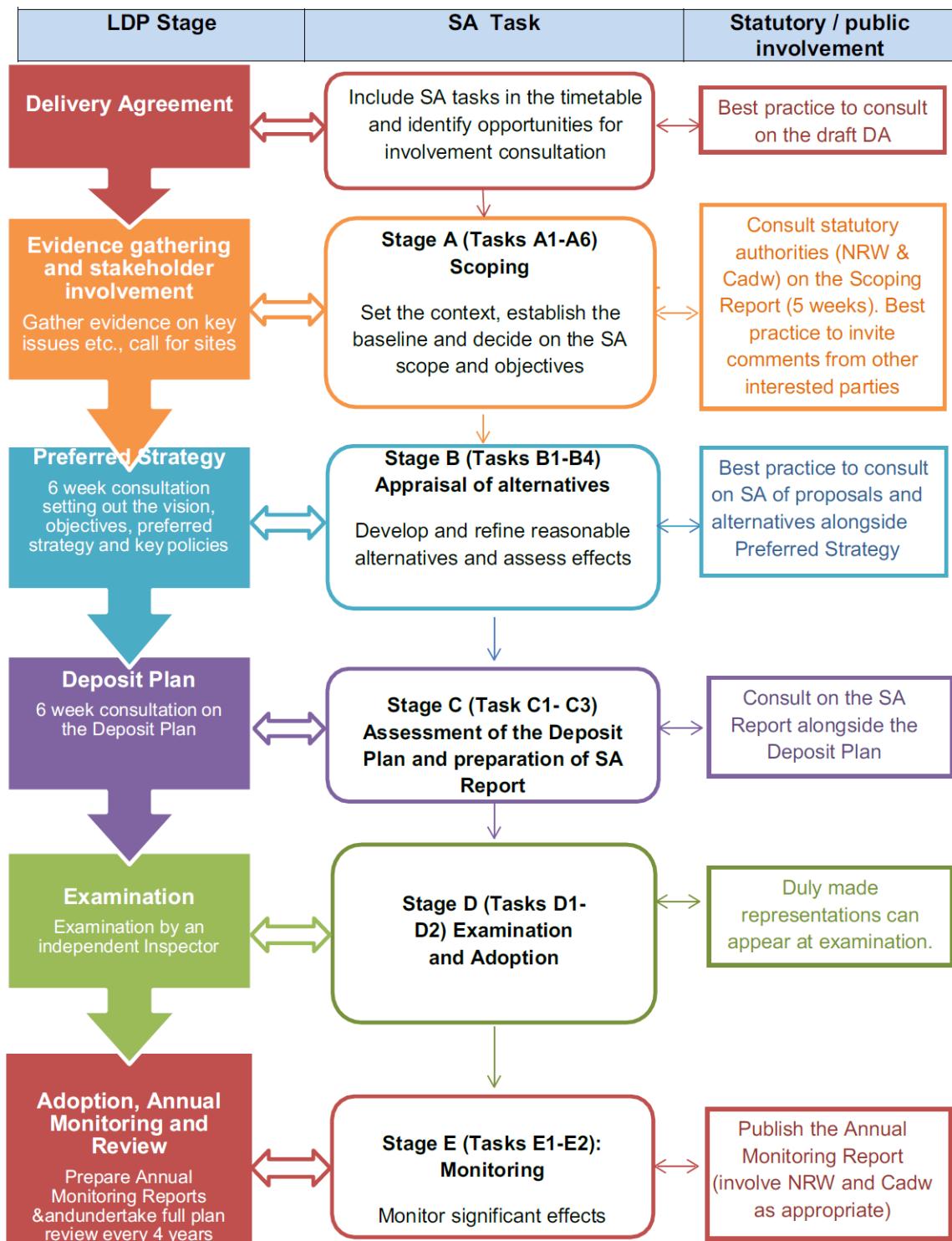


Figure 1.3 Links between RLDP stages and ISA stages

Table 1.1 shows the reporting requirements for SA/SEA and how this report fulfils them;

<b>Table 1.1 – SEA Directive requirements and where they are covered in the ISA</b>	
<b>SEA Directive Requirements</b>	<b>Where covered</b>
a) an outline of the contents, main objectives of the plan or programme... ... and relationship with other plans or programmes	Sec. 1.1 of this report Sec. 2 of scoping report; Sec. 2.1 of Initial ISA report; Sec. 2.1 of this report
b) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme	Sec. 3 of scoping report, Sec. 2.2 of Initial ISA report
c) the environmental characteristics of the areas likely to be affected	Appendix A to this report
d) Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;	Sec. 2.1 of this report
e) The environmental protection objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation;	Sec. 2 of scoping report; 2.2 of this report
f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. (Footnote: These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects);	Sec. 6 of this report
g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;	Sec. 8 of this report
h) An outline of the reasons for selecting the alternatives dealt with... ... and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;	Sec. 4 (policies) and 5 (sites) of this report Sec. 1.2 and 1.4 of this report
i) a description of measures envisaged concerning monitoring in accordance with Article 10; j) a non-technical summary of the information provided under the above headings.	Sec. 9 of this report Non-technical summary at beginning of this report
<b>Consultation:</b> authorities with environmental responsibility, when deciding on the scope and level of detail of the information to be included in the environmental report (Art. 5.4) authorities with environmental responsibility and the public shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme (Art. 6.1, 6.2). other EU Member States, where the implementation of the plan or programme is likely to have significant effects on the environment of that country (Art. 7)	Sec. 1.3 of this report No longer applicable post Brexit
<b>Taking the environmental report and the results of the consultations into account in decision-making (Art. 8)</b> When the plan or programme is adopted, the public and any countries consulted under Art.7 shall be informed and the following made available to those so informed: • the plan or programme as adopted;	Still to come

<ul style="list-style-type: none"> <li>• a statement summarising how environmental considerations have been integrated into the plan or programme and how the environmental report pursuant to Article 5, the opinions expressed pursuant to Article 6 and the results of consultations entered into pursuant to Article 7 have been taken into account in accordance with Article 8, and the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and</li> <li>• the measures decided concerning monitoring (Art. 9 and 10)</li> </ul> <p><b>Monitoring</b> of the significant environmental effects of the plan's or programme's implementation (Art. 10)</p>	Still to come
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## 1.3 Consultation

Cardiff Council consulted on a first scoping report for eight weeks, from March 2021. Comments were received from both statutory consultees (NRW and CADW) and seven additional consultees: they are summarised at Table 2.1 of the updated scoping report of April 2023.

There were no comments on the initial ISA report of April 2023, although many comments on the plan emphasised the need to protect the city's green spaces and rivers. Natural Resources Wales stated that "We are generally satisfied the Preferred Strategy has been appropriately appraised through the ISA methodology."

## 1.4 Difficulties encountered

The coronavirus pandemic meant that some monitoring data were not collected.

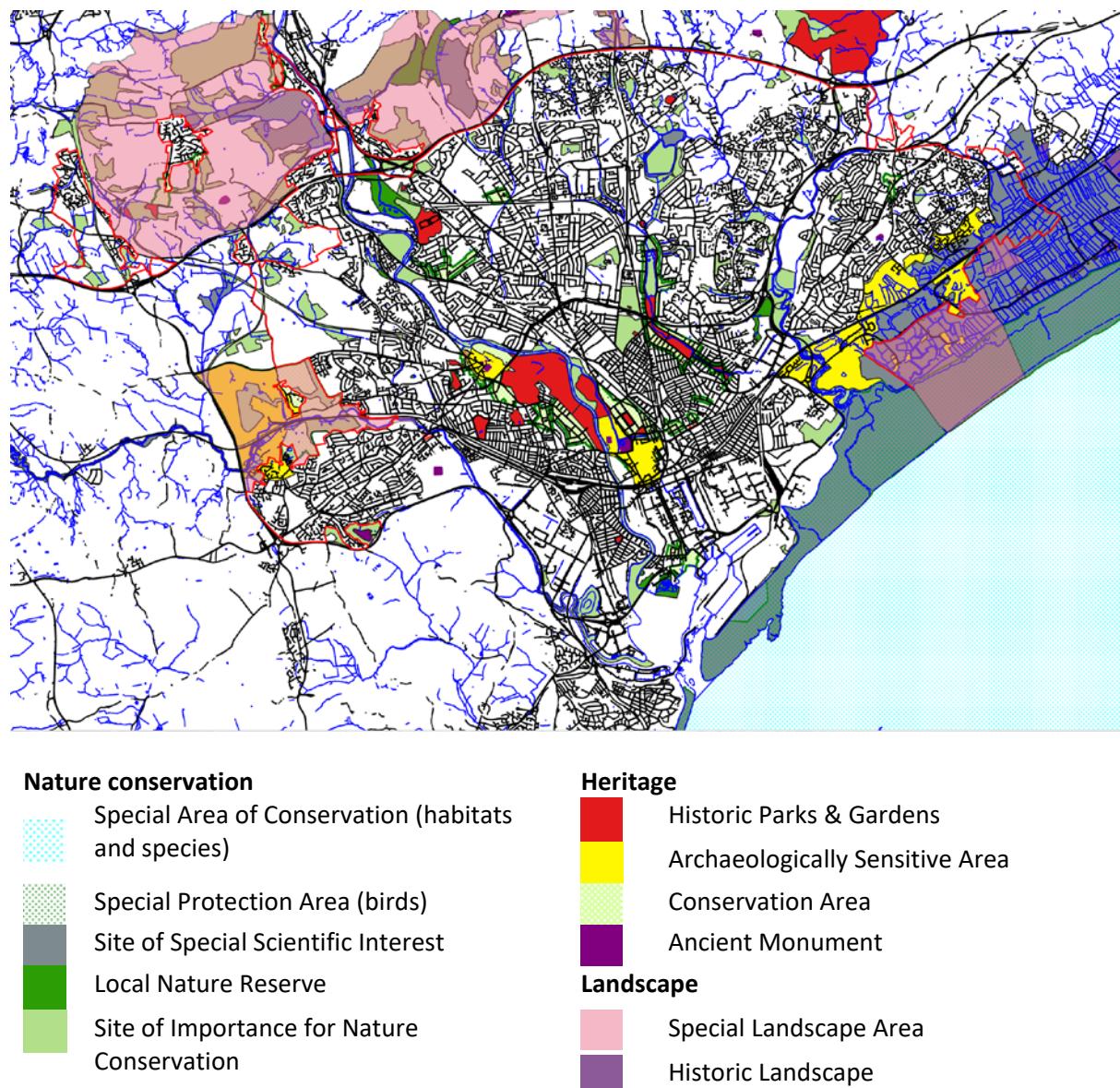
It is not possible, at the strategic level of an ISA, to carry out a fine-grained analysis of the impacts of each development site, or to fully identify all of the strengths and weaknesses of sites. For instance, a site that is not near a nature conservation designation may still be very biodiverse, and suffer significant biodiversity impacts if developed. Distances are direct line, and do not take into account barriers posed by rivers, railway lines etc. The ISA also does not take into account any mitigation measures: the impacts of developing a seemingly sensitive site may be reduced or eliminated through mitigation measures.

## 2. Stage A. Scoping and the ISA framework

### 2.1 Existing sustainability context and issues (Tasks A1-A4)

The [initial ISA of May 2023](#) provides the **sustainability context** for the RLDP, which remains an appropriate baseline in 2024. Figure 2.1 shows the main environmental and heritage constraints in Cardiff.

**Figure 2.1 Environmental and heritage constraints in Cardiff**



The only significant change to the **policy context** since the initial ISA has been the publication of a new edition of Planning Policy Wales<sup>1</sup> in February 2024, which incorporates at Sec. 6.4 the

<sup>1</sup> [https://www.gov.wales/sites/default/files/publications/2024-02/planning-policy-wales-edition-12\\_1.pdf](https://www.gov.wales/sites/default/files/publications/2024-02/planning-policy-wales-edition-12_1.pdf)

strengthened guidance<sup>2</sup> of October 2023 on addressing the nature emergency through the planning system. The main changes are:

- Stronger emphasis on taking a proactive approach to green infrastructure, including requirements for green infrastructure assessments/statements;
- Greater clarity on the step-wise approach to securing net benefit for biodiversity, with off-site compensation measures being a last resort, and consideration of enhancement and long-term management being required at each step;
- Strengthened approach to the protection of sites of special scientific interest (SSSIs). Other than exemptions for minor development necessary to maintain a ‘living landscape’, development in SSSIs is considered unacceptable as a matter of principle; and
- Guidance on promoting tree and woodland planning based on “the right tree in the right place”.

Table 2.1 summarises the **key sustainability issues and problems** for Cardiff. This provides a ‘baseline’ for the assessment of cumulative impacts at Section 5.4 of this report.

**Table 2.1 Key sustainability issues and main problems for Cardiff**

Key:

Topic:	Main sustainability problem			Not main problem		
	Good condition	Relatively good condition	Intermediate condition	Relatively poor condition	Poor condition	Unknown condition

Topic	Current status	Likely future without the RLDP
<b>1. Access, equality and population</b>		
<ul style="list-style-type: none"> <li>• The population of Cardiff will increase by 2039, although forecasts differ about the scale of this increase.</li> <li>• The cost of housing - particularly family housing - is excluding those on low incomes from entering the housing market. Providing an appropriate range and choice of housing for this population growth (including services and infrastructure) is a key sustainability issue.</li> <li>• Cardiff has a much higher proportion of young adults and minority ethnics than the Welsh average, and its population is ageing.</li> <li>• Cardiff contains some of the most deprived areas in Wales - geographically there is a concentration of deprivation in the ‘southern arc’ although hotspots exist elsewhere.</li> <li>• Unemployment benefits claims have doubled during the coronavirus pandemic.</li> </ul>	Orange	Red

<sup>2</sup> <https://www.gov.wales/addressing-nature-emergency-through-planning-system-update-chapter-6-planning-policy-wales>

Topic	Current status	Likely future without the RLDP
<ul style="list-style-type: none"> <li>Cardiff has a significant number of homeless people. Many of these have been housed during the coronavirus pandemic, but their longer-term future remains uncertain.</li> </ul>		
<b>2. Air quality</b>		
<ul style="list-style-type: none"> <li>There are four air quality management areas in Cardiff based on NO<sub>x</sub> levels. Although air quality in the city is generally improving in line with national trends, and this may be helped by changes post-pandemic, the Cardiff City AQMA in particular still consistently has NO<sub>2</sub> levels above legal standards for both humans and sensitive habitats.</li> <li>Levels of particulates (PM<sub>10</sub>, PM<sub>2.5</sub>) are a concern.</li> </ul>		
<b>3. Biodiversity, flora and fauna</b>		
<ul style="list-style-type: none"> <li>The city's internationally important nature conservation sites – the Cardiff Beech Woods SAC and the Severn Estuary SAC/SPA/Ramsar – are broadly in good condition, but are affected by recreational pressures and urbanisation.</li> <li>The Severn Estuary's wetland birds are particularly negatively affected by recreational pressures and habitat loss.</li> </ul>	?	?
<b>4. Climate change</b>		
<ul style="list-style-type: none"> <li>Cardiff aims to become carbon neutral by 2030. CO<sub>2</sub> emissions are already reducing, but much too slowly to achieve this target without immediate additional action.</li> <li>Although walking, cycling and public transport use have gradually increased over time, before the coronavirus pandemic 50% of commuting journeys were still by car. Cardiff's growing population is likely to lead to more car journeys, with associated poor air quality, traffic accidents and poor health; although this may be partly offset by lifestyle changes post-pandemic.</li> <li>Cardiff is a major attractor of in-commuters from other parts of South East Wales.</li> <li>Energy use in buildings is responsible for about one-third of Cardiff's greenhouse gas emissions: new buildings need to be more energy efficient.</li> </ul>		
<b>5. Cultural heritage and the historic environment</b>		
<ul style="list-style-type: none"> <li>Cardiff's cultural and historic attractions attract large numbers of visitors each year and perform an important national/regional role.</li> <li>A live music arena is expected to open in 2027.</li> <li>In 2015, 27 of Cardiff's listed buildings were at risk, and 116 were vulnerable.</li> <li>An increasing number of Cardiff residents speak Welsh. The Bilingual Cardiff Strategy Action Plan 2019 - 2022 supports using the Welsh language as a unique selling point for Cardiff.</li> </ul>		?
<b>6. Economy</b>		
<ul style="list-style-type: none"> <li>Maintaining Cardiff's performance is vital for the economic well-being of the region and Wales. Cardiff has been experienced strong jobs growth, and almost half of Cardiff's employees are in one of the Welsh</li> </ul>		?

Topic	Current status	Likely future without the RLDP
<p>Government's priority sectors. However the coronavirus pandemic has had devastating effects on the retail and hospitality sectors.</p> <ul style="list-style-type: none"> <li>Cardiff's workforce is polarised between more highly-qualified and low or unskilled workers; there are significant concentrations of unemployment in parts of the city; and the education and skill base of Cardiff's population varies significantly.</li> <li>Significant areas of employment land have been changing to other uses (notably housing) as a result of changing employment patterns and market conditions.</li> </ul>		
<p><b>7. Health and well-being</b></p> <ul style="list-style-type: none"> <li>The health of Cardiff's population is generally slightly better than the Welsh average, but over half of Cardiff's adults are overweight or obese.</li> <li>The 'southern arc' of the city ranks poorly on a wide range of criteria in the Welsh Index of Multiple Deprivation. Health inequalities in the city are particularly stark, with the most disadvantaged groups in Cardiff having a healthy life expectancy 20+ years less than the least disadvantaged groups.</li> <li>The coronavirus pandemic has shown the importance of access to green spaces for mental and physical wellbeing.</li> <li>Crime levels in Cardiff have slightly fallen over time, but fear of crime has increased.</li> </ul>		
<p><b>8. Land, soil and minerals</b></p> <ul style="list-style-type: none"> <li>Cardiff's ecological footprint exceeds the global 'fair share'</li> <li>Whereas almost all new housing was built on brownfield land ten years ago, most recently it has been 58-59%. The current LDP has allocated large new greenfield sites for development.</li> <li>Cardiff's allotments are important for people's health and food security, but they are oversubscribed, and more will be needed.</li> <li>Cardiff's grade 2 and 3 land is important for people's health and food security.</li> </ul>		
<p><b>9. Landscape</b></p> <ul style="list-style-type: none"> <li>Cardiff has a distinctive landscape setting, and has six Special Landscape Areas where development may be restricted on landscape grounds.</li> <li>Cardiff has 1.10 ha of functional open space per 1000 population, compared to the Welsh Assembly Government's recommended 2.43ha. If all types of open space are included, the figure is 8.10 ha of open space per 1,000 population.</li> </ul>		
<p><b>10. Waste</b></p> <ul style="list-style-type: none"> <li>Total municipal waste production has stayed broadly the same over the past decade, but per-person waste production has dropped sharply.</li> <li>Recycling levels in Cardiff are about 62%</li> </ul>		

Topic	Current status	Likely future without the RLDP
<b>11. Water and flooding</b> <ul style="list-style-type: none"> <li>Water quality in most of Cardiff's waterbodies is moderate (poor in River Ely) putting biodiversity and population health and wellbeing at risk.</li> <li>Water supplies are expected to be adequate over the RLDP period, although water efficiency measures are needed.</li> <li>Large areas of Cardiff are at flood risk due to the city's low-lying nature. The communities of St. Mellons, Roath, Grangetown, Riverside and Canton are at particular risk.</li> </ul>		

## 2.2 ISA objectives (Task A5)

*“the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation”*

(SEA Directive Annex I(e))

Two ISA frameworks have been used to assess the sustainability of the emerging RLDP: one for policies and one for sites. Chapter 5 of the scoping report explains these tables. They have been amended slightly for this report in response to consultation comments and information available on Cardiff Council's Geographical Information System (GIS). The scores used are:

--	Major negative compared to the current situation
-	Minor negative compared to the current situation
+/	Both positive and negative
0	Neutral effect.
+	Minor positive compared to the current situation
++	Major positive compared to the current situation
?	Uncertain - Uncertain or unknown effect.

The policy framework of Table 2.2 has been used to assess the plan vision, objectives, strategic alternatives, and policies. This has helped to fine-tune each element of the RLDP. Many of the objectives and indicators in the framework relate to each other: for instance, minimising the need to travel is good for health, air quality, biodiversity and community.

The site framework of Table 2.3 is based on the information available on the council's GIS system<sup>3</sup>. The site appraisals aim to identify sustainability strengths and weaknesses/ constraints for each site,

<sup>3</sup> It is more detailed than the site framework in the Initial ISA because the council's GIS system now has more data, for instance about community facilities (schools, health centres etc.) and historic designations (e.g. historic landscape) than originally expected. Also the GIS system considered 'open space' to be open space expected as part of the planning application rather than existing open space, so this indicator was removed. Definitions of flood zones also changed between 2021 and 2024.

to inform the choice of sites for the plan. Sites that are on previously developed land, far from sensitive areas and near existing services are likely to be more sustainable than greenfield sites near sensitive areas, and that would require people to drive to other services. The results of applying Table 2.3 do not obviate the need for future more detailed assessments, but they identify key strategic level constraints facing individual development sites, and strategic level mitigation measures that should be considered in the RLDP.

**Table 2.2 ISA framework for draft plan policies**

<b>ISA objective</b>	<b>Sub Objectives: Will the vision/objective/alternative/policy...</b>
1. Help deliver equality of opportunity and access for all	<ul style="list-style-type: none"> <li>Meet the need of Cardiff's population for homes, jobs and community facilities</li> <li>Address existing imbalances of inequality, deprivation and exclusion</li> <li>Improve access to education, life-long learning and training opportunities</li> <li>Improve access to affordable housing and employment opportunities, particularly for disadvantaged sections of society</li> <li>Improve access to community facilities and services, particularly for young and elderly people</li> <li>Support the regeneration of deprived areas</li> </ul>
2. Maintain and improve air quality	<ul style="list-style-type: none"> <li>Reduce the need to travel through the location and design of new development, provision of public transport infrastructure and promotion of cycling and walking</li> <li>Avoid locating new development, including active travel routes, where air quality could negatively impact upon peoples' health</li> <li>Help to meet air quality standards for people and ecosystems</li> </ul>
3. Protect and enhance biodiversity, flora and fauna	<ul style="list-style-type: none"> <li>Maintain and achieve favourable condition of international and national sites of nature conservation importance (SACs, SPAs and SSSIs)</li> <li>Maintain extent and enhance the quality of locally designated sites (LNRs and SNCIs) and LBAP priority habitats</li> <li>Protect and enhance protected species and LBAP priority species</li> <li>Maintain and enhance connectivity of corridors of semi-natural habitats</li> <li>Provide opportunities for people to experience wildlife and habitats</li> <li>Help to provide a net benefit for biodiversity, consistent with Planning Policy Wales 10</li> </ul>
4. Reduce emissions of greenhouse gases and adapt to the effects of climate change	<ul style="list-style-type: none"> <li>Support energy conservation and energy efficient design</li> <li>Promote renewable energy generation</li> <li>Promote efficient land use patterns that minimise the need to travel</li> <li>Promote sustainable modes of transport and integrated transport systems</li> <li>Reduce vulnerability of the built environment to the effects of climate change</li> <li>Help Cardiff to achieve the One Planet Cardiff vision to become a carbon neutral city by 2030</li> </ul>
5. Protect and enhance historic and cultural heritage, including the Welsh Language	<ul style="list-style-type: none"> <li>Protect and enhance historic and cultural assets including scheduled ancient monuments, listed buildings, historic parks and gardens, historic landscapes and conservation areas</li> <li>Encourage access to the historic and cultural heritage</li> <li>Support local character and distinctiveness through good design</li> <li>Support the use of the Welsh Language</li> </ul>
6. Help deliver the growth of a sustainable and diversified economy	<ul style="list-style-type: none"> <li>Increase the number and range of employment opportunities</li> <li>Support and enhance the role of Cardiff as a key economic driver of South East Wales city region</li> <li>Promote and support city and local centres, local employment opportunities and mixed use development</li> <li>Support a post-pandemic green recovery</li> </ul>

ISA objective	Sub Objectives: Will the vision/objective/alternative/policy...
7. Improve health and well-being	<ul style="list-style-type: none"> <li>Reduce health inequalities</li> <li>Encourage and facilitate walking and cycling, particularly in green infrastructure</li> <li>Protect, and improve access to, open space, the countryside and other opportunities for physical activity</li> <li>Improve environmental quality by minimising adverse impacts on health and wellbeing from pollution, flooding and waste management disposal</li> <li>Promote good design that minimises adverse impacts on health and wellbeing from crime and road traffic accidents</li> </ul>
8. Use soils and minerals efficiently and safeguard their quality	<ul style="list-style-type: none"> <li>Re-use derelict and other previously developed land</li> <li>Remediate contaminated and unstable land</li> <li>Safeguard soil quality including the best and most versatile agricultural land, and protect and enhance allotments</li> <li>Safeguard mineral resources and encourage their efficient and appropriate use</li> </ul>
9. Protect and enhance the landscape	<ul style="list-style-type: none"> <li>Protect and enhance the landscape including the countryside, areas of landscape value, river valleys, greenspaces and the undeveloped coastline</li> <li>Protect and enhance Cardiff's Special Landscape Areas</li> <li>Promote high quality design in keeping with its landscape context</li> <li>Increase access to open space</li> </ul>
10. Minimise resource use and waste, increase re-use and recycling	<ul style="list-style-type: none"> <li>Reduce Cardiff's ecological footprint</li> <li>Promote resource efficiency and the use of secondary and recycled materials</li> <li>Promote waste reduction, re-use, recycling and recovery</li> </ul>
11. Maintain and enhance water quality and resources, and manage flooding	<ul style="list-style-type: none"> <li>Conserve water resources and increase water efficiency</li> <li>Improve the water quality of rivers, lakes, groundwaters and coastal areas</li> <li>Ensure that a precautionary approach is applied, and that the location and design of new development manages the potential risks and consequences of flooding down to an acceptable level.</li> <li>Ensure new developments have adequate sustainable drainage systems</li> <li>Help to achieve water quality standards</li> </ul>

**Table 2.3 ISA framework for development sites\***

International level designation	UK/Wales level designation	Related to distance to services		Local level designation
ISA objective	The candidate site is...			
	++	+	-	--
1. Help deliver equality of opportunity and access for all	Welsh Index of Multiple Deprivation levels noted without colour <400m from a community facility (primary school, secondary school, health centre, GP, allotments, hub) measured from the middle of the site			
		401-800m from community facility	801-1500m from community facility	>1500m from community facility
			Adjacent to right of way (needs management)	Contains right of way (needs protection)
	Housing site of >5ha proposed	Housing site of <5ha proposed		

ISA objective	The candidate site is...			
	++	+	-	--
2. Maintain and improve air quality	>200m from an AQMA		≤200m of an AQMA	In an AQMA
3. Protect and enhance biodiversity, flora and fauna	>2km from a nature conservation designation (SPA/ Ramsar site, SAC, SSSI, LNR, SINC)	401m-2km from nature conservation designation	≤400m from nature conservation designation	In a nature conservation designation
4. Reduce emissions of greenhouse gases that cause climate change and adapt to its effects	<400 m from a bus stop or train station	401-800m from a bus stop or train station	801-1500m from a bus stop or train station	>1500m from a bus stop or train station
	<400m from district or local centre	401-800m from district or local centre	801-1500m from district or local centre	>1500m from district or local centre
5. Protect and enhance historic and cultural heritage, including the Welsh Language	>200m from a heritage designation (historic landscape, historic parks & gardens, ancient monument, conservation area, archaeologically sensitive area)		≤200m from a heritage designation	In a heritage designation
6. Help deliver the growth of a sustainable and diversified economy	Employment or mixed use site of >5ha	Employment or mixed use site of <5ha		
7. Improve health and well-being	See 1.			
8. Use soils and minerals efficiently and safeguard their quality	Previously developed land			Greenfield land
	Urban	Grade 3b-5 agricultural land	Grade 2 or 3a agricultural land	Grade 1 agricultural land
9. Protect and enhance the landscape	>2km from a Special Landscape Area	200m – 2km from a Special Landscape Area	≤200m from a Special Landscape Area	In a Special Landscape Area
11. Maintain and enhance water quality and resources, and manage flooding	>50m from water body		<50m from water body	Includes water body
	Not covered by any flood zone	Within a defended zone for seas or rivers	Outside a defended zone and within Zone 2 for seas or rivers	Outside a defended zone and within Zone 3 for seas or rivers

\* Distance is as the crow flies and does not take into account actual travel distance, presence of railway lines etc.

### 3. Stage B. Appraisal of vision and objectives

A draft version of the RLDP vision and objectives was appraised in August 2021, using the ISA framework of Table 2.2 as a structure. This resulted in suggested modifications, which are discussed at Section 8. The vision and objectives were refined in response to the ISA and other comments. The refined vision and objectives were subsequently re-appraised: the re-appraisal results are shown at Table 3.1.

**Table 3.1. Appraisal of RLDP vision and objectives**

+	-	+/-							0									
Positive impact likely	Negative impact likely	Impact could be positive or negative, depending on how the LDP is implemented							No significant impact likely									
<b>ISA objective</b>																		
<b>Plan vision/objective</b>																		
To create a fair, bilingual, healthy, more liveable, sustainable and low carbon city by:	+		+	+	+	+	+	+	+	+								
• Creating a greener, fairer, and stronger city that enhances the health of the current population and wellbeing of future generations;																		
• Meeting future needs for new low carbon homes, jobs and infrastructure;																		
• Developing a high accessibility city that reshapes movement around a core of active travel and public transport usage;																		
• Using placemaking, high quality design, sustainability management and working with local communities to create a thriving city centre and local neighbourhoods																		
• Protecting and enhancing our natural, historic and cultural assets;																		
• Placing Cardiff at the forefront of cities showing leadership and bold action to tackle climate change.																		
• Building a truly bilingual city where the Welsh Language thrives.																		
1. To provide a variety of quality low carbon homes to address the housing crisis and future housing needs.	+	-	0		+	+	+/-	+/-		-								
2. To provide space for more jobs and maximise Cardiff's role as the capital city of Wales and the economic driver of South East Wales to improve the prosperity of the region.	+/-	-	+		+		+/-	-										
3. To ensure the adequate and timely provision of new infrastructure to support communities and future growth.	+	+		+		+			+?	+								
4. To respond to the climate emergency so Cardiff becomes more resilient and maximises opportunities for energy-efficient solutions in line with the One			+	+			+		+		+							

ISA objective	1. Equality	2. Air	3. Biodiversity	4. Climate	5. Heritage	6. Economy	7. Health	8. Soils	9. Landscape	10. Resources	11. Water
<b>Plan vision/objective</b>											
Planet Cardiff Strategy to become a carbon neutral city by 2030.											
5. To make the city easier to move around with a focus on sustainable and active travel.	+	+		+		+	+			+	
6. To create healthier environments, reduce inequalities and improve wellbeing.	+	+		+			+			+	+
7. To ensure a vibrant, thriving mixed-use city centre and develop Cardiff Bay's full potential as a core destination for Cardiff and beyond, whilst ensuring vibrant and thriving district and local retail centres at the heart of local neighbourhoods.						+		+			
8. To ensure that the city positively adapts to the new challenges posed by the implications of the pandemic.		+		+		+	+				
9. To use the placemaking approach to create sustainable places, improve the city centre and neighbourhoods, maximise regeneration opportunities, enhance the role of public spaces, ensure that future growth can be effectively managed and deliver new developments of high quality design.							+	+	+	+	
10. To ensure the resilience of ecosystems by protecting and enhancing Cardiff's green and blue Infrastructure, its biodiversity and other natural assets.			+	+			+			+/-	+
11. To protect and enhance Cardiff's historic and cultural assets together with supporting sustainable tourism and cultural sectors.					+	+					

## 4. Stage B. Appraisal of strategic alternatives

*“the likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors”*  
(SEA Directive Annex I(f))

*“an outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information”*

(SEA Directive Annex I(h))

Cardiff Council's Initial ISA of April 2023 appraised a range of strategic alternatives. These are repeated here.

Two types of strategic level alternatives were considered and appraised as part of the development of the Replacement LDP.

First, the planning team considered the existing and likely future strategic plan policies, and identified those policies where several reasonable alternatives were available. One set of reasonable alternatives was around growth levels:

- Approx. 19,000 homes and 30,000 new jobs
- Approx. 24,000 homes and 32,000 new jobs
- Approx. 30,500 homes and 43,000 new jobs

There were also eight spatial alternatives for providing for growth:

1. Further extension of existing strategic site commitments
2. Urban intensification based on a brownfield only strategy
3. Renewal and regeneration based on brownfield mixed use sites
4. Growth based around district and local centres in line with the city of villages concept
5. Growth based around transport nodes
6. Strategic public transit growth corridors
7. Dispersed greenfield growth areas
8. Dispersed combination of brownfield and greenfield

These two sets of alternatives were appraised in early August 2022 and are discussed at Sec. 4.1 and 4.2. The full appraisal is at **Appendix B**.

Second, a workshop was held on 31 August 2022 with the planning team, Sustainable Development team, and SEA consultant. The aim of the workshop was to identify other possible 'reasonable alternatives' for consideration during the development of more detailed development management policies for the RLDP. The two-hour workshop was informed by a summary of existing sustainability issues facing Cardiff. These alternatives are discussed at Sec. 3.3.

### 4.1. Options for housing and jobs growth

Table 4.1 summarises the appraisal of the options for housing and jobs growth against the ISA objectives of Table 2.2.

**Table 4.1 Appraisal of housing and jobs growth options**

ISA objective	1. Equality	2. Air	3. Biodiversity	4. Climate	5. Heritage	6. Economy	7. Health	8. Soils	9. Landscape	10. Resources	11. Water
Growth option											
A. About 19,000 new homes in total (residual requirement for additional 2,140 homes). About 30,000 new jobs in total	+	-	-	-	-?	+	+/-	-	-	-	-
B. About 24,000 new homes in total (Residual requirement for additional 7,640 new homes). About 32,300 new jobs in total.	+/ ++?	-/-	-/-	-/-	-?	+/ ++	++/	-/-	-/-	-/-	-/-
C. About 30,500 new homes in total (Residual requirement for additional 14,790 homes). About 43,000 new jobs in total	+/ ++?	--	--	--	--?	++	++/	--	--	--	--

*Equality:* All three options would provide enough housing for Cardiff's housing need. Options B and C would provide additional housing to support the Welsh Government's ambitions for Cardiff to act as a regional economic driver. Depending on the type and location of new housing, Options B and C are more likely to deliver affordable housing, support the regeneration of deprived areas, and address deprivation and imbalances of inequality. Option C is unlikely to offer significant more benefits to Cardiff residents than Option B: the current Local Development Plan already aims to deal with most of Cardiff's need for affordable housing, so the additional homes are likely to house in-migrants rather than Cardiff residents.<sup>4</sup>

*Air, biodiversity, climate, heritage, soils, landscape, water:* Even if new housing was built at very high density (e.g. 50 dwellings per hectare including infrastructure), Options A, B and C would respectively involve a land take of 43ha, 153ha and 296ha. For comparison, the nine strategic sites in the current LDP total 969ha. This would have a cumulative – with the current LDP's sites - negative effect on biodiversity, soils and landscape, and may affect heritage assets such as archaeology. Development on the edges of Cardiff is also likely to increase car journeys and energy use (e.g. for heating), with a negative effect on air quality and climate change. An increased population will generate additional waste, use additional resources, and affect water resources and quality. The greater the land take ('residual requirement for homes'), the greater the impact are likely to be. Option A would have the fewest negative impacts, and Option C the most.

*Economy:* All three options would deliver the Council's economic aspirations. Options B and C also generally conform with Future Wales National Growth Area objectives for the area. Option C would provide the greatest support for economic growth.

*Health:* All three options would help to reduce overcrowding and improve the quality of housing in Cardiff. Options B and C would lead to more land becoming urbanised, with pressure on green spaces and reduced access to the countryside.

**Possible mitigation measures:** For all the growth options, mitigation of negative impacts and enhancement of positive impacts could include:

<sup>4</sup> In early 2021, there were approximately 8,000 applicants on Cardiff's social housing waiting list. The current Local Development Plan sets a target for the delivery of 6,646 affordable units to be provided between 2014 and 2026.

- **High density development**, to minimise the need for greenfield land take. This may need careful design to ensure that public open space and other local facilities/services are not lost.
- **Phasing** of development according to a hierarchy: allowing development on less sensitive brownfield land first, then on less sensitive greenfield and more sensitive brownfield land, and allowing development on more sensitive greenfield land only if the need for that housing is shown later in the plan period. ‘More sensitive’ land could include land with high biodiversity, near watercourses, that provides a recreational amenity in areas with limited amenities, in sensitive landscapes, that connects other areas of high biodiversity etc.
- Development of **sustainable neighbourhoods**, where all key services – schools, shopping, recreation etc. – are available within a 20 minute walk of people’s homes. This helps to reduce the need to travel by car, encourages active travel (walking and cycling), and increases a feeling of neighbourliness.
- ‘**Infrastructure first**’, where necessary infrastructure such as public transport, walking and cycling routes, district heating, and social infrastructure such as schools and shops, are in place before the first house can be sold. This would stop unsustainable habits, including transport patterns, from becoming entrenched in new residents.
- Using new development to help **provide services that are currently under-provided**, for instance shops selling fresh food, children’s play areas or public open space.
- For larger new developments (including adjacent to other development sites), integrating **district heating** and other forms of renewable energy generation as part of the development.
- **Compensation for reduced access to open space** by requiring developers to fund recreational improvements in those areas of the city that have few green/open spaces, notably Cathays/Plasnewydd/Adamstown, Splott/Butetown and Canton/Riverside.
- Ensuring high levels of **affordable housing**, particularly in large greenfield sites which should make this more viable.

The preferred option, set out in the RLDP Preferred Strategy, is Option B: 24,000 new homes and 32,300 new jobs. Option C is felt to be unrealistic and to depart from the latest evidence on demographic growth. It also raises major environmental and capacity issues, particularly relating to transport. Option A would fall short in delivering the evidenced need for new homes and jobs, as well as being inconsistent with Future Wales and Cardiff’s role as the centre of a thriving city-region.

## 4.2. Possible ways of providing for growth

Table 4.2 summarises the appraisal of the options for providing for growth against the ISA objectives of Table 2.2. The ways of providing for growth have links to the levels of growth. For instance, urban intensification based on a brownfield only strategy may not be able to provide for the level of growth envisaged by Option C. This appraisal does not test this, but focuses on the generic impacts of possible ways of providing for growth.

Options 2, 3 and 4, which focus on brownfield sites, are the most sustainable because they minimise the need to travel, can regenerate neighbourhoods, and make best use of existing services. Options 7 and 1 are least sustainable because they focus on greenfield sites comparatively distant from services, and would lead to a significant increase in car-based journeys.

**Table 4.2 Appraisal of options for the provision of growth**

ISA objective	1. Equality	2. Air	3. Biodiversity	4. Climate	5. Heritage	6. Economy	7. Health	8. Soils	9. Landscape	10. Resources	11. Water
<b>Possible ways of providing for growth</b>											
1. Further extension of existing strategic site commitments	++?	--	-	--	-?	?	+/-	-	-	--	-
2. Urban intensification based on a brownfield only strategy	?	-	-?	-	0	+	+/-	0	-	-	-
3. Renewal and regeneration based on brownfield mixed use sites	++?	-	-?	-	0	++	+/-	0	+	-	-
4. Growth based around district and local centres in line with the city of villages concept	?	-	0?	-	0	++	+/-	0	-?	-	-
5. Growth based around transport nodes	?	-/-	-	-/-	0	?	+/-	0?	-	-	-
6. Strategic public transit growth corridors	+	-/-	--	-/-	-?	?	+/-	--	-/-	--	--
7. Dispersed greenfield growth areas	++?	--	--	--	-?	?	+/-	--	--	--	--
8. Dispersed combination of brownfield and greenfield	+	--	-?	--	-?	?	+/-	-?	-?	--	-?

Option	Likely sustainability impacts of the option	Mitigation
1. Further extension of existing strategic site commitments	<p>This option would focus on greenfield sites that are relatively distant from existing centres. Because development would be on greenfield sites, it would have negative impacts on biodiversity, soil, the landscape and the quality of nearby water bodies. Because the development sites would be relatively far from existing centres, they would encourage car use, with associated impacts on air, climate, health and resources. That said, the impact would be less than Option 7 (dispersed greenfield) because residents of the new sites would be able to use the amenities provided on the existing strategic sites.</p> <p>Development on large greenfield sites is typically cheaper than on smaller and/or brownfield sites. This makes provision of more affordable housing viable. In terms of economy, this option could permit larger housing that allows working from home; but it could also lead to longer commutes, with associated costs.</p>	<p>Most of the impacts of this option would be difficult to mitigate: it would have an irreversible impact on biodiversity, soils and the landscape. Some of the transport impacts could be mitigated through the development of <b>sustainable neighbourhoods</b> to reduce the need to drive to many services/facilities, including <b>provision of services</b> that the existing strategic sites will not be providing. Together, an existing site plus the new site could also support <b>new public transport</b> links.</p> <p>Provision of high quality <b>IT connectivity</b> can encourage working from home. <b>District heating</b> should be strongly encouraged. The main advantage of this option is the ability to provide <b>much affordable housing</b>, so this should be a key requirement.</p>

Option	Likely sustainability impacts of the option	Mitigation
2. Urban intensification based on a brownfield only strategy	<p>This option would focus on brownfield sites in existing urban areas. This would minimise the amount of land take, thus protecting biodiversity, soil, and water bodies. It would make it easy for people to travel by public transport, walking and cycling, thus minimising air pollution and climate change, and encouraging active travel.</p> <p>Cardiff's urban areas would become denser, probably with taller buildings, affecting the urban landscape, although protecting outlying green areas. It is typically more expensive to develop on brownfield sites, so this option is less likely to deliver large quantities of affordable homes, and may not provide the full range of homes that people want.</p>	<p>This is a broadly sustainable option which requires minimal mitigation. Brownfield sites with high biodiversity or recreational benefits in areas where such sites are limited should be kept as <b>publicly accessible open space</b>. <b>High quality design</b> can help to minimise the landscape impacts of higher densities.</p> <p>Where the sites are not too small or scattered, <b>district heating</b> should be encouraged/required, as well as <b>provision of services</b> that are locally in short supply. Some <b>car-free development</b> may be possible.</p> <p>This option on its own may not provide enough capacity for Options B and/or C.</p>
3. Renewal and regeneration based on brownfield mixed use	<p>This option would also focus on brownfield sites in existing urban areas, but would prioritise areas in the more deprived 'southern arc', with the aim of regenerating the neighbourhoods there. The focus on mixed use would help to deliver 20-minute neighbourhoods, where key services and facilities are available within easy walking or cycling distance; and it would help to provide jobs for local residents.</p> <p>The areas of regeneration would become denser, probably with taller buildings. Given the focus on regeneration, this could improve the landscape in the development areas, as well as protecting green areas. Where specific services – for instance supermarkets or GP surgeries – are in short supply, mixed use development should be able to redress this. It is typically more expensive to develop on brownfield sites, so this option is less likely to deliver large quantities of affordable homes, and may not provide the full range of homes that people want.</p>	<p>This is the most obviously sustainable option, since it avoids the impacts of building on greenfield land and can help to regenerate Cardiff's more deprived areas. Again, brownfield sites with high biodiversity or recreational benefits in areas where such sites are limited should be kept as <b>publicly accessible open space</b>. Many areas that need regeneration also have low levels of open space per resident, so creative approaches to providing open space while increasing density should be considered. <b>High quality design</b> can help to minimise the landscape impacts of higher densities. Where services are in short supply, the mixed use development should aim to <b>improve the provision of services</b>, and aim towards <b>sustainable neighbourhoods</b>. District heating should be encouraged. Some <b>car-free development</b> may be possible.</p> <p>This option on its own may not provide enough capacity for Options B and/or C.</p>

Option	Likely sustainability impacts of the option	Mitigation
4. Growth based around district and local centres in line with the city of villages concept	<p>This option is similar to the concept of 'sustainable neighbourhoods', in that new development would go near existing amenities. This would reduce the need to travel, encourage walking and cycling, help to support local shops and associated jobs, and support vibrant neighbourhoods.</p> <p>The areas near district centres would become denser, probably with taller buildings. This option would protect outlying green areas, but may result in local green areas being developed. It is typically more expensive to develop in existing developed areas, so this option is less likely to deliver large quantities of affordable homes and may not provide the full range of homes that people want.</p>	<p>This is also a broadly sustainable option. Increasing the density around existing centres will probably mean increasing building height, and possibly building on existing open spaces. <b>High quality design</b> can help to minimise the landscape impacts of higher densities. Creative approaches to providing <b>open space</b> while increasing density should be considered.</p> <p>Where the district and local centres lack services (e.g. GP practice), <b>provision of such services</b> could be sought as part of the redevelopment, aiming at <b>sustainable neighbourhoods</b>. <b>District heating</b> and <b>car-free development</b> could be encouraged.</p> <p>This option on its own may not provide enough capacity for Options B and/or C.</p>
5. Growth based around transport nodes	<p>This option is similar to Option 4, but focuses on existing bus and rail hubs rather than district/local centres. This appraisal assumes that development would mostly be on brownfield sites, although some greenfield sites may also be developed. This less clearly supports the concept of 'sustainable neighbourhoods' as the focus would be on easy accessibility to other parts of the city rather than to local services. Some transport nodes (e.g. Park and Ride) may have few or no co-located services. As such, this option is more likely to lead to transport movements, albeit by public transport rather than car.</p> <p>This option would increase building density near transport nodes, probably with taller buildings. It would generally protect outlying green areas, but may result in green areas near transport nodes being developed. It is typically more expensive to develop in existing developed areas, so this option is less likely to deliver large quantities of affordable homes and may not provide the full range of homes that people want.</p>	<p><b>High quality design</b> can help to minimise the landscape impacts of higher densities. Creative approaches to providing <b>open space</b> while increasing density should be considered.</p> <p>This option offers the potential of developing new district/local centres around transport nodes on a <b>sustainable neighbourhood</b> model, and/or of <b>improving the provision of services</b> around the transport nodes. These services should be in place before people move into the new homes ('<b>infrastructure first</b>'), to avoid establishing unsustainable transport patterns. <b>District heating</b> should be strongly encouraged.</p> <p><b>Car-free development</b> could be encouraged where the sites have (or will have) good local services.</p>

Option	Likely sustainability impacts of the option	Mitigation
6. Strategic public transit growth corridors	<p>This option would focus on greenfield sites along new public transport corridors. Because development would be on greenfield sites, it would have negative impacts on biodiversity, soil, and the quality of nearby water bodies. Because the public transit corridor would anyway be built, the additional impact of development on the landscape would be more limited, but cumulatively with the public transport corridor the impacts would be significant.</p> <p>In theory, this option would help to contain car use because of the sites' location along public transit corridors. However, unless the development sites are large, it will be difficult to develop 20 minute neighbourhoods to reduce the need to drive to many services/ facilities. As such, this option is still likely to encourage car use, particularly if the public transport links are developed after the housing is built. This would have associated impacts on air, climate, health and resources. The option would support the delivery of Cardiff's public transport system.</p> <p>Development on greenfield sites is typically cheaper than on smaller and/or brownfield sites. This makes provision of more affordable housing viable. In terms of economy, this option could permit larger housing that allows working from home; but it could also lead to longer commutes, with associated costs.</p>	<p>Most of the impacts of this option would be difficult to mitigate: development of greenfield sites would have an irreversible impact on biodiversity, soils and the landscape. This would be cumulative with the planned public transport improvements.</p> <p>Provision of high quality <b>IT connectivity</b> could encourage working from home. It may be possible to develop <b>sustainable neighbourhoods</b> at larger sites to reduce the need to travel to distant services/ facilities. Any services, including public transport nodes, should be operational before people move into the new homes ('<b>infrastructure first</b>'), to prevent people from establishing unsustainable behaviours using their cars.</p> <p><b>District heating</b> should be strongly encouraged. The main advantage of this option is the ability to get <b>much affordable housing</b>, so this should be a key requirement.</p>
7. Dispersed greenfield growth areas	<p>This option would focus on greenfield sites that are relatively distant from existing centres. Because development would be on greenfield sites, it would have negative impacts on biodiversity, soil, the landscape and the quality of nearby water bodies. Because the development sites would be dispersed, they would encourage car use, with associated impacts on air, climate, health and resources. It would</p>	<p>This is the least sustainable option. Most of the impacts of this option would be difficult to mitigate: development of greenfield sites would have an irreversible impact on biodiversity, soils and the landscape. Unless the development sites are large, it will be difficult to develop sustainable neighbourhoods to reduce the need to drive to many services/ facilities.</p>

Option	Likely sustainability impacts of the option	Mitigation
	<p>probably be difficult to achieve high quality public transport to/from dispersed locations.</p> <p>Development on large greenfield sites is typically cheaper than on smaller and/or brownfield sites. This makes provision of more affordable housing viable. In terms of economy, this option could permit larger housing that allows working from home; but it could also lead to longer commutes, with associated costs.</p>	<p>Provision of high quality <b>IT connectivity</b> could encourage working from home. <b>District heating</b> should be strongly encouraged on the larger sites. Larger sites could also aim to provide a good range of services, on the <b>sustainable neighbourhood</b> concept. Any services should be in place before people move into the new homes ('<b>infrastructure first</b>'), to avoid establishing unsustainable transport patterns.</p> <p>The main advantage of this option is the ability to get <b>much affordable housing</b>, so this should be a key requirement.</p>
8. Dispersed combination of brownfield and greenfield	<p>This option would focus on greenfield and brownfield sites that are relatively distant from existing centres. Much of its impacts will depend on the location of the sites, and the proportion of greenfield v. brownfield development. Development on greenfield sites would have negative impacts on biodiversity, soil, the landscape and the quality of nearby water bodies. Because the development sites would be dispersed, they would encourage car use, with associated impacts on air, climate, health and resources. It would probably be difficult to achieve high quality public transport to/from dispersed locations.</p> <p>Development on large greenfield sites is typically cheaper than on smaller and/or brownfield sites. This makes provision of more affordable housing viable. In terms of economy, this option could permit larger housing that allows working from home; but it could also lead to longer commutes, with associated costs.</p>	<p>Most of the impacts of this option would be difficult to mitigate: development of greenfield sites would have an irreversible impact on biodiversity, soils and the landscape; although these impacts would be less severe than under Option 7 because some sites would be brownfield. Unless the development sites are large, it will be difficult to develop sustainable neighbourhoods to reduce the need to drive to many services/ facilities.</p> <p>Provision of high quality <b>IT connectivity</b> could encourage working from home. <b>District heating</b> should be strongly encouraged on the larger sites. Larger sites could also aim to provide a good range of services, on the <b>sustainable neighbourhood</b> concept. Any services should be in place before people move into the new homes ('<b>infrastructure first</b>'), to avoid establishing unsustainable transport patterns. The main advantage of this option is the ability to get <b>much affordable housing</b>, so this should be a key requirement.</p>

The preferred option is a hybrid of Option 2, 3, 4 and 5. It seeks to provide most of the remaining housing land required during the plan period to 2036 through a range of brownfield sites within the existing settlement boundary. Most of the sites will be major regeneration and renewal areas, located in or next to existing or proposed transport hubs. These sites in combination with the substantial existing landbank of sites on greenfield sites around the edge of the city will provide for a range and choice of housing types and locations across the city.

## 4.3 Other strategic level options considered

Other strategic level options were considered as part of the Initial ISA:

**Affordable housing target and delivery:** In 2021, broadly 8,000 families are on Cardiff's social housing waiting list (this has since increased). Policy H3 of the current LDP<sup>5</sup> requires greenfield sites to deliver 30% affordable housing and brownfield sites to deliver 20% affordable housing. The council has a large landbank of greenfield and brownfield sites that could deliver 5,000-6,000 homes. In practice, greenfield sites have been achieving 30% affordable housing but brownfield sites have not been achieving 20%, primarily because the affordable housing requirement would make developing many of them unviable. Greenfield developments have not been rolled out as quickly as was expected in the LDP, due to the time lag between allocation in the LDP and obtaining the necessary planning permissions and permits to begin construction on site, shortages of materials and labour post-Brexit and as a result of the pandemic.

The RLDP's approach to any under-delivery of affordable housing could take two main approaches:

- Provision of fewer homes overall and a focus on brownfield sites would potentially provide less affordable homes but would better protect the environment and have fewer social impacts.
- Provision of more homes overall and a focus on greenfield sites would potentially provide more affordable homes but would have more negative environmental and social impacts.

The targets for affordable housing have since been worked up and included in the RDLP as Policy H3. This work was informed by the findings of the Local Housing Market Assessment and an economic viability study to determine what targets are appropriate.

**Shift in transport modal split:** Cardiff Council's Transport White Paper of 2019<sup>6</sup> sets a goal for 25% of travel to work journeys to be by car in 2030 (down from 49% in 2019), 33% by public transport (up from 19%), and 43% to be by cycling and walking (up from 31%). The RLDP could support this shift by, for instance,

- Supporting active travel (e.g. cycle highways, green infrastructure)
- Tightening parking standards, notably in the January 2010 SPG on Access, Circulation and Parking Standards<sup>7</sup>
- Supporting car-free development
- Planning for the public transport improvements set out in Cardiff Council's 2022 "Stronger, Fairer, Greener"<sup>8</sup>, including Crossrail, new railway stations, and bus priority measures
- Planning for the five strategic cycleways.

The Strategic Policies support walking and cycling, and the provision of strategic cycle ways. The SPG on Access, Circulation and Parking Standards will be reviewed once the RLDP is adopted.

<sup>5</sup> <https://www.cardiffldp.co.uk/wp-content/uploads/Final-Adopted-Local-Development-Plan-English.pdf>

<sup>6</sup> <https://www.cardiff.gov.uk/ENG/resident/Parking-roads-and-travel/transport-policies-plans/transport-white-paper/Documents/White%20Paper%20for%20Cardiff%20Transport%202019.pdf>

<sup>7</sup> <https://www.cardiff.gov.uk/ENG/resident/Planning/Planning-Policy/Documents/Access%20Circulation%20and%20Parking%20Standards%20Jan%202010.pdf>

<sup>8</sup> <https://www.cardiff.gov.uk/ENG/Your-Council/Strategies-plans-and-policies/stronger-fairer-greener/Documents/Stronger%20Fairer%20Greener%20strategy%202022.pdf>

**Reducing energy use:** One Planet Cardiff of September 2021<sup>9</sup> aims, by 2030, for the Council to be carbon neutral in its activities, and to develop a pathway for a carbon neutral city. The One Planet Cardiff action plan of September 2021<sup>10</sup> has, as a short-term action for the built environment “a large housing development programme delivering ~2,700 new council homes over the next 6-7 years. Over 2,000 council home new builds (planned over 10 year programme) will meet higher standards. Around 500 built out or in construction to exceed building regs the previous standard (SAP B+)”. As its longer-term action related to the built environment, the action plan has “by 2024 any Council procured new build development will be Carbon Neutral, exceeding current Building Regulations standards”.

A new version of the Building Regulations Part L, published in May 2022<sup>11</sup>, requires new homes to have a minimum EPA rating of 81 (B), which is a 37% reduction in carbon emissions compared to the 2014 standards. By 2025, the intention is that mains gas will no longer power new homes. New Building Regulations on building energy efficiency were approved in 2024.

Objective 1 of the RLDP Preferred Strategy no longer states that the plan will “require new homes to be zero carbon by 2025”. However, Strategic Policy 20 aims to prevent development that places an additional de-carbonisation burden on the city, and promotes ‘lowest viable’ carbon emissions in new development. Policy RE2 promotes net zero development for all new build development.

**Generating renewable energy:** Planning Policy Wales (para. 5.95) requires LPAs to identify challenging, but achievable targets for renewable energy in LDPs<sup>12</sup>. The One Planet Cardiff action plan<sup>13</sup> supports the development of up to 20MW of renewable energy generation across the Council’s estate; roll out of solar photovoltaic coupled with battery storage where possible; work with partners on projects around new energy and heat generation opportunities; development of a low carbon development guidance note to inform the Replacement LDP; and use of suitable lower carbon alternatives where they exist.

Cardiff’s district heating system is in development, but not yet operational. The first phase is in the Bay area with the Cardiff Energy Recovery Facility (Viridor) as a heat source. The second phase is expected to take the system to the city centre. District heating is most likely to be relevant to commercial rather than residential development. Further research is needed on whether consumers can be required to hook up to district heating where it is available, or merely encouraged to do so.

The RLDP could thus:

- Set renewable energy targets
- Identify locations for large-scale renewables
- Require district heating systems to be established for relevant large sites, with the developer building and possibly managing the district heating system post operation
- Require organisations to hook up to available district heating systems, if this is legally permitted under e.g. competition regulation
- Require air source heat pumps for new housing and non-domestic developments where possible (this would overlap with Building Regulations and may thus not be feasible)
- Require photovoltaics to be installed on new housing and non-domestic developments (again this would overlap with Building Regulations and may thus not be feasible)
- Require a certain proportion of the energy used on site to be produced on site

<sup>9</sup> <https://www.oneplanetcardiff.co.uk/wp-content/uploads/OPC%20vision%20document.pdf>

<sup>10</sup> <https://www.oneplanetcardiff.co.uk/wp-content/uploads/OPC%20action%20plan.pdf>

<sup>11</sup> <https://gov.wales/building-regulations-guidance-part-l-conservation-fuel-and-power>

<sup>12</sup> [https://gov.wales/sites/default/files/publications/2021-02/planning-policy-wales-edition-11\\_0.pdf](https://gov.wales/sites/default/files/publications/2021-02/planning-policy-wales-edition-11_0.pdf)

<sup>13</sup> <https://www.oneplanetcardiff.co.uk/wp-content/uploads/OPC%20action%20plan.pdf>

Strategic Policy 20 on climate and renewable energy states that developments should consider increasing the supply of renewable energy, and Strategic Policy 5 notes that new development will provide or contribute towards necessary infrastructure including 'district heating and sustainable energy infrastructure'. Policy RE1 supports development proposals associated with the generation/storage/provision of renewable and low carbon energy. In preparing the RLDP, Cardiff Council has undertaken a Local Area Energy Plan (LAEP). The LAEP identifies targets for renewables and the preferred combination of technological and system changes needed to the local energy system, to decarbonise heat and local transport and realise opportunities for local renewable energy production.

**Climate change resilience – shading:** The heat wave of 2022 has highlighted problems of housing with inadequate shading (shutters, louvres, trees etc.). The RLDP can

- Establish requirements regarding shading in new developments, and supporting retrofits of shading in existing developments
- Support the Council's Coed Caerdydd project, highlighted in "Stronger, Fairer, Greener"<sup>14</sup> which aims to increase the city's tree canopy area from 19% to 25%.

Objective 4 of the RLDP Preferred Strategy states that the plan will "ensure an increase in tree canopy cover across the city". Strategic Policy 20 aims to protect carbon sinks including vegetation, and adapt to the implications of climate change. The supporting text to the policy notes that "As far as practicable, trees should be retained and protected... Landscape will be a critical issue with trees providing protection both by shading and active cooling".

**Climate change resilience – flooding:** Cardiff is Britain's city that is at most risk of flooding, with up to 15% of Cardiff homes at risk by 2050<sup>15</sup>. Grangetown, Riverside, Canton, St. Mellons and Roath are at particular risk<sup>16</sup>, as is the Wentloog area which the current LDP identifies for employment development. The Welsh Government have national flood maps, and prohibit development in flood risk areas.

There is a clear conflict between avoiding flood risk by not building in areas prone to flooding, and the need for Cardiff to be the economic driver for Wales. Cardiff has an identified shortfall (31 ha or 125,000 sq m) of Use Class B8 (storage and distribution) land. Wentloog could provide this, and is physically near some of the more deprived areas of Cardiff. It would be possible to make the area flood-resistant through seawalls, although this could affect the condition of the Wentloog Levels – Rhymney and Peterstone Site of Special Scientific Interest. Reasonable alternatives for the RLDP thus include:

- To prevent further development at Wentloog
- To develop/extend employment development at Wentloog (e.g. as Use Class B8), ensuring that it is protected from flooding, that it does not increase flooding elsewhere, and that it minimises impacts on the SSSI
- To not promote a railway line and station at Wentloog
- To support employment development at Wentloog with a railway line and station, ensuring that it is protected from flooding, that it does not increase flooding elsewhere, and that it minimises impacts on the SSSI

<sup>14</sup> <https://www.cardiff.gov.uk/ENG/Your-Council/Strategies-plans-and-policies/stronger-fairer-greener/Documents/Stronger%20Fairer%20Greener%20strategy%202022.pdf>

<sup>15</sup> <https://www.itv.com/news/wales/2022-04-14/dramatic-new-data-reveals-cardiff-faces-the-highest-flood-risk-in-britain>

<sup>16</sup> <https://naturalresources.wales/evidence-and-data/research-and-reports/flooding-reports-evidence-and-data/preliminary-flood-risk-assessment/?lang=en>

- To promote other sites in Cardiff that could offer equivalent employment/economic benefits without the impact on flooding and biodiversity.

The Council resolved to approve the planning application for the strategic employment site and new rail station at Cardiff Parkway in Wentloog but this application was called in by Welsh Government for consideration by an independent Inspector. The hearing took place in 2023, and the final decision on that site is expected to be taken by Welsh Government Ministers. Cardiff Council supports development at Wentloog because of the expected economic and employment and sustainable transportation benefits.

**Areas of deprivation / sustainable neighbourhoods:** Cardiff has several areas of multiple deprivation, some of which are due to (or reflected in) poor access to services. The LDP has a role in providing services to these areas, regenerating brownfield, and particularly delivering affordable housing.

The Cardiff Council meeting of 18 March 2021<sup>17</sup> concluded that “the forthcoming full LDP review represents an opportunity to embed the principles of sustainable neighbourhoods the 15 minute city into the Council’s planning policy; that the principles of increasing urban density, low-speed zones, and transferring road space from car users to public transport, pedestrians and cyclists are central to the success of 15 minute cities, and support for the concept also necessitate support for these principles.” In 2023, the council determined that the term ‘sustainable neighbourhoods’ would be more appropriate than ‘15 minute neighbourhoods’, so that term will be used within this report.

Objective 6 aims to contribute towards equality of opportunity and deliver the regeneration of local neighbourhoods, particularly in areas of higher deprivation. Strategic Policies 4 and 12 promote mixed use sustainable neighbourhoods that deliver affordable housing and access to employment opportunities, and support the regeneration of deprived communities. Strategic policy SP2 aims to provide a range and choice of employment sites, with a focus on providing accessible job opportunities to areas of known deprivation. The Housing Regeneration team is undertaking a study of this. However, the RLDP does not identify what services are available in different parts of the city, and therefore which neighbourhoods can be described as sustainable neighbourhoods and which cannot.

**Multifunctional open space:** Cardiff currently has 1.16ha of functional open space per 1000 population, compared to the Welsh Assembly Government’s recommended 2.43ha. If all types of open space are included, the figure is 8.10ha of open space per 1,000 population. However the sheer amount of open space does not indicate its value, for instance whether it is biodiverse, provides green infrastructure, reduces flood risk etc.

The RLDP can consider alternatives around:

- The amount of open space to require as part of larger new developments
- How to increase (access to) open space as part of redevelopment, especially where open space is currently limited
- Improving new and existing open space to become more multifunctional, e.g. retrofitting walking/ cycling routes, planting indigenous trees, other forms of biodiversity net gain, tree planting to enhance the canopy, etc.

The masterplanning principles of Strategic Policy 3 require new developments to have multi-functional and connected green open spaces. Strategic Policy 5 requires new developments to provide for, or contribute to, necessary infrastructure including open space. Strategic Policy 12 notes that access to well-maintained open space contributes to improving people’s health, and Strategic

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<sup>17</sup> <https://cardiff.moderngov.co.uk/documents/s46204/Amendment%20Sheet%2018%20March%202021.pdf> .

Policy 21 seeks to protect and enhance open space. Policy OS1 aims to protect existing open space. Policy OS2 sets out standards for provision of open space in all new residential developments over 5 units. This work was informed by a Green Infrastructure Assessment.

## 5. Stage B. Appraisal of candidate site alternatives

Seventy three candidate sites were appraised in Spring 2024 to identify sustainability strengths and weaknesses/ constraints for each site, to inform the choice of sites for the plan. **Appendix A** shows the detailed results of these site appraisals, and they are summarised at Table 5.1. Each site appraisal shows a map of the site, the appraisal results, and a list of sustainability constraints that should be considered if the site is included in the plan.

The RLDP *Background Technical Paper No. 10 Candidate Site Assessment* provides information on how preferred sites were chosen.

During the site appraisal, several sites were identified as being of particular concern:

- **Port of Cardiff** is a very large site (289ha), of which about one third is proposed in the Severn Estuary SPA/SAC/Ramsar site. Although it is believed that the owner APB intends to develop only those parts that are not in the SPA/SAC/Ramsar site, increased port uses and mixed development adjacent to the SPA/SAC/Ramsar site would still increase urbanisation, to which the SPA/SAC/Ramsar site is particularly sensitive. Development of the site could also change hydraulic conditions and water quality in the estuary; and lead to more traffic movements through Cardiff.
- **Land at Rover Way** is a relatively large greenfield site (21ha) located across the road from the Severn Estuary SPA/SAC/Ramsar site. Development of the site is likely to increase urbanisation and possible recreational use: the SPA/SAC/Ramsar site is sensitive to both of these. Almost the entire proposed development site is a Site of Importance for Nature Conservation. Any large-scale development on the site is also likely to be visible from the Special Landscape Area and historic landscape across the estuary. It is very close to the Rhymney River: any runoff from the site could affect water quality in the river.
- **Land South of St. Mellons Business Park** and **Land at Wentloog Avenue** are large (respectively 80ha and 14.6ha) sites located completely in a Site of Special Scientific Interest; completely in an Archaeologically Sensitive Area; mostly in a historic landscape; and adjacent a Special Landscape Area. They would thus affect nature conservation, landscape and heritage designations: three national and one local. They could also indirectly affect hydraulic conditions at the Severn Estuary SPA/SAC/Ramsar site through changes in drainage and cultivation, to which the SPA/SAC/Ramsar site is particularly sensitive.

A new site for Gypsies and Traveller accommodation is now being proposed in the RLDP, at Pengam Green, which forms part of the larger Rover Way site referenced above. Port of Cardiff and Land at Wentloog Avenue are not being put forward in the RLDP. Land South of St. Mellons Business Park is being put forward in the RLDP, with the final decision on that site expected to be taken by Welsh Government Ministers.

**Table 5.1 Summary site appraisal**

See Table 2.3 for key for red/amber/green appraisals. The site summary relates to the highest level of designation of the site, and its accessibility to services, with negative impacts being international designation > UK/Wales designation > inaccessible other than by car > local level designation. Sites with a white 'site summary' are, in the absence of mitigation measures, the most sustainable from a strategic ISA perspective.

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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Proposed use: R = residential, L = residential-led mixed use, M = mixed use, T = transport, O = other

ISA criteria		Site summary																												
		Proposed use	WIMD	Primary school	Second. school	Health centre	GP	Allotments	Hub	PRoW	Housing	Air quality mgm	SPA/Ramsar	SAC	SSSI	LNR	SINC	Bus stop	Train station	Local centre	District centre	Historic landsc	Historic park&G	Ancient monum	Conserv area	Archaeol sens	Employment	Prev devel land	Agric land qual	Spec landsc area
34	Land at Church Farm	R	1	Red	Yellow	Red	Red	Red	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green			
1	Land at Customhouse St	M	1	Green	Red	Green	Green	Red	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green			
80	Land at Cwm Farm	R	1	Yellow	Red	Red	Red	Red	Yellow	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green			
47	Land at Druidstone Rd	R	1	Yellow	Red	Red	Red	Yellow	Red	Red	Green	Green	Green	Green	Green	Green	Green	Green	Red	Red	Red	Red	Red	Red	Red	Red	Red			
11	Land at Ely Mill	T	1/2	Green	Yellow	Red	Red	Red	Red	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Yellow	Red	Red	Red	Red	Red	Red	Red			
54	Land at Goitre Farm	R	1	Yellow	Red	Red	Red	Red	Red	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green			
17	Land at Henstaff Ct	R	1	Yellow	Red	Red	Red	Red	Red	Red	Green	Green	Green	Green	Green	Green	Green	Green	Red	Red	Red	Red	Red	Red	Red	Red	Red			
21	Land at Llantrisant Rd	R	1	Green	Red	Red	Red	Red	Red	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green			
14	Land at Llanfair	M	1	Red	Red	Red	Red	Red	Red	Red	Green	Green	Green	Green	Green	Green	Green	Green	Red	Red	Red	Red	Red	Red	Red	Red	Red			
81	Land at Llwynioli Farm	M	1	Red	Red	Red	Red	Red	Red	Red	Green	Green	Green	Green	Green	Green	Green	Green	Red	Red	Red	Red	Red	Red	Red	Red	Red			
5	Land at Pierhead St	T	1	Yellow	Yellow	Red	Red	Red	Red	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green			
66	Land at Rover Way	E	3/5	Green	Green	Red	Red	Red	Red	Red	Green	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red			
13	Land at Old Forge	R	1	Red	Red	Red	Red	Red	Red	Red	Green	Green	Green	Green	Green	Green	Green	Green	Red	Red	Red	Red	Red	Red	Red	Red	Red			
48	Land at Tyla Farm	R	1	Yellow	Red	Red	Red	Red	Red	Red	Green	Green	Green	Green	Green	Green	Green	Green	Red	Red	Red	Red	Red	Red	Red	Red	Red			
43	Land at Tynewydd	R	1	Green	Red	Red	Red	Red	Red	Red	Green	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red			
83	Land at Wentloog Ave	E	3	Yellow	Yellow	Yellow	Red	Red	Red	Red	Green	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red			
16	Land E of Croft y Genau	O	1	Yellow	Red	Red	Red	Red	Red	Red	Green	Green	Green	Green	Green	Green	Green	Green	Red	Red	Red	Red	Red	Red	Red	Red	Red			
22	Land E of Heol Pant-Y-Gored	R	1	Red	Red	Red	Red	Red	Red	Red	Green	Green	Green	Green	Green	Green	Green	Green	Red	Red	Red	Red	Red	Red	Red	Red	Red			
56	Land N of Bridge Rd	R	1	Yellow	Red	Red	Red	Red	Red	Red	Green	Green	Green	Green	Green	Green	Green	Green	Red	Red	Red	Red	Red	Red	Red	Red	Red			
50	Land N of Druidstone Rd	R	1	Red	Red	Red	Red	Red	Red	Red	Green	Green	Green	Green	Green	Green	Green	Green	Red	Red	Red	Red	Red	Red	Red	Red	Red			
7	Land N of Loudon Sq	T	4	Green	Red	Red	Red	Red	Red	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green			
51	Land NW of Druidstone Rd	R	1	Yellow	Red	Red	Red	Red	Red	Red	Green	Green	Green	Green	Green	Green	Green	Green	Red	Red	Red	Red	Red	Red	Red	Red	Red			
20	Land off Brummel Dr	R	1	Yellow	Red	Red	Red	Red	Red	Red	Green	Green	Green	Green	Green	Green	Green	Green	Red	Red	Red	Red	Red	Red	Red	Red	Red			
70	Land off Clos Medwyn	R	1	Yellow	Yellow	Yellow	Red	Red	Red	Red	Green	Green	Green	Green	Green	Green	Green	Green	Red	Red	Red	Red	Red	Red	Red	Red	Red			
84	Land off Forest Rd	?	1	Yellow	Red	Red	Red	Red	Red	Red	Green	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red			
6	Land S of Cardiff Central Stn	M	3	Green	Red	Red	Red	Red	Red	Red	Green	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red			
30	Land S of Mynachdy Rd	O	1	Green	Red	Red	Red	Red	Red	Red	Green	Green	Green	Green	Green	Green	Green	Green	Red	Red	Red	Red	Red	Red	Red	Red	Red			
73	Land S of St Mellons Bus.	E	1	Green	Red	Red	Red	Red	Red	Red	Green	Green	Green	Green	Green	Green	Green	Green	Red	Red	Red	Red	Red	Red	Red	Red	Red			
33	Land S of M4	R	1	Green	Red	Red	Red	Red	Red	Red	Green	Green	Green	Green	Green	Green	Green	Green	Red	Red	Red	Red	Red	Red	Red	Red	Red			

ISA criteria		Site summary																												
		Proposed use	WIMD	Primary school	Second. school	Health centre	GP	Allotments	Hub	PRoW	Housing	Air quality mg/m <sup>3</sup>	SPA/Ramsar	SAC	SSSI	LNR	SINC	Bus stop	Train station	Local centre	District centre	Historic landsc	Historic park&G	Ancient monum	Conserv area	Archaeol sens	Employment	Prev devel land	Agric land qual	Spec landsc area
62	Land E and W of Thornhill	L	1	Yellow	Red	Red	Red	Red	Red	Red	Green	Green	Green	Green	Green	Green	Green	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red		
57	Land N of Ty-Draw Rd	R	1	Green	Red	Green	Red	Red	Red	Red	Green	Green	Green	Green	Green	Green	Green	Green	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red		
58	Land to rear of Charters	R	1	Yellow	Red	Red	Yellow	Yellow	Red	Red	Green	Green	Green	Green	Green	Green	Green	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red		
59	Land to rear of Mainbrace	R	1	Yellow	Red	Red	Yellow	Red	Red	Red	Green	Green	Green	Green	Green	Green	Green	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red		
19	Land S of Llantrisant Rd	R	1	Yellow	Red	Red	Yellow	Red	Red	Red	Green	Green	Green	Green	Green	Green	Green	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red		
35	Land W of Graig Rd	R	1	Yellow	Red	Red	Yellow	Red	Red	Red	Green	Green	Green	Green	Green	Green	Green	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red		
39	Llandaff station car park	O	1	Green	Green	Red	Red	Red	Red	Red	White	Green	Green	Green	Green	Green	Green	Yellow	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red		
77	Northern Meadows	O	4	Green	Yellow	Red	Red	Red	Red	Red	White	Green	Green	Green	Green	Green	Green	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red		
23	Plasdwr Uchaf	L	1	Red	Red	Red	Red	Red	Red	Red	Green	Green	Green	Green	Green	Green	Green	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red		
9	Port of Cardiff	M	1	Yellow	Red	Red	Red	Red	Red	Red	White	Red	Red	Red	Red	Red	Red	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow		
4	Porth Teigr & Alexandra Head	M	1	Yellow	Red	Red	Red	Red	Red	Red	White	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red		
	Pengam Green	H	5	Green	Green	Red	Red	Red	Red	Red	White	Green	Green	Green	Green	Green	Green	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red		
60	Radyr station car park	O	1	Green	Yellow	Red	Red	Red	Red	Red	White	Green	Green	Green	Green	Green	Green	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red		
8	Roath Dock North	M	1	Yellow	Red	Yellow	Red	Red	Red	Red	White	Green	Green	Green	Green	Green	Green	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow		
15	Robin Hill, Creigiau	R	1	Yellow	Red	Red	Red	Red	Red	Red	White	Green	Green	Green	Green	Green	Green	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red		
37	Rookwood Hospital	R	1	Green	Green	Yellow	Red	Red	Red	Red	White	Red	Red	Red	Red	Red	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green		
44	Taffs Well Quarry	O	1	Yellow	Red	Red	Red	Red	Red	Red	White	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red		
82	The Manor, Druidstone Rd	R	1	Yellow	Red	Red	Yellow	Red	Red	Red	White	Green	Green	Green	Green	Green	Green	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red		
45	Ton Mawr Quarry	O	1	Red	Red	Red	Red	Red	Red	Red	White	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red		
76	Velindre Cancer Centre	L	4	Green	Green	Red	Red	Red	Red	Red	White	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red		
79	Velindre Station	T	4	Green	Yellow	Red	Red	Red	Red	Red	White	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red		
74	Wentloog Levels	O	1/3	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	White	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red		
78	Whitchurch Hospital	M	4	Green	Yellow	Red	Red	Red	Red	Red	White	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red		
75	Whitchurch Tennis Club	O	1	Yellow	Green	Red	Red	Red	Red	Red	White	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green		

Several clusters of sites were also identified as potentially having cumulative impacts if they were all included in the plan:

- Druidstone Road: Sites 47-51, 53, 55, 56, 58, 59 and 82 are clustered near Druidstone Road. They are located far from existing services; quite small so unable to provide services on site; and several include Sites of Importance for Nature Conservation. None of these sites were taken forward in the RLDP so they are not discussed further here.
- Creigiau: Sites 15, 17-20, 22, 81 and (to the south-east by about 1km) sites 21 and 13 are clustered near Creigiau, north of the M4. Several of these sites were taken forward in the RLDP. They are discussed further at Section 6.5.
- Wentloog Levels: Sites 83, 73 and Land at Areas 9-12, St. Mellons are all located in an area with multiple national-level designations, where changes in hydrology and water quality could affect the Severn SPA/SAC/Ramsar site. The latter two sites were taken forward in the RLDP. They are discussed further at Section 6.5.

## 6. Stage C. Appraisal of Deposit RLDP

***“the likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors”***

(SEA Directive Annex I(f))

This section discusses the main sustainability impacts of first the Deposit RLDP's vision and objectives, then its strategic policies, then its development policies, and then proposed development sites. It concludes with an analysis of the Deposit RLDP's main indirect and cumulative impacts.

### 6.1 Vision and objectives

Table 6.1 summarises the appraisal findings of Section 3, using the ISA framework of Table 2.2. Overall the RLDP vision and objectives are very positive, particularly in terms of climate, economy and health. The need to deliver homes and employment sites means that there will be inevitable negative impacts on biodiversity, the landscape, and water quality and resources.

**Table 6.1 Summary appraisal of vision and objectives**

Plan vision/objective	ISA objective										
	1. Equality	2. Air	3. Biodiversity	4. Climate	5. Heritage	6. Economy	7. Health	8. Soils	9. Landscape	10. Resources	11. Water
Vision	+		+	+	+	+	+		+	+	
1. Variety of quality low carbon homes	+		-	0		+	+	+/-	+/-		-
2. Space for more jobs, maximise Cardiff's role	+/-		-	+		+		+/-	-		
3. Adequate, timely provision of new infrastructure	+	+		+		+	+			+?	+
4. Respond to the climate emergency			+	+			+		+		+
5. Sustainable and active travel.	+	+		+		+	+			+	
6. Healthier environments, reduced inequalities	+	+		+			+			+	+
7. Vibrant, thriving mixed-use city centre						+		+			
8. Adapt to pandemic-related challenges		+		+		+	+				
9. Use the placemaking approach							+	+	+	+	
10. Ensure the resilience of ecosystems			+	+			+			+/-	+
11. Protect and enhance historic and cultural assets					+	+					

\* The full vision and objectives are at Section 3

## 6.2 Strategic policies

A draft version of the strategic policies was appraised in March 2023 using the ISA framework of Table 2.2. Some changes were subsequently made to the strategic policies, including the addition of a new strategic policy on the Welsh language. The full appraisal of the strategic policies is provided at **Appendix B** and summarised at Table 6.2.

Overall, the RLDP strategic policies would have mostly positive or neutral impacts. The impacts would be particularly positive with regard to social and economic issues such as equality, economic growth and response to demographic change. The main negative effects would be caused by the policies that promote housing and economic growth and minerals development, notably Policies SP1, SP2, SP10, SP11 and SP19. Together these would have significant impacts on air quality, biodiversity, climate, resources and water.

**Table 6.2 Summary appraisal of strategic policies**

ISA objective	1. Equality	2. Air	3. Biodiversity	4. Climate	5. Heritage	6. Economy	7. Health	8. Soils	9. Landscape	10. Resources	11. Water
Policy title*											
SP1: Providing for sustainable growth	+	-	-	-	+/-	+	+/-	+/-	+/-	-	-
SP2: Sustaining economic growth & resilience	+	-	-	-	-	++	+?	+/-	+/-	-	-
SP3: Ensuring a masterplanning approach	0	+/-	+/-	+/-	0	0	+	+	+/-	0	+/-
SP4: Securing good quality & sustainable	+	?	?	+?	+	0	+	+	+	0	0
SP5: Securing new infrastructure	0	?	?	?	0	+	+	?	?	+	+
SP6: Securing planning obligations	?	?	?	?	?	?	?	?	?	?	?
SP7: Supporting Placemaking Plans	+?	?	?	?	?	?	?	?	?	?	?
SP8: Supporting Central & Bay business area	0	0	0	0	0	+	0	+	0	0	0
SP9: Supporting the role of Cardiff port	+	?	-?	?	+	+	?	?	?	0	?
SP10: Tourism	+?	-	-	-	?	+	+?	0	?	0	-?
SP11: Maintaining a supply of minerals	0	-	-	-	0?	+	-	+/-	-	+	-?
SP12: Delivering sustainable neighbourhoods	++	+	0	+	0	0	+	0	0	0	0
SP13: Securing health/well-being & resilience	+	0	0	+?	0	0	++	0	0	0	0
SP14: Protecting/enhancing built heritage	0	0	0	0	+?	0	0	0	0	0	0
SP15: Welsh language	0	0	0	0	+	0	0	0	0	0	0
SP16: Protecting the setting of the city	-	0	+?	0	0	0	+	0	+?	0	0
SP17: Managing spatial growth	0	0	0	0	0	0	0	+	+	0	0
SP18: Delivering sustainable transport	+	+	0	+	0	0	+	+?	0	+	0
SP19: Securing new transportation	+	+	--	+	-	+	+	-	--	+/-	-
SP20: Securing climate resilience	0	+?	+?	++	0	+?	0	0	-?	0	0
SP21: Protecting/enhancing biodiversity	+	+	++	+	0	0	+	0	0?	0	+
SP22: Minimising impacts on natural	0	+	+	0	0	0	+?	+	0	0	0?
SP23: Managing waste	0	0	0	0	0	0	0	0	0	++	0

\* The full titles of the policies are at Section 1.1

## 6.3 Detailed policies

The detailed policies were appraised in April-November 2024 using the ISA framework of Table 2.2. In many cases the policies went through two or three rounds of appraisal, as the appraisal results influenced the development of the policies, which then changed and had to be re-appraised. The full appraisal of the detailed policies is provided at **Appendix C** and summarised at Table 6.3.

**Table 6.3. Summary appraisal of detailed policies**

ISA objective	1. Equality	2. Air quality	3. Biodivers.	4. Climate	5. Heritage	6. Economy	7. Health	8. Soils	9. Landscape	10. Resources	11. Water
Policy title*	1.	2.	3.	4.	5.	6.	7.	8.	9.	10.	11.
H1A: Strategic housing sites	+-	-/-	--	--	0	+	+/-	--	--	-/-	-/-
H1B: Non-strategic housing sites	0	-?	-	0	-/-	+?	+	+	0	0/-	-
H2: Housing led regeneration areas	++/-	-	-	-	-?	+	+	-	+/-	-	-
H3: Affordable housing	++/-	0	0	0	0	+?	+	0	0	0	0
H4: Conversion to flats	+	0	0	0	0	+?	0	+	0	0	0
H5: Houses in multiple occupation	+?	0	0	0	0	+?	0	+	-?	0	0
H6: Student accommodation	0	-?	0	0	0?	+	0	0	0	0	0
H7: Co-living accommodation	+	0	0	0	0	0	0	0	0	0/+	0
H8: Change of use of residential	0	?	0	?	0	+/-	0	+/0	0	0	0
H9: Change of use to residential	+	?	0	?	0	+/-	0	+/0	0	0	0
H10: Sites for Gypsy & Traveller caravans	+	0	0	0	0	0	+	0	0	0	0
H11: Gypsy & Traveller site	++/-	0	--	0	0	0	+	0	-	0	-?
EC1: Cardiff Central Enterprise Zone	0/-	+	0	+	0	++	0	0/+	+/-	+/-	-?
EC2: Land south of St Mellons business park	+	-	--	--	--	++	+/-	-/-	--	-	-/-
EC3: Protected employment land	++	-	--	+/-	-	++	+/-	-	-/-	?	0/-
EC4: Complementary facilities for employees	+	+/-	?	+/-	?	+	+?	0	0	0	0
EC5A: Alt use of protected employment land	+	?	0	?	?	+	0	+	?	?	?
EC5B: New workspace in mixed use	+	?	0	?	?	+	0	+	?	?	?
EC6: Protecting offices in Central & Bay	+	?	0	?	?	+	0	+	?	?	?
EC7: Alternative use of employment land not	+	?	?	?	?	?	0	+	?	?	?
EC8: Employment proposals on land not	?	-?	-	-?	-?	+?	?	-?	?	?	-
EC9: Hotel development	0	0	0	0	0	+	0	0	0	-	-
EC10: Night-time and cultural economy	+	0	0	0	0	+	-?	+?	-?	0	0
D1: Tall buildings	0	0	0	0	+?/-	+	0	0	+/-	0	0
R1: Retail hierarchy and town centre first	++	+/-	0	+/-	0	+	+	0	0	0	0
R2: Devel in central retail / commercial area	0	0	0	0	0	+	0	0	0	0	0
R3: Protected shopping frontages	0	0	0	0	0	0	0	0	0	0	0
R4: District centres	+	0	0	0	0	0	0	0	0	0	0
R5: Local centres	+	0	0	0	0	0	0	0	0	0	0
R6: Town centre first approach	+	0	0	0	0	0	0	0	0	0	0
R7: Creation of new centres	++	+	-?	+	-?	++	+/-	-?	-?	+?	-?
R8: Food and drink uses	0	0	0	0	0	0	0	0	0	0	0
R9: Conversion to residential	+	+/-	0	+	0	+/-	-	+	0	0	0
C1: Community facilities	++	-?	-?	-?	0	+	++	-?	+/-	0	-?
C2: Protection of community facilities	0/+	0	0	0	0	0	0	0	0	0	0
C3: Community safety	+	0	0	0	0	0	+	0	0	0	0
C4: Planning for schools	+	0	0	0	+?	+	0	+	0	0	0
HE1: The historic environment	0	0	0	0	0	0	0	0	0	0	0

ISA objective	1. Equality	2. Air quality	3. Biodivers.	4. Climate	5. Heritage	6. Economy	7. Health	8. Soils	9. Landscape	10. Resources	11. Water
Policy title*	1.	2.	3.	4.	5.	6.	7.	8.	9.	10.	11.
HF1: Health, wellbeing & development	++	++	+?	++	0	+	++	0	0	+?	++
HF2: Provision of allotments	+	0	+/-	0	0	0	++	+/-	+	+/-	0
HF3: Provision of food growing space	+	0	+/-	0	0	0	++	+/-	+	+/-	0
HF4: Protection of existing food growing	+?	0	0	+?	0	+	+?	+	?	+	?
WL1: Welsh language	0	0	0	0	+	0	0	0	0	0	0
CP1: Countryside protection	+/-	0	0	0	0	+	-	0	0	0	0
CP2: Conversion of buildings in countryside	0	0	0	0	0	0	0	0	0	0	0
CP3: Landscape protection	+/-	0	0	0	0	+	-	0	0	0	0
CP4: River corridors	+/-	0	0	0	0	+	-	0	0	0	+
BG1: Designated sites	0	0	0/+?	0	0	0	0	0	0	0	0
BG2: Ecological networks & features	+/-	0	+?	0	0	-	+?	0	0	0	0
BG3: Priority habitats & species	0	0	0	0	0	0	0	0	0	0	0
BG4: Net benefits for biodiversity	0	0	0/+?	0	0	0	0	0	0	0	0
BG5: Trees, woodlands and hedgerows	0	0	+	+	0	0	+	0	+	0	+
BG6: Soils	0	0	0	0	0	0	0	0	0	0	0
BG7: Severn Estuary and Cardiff Beech Woods	-?	?	0	0	0	0	-	0	0	0	0
T1: Prioritising walking & cycling	++	++	-?	++	0	0	++	0	0	0	0
T2: Strategic rapid transit, bus corridors	++	++	-?	++	-?	++	+	+/-	-?	+	-?
T3: Rail transport	+	+	-?	++	-?	++	+	+/-	-?	+	-?
T4: Managing transport impacts	++	0	0	0	0	+	0	0	0	0	0
T5: Transport interchanges	+?	+/-	-?	++	-?	+	0	+	-?	+	-?
T6: Cardiff City Region 'Metro' network	++	+	-	++	-?	++	+	+/-	-	+	-?
T7: Electric vehicle charging	0	+	0	+	0	0	+	0	0	+	0
OS1: Protection of open space	+/-	0	-?	0	0	-?	0	0	0	0	0
OS2: Provision for open space	+	0	+/-	0	0	0	+/-	0	0	0	0
P1: Play and informal recreation	+	0	0	0	0	0	+	0	0	0	0
RE1: Renewable and low carbon energy	0	+	-?	++	-?	+	+	?	-?	++	+
RE2: Net zero development	0	+?	0	+	?	+	+?	0	-?	+/-	0
W1: Water sensitive design	0	0	+	+	0	+?	+/0	+	+	+	++
W2: Protection of water resources	0	0	0	0	0	0	0	0	0	0	0
W3: Flood risk	0	0	?	?	0	0	0	0	+	0	++
PC1: Air, noise, light pollution, land	0	0	0	0	0	0	0	0	0	0	0
MW1: Mineral limestone reserves & resources	0	-	--	+/-	0	++	0	+/-	-	--	-?
MW2: Preferred order of mineral resource	0	0	+/-	0	0	0	0	++	0	0	0
MW3: Quarry closures & extension limits	0	0	+	0	0	0	0	+?	+	0	+?
MW4: Minerals buffer zones	0	0	0	0	0	0	0	0	0	0	0
MW5: Restoration and after-use of mineral	0	0	0	0	0	0	0	0	0	0	0
MW6: Sand wharf protection areas	0	0	0	0	0	+?	0	0	0	0	0
MW7: Safeguarding sand & gravel & limestone	0	0	0	0	0	0	0	++	0	0	0
MW8: Sites for waste management facilities	+	-	-?	+/-	-?	++	+/-	+/-	-	+	-
MW9: Provision for waste management	0	0	0	0	0	0	-	0	-?	++	0
<b>Overall impact</b>	<b>++</b>	<b>+/-</b>	<b>-</b>	<b>+</b>	<b>-?</b>	<b>++</b>	<b>+</b>	<b>-</b>	<b>-</b>	<b>0</b>	<b>-</b>

\* The full titles of the policies are at Section 1.1

Particularly sustainable policies are those that aim to enhance (not simply protect) the environment and social/health facilities:

- Policies HF1-HF3 on health and wellbeing because they support active lifestyles, good access to facilities and services, healthy eating, and local food provision.
- Policy T1 on prioritising walking and cycling because it supports healthy lifestyles, and helps to reduce accidents, air pollution and greenhouse gas emissions.
- Policies T2 and T6 on strategic rapid transit and the Metro network, because they aim to improve public transport and especially bus travel, which will help to reduce the need to travel by car.
- Policy W1 on water sensitive design, which aims to improve water quality, reduce the likelihood of flooding, improve biodiversity, and which indirectly should improve the landscape.

Policies of particular sustainability concern are those that would affect designated sites, notably those near the Severn Estuary and the Cardiff Beech Woods (see Section 7.4):

- Policy H1A because it proposes 1675 new homes in locations that are far from most existing services, and at relatively low density (roughly 22 dwellings/ha<sup>18</sup> except for Former Gas Works where density would be high). The sites are part of larger strategic allocations which will provide some additional services on the sites, but most transport movements are still likely to be by car. Housing density could be increased, possibly reducing the need for some of the allocations.
- Policy H1B because of site H1.1 (the other site is sustainable). Site H1.1 would provide 150 homes on 4ha at Land at areas 9-12, St. Mellons. The site lies in multiple designations: Site of Special Scientific Interest (SSSI, a national level designation), historic landscape (national level designation), and Site of Interest for Nature Conservation (local level designation). It could also have a negative impact on water quality.
- Policy H2 on housing led regeneration areas. Cardiff Gate Business Park and Porth Teigr/Alexandra Head are both far from existing services. The International Sports Village is near Cogan, but on the far edge of Cardiff. All three sites are likely to be accessed primarily by car. Six of the seven sites in Policy H2 are adjacent Sites of Importance for Nature Conservation, and Porth Teigr/Alexandra Head is adjacent the internationally important Severn Estuary SPA/SAC/Ramsar site. Roath Dock and Porth Teigr are at significant risk of flooding, and several sites would have impacts on the historic heritage. The sites will be subject to detailed Masterplanning in accordance with Policy SP3: this will set out the services, sustainable transportation, and other measures required for the sites.
- Policy EC2 because it proposes 44ha of employment land (office, industrial, storage/distribution) at Land south of St. Mellons Business Park. This area is covered by two national designations (SSSI, historic landscape) and three local designations (SINC, archaeologically sensitive area, special landscape area). It may have an indirect impact on the internationally-important Severn Estuary through changes in hydrology and water quality. It is on greenfield land.
- Policy EC3 because it would protect several employment sites with significant impacts, notably at Rover Way, Wentloog Road and St. Mellons Business Park. St. Mellons is in the Gwent Levels SSSI which is designated in part because of its extensive system of ditches/reens, and the flora/fauna these contain. It is less than 1km from the internationally important Severn Estuary SPA/SAC/Ramsar site. The Rover Way and Wentloog Road sites are adjacent to the Severn

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<sup>18</sup> SH1.1 Land at Church Farm 205 homes on 14.16ha; SH1.2 Land south of the M4 100 homes on 4.96ha; SH1.3 Land to the north of Ty-Draw Road 350 homes on 15.33ha; SH1.4 Land south of Llantrisant Road 300 homes on 13ha; SH1.5 Land at Llantrisant Road 150 homes on 8.73ha; SH1.6 Land at Llwynioli Farm 70 homes on 3.4ha; H1.1 Land at areas 9-12, St. Mellons 150 homes on 3.98ha; H2.3 Cardiff Gate Business Park (West) 200 homes on 6.4ha.

Estuary SPA/SAC/Ramsar site. The sites are in highly visible locations, with likely negative impacts on the landscape.

- Policy M1 because it would safeguard land to allow Taffs Well Quarry and Ton Mawr Quarry to be developed. Both quarries would be adjacent to an SSSI and the Cardiff Beech Woods SAC, and Ton Mawr Quarry includes a Site of Nature Conservation Importance. A third quarry, Creigiau, is in a Special Landscape Area, so would have significant landscape impacts.

## 6.4 Sites

Table 6.4 shows the site appraisals for the sites included in the RLDP. They are a subset of those appraised at Table 5.1.

## 6.5 Overall and cumulative impacts

Table 6.5 summarises the overall impacts of the RLDP's policies and site allocations.

The RLDP's main **short term, temporary** impacts are construction of 26,400 new homes, development of employment land for 32,300 new jobs, and associated retail, community, minerals/waste etc. development.

The RLDP's main **long term, permanent** impacts are an increase in the city's population; economic growth of the city and region; an increased proportion of journeys made by walking, cycling and public transport; improved average energy efficiency of the city's homes and businesses; and urbanisation/development of 105ha of greenfield land.

The RLDP's main **indirect** impacts are reduced per-person greenhouse gas emissions; negative impacts on biodiversity, soils, water infiltration and the landscape associated with the development of 105ha of greenfield land; improved health for Cardiff's residents resulting from new homes, improved energy efficiency, and more walking and cycling; and increased use of the Welsh language.

Table 6.6 summarises the RLDP's main **cumulative impacts**, namely the baseline future situation in the absence of the plan from Table 2.1 plus the overall impacts of the RLDP from Table 6.5.

Cumulatively, the economy and people's health are likely to improve; equality, air pollution and climate change impacts are likely to remain roughly the same; and biodiversity, soils, water and the landscape are likely to significantly worsen.

**Table 6.4 Summary site appraisal for sites included in the Plan**

See Table 5.1 for explanation of colour-coding

Site		ISA criteria		Proposed use		WIMD		In international level designation		In UK/Wales level designation		Difficult to access other than by car		In local level designation																							
Proposed use: R = residential, L = residential-led mixed use, M = mixed use																																					
						Primary school	Second. school	Health centre	GP	Allotments	Hub	PROW	Housing	Air quality mgm	SPA/Ramsar	SAC	SSSI	LNR	SINC	Bus stop	Train station	Local centre	District centre	Historic landsc	Historic park&G	Ancient monum	Conserv area	Archaeol sens	Employment	Prev devel land	Agric land qual	Spec landsc area	Water body	Flooding			
34	Land at Church Farm (SH1.1)	R	1																																		
33	Land S of M4 (SH1.2)	R	1																																		
57	Land N of Ty-Draw Rd (SH1.3)	R	1																																		
19	Land S of Llantrisant Rd (SH1.4)	R	1																																		
21	Land at Llantrisant Rd (SH1.5)	R	1																																		
81	Land at Llwynioli Farm (SH1.6)	M	1																																		
	Former Gas Works (SH1.7)	R	1																																		
<b>Policy H1A: Strategic housing sites</b>																																					
34	Land at Church Farm (SH1.1)	R	1																																		
33	Land S of M4 (SH1.2)	R	1																																		
57	Land N of Ty-Draw Rd (SH1.3)	R	1																																		
19	Land S of Llantrisant Rd (SH1.4)	R	1																																		
21	Land at Llantrisant Rd (SH1.5)	R	1																																		
81	Land at Llwynioli Farm (SH1.6)	M	1																																		
	Former Gas Works (SH1.7)	R	1																																		
<b>Policy H1B: Non-strategic housing sites</b>																																					
	Land at Areas 9-12, St. Mel (H1.1)	H	3																																		
37	Rookwood Hospital (H1.2)	R	1																																		
<b>Policy H2: Housing led regeneration areas</b>																																					
	International Sports Village (H2.1)	M	1																																		
76	Velindre Cancer Centre (H2.2)	L	4																																		
78	Whitchurch Hospital (H2.2)	M	4																																		
52	Cardiff Gate Business Park (H2.3)	M	1																																		
8	Roath Dock North (H2.4)	M	1																																		
4	Porth Teigr & Alexandra (H2.5)	M	1																																		
32	Hadfield Road (H2.6)	R	2																																		
3	Land at Callaghan Sq (H2.7)	M	3																																		
<b>Other policies with sites</b>																																					
	EC1: Cardiff Central Ent. Zone	M	1/3/5																																		
73	EC2: Land S of St Mellons Business	E	1																																		
	H11: Pengam Green	H	5																																		

**Table 6.5 Overall impacts of plan policies and site allocations**

	<b>Overall impacts of plan policies</b>	<b>Overall impacts of site allocations</b>
1. Equality	<p>++</p> <p>The plan supports affordable housing (H3), a variety of employment opportunities (EC1-EC3), healthy lifestyles and eating (HF1-HF4), walking and cycling (HF1, T1), public transport (T2, T3, T5), community facilities and schools (C1, C2, C4) and local centres (R1, R4, R5, R7). Policy P1 supports children through improved play and informal recreation. Together, these help to address imbalances of inequality and exclusion; improve access to affordable housing, employment opportunities, and community facilities</p>	<p>+/-</p> <p>Of the site allocations, only Velindre Cancer Centre/Whitchurch Hospital (H2.2) are in the Welsh Index of Multiple Deprivation rank 4, and so would help to revitalise a pocket of deprivation within a much less deprived wider area. All of the strategic housing sites (H1A), International Sports Village (H2.1), Cardiff Gate West (H2.3), Porth Teigr and Alexandra Head (H2.5) and Land South of St. Mellons Business Park (EC2) are in WIMD rank 1, namely the least deprived areas in the city, although they are adjacent to the 'southern arc' which contains some of the most deprived wards in the city. Pengam Green (H11) would provide pitches for about 80 gypsy and traveller caravans.</p>
2. Air quality	<p>+/-</p> <p>The plan aims to reduce air pollution (PC1), and its transport policies (T1-T3, T5, T6, ) support walking, cycling and public transport which are less polluting than the private car. The plan's focus on brownfield sites, its support of local centres (R4-R7), and its aim to protect and enhance community facilities (C1, C2) will also minimise per person car use.</p> <p>However the plan is for 26,400 new homes and 32,300 new jobs over the plan period, which will counterbalance the per-person decrease in air pollution.</p>	<p>-</p> <p>None of the sites is in an Air Quality Management Area. Most of the strategic sites (H1A), International Sports Village (H2.1), Cardiff Gate West (H2.3) and Porth Teigr and Alexandra Head (H2.5) are all difficult to access other than by car, and so are likely to generate air pollution.</p>

	<b>Overall impacts of plan policies</b>	<b>Overall impacts of site allocations</b>
3. Biodiversity	<p>- Policies BG1-BG5 aim to protect biodiversity in Cardiff; policy BG7 focuses on the integrity of Cardiff's internationally important biodiversity sites; and policy W1 on water sensitive design promotes the use of sustainable drainage systems which often also enhance biodiversity.</p> <p>However policies H1A, H1B, H2, EC2 and EC3 propose development in/near nationally and internationally important nature conservation areas. Policy MW1 proposes quarry development adjacent to an SSSI and SAC. The plan would involve developing 105ha of greenfield land<sup>19</sup>, with associated impacts on biodiversity. Depending on their location, future employment sites (EC7), retail centres (R7), community facilities (C1), transport projects (T2, T3, T5, T6) and waste management projects (MW8) could also negatively affect biodiversity.</p>	<p>-- Land at Areas 9-12 (H1.1) and Land South of St. Mellons Business Park (EC2) are both in the nationally- important Gwent Levels SSSI. Porth Teigr and Alexandra Head (H2.5); sites H1.1 and EC2, the International Sports Village, Roath Dock North (H2.4) and Pengham Green (H11) are all near the internationally- important Severn Estuary SPA/SAC/Ramsar site, with possible cumulative impacts on the integrity of that site. All of the strategic housing sites are either on or adjacent to Sites of Importance for Nature Conservation.</p>
4. Climate	<p>+</p> <p>The plan aims to reduce greenhouse gas emissions (PC1, RE1, RE2) and support renewables (RE1). Its transport policies (T1-T3, T5, T6) support walking, cycling and public transport which emit fewer greenhouse gases than the private car; and policy T7 supports electric vehicle charging. The plan's support for local centres (R4-R7), and its aim to protect and enhance community facilities (C1, C2) will not only minimise per person car use but also prevent unnecessary development on greenfield sites that can absorb carbon.</p> <p>However the plan is for 26,400 new homes and 32,300 new jobs over the plan period, which will counterbalance some of this per-person decrease in greenhouse gas emissions.</p>	<p>-</p> <p>Most of the strategic sites (H1A), International Sports Village (H2.1), Cardiff Gate West (H2.3) and Porth Teigr and Alexandra Head (H2.5) are difficult to access other than by car, and so are likely to generate greenhouse gases.</p>

<sup>19</sup> Greenfield land take: SH1.1 Land at Church Farm 14.16ha; SH1.2 Land south of the M4 4.96ha; SH1.3 Land to the north of Ty-Draw Road 15.33ha; SH1.4 Land south of Llantrisant Road 13ha; SH1.5 Land at Llantrisant Road 8.73ha; SH1.6 Land at Llwynioli Farm 3.4ha; H1.1 Land at areas 9-12, St. Mellons 3.98ha; H2.3 Cardiff Gate Business Park (West) 6.4ha; EC2 Land south of St. Mellons Business Park 35ha. In most of these sites, not all the land will be developed: some will be kept as open space. This accounts the difference between the full site size and the greenfield landtake.

	<b>Overall impacts of plan policies</b>	<b>Overall impacts of site allocations</b>
5.Heritage	<p>-?</p> <p>Policy HE1 provides strong protection for Cardiff's heritage assets, and WL1 promotes the Welsh language.</p> <p>However a range of plan policies may lead to a negative impact on heritage. Policies H1B and H2 propose new housing in a historic landscape and in historic parks &amp; gardens, and EC2 proposes employment development in a historic landscape and an archaeologically sensitive area. Depending on their location, future employment sites (EC7), retail centres (R7), transport projects (T2, T3, T5, T6) and waste management projects (MW8) could also negatively affect heritage assets, although they may also help to restore and/or improve public access and understanding of such assets.</p>	<p>-</p> <p>Land South of St. Mellons Business Park (EC2) and Land at Areas 9-12, St. Mellons (H1.1) are both in a historic landscape and an archaeologically sensitive area. Rookwood Hospital (H1.2), and Whitchurch Hospital / Velindre (H2.2) are both in historic parks and gardens, and Rookwood is also near a conservation area and archaeologically sensitive site. Cardiff Central Enterprise Zone (EC1) contains a range of heritage designations</p>
6.Economy	<p>++</p> <p>Most of the plan policies directly or indirectly support Cardiff's economic growth. The housing policies (H1A, H1B, H2, H5, H6) plan for 26,400 homes to accommodate people coming to Cardiff for study or work, as well as for existing residents. The economic (EC1-EC3) policies plan for 32,300 jobs. The minerals policies (MW1, MW2) support and protect a range of employment opportunities. Policies on transport (T2-T6), retail centres (R1, R2, R7) and minerals and waste (MW1, MW6-8) support the economy by supporting good access to employment, helping to provide the facilities that employers and employees need, and dealing with the side-effects of economic activities.</p>	<p>+</p> <p>Cardiff Central Enterprise Zone (EC1) and Land South of St. Mellons Business Park (EC2) would both provide employment, as would the 25 employment sites of EC3. Most of the housing-led regeneration Areas (H2) would incorporate an element of employment.</p>
7.Health	<p>+</p> <p>The plan directly supports health through policies HF1-HF4 on health and food, C1 on new and improved community/health facilities, and C3 on community safety. Indirectly, it supports walking and cycling, will help to minimise air and water pollution, and helps to provide needed housing, particularly affordable housing (H3). Policies OS1 and OS2 aim to protect existing open space and provide for new open space, which support good health. Policy P1 supports play and informal recreation.</p> <p>The plan may lead to some negative health impacts where development affects open space and biodiverse areas, or increases traffic in some areas.</p>	<p>+</p> <p>The development sites most likely to encourage walking, cycling and public transport as they are nearest existing services are Former Gas Works (SH1.7), Land at Areas 9-12 (H1.1), Rookwood Hospital (H1.2), Whitchurch Hospital/Velindre (H2.2), Hadfield Road (H2.6) and Callaghan Square (H2.7). The provision of about 80 pitches at Pengam Green (H11) would support the health of gypsies and travellers.</p>

	<b>Overall impacts of plan policies</b>	<b>Overall impacts of site allocations</b>
8. Soils	<p>-</p> <p>The plan seeks to meet about half of its housing land requirements on brownfield locations (Objective 1). Policy HF4 aims to protect local food growing enterprises. Policy BG6 on soils aims to protect and enhance important soil resources, and PC1 aims to prevent unacceptable levels of land contamination. Policies MW1, MW6 and MW7 safeguard mineral-related uses.</p> <p>However, the plan includes the roll-out of strategic sites from the current Local Plan, most of which are on greenfield land, which will have negative impacts on soil quality. It also includes greenfield sites at Policies H1B, H2 and EC2.</p>	<p>--</p> <p>The strategic sites from the current LDP (SH1.1-1.6) together involve developing 59.58ha of greenfield land (see footnote 19). Additional greenfield sites are Land at Areas 9-12, St. Mellons (Policy H1B, 3.98ha), Cardiff Gate Business Park West (Policy H2, 6.4ha), and Land South of St. Mellons Business Park (Policy EC2, 35ha).</p>
9. Landscape	<p>-</p> <p>Policy CP3 aims to protect the character and quality of the landscape. Policy SP4 promotes good design, and D1 sets criteria for tall buildings. The plan's policies on open space (OS1, OS2) and biodiversity (BG1-5) indirectly protect the landscape and open space.</p> <p>However cumulatively the plan is likely to have negative impacts on the landscape through development of 105ha of greenfield land, and development in or near designated landscape areas.</p>	<p>-/-</p> <p>Creigiau Quarry (MW1) is in a Special Landscape Area (SLA). Land at Llantrisant Road (SH1.5) is adjacent to a SLA. Land at Church Farm (SH1.1), Land south of the M4 (SH1.2), Land south of Llantrisant Road (SH1.4) and Land at Llwynioli Farm (SH1.6) are within 1km of a SLA. All of Land South of St. Mellons Business Park (EC2) and about 15% of Land at Areas 9-12 (H1.1) are in a historic landscape.</p>
10. Resources	<p>0</p> <p>The plan says little about Cardiff's ecological footprint, or about waste reduction, re-use, recycling and recovery. Policy MW9 expects appropriate provision to be made in new developments for facilities for storage and recycling of waste. The transport policies that promote public transport (T1-3, T5, T6) help to reduce the need for cars, with associated resource savings in petrol and land for parking.</p>	No site allocation related issues
11. Water	<p>-</p> <p>Policy SP22 aims to safeguard water resources and improve water quality, W1 promotes water sensitive design, W2 aims to protect water resources, CP4 aims to protect the city's rivers, and W3 aims to minimise flood risk.</p> <p>However the plan is for 26,400 new homes and 32,300 new jobs over the plan period, including development of 105ha of greenfield land. This will increase water use, increase runoff, and increase the likelihood of flooding.</p>	<p>-</p> <p>Roath Dock North (H2.4) and Porth Teigr and Alexandra Head (H2.5) are outside a defended flood zone and within Zone 3 for seas or rivers, i.e. at high risk of flooding. Velindre (H2.2) is at lesser risk but still outside a defended flood zone.</p> <p>Most of the site allocations in the plan are adjacent to water bodies or include water bodies.</p>

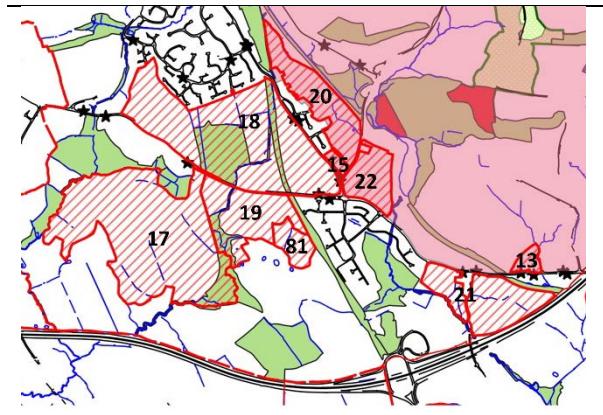
**Table 6.6 Cumulative impacts of the RLDP plus existing trends**

	Likely future without plan (Table 2.1)	Overall impacts of plan policies (Table 6.5)	Overall impacts of site allocations (Table 6.5)	Cumulative impacts of likely future without the plan + plan
1. Equality	--	++	+/-	0 The plan policies are overall very positive (e.g. on healthy food and children's play), but the site allocations are unlikely to lead to significant reduction in deprivation and inequality.
2. Air quality	+	+/-	-	+/- Electrification of vehicles and heating is likely to improve air quality per person nationally. However the increase in Cardiff's population will cancel out some of these benefits, and several of the site allocations are in areas likely to be accessible primarily by car.
3. Biodiversity	?	-	--	-/- Biodiversity is plummeting nationally. In Cardiff, it is likely to be negatively affected by the RLDP's development of 105ha of greenfield sites; and particularly by sites set in the Gwent Levels SSSI, cumulative impacts on the Severn Estuary SPA/SAC/Ramsar sites, and the strategic sites' impacts on SINCs.
4. Climate	+	+	-	+/- The plan policies aim towards zero carbon development, and nationally there is a move to increasing use of renewables and increased electrification of vehicles and heating/cooking. However the increase in population will cancel out some of these benefits, and several of the site allocations are in areas likely to be accessible primarily by car.
5. Heritage	?	-?	-	-? The plan aims to minimise negative impacts on heritage assets. Although some of the allocated sites are within heritage designations, it is likely that mitigation measures can be implemented that minimise heritage impacts.
6. Economy	?	++	+	+\nCardiff's and the wider regional economy are likely to improve as a result of 32,300 new jobs and 26,400 new homes over the plan period. The RLDP transport policies should help to facilitate transport to/from the new jobs.

	Likely future without plan (Table 2.1)	Overall impacts of plan policies (Table 6.5)	Overall impacts of site allocations (Table 6.5)	Cumulative impacts of likely future without the plan + plan
7. Health	+/-	+	+	<p>+</p> <p>Cardiff residents' health is likely to improve as a result of more housing that is more energy efficient, the RLDP's policies on walking and cycling, and the policies on wellbeing, open space and children's play.</p>
8. Soils	-	-	--	<p>--</p> <p>Although the RLDP aims to provide much development on brownfield land, overall it will lead to the development of 105ha of greenfield land. Cumulatively with strategic sites that are in the process of being developed, this will have a significant negative impact on soils.</p>
9. Landscape	+/-	-	-/-	<p>-/-</p> <p>The RLDP proposes several large development sites in and near sensitive landscapes. The urbanisation of 105ha of greenfield land will also have a significant negative impact on the landscape.</p>
10. Resources	+	0	0	<p>0</p> <p>The RLDP says little about resource use. Underlying trends are for increasing recycling and efficient use of materials.</p>
11. Water	--	-	-	<p>-/-</p> <p>Water quality in most of Cardiff's rivers is moderate (poor in the Ely). The RLDP aims to protect, but not necessarily enhance, water quality. Cardiff is already at significant risk of flooding, although flood protection works are under way at Rover Way. Although the RLDP aims to minimise flooding, several site allocations are still in zones at high risk of flooding, and the development of 105ha of greenfield land is likely to reduce infiltration and increase flooding.</p>

Three areas are likely to be significantly cumulatively affected by sites allocated in the RLDP:

**Creigiau:** Sites 15, 17-20, 22, 81 and (to the south-east by about 1km) sites 21 and 13 are clustered near Creigiau, north of the M4. Individually they are not sustainable because they are located far from existing services – Creigiau has a primary school but all other existing services are located more than 5km away, and involve crossing the M4. Several of the sites are in a Special Landscape Area (pink shading on map) or in Sites of Interest for Nature Conservation (SINC, green shading).



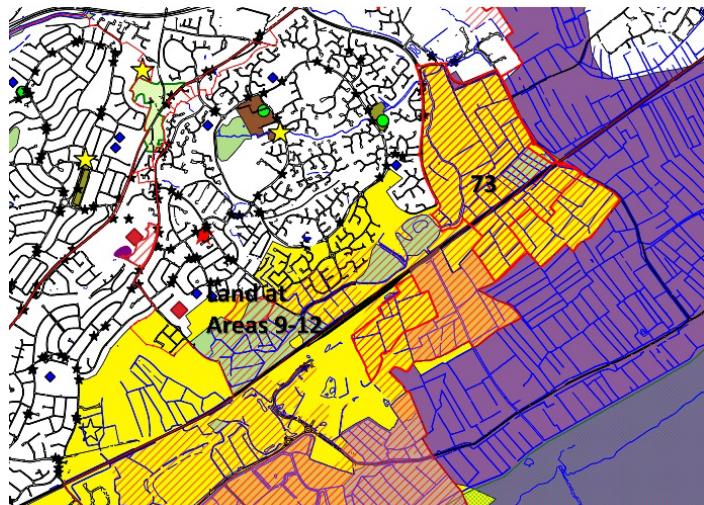
Site 18 (Land to the south of Creigiau, 38.8ha) received planning permission in November 2024. The RLDP includes the residual areas of strategic site D, which together comprise 25ha:

- 19: Land south of Llantrisant Road (SH1.4)
- 21: Land at Llantrisant Road (SH1.5)
- 81: Land at Llwynioli Farm (SH1.6)

Masterplans for the strategic sites have been prepared, and these sites are needed to allow the masterplans to be fully delivered together with the agreed community infrastructure. Junction 33 has a park and ride, with regular buses to the centre of Cardiff, and the draft Cardiff Bus Priority Plan 2024-2030<sup>20</sup> includes a bus link from the city centre to Junction 33 as part of the secondary bus priority network. The SINC areas could be designated as open space.

However, the sites together would have a cumulative negative impact on the Special Landscape Area; and residents would still access most services and employment by car, possibly quite far away since the M4 is conveniently nearby. Together, the sites would more than double the size of Creigiau, with a significant impact on existing residents.

**Wentloog Levels:** Land South of St. Mellons Business Park (part of site 73, 44ha north of the railway line) and Land at Areas 9-12, St. Mellons (3.98ha) would both be located in areas with multiple national-level designations (heritage, landscape and nature conservation), where changes in hydrology and water quality could affect the Severn SPA/SAC/ Ramsar site. Both sites include Sites of Importance for Nature Conservation.

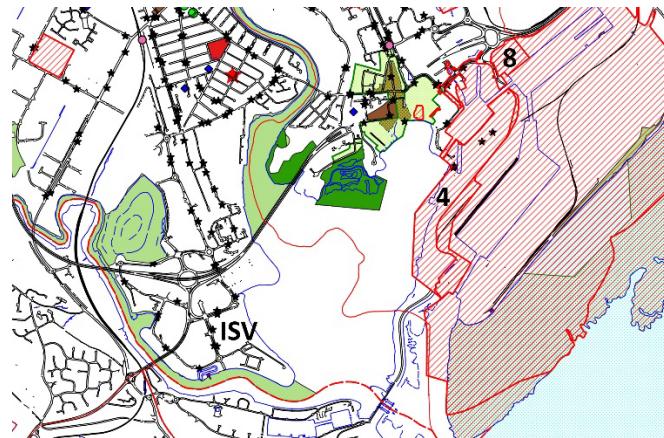


Cumulatively, the sites would cover about 10% of the south-east Cardiff Archaeologically Sensitive Area (yellow Shading); about 10% of the south-east Cardiff historic landscape (purple shading); and about 5% of the Rumney and Peterstone SSSI.

<sup>20</sup> <https://cardiff.moderngov.co.uk/documents/s76394/Item%205%20-%20Appendix%201.pdf>

Land South of St. Mellons Business Park is being put forward as a major new, regionally-important employment generator. A new train station at the business park would allow local residents as well as workers at the new sites easy access to the city centre and Newport. The site is being considered by Welsh Ministers.

**Cardiff Bay:** Porth Teigr and Alexandra Head (site 4, 2310 homes), Roath Dock North (site 8, 316 homes) and the International Sport Village (ISV, 1000 homes) are all proposed as housing-led regeneration areas at policy H2. None are directly in any designated sites, and jointly they would provide more than 3,600 homes plus employment land. Cumulatively, however, they would need to be carefully managed to avoid significant effects on the landscape, water quality and biodiversity of Cardiff Bay. Cumulatively, they could also have indirect impacts on the integrity of the Severn Estuary SPA/SAC/Ramsar site through additional recreational impacts: they are likely to require avoidance and mitigation measures as set out in Policy BG7.



## 7. Summary of other appraisal findings

This section summarises the findings of other assessments of the RLDP: on equalities, health, the Welsh Language and on internationally important nature conservation sites under the Habitats Directive. The full appraisals are available as background technical papers to the RLDP.

### 7.1 Equalities impact assessment

An equalities impact assessment was carried out in house by Cardiff Council. It tested the impact of the RLDP on the protected characteristics of the Equalities Act 2010 (age, disability etc.). It found that, overall, the strategy would not have differential impact on any of the Protected Characteristics. The main policies supporting the equalities impact assessment were

- SP4 Securing good quality and sustainable design
- SP12 Delivering sustainable neighbourhoods, social cohesion and affordable housing
- SP13 Securing health and well-being and resilience
- SP18 Delivering sustainable and active travel
- H3 Affordable housing
- H10 Sites for Gypsy and Traveller caravans
- H11 Allocation policy for Gypsy and Traveller site
- R4 District centres
- R5 Local centres
- C1 Community facilities
- C2 Protection of community facilities
- C4 Planning for Schools
- HF1 Health, wellbeing and development
- T1 Prioritising walking and cycling
- T2 Strategic rapid transport, bus corridors and bus enhancements
- T3 Rail transport
- T4 Managing transport impacts
- OS1 Protection of open space
- OS2 Provision for open space, outdoor recreation, children's plan and sport
- P1 Play and informal recreation

Age:

- The Preferred Strategy aims to provide for an appropriate mix of dwelling types and sizes, including housing suitable for older people.
- The pressure on younger people arising from house prices compared to incomes is recognised. The Preferred Strategy aims to provide affordable and a range and choice of homes.
- Where possible the Preferred Strategy locates development towards areas where there are already a range of services and facilities, and provides new services and facilities where there is a deficiency – this will assist non-car owners.
- The Plan supports development that can be designed to adapt to the changing needs of its occupants.

Disability:

- The Preferred Strategy aims to locate, where possible, development towards areas where there are already a range of services and facilities and providing new services and facilities where there is a deficiency – this will assist non-car owners.
- It also aims to support development that can be designed to adapt to the changing needs of its occupants and requires development to have safe and satisfactory access for disabled people.

Gender reassignment; sexual orientation; marriage and civil partnership; race:

- It is not anticipated that the plan is likely to have an adverse effect on these groups.

Pregnancy and maternity:

- This group will be influenced most by the location of housing in relation to health care facilities and employment opportunities. The plan will facilitate an appropriate level of housing development to be located near to these facilities and opportunities and/or in accessible locations that have an efficient transport network. The location of development in terms of accessibility by different transport modes will also be important.

Religion, belief or non-belief:

- It is not anticipated that the plan is likely to have an adverse effect on this group. Some religious groups may require purpose-built accommodation and these issues will be considered at the detailed master planning stage.

Sex:

- In sections of the population, women may have more limited mobility in single car households which could lead to some isolation. The plan's focus on new development having good public transport will ensure that this group have an improved equality of access to services, employment etc. Increasing the accessibility of the built environment, public transport and housing and improving access to services will benefit both men and women but will be particularly beneficial to people with caring responsibilities.
- The more detailed policies of the plan will directly address issues such as design, the public realm, public transport and fear of crime which may affect both men and women.

Socio-economic duty

This part of the equalities impact assessment considered whether the RLDP Preferred Strategy would reduce or contribute to inequality of outcome because of socio-economic disadvantage.

- The plan aims to provide 32,300 new jobs up to 2036 through provision of a range and choice of employment for different types of employment in different geographical locations across the city. This will be supported by a strong framework to protect the future role of the city's employment land, through the designation of strategically and locally important land and premises.
- The plan also aims to provide 26,400 new homes with a range of dwelling sizes, tenures, types and locations that meet the full range of housing needs, particularly affordable accommodation and accommodation that meets the needs of an ageing population, and family units to meet the needs of children and young people.
- The plan aims to deliver well balanced and cohesive communities, with improved quality of life and access to employment opportunities through supporting the regeneration of deprived communities within the city and maximising the additional benefits that new communities can bring to adjoining or surrounding communities.

## 7.2 Health impact assessment

Sixteen officers from Cardiff Council, Cardiff & Vale University Health Board, and Shared Regulatory Services carried out a rapid participatory health impact assessment (HIA) of the deposit plan on 2 May 2024. They first identified vulnerable groups of people, including

- age-related groups (e.g. children, older people)
- groups at higher risk of discrimination or another social disadvantage (e.g. experiencing homelessness, Gypsies and Travellers, asylum seekers and refugees)
- geographical groups and settings (e.g. people in the 'southern arc' of Cardiff with poor economic/health indicators and high levels of deprivation)
- other groups (e.g. people who are neurodivergent, young people in care, carers)

The appraisal concluded that the Deposit Plan will overall have a positive impact on health, but elements of some policies could be strengthened to ensure they have a positive impact, and that development takes into account the different needs of community groups:

Plan Policy	Summary of HIA comments
R8: Food and drink uses	<ul style="list-style-type: none"><li>• Concern over lack of control of hot food takeaways near schools</li><li>• Deprived areas lack access to healthy and affordable options for food</li></ul>
C1: Community facilities	<ul style="list-style-type: none"><li>• Detailed understanding of the local community is needed (e.g. through HIA)</li><li>• Need to define what is meant by 'accessible' and who this applies to. Local residents may have very different needs</li><li>• Community facilities can be joined up with health facilities, as multipurpose facilities</li></ul>
C3: Community safety / creating safe environments	<ul style="list-style-type: none"><li>• Need to define 'good standard of lighting'</li><li>• Proposals should consider whether the needs of all population groups are considered, e.g. Muslim women may have specific needs to enable them to feel safe</li><li>• Should the policy address violence against women / domestic abuse?</li><li>• Consider the implications of the Anti-racist Wales Action Plan</li></ul>
C4: Planning for schools	<ul style="list-style-type: none"><li>• Consider community use of school playing fields/playgrounds outside of school hours</li><li>• Having good quality facilities will draw people to an area</li><li>• Consider the impact of using school facilities on surrounding residential amenity e.g. noise</li><li>• Ensure sites are accessible from across the surrounding area to avoid widening inequalities</li></ul>
HF1: Health, Wellbeing and development	<ul style="list-style-type: none"><li>• Cycle storage should be secure</li><li>• Consider if the council should provide large stand-alone cycle storage areas</li><li>• A HIA undertaken for major developments involving healthcare service requirements should consider the impact on staffing in local health facilities, through a discussion with the local health board</li><li>• Specify that healthcare facilities refer to primary, secondary and community</li><li>• Change wording of point vi to '<i>comprehensively considers the capacity of existing healthcare facilities...</i>'</li><li>• Consider if the HIA requirement should apply to school developments</li></ul>
HF2: Provision of allotments	<ul style="list-style-type: none"><li>• Allotments should preferably be provided on site</li></ul>

Plan Policy	Summary of HIA comments
HF3: Provision of food growing space in new developments	<ul style="list-style-type: none"> <li>Focus should be on community food growing as this will foster social cohesion</li> </ul>
T1: Prioritising walking and cycling	<ul style="list-style-type: none"> <li>Joint cycling and walking routes should be segregated whenever possible, to ensure the safety of pedestrians, particularly on shared walkways, and at floating bus stops</li> <li>Cycle paths should be well lit</li> <li>Consider access needs of disabled users to cycle and pedestrian routes</li> <li>Policy should cover cycling to school</li> </ul>
OS2: provision for open space, outdoor recreation, children's play and sport	<ul style="list-style-type: none"> <li>Open space should be designed with local needs in mind</li> <li>Children's play should be separated from sport as they are separate issues</li> <li>Children's opportunity to play in informal areas is just as important as in formally laid out play areas</li> <li>Maintenance of formal play areas is expensive</li> <li>Consider the implications of the council's <a href="#">Play Strategy</a> and <a href="#">Play Sufficiency Assessment</a></li> <li>A Play SPG should be developed</li> </ul>

### 7.3 Welsh language impact assessment

Cardiff is an Area of Linguistic Importance, and the RLDP should aim to protect, promote and strengthen the Welsh Language to ensure a bilingual Cardiff. Bilingual Cardiff's mission is to double the number of Welsh speakers in Cardiff by 2050.

A Welsh Language Impact Appraisal of the RLDP was carried out by Iaith Cyf/Burum in November 2024. This found that the draft RLDP's vision and objectives support the City's role as an area of linguistic importance, and contribute to Cymraeg 2050. In particular, the RLDP includes policies SP15 Securing and Enhancing Opportunities to Grow the Welsh Language, and WL1 Welsh Language. The Iaith Cyf/Burum appraisal tested the RLDP against three key outcomes:

Bilingual Cardiff outcomes	Overall impacts of plan policies	Overall impacts of site allocations
1. The number and percentage of Welsh speakers continues to increase and meets the identified (WG) targets	0	?
2. The use of the Welsh language significantly increased and normalised	?	?
3. The Welsh language is supported through linguistic planning, economic development, digital platforms and culture	+	+

Despite the plan's Welsh language related policies, concerns remain that the scale, pace and growth and some locations of major development, whilst possibly helping to grow the number of Welsh speakers, could adversely affect the community, school or workplace use of the language and its normalisation.

The Assessment highlights in particular the opportunity that effective use of Policies SP3 (Ensuring a Masterplanning Approach), and SP5 (Securing Infrastructure) and SP6 (Planning Obligations) can have to deliver mitigation and enhancement measures to support the growth of the use of the Welsh language and the Bilingual Cardiff Strategy in major new developments.

## 7.4 Habitat Regulations Assessment

The Habitat Regulation Assessment (HRA) for the Cardiff RLDP assessed the likely impacts of the plan on the integrity of the Severn Estuary SAC/SPA/Ramsar and Cardiff Beech Woods SAC. Both are internationally important nature conservation sites, and the plan cannot be adopted if it will negatively affect the sites' integrity. Site integrity relates to why the sites have been designated.

The Severn Estuary SAC/SPA/Ramsar's integrity relates primarily to its overwintering birds, tidal range and associated run of migratory fish, and estuarine/ mudflat/salt meadow ecological communities. The Cardiff Beech Woods SAC's integrity relates to its beech forests, and forests of slopes, scree and ravines.

The HRA analysed the plan's likely impacts on the sites in terms of the sites' main sensitivities and threats, namely recreational pressure and disturbance; water quantity/level/flow; water quality; air quality; and (for the Severn Estuary) coastal squeeze. The HRA found:

- Avoidance (e.g. not building near the estuary, preventing access to the estuary) and mitigation (e.g. Strategic Access Management and Monitoring, access improvements to appropriately sited, existing or newly developed greenspaces) would be required for both the Severn Estuary SAC/SPA/Ramsar and Cardiff Beech Woods SAC to allow housing growth in Cardiff to come forward (para. 6.17-6.24, 6.35)
- The plan should include a policy stating that proposals that would result in increased visitor pressure on these sites will not be supported unless it can be demonstrated that no adverse impact on the integrity of the sites will occur (para. 6.26, 6.37)
- The development proposed in the plan could affect land that is functionally linked to the Severn Estuary SPA/Ramsar, namely land that is used by SPA birds. This could particularly affect Land at areas 9-12, St. Mellons. To meet the requirements of the Habitats Directive, the applicant should be required to provide evidence that the development will not result in adverse effects on the integrity of the Severn Estuary SPA/Ramsar, including adjacent land.
- Changes in water quantity/level/flow, water quality, air quality and coastal squeeze as a result of the RLDP are unlikely to affect the integrity of the Severn Estuary SAC/SPA/Ramsar and Cardiff Beech Woods SAC.

The RLDP includes Policy BG7, which states that "Development proposals that would result in an increase in visitor pressure on features of the Severn Estuary SAC, SPA, Ramsar site and Cardiff Beech Woods SAC, impact on functionally linked land with respect of the Severn Estuary Marine Site (EMS), will not be supported unless it can be demonstrated that the integrity of the European Marine Site or Cardiff Beech Woods SAC can be maintained following the HRA staged process."

## 8. Mitigation measures

*“the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme” (SEA Directive Annex I(g))*

This section looks at mitigation measures recommended by the ISA, and responses to these by the planning team. It starts with strategic policies, then development policies, and concludes with sites. Many proposed changes were minor wording changes, which are not discussed here.

### 8.1 Vision and objectives

Table 8.1 summarises the key changes made to the vision and objectives in response to the ISA process. No significant changes were made to Objectives 7-11.

**Table 8.1 Changes to the vision and objectives**

<b>Vision or objective</b>	<b>Key changes to contents of* vision/objective</b>
Vision	Vision reworded from “city which is easier to move around” to “high accessibility city”
Objective 1. To provide a variety of quality low carbon homes to address the housing crisis and future housing needs	Reference to Gypsies and Travellers added
Objective 2. To provide space for more jobs and maximise Cardiff’s role as the Capital City of Wales and the economic driver of South East Wales to improve the prosperity of the region.	Added: “Prioritise opportunities for new employment sites in... sustainable brownfield locations”
Objective 3. To ensure the adequate and timely provision of new infrastructure to support communities and future growth.	Water, wastewater and energy added to list of infrastructure
Objective 4. To respond to the climate emergency so Cardiff becomes more resilient and maximises opportunities for energy-efficient solutions in line with the One Planet Cardiff Strategy to become a carbon neutral city by 2030.	Include “in line with the One Planet Cardiff Strategy to become a carbon neutral city by 2030.” Remove “reduces its carbon footprint” as this is covered by the above Reference to energy efficiency improvements was limited to new developments; now applies to all development.
Objective 5. To make the city easier to move around with a focus on sustainable and active travel.	Rewording of reference to integration with Metro/Crossrail
Objective 6. To create healthier environments, reduce inequalities and improve wellbeing.	Reference added about access to local healthy food Added: “Ensure strong and cohesive communities which recognises Cardiff’s commitment to make Cardiff a Child Friendly City and Age Friendly City”

\* The objectives have sub-objectives: it is the sub-objectives that have been changed

## 8.2 Strategic policies

Table 8.2 lists the main suggested mitigation measures based on the policy appraisal of **Appendix B**, and the planning team's response. In particular, SP21 on green infrastructure was strengthened to better protect existing biodiversity and deliver biodiversity benefit; and SP10 on tourism was added after the ISA identified a gap related to tourism.

**Table 8.2 Changes to strategic policies resulting from the ISA**

<b>Draft policy</b>	<b>Summary of main ISA comments</b>	<b>Summary of responses to ISA comments</b>
SP3: Ensuring a masterplanning approach/ SP4: Securing good quality and sustainable design	Reduce overlap between policies (e.g. on walking and cycling)	Overlap reduced
	Clarify density requirements	Now clarified at SP4 ix.
	Mention biodiversity gain/benefit	Now mentioned at SP4 iii.
SP5: Securing new infrastructure	Mention need to provide for infrastructure where it is currently under-provided	Added indirectly/partly in first paragraph of supporting text
	Add SUDS to list of infrastructure	Added
SP9: Supporting the role of Cardiff Port	Refer to constraints on development set by the Severn Estuary SPA/SAC/Ramsar	Referenced in supporting text
SP10: Supporting tourism		New policy responding to ISA recommendation
SP11: Maintaining a supply of minerals	Add a requirement about reinstatement of sites post-extraction	Added
SP19: Securing new transportation infrastructure (includes former T8)	Remove Eastern Bay Link which seems to be finished.	One section still needs to be upgraded, so left in
	Remove St. Mellons rail interchange which would negatively affect multiple designations	The St. Mellons Rail Interchange forms part of the larger Cardiff Parkway scheme for a new business park, rail station and P&R. The scheme is currently with Welsh Ministers for consideration.
SP20: Securing climate resilience, de-carbonisation and renewable energy in new developments	Reword “Developments should take into account the following factors” could be more actively worded.	Changed to “development proposals must... demonstrate how they have worked towards”, which is more active, and doesn't treat climate issues as external to the development.
	Include tree planting as a way of increasing carbon sinks	Tree planting added at iii.
SP21: Protecting, compensating and enhancing green infrastructure and biodiversity	“Protection and conservation of natural heritage network needs to be reconciled with the benefits of development” suggests a gradual erosion of natural heritage assets.	Policy significantly rewritten to be much stronger in its protection of green infrastructure, requirement for biodiversity benefit, and

	Policy should more clearly encourage a hierarchy of avoid – reduce – compensate, and ‘improve’ where possible	promotion of ecosystem resilience.
SP23: Managing waste	Waste prevention, reuse and recycling should precede the other points, to show links to the waste hierarchy.	Moved to i.

### 8.3 Detailed policies

Table 8.3 lists the main suggested mitigation measures based on the policy appraisal of **Appendix C**, and the planning team’s response. Minor changes, for instance to punctuation or individual words, are not listed. The main changes resulting from the policy appraisal are:

- Pengam Green chosen over Rover Way as the Gypsy and Traveller site
- Addition of policy D1 Tall Buildings
- BG4 Net Benefits for Biodiversity and the Green Infrastructure Statement comprehensively rewritten to be clearer about biodiversity net gain
- BG6 Soils explanatory text provides further detail about how soil quality can be enhanced
- BG7 Severn Estuary and Cardiff Beech Woods Recreational Pressure explanatory text more clearly promotes avoidance as well as mitigation of impacts on Cardiff’s internationally important nature conservation sites
- T4 Managing Transport Impacts rewritten to distinguish between 1. where new development should be located to minimise car movements, and 2. design of new development to minimise car movements
- P1 Play Areas amended to ensure that children’s play areas are accessible by walking and cycling
- RE2 Net Zero Development comprehensively rewritten to distinguish between 1. energy efficiency measures and 2. provision of renewable energy; and to include the energy hierarchy

**Table 8.3 Changes to RLDP detailed policies resulting from the ISA**

Draft policy	Summary of main ISA comments	Summary of responses to ISA comments
H1A: Strategic housing sites	The sites are far from existing services and, except for SH1.7, on greenfield land with relatively low density (average 22 dwelling/ha). Are they all necessary?	All sites are needed to deliver plan objectives. They have all been masterplanned, and take account of the need to protect SINCs and other sensitive receptors.
H1B: Non-strategic housing sites	H1.1 is not a sustainable site because of impacts on multiple designations	Mitigation measures will be put in place to deal with these impacts
	Should there be a policy on housing density?	Housing numbers included in the policy indicate the expected number to be delivered

<b>Draft policy</b>	<b>Summary of main ISA comments</b>	<b>Summary of responses to ISA comments</b>
H2: Housing led regeneration areas	Specify housing numbers to be provided, and explain how sites relate to employment policies	Housing numbers detailed in supporting text. There is no overlap with protected employment areas except H2.6.
	Reconsider International Sports Village	Outline planning application for ISV has been received
	Reconsider Cardiff Gate West and Porth Teigr and Alexandra Head	Both sites will have masterplans. For Porth Teigr this includes provision of an extension to the Cardiff Metro
H5: Houses in Multiple Occupation	Specify need for adequate parking and waste management facilities	Added in criteria vi. and vii.
H6: Student accommodation	Range of room size ('minimum 16-20m <sup>2</sup> ') is confusing	Removed
H7: Co-living accommodation	Should policy specify a minimum tenancy length?	Better done through planning conditions and obligations
	Range of room size is confusing	Removed
H10: Sites for gypsy and traveller caravans	No comments on policy. Pengham Green site is much more sustainable than Rover Way site	Pengham Green chosen as preferred site (H11: Gypsy and Traveller Site)
H11: Gypsy and traveller site	Confirm that there are no Habitats Regulations Assessment restrictions	Policy BG7 will apply. It sets criteria for permitting sites that could affect the integrity of the Severn Estuary SPA/SAC/Ramsar
EC1: Cardiff Central Enterprise Zone and regional transport hub / EC9: Hotel development	Consider adding a policy on tall buildings	Policy D1 on tall buildings added
EC2: Land south of St. Mellons Business Park	Delete site as it affects two national-level and three local-level designations; could indirectly affect the Severn Estuary SPA/SAC/Ramsar; and is a greenfield site	Site is being considered by Welsh Ministers. Mitigation is being proposed to avoid significant harm to the designations.
EC3: Protected employment land and premises	Remove site EC3.4 as it affects multiple designations. Sites EC3.2 and EC3.3 are also in particularly sensitive environments.	All three sites are already established
	[In response to comment on waste policy W1]	Addition to supporting text about council helping businesses to reduce their carbon footprint, and to use each other's waste as a resource
EC10: Night-time and cultural economy / R9: Conversion to residential	Policy is unclear about the proposed location of night-time economy developments, and the meaning of "neighbourly use"	Policy rewritten to specify location, and remove reference to "neighbourly use", with more detail inserted in the supporting text

<b>Draft policy</b>	<b>Summary of main ISA comments</b>	<b>Summary of responses to ISA comments</b>
	Concern about possible conflict between this policy and policy R9 which supports conversion of vacant space above commercial properties to housing use	Size and character of district centres means that they are more likely to satisfactorily accommodate non-retail uses. Local centres are more residential
	Content of policy seems to only be about night-time uses	‘Cultural’ removed from policy title
R1: Retail hierarchy and town centre first approach / R7: The creation of new centres	There is a notable lack of district or local centres at Cyncoed/Mynydd Bychan, Llys-faen/Pontprennau, and north of the M4 . Should land for any of these be earmarked?	A retail and commercial leisure study found that there were no obvious candidates for inclusion other than those listed in the policy
R5: Local centres	Specify that provision of new local services may be needed where access to existing services by walking/cycling/PT (e.g. in large new developments) is not possible	Policy R7 refers to new facilities
R7: The creation of new centres	Include a component of re-use (e.g. charity shops) and/or recycling (recycling banks) in new centres	This would be too detailed and prescriptive
C1: Community facilities / C2: Protection of community facilities	Clarify what is meant by community facilities	There is no comprehensive list, but added health, education and religious purposes to policy
	Should there be a (separate) policy on development that overloads existing community facilities?	Covered in supporting text to C1. C1 aims to ensure that adequate facilities are provided to meet future demands
C2: Protection of community facilities	Specify a timescale for the provision of replacement facilities	Difficult to specify
C3: Community safety / creating safe environments	Place alongside the design policy since it applies to all development	Policy is not intended to be specific to community facilities
C4: Planning for schools	Policy sounds like schools are the only community facilities for which cost contributions will be sought	Schools are not the only community facilities for which cost contributions will be sought, but the Council has a statutory duty to ensure a sufficient number and variety of school places
HF1: Health, wellbeing and development	Can reference to capacity of healthcare facilities be extended to other things like open space?	Policy aim is to improve health, hence the reference to healthcare facilities. Other plan policies (e.g. SP5, OS2, C1) deal with other policy areas
HF4: The protection of existing food growing enterprises and allotments	Add protection of Grade 2 agricultural land	Covered under SP22 Minimising Impacts on Natural Resources
WL1: Welsh language		Policy added in part because of earlier ISA findings

<b>Draft policy</b>	<b>Summary of main ISA comments</b>	<b>Summary of responses to ISA comments</b>
CP4: River corridors	The explanatory text mentions river buffers: should the policy itself mention them?	Clarified in the explanatory text
	Can the policy be made more positive, i.e. enhance rivers?	Will be done in the Green Infrastructure SPG
BG1: Designated sites	Explain how development proposals can “enhance the... importance of the designations”	No change
BG4: Net benefits for biodiversity and the Green Infrastructure Statement	Policy aim is unclear	Policy comprehensively rewritten
BG6: Soils	Provide additional protection for Grade 1 and 2 soils	Partly covered in Policy SP21 which aims to protect soils
	Provide more information about how soils can be enhanced	Information added to explanatory text
BG7: Severn Estuary and Cardiff Beech Woods recreational pressure	Express more certainty about development of an SPG, and require developments to be consistent with the SPG	Policy rephrased to reflect this
	Rephrase “mitigation” as “any mitigation”, as avoidance (not mitigation) is the preferred approach	
T4: Managing transport impacts	Policy conflates 1. Where new development should be located to minimise car movements, and 2. Design of new development to minimise car movements	Policy reshuffled to distinguish between the two approaches
	Specify that new local services may be needed where access by walking / cycling / public transport is not possible	No change
T7: Electric vehicle charging	Rename policy from “Electric vehicle policy”	Policy renamed
	Specify what “wider demand measures” are	Policy reworded to make this clearer
	Explain why there do not need to be charging points if the communal car park is <10 spaces. Also 10% of spaces providing charging points seems low	Policy now refers to Managing Transportation SPG
OS1: Protection of open space	In areas where there is already a lot of open space, could compensatory provision be instead provided in areas where there isn’t much existing open space?	This would fail the planning obligation test where compensatory provision must be directly related to the development
P1: Play and informal recreation	Add reference to play areas being accessible by walking and cycling	Added at iii.

<b>Draft policy</b>	<b>Summary of main ISA comments</b>	<b>Summary of responses to ISA comments</b>
RE1: Climate emergency: renewable & low carbon energy development	Specify what is “long term”, e.g. would the 25-40 year lifespan of an offshore wind farm be considered long or short term?	“Long term” removed
RE2: Net zero development	Clarify what is meant by “net zero” development	Policy comprehensively rewritten to clarify what is meant by “net zero”; refer to the energy hierarchy; and apply the policy to all new build development, major and strategic sites
	The policy seems to conflate 1. The energy efficiency of new development and 2. Provision of on-site renewable energy. Consider specifying an energy hierarchy.	
	Clarify what requirements apply to all development v. major and strategic sites	
W3: Flood risk	Update supporting text to refer to zones 2 and 3 instead of C1 and C2	Reference to flood zones removed
	Refer to future changes in flood likelihood as a result of climate change	Flood Map for Planning will be updated every six months to take into account latest modelling
	Proposed extension to the Rover Way Gypsy and Traveller site would be inconsistent with W3	Works are currently taking place to improve the coastal defences along Rover Way; also Gypsy and Traveller site is now at Pengham Green
MW1: Mineral limestone reserves and resources	Taffs Well Quaffy is slightly more sustainable than Ton Mawr Quarry. Consider promoting Taffs Well over Ton Mawr	Both quarries are needed to meet Cardiff’s apportionment and allocations for crushed rock
MW4: Minerals buffer zones / M7: Safeguarding of sand and gravel and limestone resources	The gist of the two policies seem very similar. Merge the policies?	The different policies reflect Welsh Government Guidance
MW8: Sites for waste management facilities	Should the policy say anything about landfill?	Only 2% of waste is being sent to landfill. Welsh Government monitors whether each region has enough capacity to manage its waste arisings
	Can the policy be made more creative/exigent to support the move up the waste hierarchy?	ii. states that the facility should move the management of waste up the waste hierarchy. See also addition to explanatory text of policy EC2

## 8.4 Sites

Table 8.4 shows the preferred candidate sites, and sustainability issues raised at **Appendix A** which will need to be considered and mitigated for in future masterplans for these sites. Additional detailed considerations may also arise as further details of these sites become available.

**Table 8.4 Mitigation measures proposed for preferred candidate sites**

<b>Site</b>	<b>Mitigation for strategic level issues, for consideration in masterplans</b>
Land at Church Farm (SH1.1)	<ul style="list-style-type: none"> <li>• Protection of Site of Nature Conservation Importance (SINC) and stream on and adjacent to the site</li> <li>• Provision of services at Strategic Site F to counteract distance of site from existing services</li> <li>• Loss of about 7ha Grade 2 agricultural land not mitigatable</li> </ul>
Land S of the M4 Motorway, West of Rudry Road, Lisvane (SH1.2)	<ul style="list-style-type: none"> <li>• Protection of SINC on site</li> <li>• Provision of services at Strategic Site F to counteract distance of site from existing services</li> <li>• Loss of 5ha Grade 2 agricultural land not mitigatable</li> <li>• Protection of watercourses on site from pollution during construction and operation</li> </ul>
Land N of Ty-Draw Rd (SH1.3)	<ul style="list-style-type: none"> <li>• Protection of SINC and stream on and adjacent to the site</li> <li>• Provision of services at Strategic Site F to counteract distance of site from existing services</li> </ul>
Land S of Llantrisant Rd (SH1.4)	<ul style="list-style-type: none"> <li>• Protection of SINC and stream on site (about 20% of the site is SINC)</li> <li>• Provision of services at Strategic Site D to counteract distance of site from existing services</li> </ul>
Land at Llantrisant Rd (SH1.5)	<ul style="list-style-type: none"> <li>• Sensitive design at northern end as site lies across a road from Special Landscape Area</li> <li>• Protection of watercourses on site from pollution during construction and operation</li> <li>• Provision of services at Strategic Site D to counteract distance of site from existing services</li> <li>• Protection of Public Right of Way crossing the site</li> <li>• Loss of about 6ha Grade 2 agricultural land not mitigatable</li> </ul>
Land at Llwynioli Farm (SH1.6)	<ul style="list-style-type: none"> <li>• Protection of adjacent SINC during construction and operation</li> <li>• Protection of watercourses (including ditches) on site from pollution during construction and operation</li> <li>• Provision of services at Strategic Site D to counteract distance of site from existing services</li> </ul>
Former Gas Works (SH1.7)	<ul style="list-style-type: none"> <li>• Sensitive design to protect the adjacent River Taff and SINC</li> </ul>
Land at Areas 9-12, St. Mel (H1.1)	<ul style="list-style-type: none"> <li>• Significant impact on SSSI, SINC and historic landscape unlikely to be mitigatable.</li> <li>• Archaeological surveys and possibly mitigation needed, as the site is in an Archaeologically Sensitive Area</li> </ul>
Rookwood Hospital (H1.2)	<ul style="list-style-type: none"> <li>• Sensitive design to reflect the fact that about 60% of the site is in historic parks &amp; gardens and adjacent a conservation area.</li> </ul>
International Sports Village (H2.1)	<ul style="list-style-type: none"> <li>• Protection of River Ely SINC and Cardiff Bay</li> <li>• Provision of service on site and in Cogan to reduce need to travel by car</li> <li>• Near SPA/SAC/SSSI – requirements of Policy BG7 on Habitats Regulations Assessment may constrain development</li> </ul>
Velindre Cancer Centre (H2.2)	<ul style="list-style-type: none"> <li>• Sensitive design needed as a small proportion of the site is Historic Parks &amp; Gardens</li> <li>• Flood mitigation needed: Site is outside a defended flood zone and within Zone 2 flooding for seas or rivers</li> </ul>

<b>Site</b>	<b>Mitigation for strategic level issues, for consideration in masterplans</b>
Whitchurch Hospital (H2.2)	<ul style="list-style-type: none"> <li>• Sensitive design needed as the entire site is Historic Parks &amp; Gardens</li> <li>• Protection of adjacent Local Nature Reserve, SINC and Glamorgan Canal from construction impacts, and possibly from over/inappropriate use by residents during operation</li> </ul>
Cardiff Gate West (H2.3)	<ul style="list-style-type: none"> <li>• Provision of services on site to help reduce need to travel by car</li> <li>• Loss of 6.4ha of Grade 3a agricultural land not mitigatable</li> </ul>
Roath Dock North (H2.4)	<ul style="list-style-type: none"> <li>• Mitigation needed for potential flooding: The site is outside a defended flood zone and within Zone 3 flooding for seas and rivers.</li> </ul>
Porth Teigr & Alexandra (H2.5)	<ul style="list-style-type: none"> <li>• Near SPA/SAC/SSSI – requirements of Policy BG7 on Habitats Regulations Assessment may constrain development</li> <li>• Flood mitigation needed: The site is outside a defended flood zone and within Zone 3 flooding for seas and rivers.</li> <li>• Mitigation to protect water quality of adjacent docks and bay</li> <li>• Maintenance of right of way: the Coastal Path goes through the site</li> </ul>
Hadfield Road (H2.6)	(none)
Land at Callaghan Sq (H2.7)	(none)
EC1: Cardiff Central Ent. Zone	<ul style="list-style-type: none"> <li>• Sensitive design to reflect conservation area designation</li> <li>• Archaeological surveys and possibly mitigation needed, as the site is in an Archaeologically Sensitive Area</li> <li>• Protection of water quality in Dock Feeder Canal and River Taff, e.g. through buffer zone</li> </ul>
EC2: Land S of St Mellons Business Park	<ul style="list-style-type: none"> <li>• Significant impact on SSSI, historic landscape, SINC, reens/ditches and Grade 2 agricultural land unlikely to be mitigatable. Possible indirect impact on SPA/SAC through changes in hydrology and water quality unlikely to be mitigatable.</li> <li>• Requirements of Policy BG7 on Habitats Regulations Assessment may constrain development</li> <li>• Good design to reduce impact on adjacent Special Landscape Area</li> <li>• Maintenance of Public Rights of Way on north end of site</li> </ul>
H11: Pengam Green	<ul style="list-style-type: none"> <li>• Entire site is SINC</li> <li>• Near SPA/SAC/SSSI – requirements of Policy BG7 on Habitats Regulations Assessment may constrain development</li> </ul>

## 9. Monitoring

Cardiff Council has been monitoring the effectiveness of the Local Development Plan and its ISA every year, and making the findings public in Authority Monitoring Reports which are available at <https://www.cardiffldp.co.uk/annual-monitoring-report/>. Table 9.1 proposes to continue most of this ISA monitoring, with minor changes to reflect current circumstances.

**Table 9.1 Proposed SA/SEA monitoring**

ISA objective	Indicator	Target
1. Help deliver equality of opportunity and access for all	Proportion of population in the 100 most deprived wards in Wales	Reduce
	Number of dwellings built	26,400
	Number of net additional affordable dwellings built	5000- 6000
	Total number of Gypsy and Traveller pitches	80
2. Maintain and improve air quality	Number of Air Quality Management Areas	0
3. Protect and enhance biodiversity, flora and fauna	Number and extent of designated sites of importance (SACs, SPAs, SSSIs, Ramsar sites, LNRs, SINCs, ancient woodland)	No loss of area
	Condition of SSSIs	No worsening of existing condition. Improvement of unfavourable condition.
4. Reduce emissions of greenhouse gases and adapt to the effects of climate change	Traffic volumes (vehicle-km)	Reduction per person
	Proportion of people walking, cycling, travelling by bus and train for each journey purpose	Increase
	a) No. residents working in Cardiff b) No. people commuting out of Cardiff c) No. people commuting into Cardiff	a) Increase b) Decrease c) n/a
	Proportion of all trips on Cardiff's transport network made by sustainable modes	At least 76%
	Number of listed buildings, conservation areas etc.	No reduction
5. Protect and enhance historic and cultural heritage, including the Welsh Language	Net job creation over the remaining RLDP plan period	32,300
6. Help deliver the growth of a sustainable and diversified economy	Proportion of journeys made by walking / cycling	Increase
7. Improve health and well-being		

<b>ISA objective</b>	<b>Indicator</b>	<b>Target</b>
	Percentage of population in the 100 most deprived wards in Wales for physical environment	Reduction
8. Use soils and minerals efficiently and safeguard their quality	Percent of housing on previously developed land	50%
	Average density of new development	Increase
9. Protect and enhance the landscape	Achievement of functional open space requirements	2.43ha per 1000 population
	Number and extent of Special Landscape Areas	No reduction
10. Minimise resource use and waste, increase re-use and recycling	Waste per household per year (all waste and residual waste)	Reduction
11. Maintain and enhance water quality and resources, and manage flooding	No. permissions granted for highly vulnerable development outside a defended zone and within Zone 2 or 3 for seas or rivers	0

## 10. Next Steps

Any comments on the Deposit Plan and this ISA report should be sent to [LDP@Cardiff.gov.uk](mailto:LDP@Cardiff.gov.uk) or the address below by 15<sup>th</sup> April 2025:

LDP Team  
Strategic Planning  
Cardiff Council  
Room 206  
County Hall  
Atlantic Wharf  
Cardiff CF10 4UW

The Deposit Plan will be revised as appropriate after this consultation, and is expected to be submitted for examination in 2025. Once submitted for examination, the timetable is not within Cardiff Council's control, but it could be another 1-2 years before the plan is adopted.

Once the plan is adopted, Cardiff Council will publish an 'SEA statement' which explains how the ISA influenced the plan. Publication of such an SEA statement is required by the SEA Directive (Article 9.1b). Most of that information is already available in this ISA report, but the SEA statement will also include information on how further rounds of ISA, and consultation comments on this report and any further ISA rounds, were taken into account by the planning team.

## APPENDIX A. SITE APPRAISALS

### Key

#### Nature conservation

-  Special Area of Conservation (habitats and species)
-  Special Protection Area (birds)
-  Site of Special Scientific Interest
-  Local Nature Reserve
-  Site of Importance for Nature Conservation

#### Heritage

-  Historic Parks & Gardens
-  Archaeologically Sensitive Area
-  Conservation Area
-  Ancient Monument

#### Landscape

-  Special Landscape Area
-  Historic Landscape

#### Social

-  Proposed district centre
-  Proposed local centre
-  Primary school
-  Secondary school
-  Hub (also allotment)
-  GP surgery
-  Health centre
-  Railway station
-  Bus stop
-  Walking trail (different colours for different trails)

## Allied Bakeries, Maes-y-coed Road, Heath

Approx. 2.7ha, housing/commercial



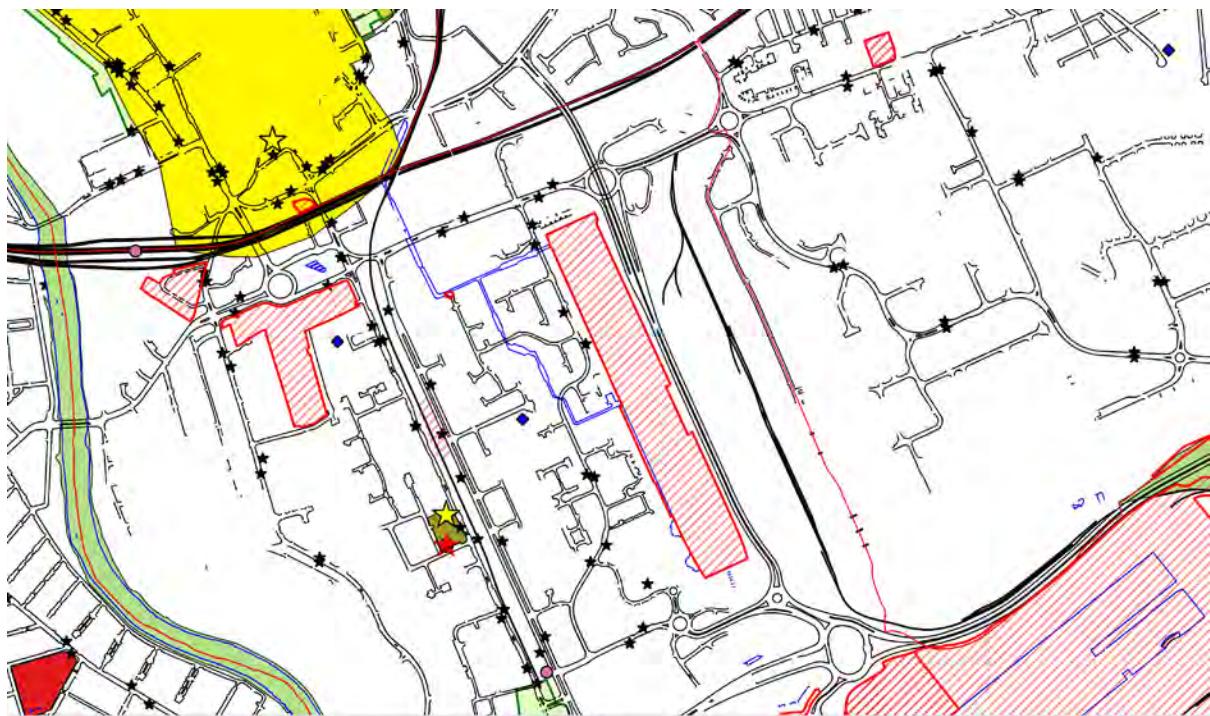
Welsh Index of Multiple Deprivation	1
Community facility	<p>410m primary school (adjacent)</p> <p>1382m secondary school</p> <p>1304m health centre</p> <p>591m GP</p> <p>793m allotments</p> <p>1176m hub</p> <p>From middle of the site</p> <p>No PRow</p>
Housing	
Air Quality Management Area	3.1km
Special Protection Area / Ramsar	>5km
Special Area of Conservation	3.9km
Site of Special Scientific Interest	1408m
Local Nature Reserve	2567m
Site of Importance for Nature Conservation	175m
Bus stop	121m (at edge of site)
Train station	119m (adjacent)
City/district centre	<p>1096m to local centre</p> <p>1755m to district centre</p> <p>From middle of the site</p>
Heritage asset	<p>&gt;5km historic landscape</p> <p>1254m historic parks &amp; gardens</p> <p>4.1km ancient monument</p>
Conservation area	1194m
Archaeologically sensitive area	2874m
Employment	
Open space	
Previously developed land	Yes

Agricultural land quality	Urban
Special Landscape Area	2082m
Water body	64m
Flooding	

**Sustainability constraints:** None

## Bute East Dock / 10

9.52 ha, mixed use



Welsh Index of Multiple Deprivation	1
Community facility	<p>262m primary school</p> <p>2160m secondary school</p> <p>553m health centre</p> <p>1369m GP</p> <p>2.6km allotments</p> <p>500m hub</p> <p>From middle of the site</p> <p>Coastal path goes around site</p>
Housing	
Air Quality Management Area	690m
Special Protection Area / Ramsar	1440m
Special Area of Conservation	1440m
Site of Special Scientific Interest	1440m
Local Nature Reserve	1054m
Site of Importance for Nature Conservation	879m
Bus stop	Adjacent
Train station	2.7km
City/district centre	<p>507m to local centre</p> <p>1006 to district centre</p> <p>From middle of the site</p>
Heritage asset	<p>Historic landscape 3.9km</p> <p>1085 historic parks &amp; gardens</p> <p>1085 ancient monument</p>
Conservation area	423m

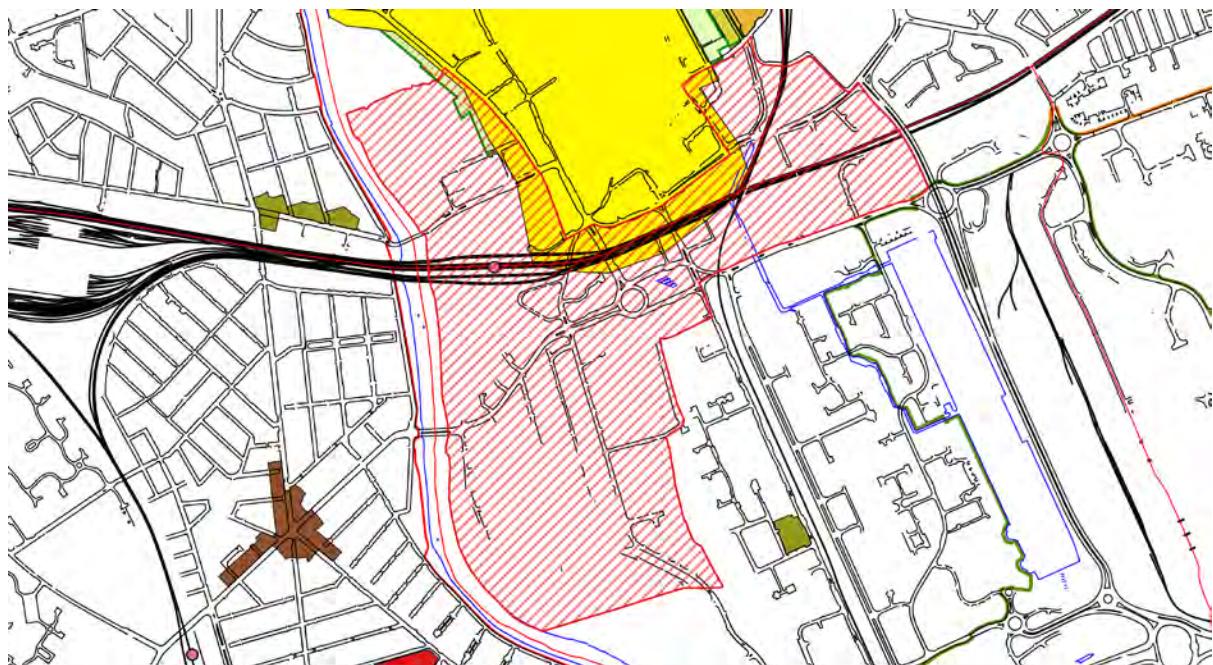
Archaeologically sensitive area	390m
Employment	
Open space	Yes
Previously developed land	Yes
Agricultural land quality	Built up
Special Landscape Area	4.4km
Water body	Ditch adjacent site
Flooding	

**Sustainability constraints:**

- Flooding
- Coastal Path

## Cardiff Central Enterprise Zone

Approx. 80.1ha, mixed use



Welsh Index of Multiple Deprivation	1/3/5
Community facility	<p>322m primary school</p> <p>2439m secondary school</p> <p>771m health centre</p> <p>665m GP</p> <p>1667m allotments</p> <p>655m hub</p> <p>From middle of the site</p> <p>No PRoW</p>
Housing	
Air Quality Management Area	675m
Special Protection Area / Ramsar	1822m
Special Area of Conservation	1822m
Site of Special Scientific Interest	1822m
Local Nature Reserve	688m
Site of Importance for Nature Conservation	Adjacent River Taff SINC
Bus stop	Many bus stops within area
Train station	Includes Cardiff Central
City/district centre	<p>506m to local centre</p> <p>723m to district centre</p> <p>From middle of the site</p>
Heritage asset	<p>4.1km historic landscape</p> <p>188m historic parks &amp; gardens</p> <p>169m ancient monument</p>
Conservation area	Includes part of a conservation area
Archaeologically sensitive area	About 10% of the site is in an ASA
Employment	Mixed use
Open space	

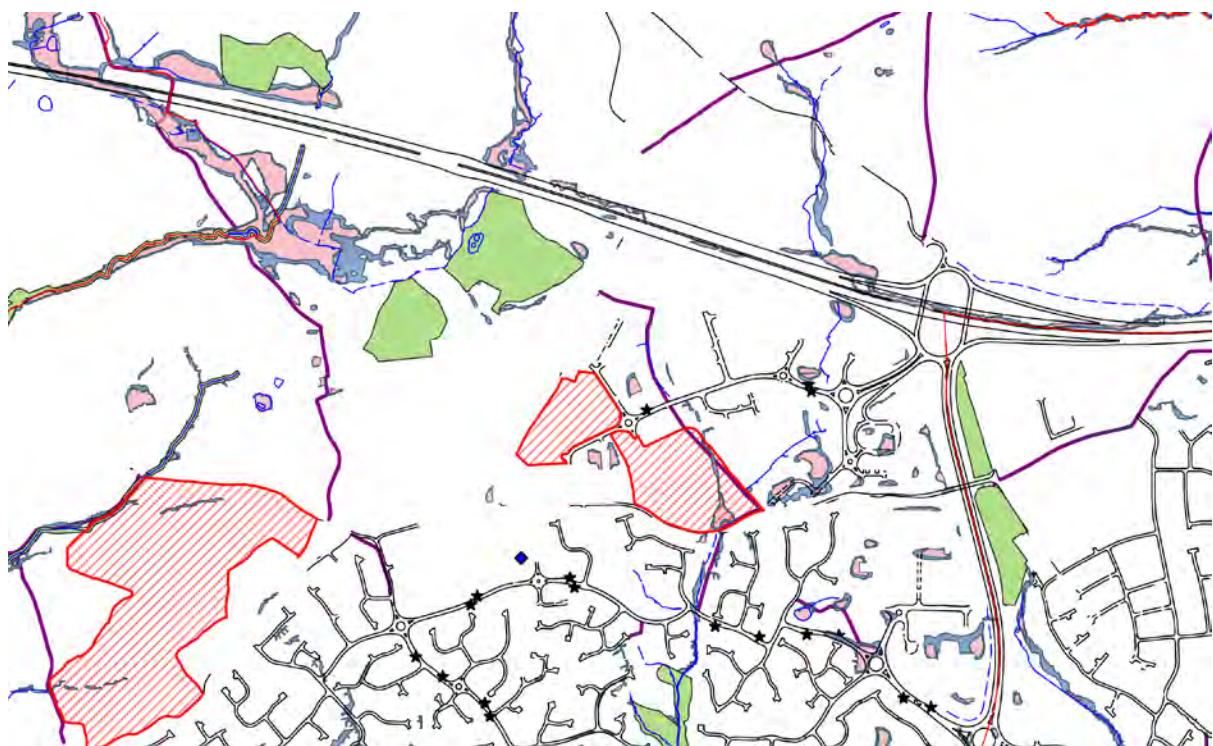
Previously developed land	Yes
Agricultural land quality	Urban
Special Landscape Area	3.5km
Water body	Adjacent River Taff, includes canal
Flooding	

**Sustainability constraints:**

- In Archaeologically Sensitive Area
- In conservation area
- Canal on site
- River Taff adjacent

## Cardiff Gate Business Park / 52

6.4ha, mixed use



Welsh Index of Multiple Deprivation	1
Community facility	378m primary school 1780m secondary school 410m GP 3km health centre 1800m allotments 2920m hub PRoW runs through site
Housing	
Air Quality Management Area	>5km
Special Protection Area / Ramsar	>5km
Special Area of Conservation	>5km
Site of Special Scientific Interest	1879m
Local Nature Reserve	3.5km
Site of Importance for Nature Conservation	180m
Bus stop	164m from centre of site, 65m from edge
Train station	>3km
City/district centre	2140m to local centre 2780m to district centre From middle of the site
Heritage asset	3.1km historic landscape 637m historic parks & gardens 1125m ancient monument
Conservation area	1830m
Archaeologically sensitive area	3.2km

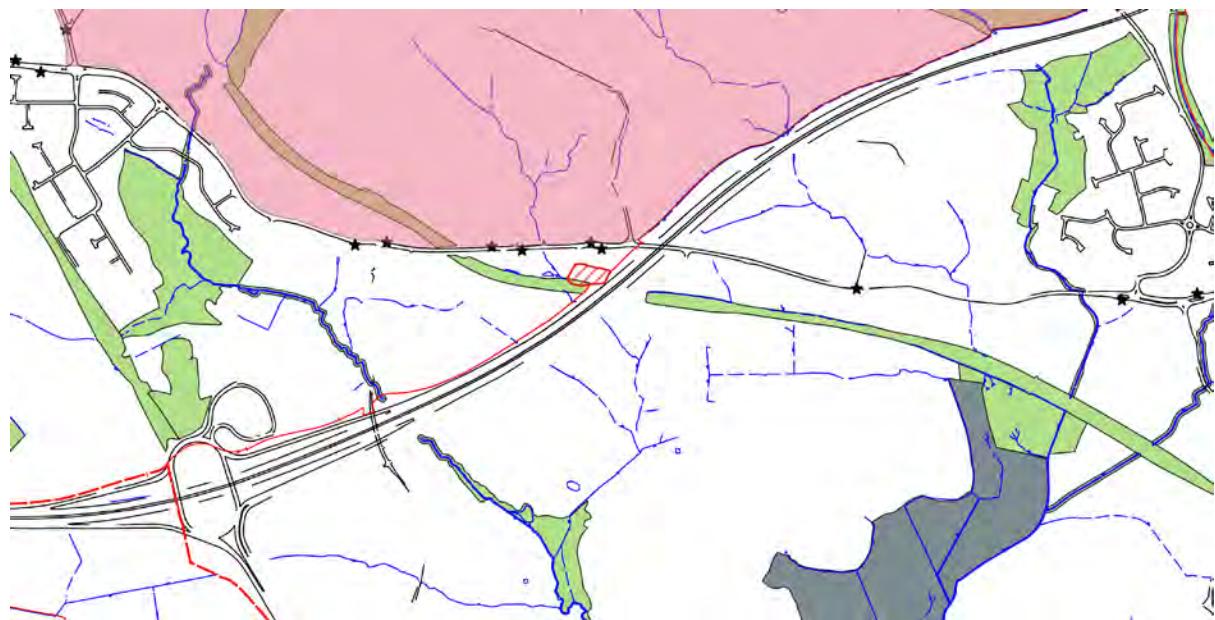
Employment	The application site is located on land designated as existing employment land (EC1.4 Cardiff Gate) as defined by the adopted Cardiff Local Development Plan proposals map. Proposal will include up to 2000 sqm employment/commercial/retail floorspace. The land owner will develop the employment elements. However the undeveloped employment land designation in the current adopted plan will have been significantly reduced, as a result of this proposal, and the mixed used commercial element is not that significant in scale.
Open space	No
Previously developed land	Greenfield
Agricultural land quality	Mostly 3a, some 4
Special Landscape Area	2500m
Water body	Watercourse crosses site
Flooding	

**Sustainability constraints:**

- Far from existing services
- Greenfield
- Watercourse on site
- Footpath

## Dwryln Cottage, Llantrisant Road

Approx. 0.3ha, housing



Welsh Index of Multiple Deprivation	1
Community facility	2.8km primary school 3.6km secondary school 4.6m health centre 3.2km 3.5km allotments 4.6km hub From middle of the site, all across the M4 No PRoW
Housing	
Air Quality Management Area	>5km
Special Protection Area / Ramsar	>5km
Special Area of Conservation	3120m
Site of Special Scientific Interest	789m
Local Nature Reserve	3.5km
Site of Importance for Nature Conservation	About 15% of the site is SINC
Bus stop	66m
Train station	3.5km
City/district centre	3.3km to local centre >5km to district centre From middle of the site
Heritage asset	>5km historic landscape 833m historic parks & gardens 1264m ancient monument
Conservation area	962m
Archaeologically sensitive area	2025m
Employment	
Open space	
Previously developed land	Greenfield
Agricultural land quality	Grade 3a

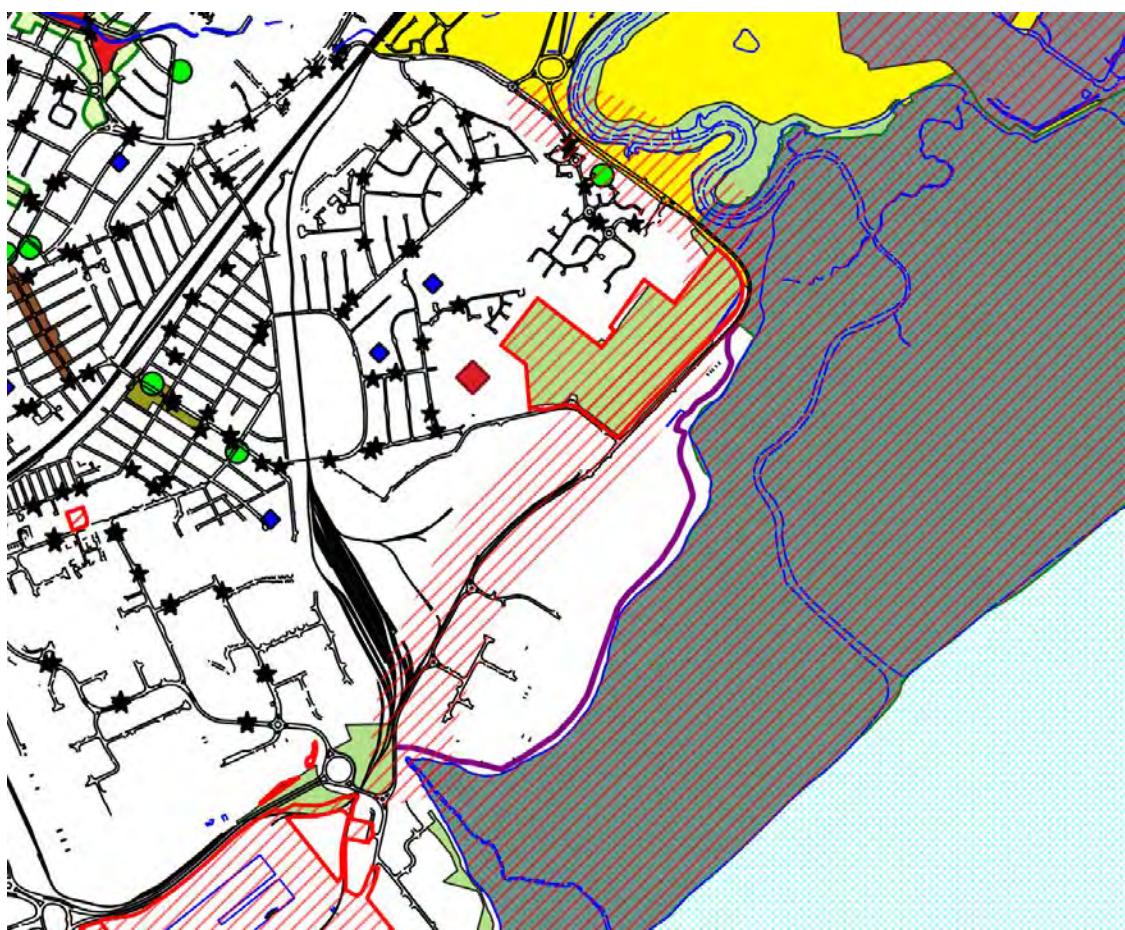
Special Landscape Area	46m
Water body	5m
Flooding	

**Sustainability constraints:**

- In SINC
- In Archaeologically Sensitive Area
- Near Special Landscape Area
- Greenfield
- Grade 3a agricultural land
- Adjacent water body
- Far from existing services

## Eastern Bay Link / 69

80ha / active travel route



Welsh Index of Multiple Deprivation	3
Community facility	<p>608m primary school</p> <p>338m secondary school</p> <p>2.5km health centre</p> <p>Adjacent GP</p> <p>173m allotments</p> <p>645m hub</p> <p>From middle of the site</p> <p>Coastal path follows line of trail at N end</p>
Housing	
Air Quality Management Area	2153m
Special Protection Area / Ramsar	adjacent
Special Area of Conservation	adjacent
Site of Special Scientific Interest	adjacent
Local Nature Reserve	1812m
Site of Importance for Nature Conservation	adjacent
Bus stop	Adjacent on N end
Train station	1795m
City/district centre	<p>1218m to local centre</p> <p>1715m to district centre</p> <p>From middle of the site</p>

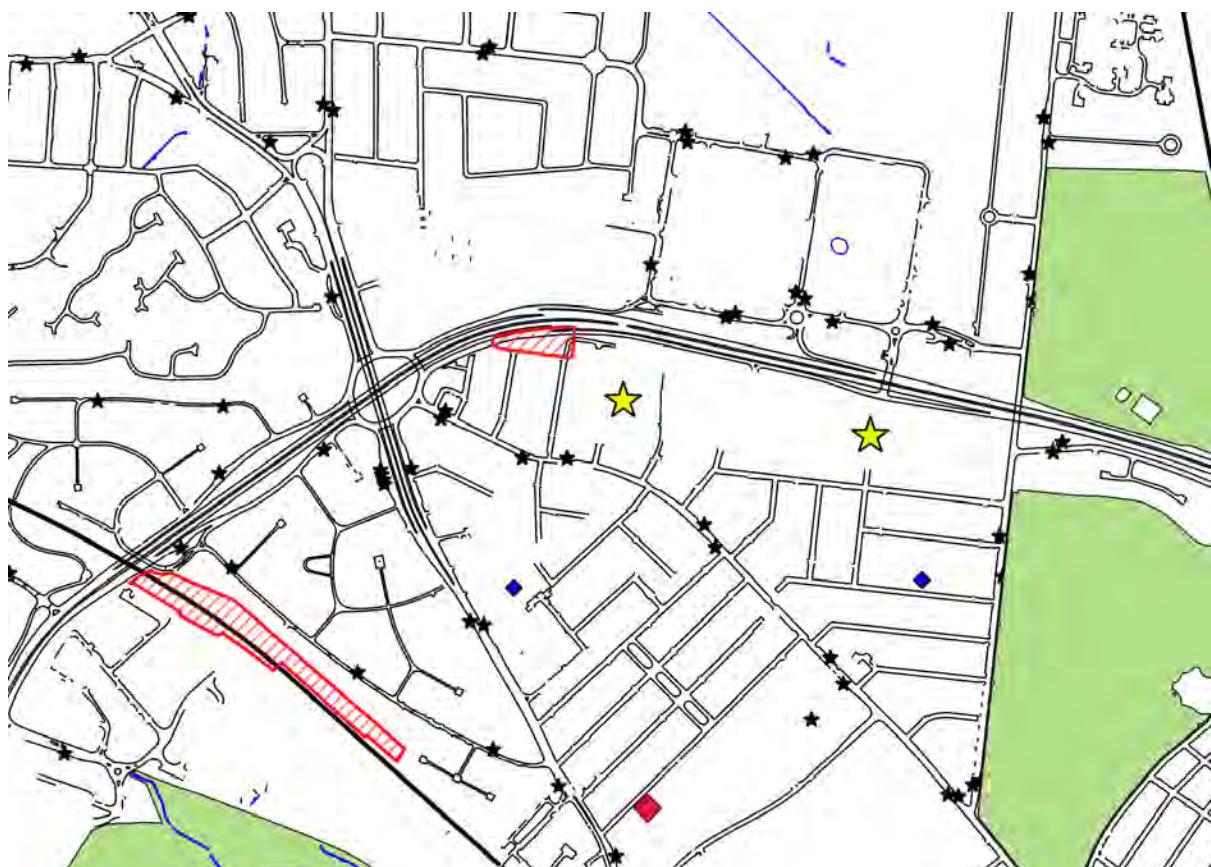
Heritage asset	1052m historic landscape 1323m historic parks & gardens 2770m ancient monument
Conservation area	1890m
Archaeologically sensitive area	inside
Employment	
Open space	Proposed along much of route
Previously developed land	About 40% greenfield
Agricultural land quality	About 40% grade 2, rest is urban
Special Landscape Area	992m
Water body	Rhymney runs through site
Flooding	

Sustainability constraints:

- Adjacent SPA/SAC/SSSI – possible HRA-related issues
- In Archaeologically sensitive area
- Adjacent SINC
- River Rhymney
- Coastal path
- Grade 2 agricultural land

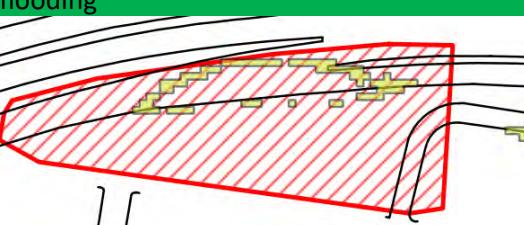
## Flaxland Woods / 29

0.25ha, community greenspace



Welsh Index of Multiple Deprivation	1
Community facility	<p>389m primary school</p> <p>740m secondary school</p> <p>311m GP</p> <p>3.1km health centre</p> <p>107m allotments</p> <p>1869m hub</p> <p>From middle of the site</p> <p>No PRoW etc</p>
Housing	
Air Quality Management Area	2.9km
Special Protection Area / Ramsar	>5km
Special Area of Conservation	>5km
Site of Special Scientific Interest	2605m
Local Nature Reserve	3.2km
Site of Importance for Nature Conservation	746m
Bus stop	132m
Train station	1442km
City/district centre	<p>618m to local centre</p> <p>256m to district centre</p> <p>From middle of the site</p>
Heritage asset	<p>&gt;5Km historic landscape</p> <p>971m historic parks &amp; gardens</p>

	1894m ancient monument
Conservation area	1175m
Archaeologically sensitive area	1696m
Employment	
Open space	Yes
Previously developed land	Greenfield
Agricultural land quality	Built up
Special Landscape Area	3.7km
Water body	449m
Flooding	About 10-15% of site prone to surface water flooding



#### Sustainability constraints:

- Greenfield

## Former Gas Works, Ferry Road

Approx. 10.2ha, housing



Welsh Index of Multiple Deprivation	1
Community facility	669m primary school 2312m secondary school 950m health centre 1080m GP 1279m allotments 1155m hub From middle of the site No PRow
Housing	yes
Air Quality Management Area	1899m
Special Protection Area / Ramsar	2292m
Special Area of Conservation	2292m
Site of Special Scientific Interest	2292m
Local Nature Reserve	911m
Site of Importance for Nature Conservation	Adjacent SINC
Bus stop	352m
Train station	859m
City/district centre	1878m to local centre 1604m to district centre From middle of the site
Heritage asset	>5km historic landscape 826m historic parks & gardens 639m ancient monument
Conservation area	1271m
Archaeologically sensitive area	1725m
Employment	

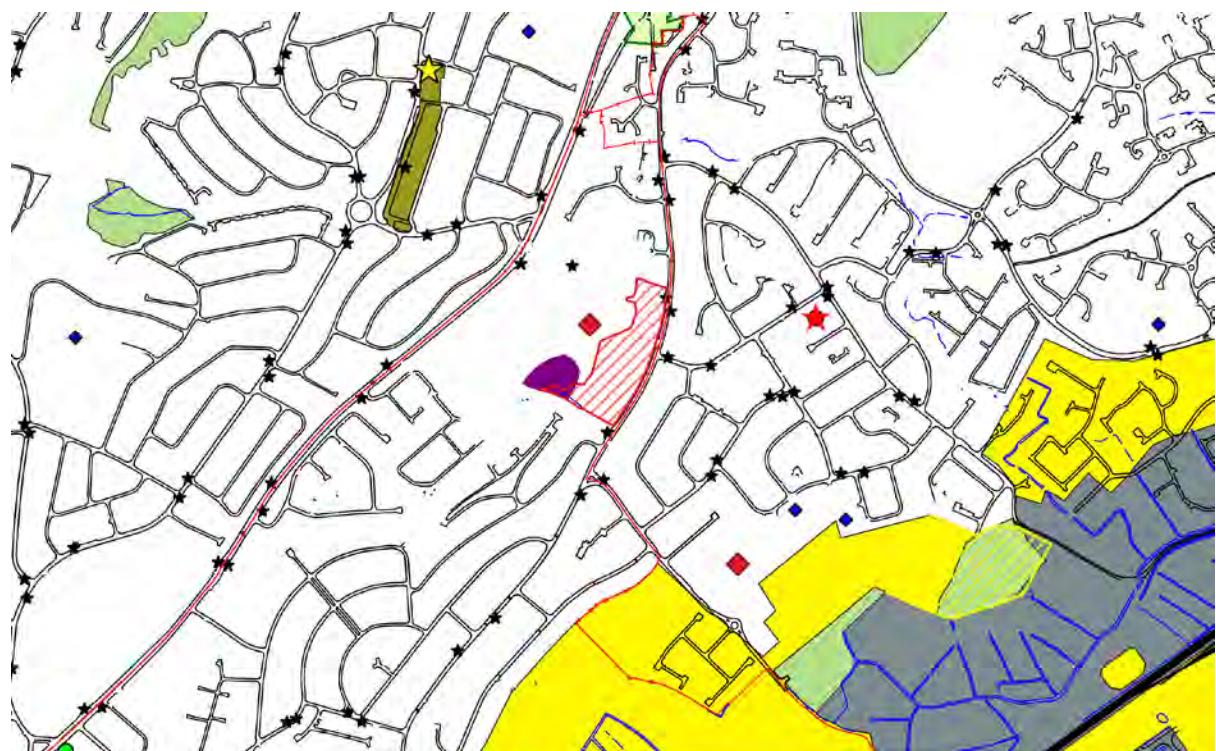
Open space	
Previously developed land	Yes
Agricultural land quality	About 40% Grade 3a, the rest urban
Special Landscape Area	3.8km
Water body	Adjacent River Taff
Flooding	

**Sustainability constraints:**

- Adjacent River Taff
- Adjacent SINC

### Former St. Johns College site

Approx 2.9ha, housing



Welsh Index of Multiple Deprivation	1
Community facility	<p>452m primary school</p> <p>97m secondary school</p> <p>394m health centre</p> <p>1210m GP</p> <p>1260m allotments</p> <p>706m hub</p> <p>From middle of the site</p> <p>No PRoW</p>
Housing	yes
Air Quality Management Area	4.7km
Special Protection Area / Ramsar	2475m
Special Area of Conservation	2475m
Site of Special Scientific Interest	624m
Local Nature Reserve	2325m
Site of Importance for Nature Conservation	701m
Bus stop	87m
Train station	4.7km
City/district centre	<p>497m to local centre</p> <p>1001m to district centre</p> <p>From middle of the site</p>
Heritage asset	<p>797m historic landscape</p> <p>2983m historic parks &amp; gardens</p> <p>&lt;10% of site is ancient monument</p>
Conservation area	642m
Archaeologically sensitive area	289m

Employment	
Open space	
Previously developed land	Yes
Agricultural land quality	Urban
Special Landscape Area	1573m
Water body	298m
Flooding	

**Sustainability constraints:**

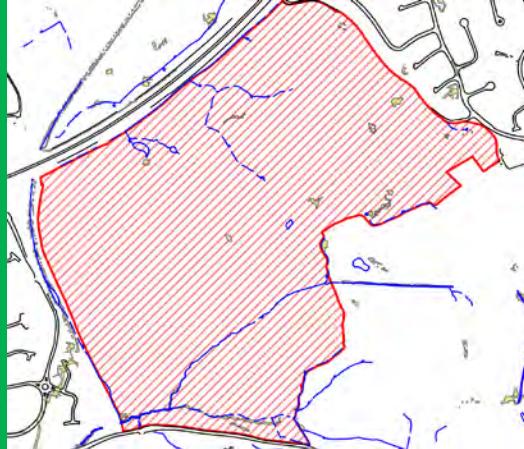
- Ancient monument on site

## Goitre Fawr, Plasdŵr, 61

57ha, residential-led mixed use



Welsh Index of Multiple Deprivation	1
Community facility	1009m primary school 1936m secondary school 3.6km health centre 1394m GP 1587m allotments across river 3.5km hub From middle of the site Site crossed by several PRoWs
Housing	
Air Quality Management Area	3.7km
Special Protection Area / Ramsar	>5km
Special Area of Conservation	1239m
Site of Special Scientific Interest	840m
Local Nature Reserve	1254m
Site of Importance for Nature Conservation	About 40% of site is SINC
Bus stop	647m
Train station	172m
City/district centre	1500m to local centre 3.6km to district centre From middle of the site
Heritage asset	>5km historic landscape 1761m historic parks & gardens 656m ancient monument
Conservation area	1087m
Archaeologically sensitive area	1962m
Employment	

Open space	Some open space proposed
Previously developed land	Greenfield
Agricultural land quality	About 30% 3a, 50% 3b, 20% 5
Special Landscape Area	Across M4
Water body	Runs through site
Flooding	<p>V minor surface water flooding</p> 

#### Sustainability constraints:

- In SINC
- Near Special Landscape Area
- Far from existing services
- Greenfield
- Footpaths
- Stream through site

## Hadfield Road / 32

4.8ha, residential



Welsh Index of Multiple Deprivation		2
Community facility		391m primary school 1461m secondary school 1191m health centre 922m GP 437m allotments 812m hub From middle of the site No PRoW
Housing		
Air Quality Management Area		1691m
Special Protection Area / Ramsar		3030m
Special Area of Conservation		3030m
Site of Special Scientific Interest		3030m
Local Nature Reserve		1147m
Site of Importance for Nature Conservation		367m
Bus stop		123m from centre of site, adjacent to edge
Train station		601m
City/district centre		1337m to local centre 701m to district centre From middle of the site
Heritage asset		>5km historic landscape 869m historic parks & gardens 1869m ancient monument
Conservation area		1708m
Archaeologically sensitive area		1569m

Employment	
Open space	None proposed
Previously developed land	Yes
Agricultural land quality	Urban
Special Landscape Area	>5km
Water body	183m ditch
Flooding	

**Sustainability constraints:** None

## Image House, East Tyndall Street / 65 and 2/68

0.33ha, residential



Welsh Index of Multiple Deprivation	4
Community facility	476m primary school 1400m secondary school 1463m health centre 571m GP <b>1943m allotments</b> 793m hub From middle of the site <b>Coastal path goes by site</b>
Housing	
Air Quality Management Area	1470m
Special Protection Area / Ramsar	1836m
Special Area of Conservation	1836m
Site of Special Scientific Interest	1836m
Local Nature Reserve	2256m
Site of Importance for Nature Conservation	1098m
Bus stop	70m
Train station	1024m
City/district centre	440m to local centre 512m to district centre From middle of the site
Heritage asset	>3km historic landscape 1450historic parks & gardens 1671m ancient monument
Conservation area	879m
Archaeologically sensitive area	1090m
Employment	
Open space	Not planned

Previously developed land	Yes
Agricultural land quality	Built up
Special Landscape Area	>3km
Water body	838m
Flooding	

**Sustainability constraints:** none

## International Sports Village



Note: ISV is near Cogan in the Vale of Glamorgan. Cardiff Council's GIS system does not include the Vale of Glamorgan, so the appraisal of this site is incomplete.

Welsh Index of Multiple Deprivation	1
Community facility	<p>1668m primary school          3.8km secondary school          1812m health centre          1064m GP (in Cogan)          2.6km allotments          2316m hub</p> <p>From middle of the site          Cardiff Bay circular trail goes by site</p>
Housing	
Air Quality Management Area	>3km
Special Protection Area / Ramsar	863m
Special Area of Conservation	863m
Site of Special Scientific Interest	863m
Local Nature Reserve	981m
Site of Importance for Nature Conservation	adjacent
Bus stop	186m from centre of site, adjacent to edge
Train station	1959m (there is a nearer station in Cogan)
City/district centre	<p>1694m to local centre          1656m to district centre</p> <p>From middle of the site</p>
Heritage asset	<p>&gt;6km historic landscape          1627m historic parks &amp; gardens          1347m ancient monument</p>

Conservation area	1108m
Archaeologically sensitive area	2.6km
Employment	
Open space	About 10% of site
Previously developed land	Brownfield
Agricultural land quality	Built up and grade 1
Special Landscape Area	>5km
Water body	Adjacent
Flooding	

**Sustainability constraints:**

- Far from existing services, likely to be car dominated
- Adjacent Cardiff Bay
- Adjacent Site of Importance for Nature Conservation
- Less than 1km from Severn Estuary SPA/SAC/Ramsar: possible HRA constraints

Land accessed from De Braose Close, Danescourt /38

2.88ha, residential



Welsh Index of Multiple Deprivation	1
Community facility	325m primary school 775m secondary school 1720m health centre 348m GP 823m allotments across river 1180m hub but across river From middle of the site Mosque adjacent site Footpaths cut through site, Cambrian Way trail adjacent
Housing	
Air Quality Management Area	1246m
Special Protection Area / Ramsar	>5km
Special Area of Conservation	2990m
Site of Special Scientific Interest	1262m
Local Nature Reserve	250m
Site of Importance for Nature Conservation	adjacent
Bus stop	205m
Train station	693m
City/district centre	529m to local centre across river, else 1810m 1378m to district centre across river From middle of the site
Heritage asset	>5Km historic landscape 900m historic parks & gardens 1698m ancient monument

Conservation area	415m
Archaeologically sensitive area	1353m
Employment	
Open space	Open space proposed
Previously developed land	Greenfield
Agricultural land quality	2 and 3b
Special Landscape Area	2075m
Water body	43m River Taff
Flooding	About 10% surface water flooding, incl. access roads 

**Sustainability constraints:**

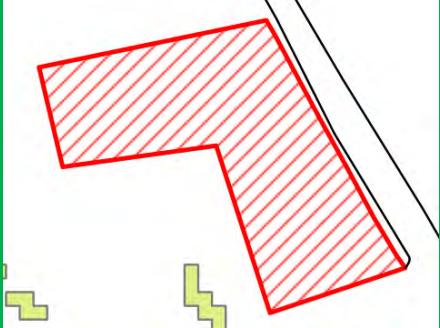
- Footpaths and Cambrian Trail
- Greenfield
- River Taff nearby

Land adjacent to Began House / 53

0.1ha, residential



Welsh Index of Multiple Deprivation	1
Community facility	<p>1394m primary school          2162m secondary school          2184m health centre          1548m GP          1082m allotments          1731m hub</p> <p>From middle of the site          No footpaths</p>
Housing	
Air Quality Management Area	>5km
Special Protection Area / Ramsar	4.4km
Special Area of Conservation	4.4km
Site of Special Scientific Interest	2058m
Local Nature Reserve	4km
Site of Importance for Nature Conservation	311m
Bus stop	584m
Train station	4.7km
City/district centre	<p>1672m to local centre          1523m to district centre</p> <p>From middle of the site</p>
Heritage asset	<p>2703m historic landscape          809m historic parks &amp; gardens          2240m ancient monument</p>
Conservation area	1159m
Archaeologically sensitive area	2064m
Employment	

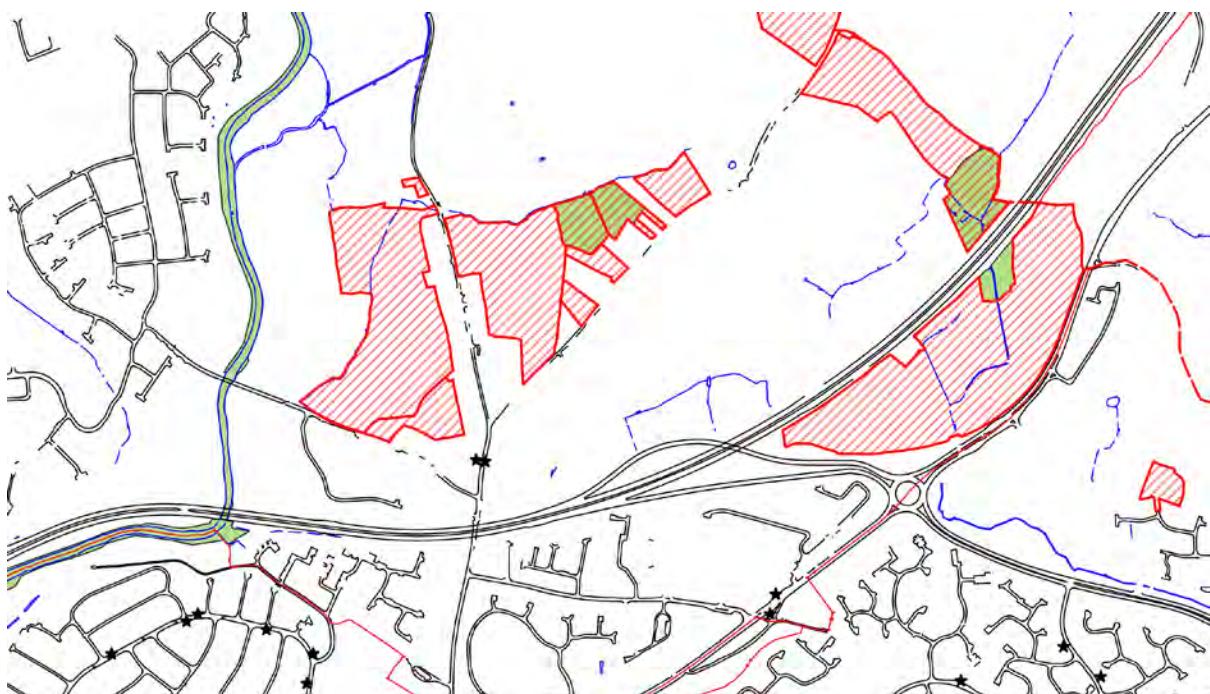
Open space	None proposed
Previously developed land	Greenfield
Agricultural land quality	Built up
Special Landscape Area	2.9km
Water body	31m stream
Flooding	<p>No flooding</p> 

**Sustainability constraints:**

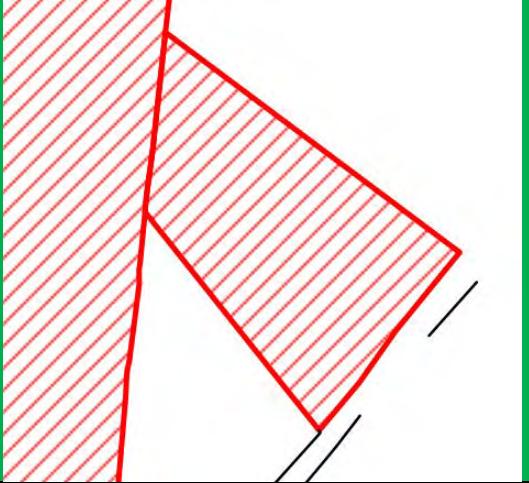
- Far from existing services
- Greenfield

## Land adjacent to Cefn Eurwg, Druidstone Road / 49

0.08ha, include within settlement boundary



Welsh Index of Multiple Deprivation	1
Community facility	1006m primary school 1977m secondary school 1925m health centre 1185m GP 902m allotments 1372m hub From middle of the site, all across A48(M) No PRoW
Housing	
Air Quality Management Area	>5km
Special Protection Area / Ramsar	3.9km
Special Area of Conservation	3.9km
Site of Special Scientific Interest	1640m
Local Nature Reserve	4.0m
Site of Importance for Nature Conservation	71m
Bus stop	379m
Train station	>5km
City/district centre	1554m to local centre 1042m to district centre From middle of the site, across A48(M)
Heritage asset	1788m historic landscape 1156m historic parks & gardens 2017m ancient monument
Conservation area	899m
Archaeologically sensitive area	1651m
Employment	
Open space	None proposed

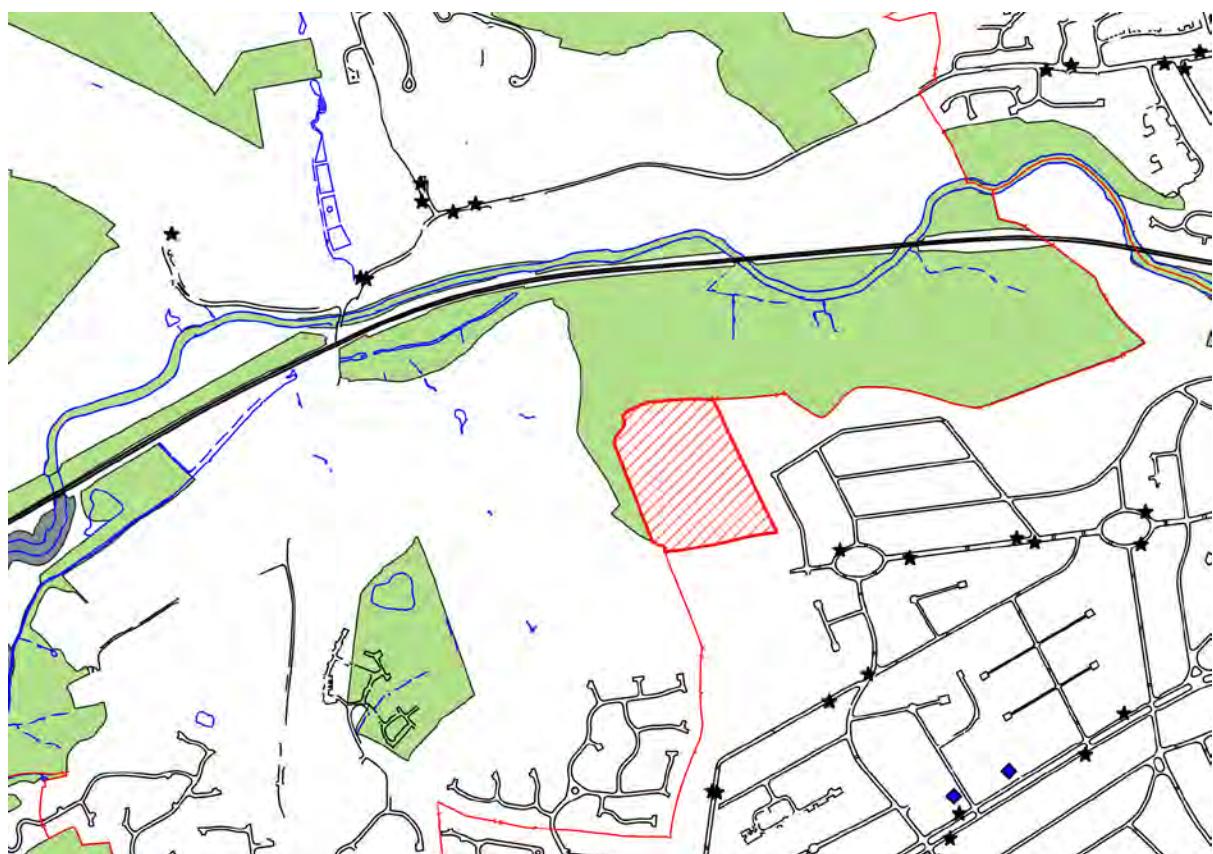
Previously developed land	Greenfield
Agricultural land quality	Grade 2
Special Landscape Area	2508m
Water body	216m
Flooding	<p>No flooding</p> 

**Sustainability constraints:**

- Far from existing services
- Greenfield
- Grade 2 agricultural land

## Land at Archer Road, North Ely / 24

4.7ha. Mixed use of residential, community and enhanced recreational facilities



Welsh Index of Multiple Deprivation		4
Community facility		<p>701m primary school</p> <p>2147m secondary school</p> <p>1647m health centre across river</p> <p>1232m GP</p> <p>1318m allotments</p> <p>1538m hub</p> <p>From middle of the site</p> <p>No footpath through site</p>
Housing		
Air Quality Management Area		1802m
Special Protection Area / Ramsar		>5km
Special Area of Conservation		>5km
Site of Special Scientific Interest		980m River Ely
Local Nature Reserve		>5km
Site of Importance for Nature Conservation		Surrounded by SINC on N and W sides
Bus stop		283m
Train station		2253m
City/district centre		<p>3.8km to local centre</p> <p>920m to district centre</p> <p>From middle of the site</p>
Heritage asset		<p>&gt;5km historic landscape</p> <p>563m historic parks &amp; gardens</p>

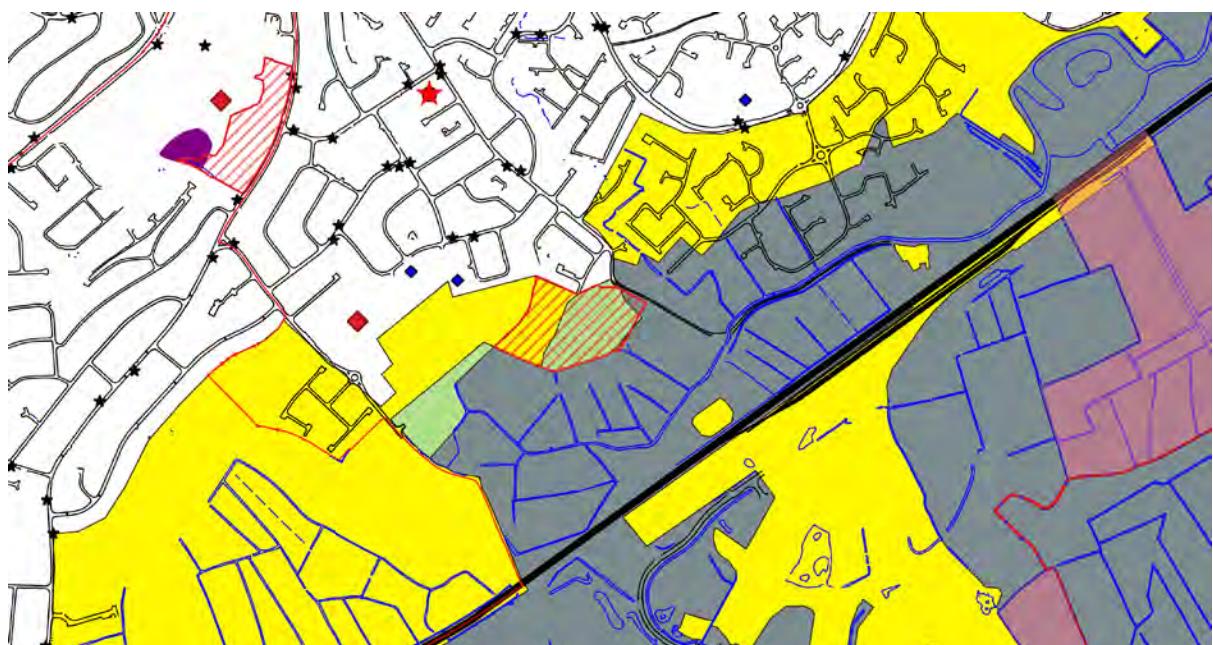
	1546m ancient monument
Conservation area	Surrounded on N and W sides
Archaeologically sensitive area	456m
Employment	
Open space	Not planned
Previously developed land	Greenfield
Agricultural land quality	Grade 2
Special Landscape Area	adjacent
Water body	263m River Ely
Flooding	

**Sustainability constraints:**

- Adjacent Special Landscape Area
- Adjacent conservation area
- Adjacent SINC
- Far from most existing services
- Greenfield
- Grade 2 agricultural land

## Land at Areas 9-12, St. Mellons

Approx. 3.8ha, housing



Welsh Index of Multiple Deprivation	3
Community facility	<p>253m primary school</p> <p>450m secondary school</p> <p>581m health centre</p> <p>1334m GP</p> <p>1271m allotments</p> <p>1209m hub</p> <p>From middle of the site</p> <p>No PRoW</p>
Housing	yes
Air Quality Management Area	>5km
Special Protection Area / Ramsar	1655m
Special Area of Conservation	1655m
Site of Special Scientific Interest	5-10% of the site is SSSI
Local Nature Reserve	2736m
Site of Importance for Nature Conservation	Two-thirds of the site is SINC
Bus stop	281m
Train station	4.7km
City/district centre	<p>1295m to local centre</p> <p>1147m to district centre</p> <p>From middle of the site</p>
Heritage asset	<p>About 15% of the site is historic landscape</p> <p>3362m historic parks &amp; gardens</p> <p>760m ancient monument</p>
Conservation area	1099m
Archaeologically sensitive area	Site is entirely within an ASA
Employment	
Open space	
Previously developed land	Greenfield

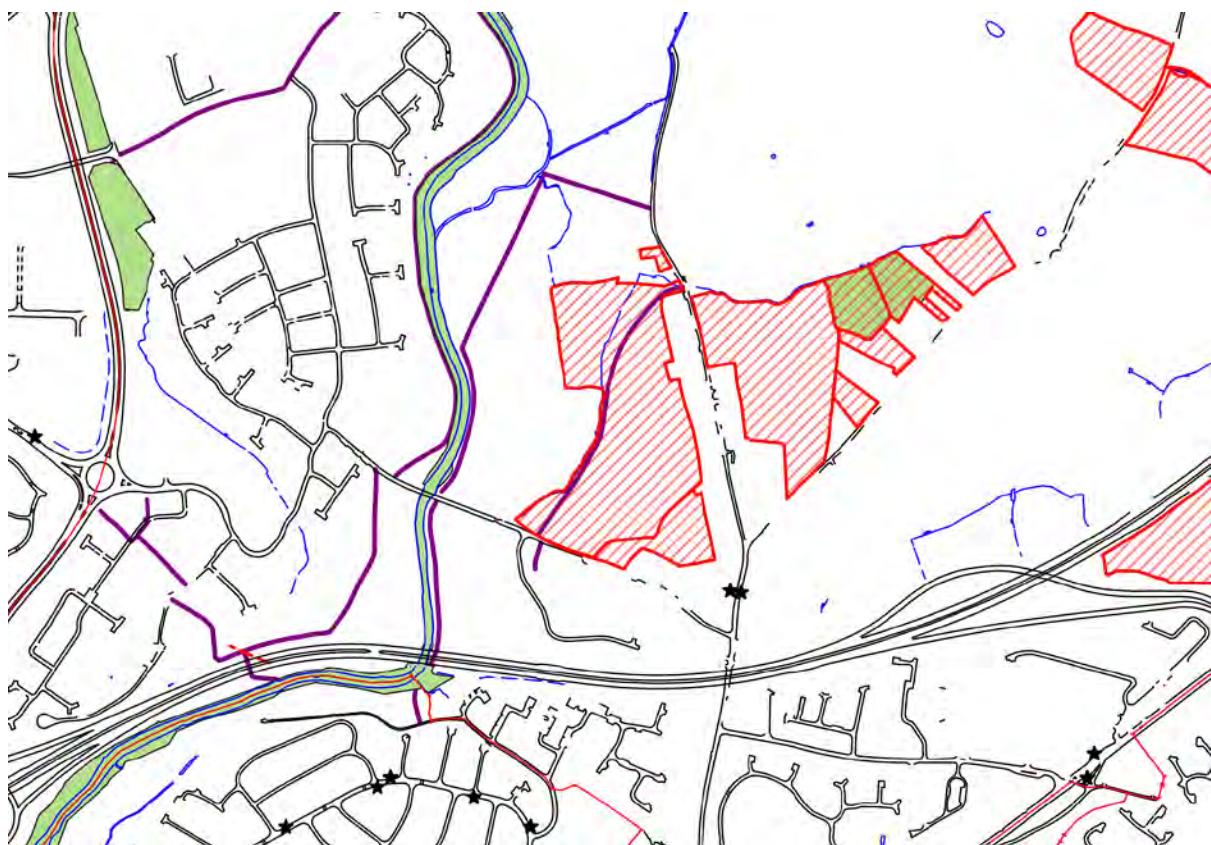
Agricultural land quality	Mostly Grade 3b
Special Landscape Area	801m across open landscape
Water body	On site in SE corner
Flooding	

**Sustainability constraints:**

- In SSSI/SINC
- In historic landscape
- In Archaeologically Sensitive Area
- Greenfield

## Land at Bridge Road, Old St Mellons / 55

8.28ha, residential



Welsh Index of Multiple Deprivation	1
Community facility	1195m primary school 1881m secondary school 1910m health centre 1227m GP 787m allotments 1463m hub From middle of the site Footpath crosses site
Housing	
Air Quality Management Area	>5km
Special Protection Area / Ramsar	4.1km
Special Area of Conservation	4.1km
Site of Special Scientific Interest	1849m
Local Nature Reserve	3.5km
Site of Importance for Nature Conservation	287m
Bus stop	321m
Train station	>4km
City/district centre	1506m to local centre 1250m to district centre From middle of the site
Heritage asset	2254m historic landscape 1077m historic parks & gardens 1880m ancient monument

Conservation area	630m
Archaeologically sensitive area	1857m
Employment	
Open space	Not proposed
Previously developed land	Greenfield
Agricultural land quality	About 60% grade 2, the rest 'NA'
Special Landscape Area	2.6km
Water body	Stream runs through site
Flooding	

**Sustainability constraints:**

- Flooding
- Greenfield
- Stream on site
- Grade 2 agricultural land
- Footpath

## Land at Callaghan Square / 3

3.36ha, mixed use



Welsh Index of Multiple Deprivation	3
Community facility	Adjacent site primary school 2610m secondary school 580m health centre 830m GP 1785m allotments 449m hub From middle of the site No PRow
Housing	
Air Quality Management Area	227m
Special Protection Area / Ramsar	2292m
Special Area of Conservation	2292m
Site of Special Scientific Interest	2292m
Local Nature Reserve	1472m
Site of Importance for Nature Conservation	320m River Taff
Bus stop	Several adjacent site
Train station	406m
City/district centre	517m to local centre 915m to district centre From middle of the site
Heritage asset	4.5km historic landscape 853m historic parks & gardens 815m ancient monument
Conservation area	227m
Archaeologically sensitive area	118m
Employment	The site is small but significant commercial floorspace proposed: 33,480 sqm B1 (office),

	4650 sqm C1 (Hotel), 3720 sqm A1,A3, D2 (Retail, Food and Drink, Leisure)
Open space	About 10% proposed on N end
Previously developed land	Yes
Agricultural land quality	Built up
Special Landscape Area	4.7km
Water body	320m River Taff
Flooding	

**Sustainability constraints:** none

## Land at Church Farm / 34

14.16ha, residential



Welsh Index of Multiple Deprivation	1
Community facility	1615m primary school 1241m secondary school 2521m health centre 1663m GP 1724m allotments 2475m hub From middle of the site No PRow on site
Housing	
Air Quality Management Area	>5km
Special Protection Area / Ramsar	>5km
Special Area of Conservation	4.5m
Site of Special Scientific Interest	935m
Local Nature Reserve	4.5m
Site of Importance for Nature Conservation	SINC stream runs through site
Bus stop	586m from centre of site
Train station	1599m
City/district centre	2410m to local centre 2131m to district centre From middle of the site
Heritage asset	>5Km historic landscape 612m historic parks & gardens 804m ancient monument
Conservation area	4.1km
Archaeologically sensitive area	>5km
Employment	
Open space	<10% planned

Previously developed land	Greenfield
Agricultural land quality	About half grade 2, half grade 3a
Special Landscape Area	848m
Water body	Streams run through and adjacent to site
Flooding	

**Sustainability constraints:**

- SINC stream on/adjacent to site
- Far from existing services
- Greenfield
- Grade 2 and 3a agricultural land

## Land at Customhouse Street / 1

0.009ha, mixed use



Welsh Index of Multiple Deprivation	1
Community facility	<p>310m primary school 2607m secondary school 827m health centre 956m GP 1940m allotments 160m hub</p> <p>From middle of the site No PRoWs</p>
Housing	
Air Quality Management Area	143m
Special Protection Area / Ramsar	2424m
Special Area of Conservation	2424m
Site of Special Scientific Interest	2424m
Local Nature Reserve	1589m
Site of Importance for Nature Conservation	510m River Taff
Bus stop	42m
Train station	383m
City/district centre	<p>708m to local centre 1121m to district centre</p> <p>From middle of the site</p>
Heritage asset	<p>4.3Km historic landscape 642m historic parks &amp; gardens 642m ancient monument</p>
Conservation area	112m

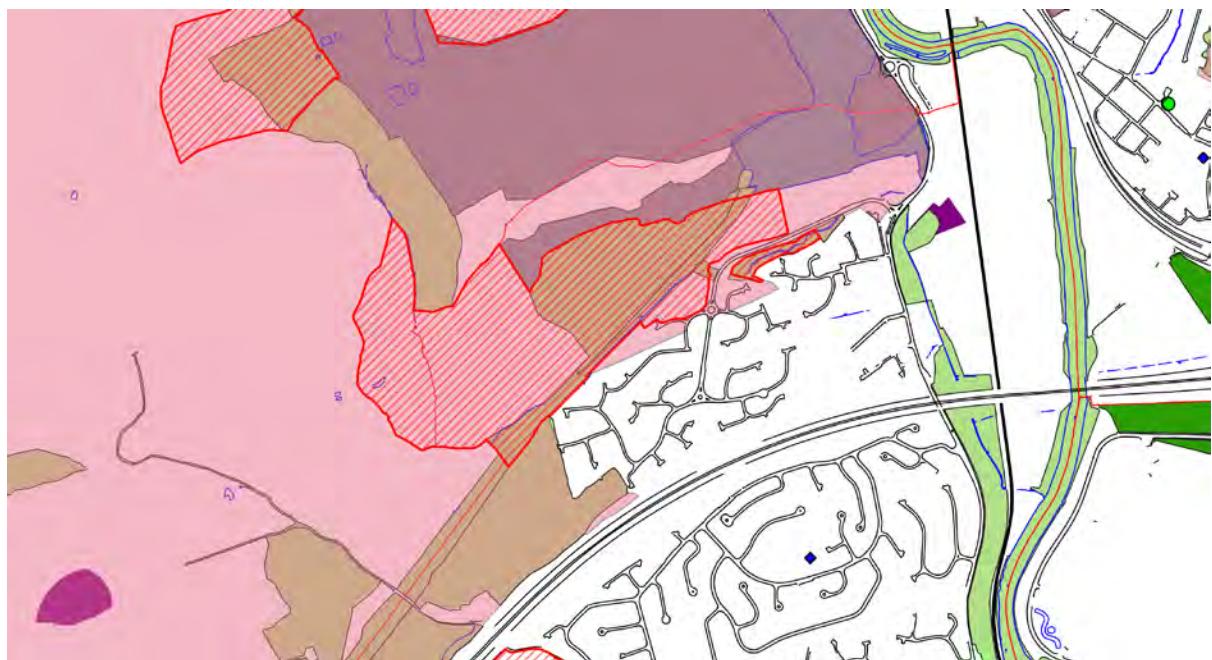
Archaeologically sensitive area	Within ASA
Employment	
Open space	None proposed
Previously developed land	Yes
Agricultural land quality	Built up
Special Landscape Area	4.6km
Water body	170m
Flooding	

**Sustainability constraints:**

- In Archaeologically Sensitive Area

## Land at Cwm Farm, Morganstown / 80

29.22ha, residential



Welsh Index of Multiple Deprivation	1
Community facility	886m primary school 2616m secondary school 4.5m health centre 1653m GP 1780m allotments 1718m hub From middle of the site, all either across M4 or across River Taff + railway line Several PROWs on/adjacent site
Housing	
Air Quality Management Area	4.4km
Special Protection Area / Ramsar	>5km
Special Area of Conservation	Adjacent
Site of Special Scientific Interest	Adjacent
Local Nature Reserve	905m across River Taff
Site of Importance for Nature Conservation	About half of site is SINC
Bus stop	416m
Train station	1690m across River Taff
City/district centre	1910m to local centre 3.8km to district centre From middle of the site, across M4
Heritage asset	>5km historic landscape 2139m historic parks & gardens 321m ancient monument
Conservation area	947m
Archaeologically sensitive area	3362m

Employment	
Open space	SINC element proposed as open space
Previously developed land	Greenfield
Agricultural land quality	About 75% grade 3b, the rest a mixture of 2, 3a and 4
Special Landscape Area	Within SLA
Water body	Stream runs through NE section
Flooding	

**Sustainability constraints:**

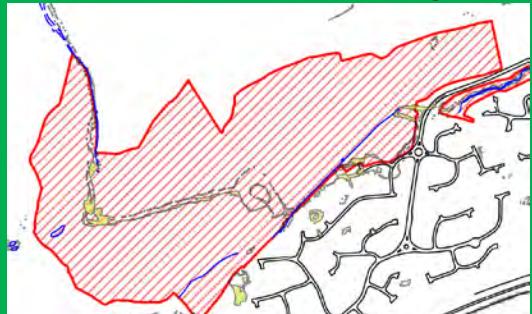
- In Special Landscape Area
- Adjacent SAC/SSSI
- In SINC
- Far from existing services
- Greenfield
- Stream
- Footpaths

## Land at Druidstone Road, Old St Mellons / 47

0.972ha, residential



Welsh Index of Multiple Deprivation	1
Community facility	<p>1147m primary school across A48(M)  2243m secondary school  2156m health centre  1351m GP  1204m allotments  1539m hub</p> <p>From middle of the site, all across A48(M)  No PRoW</p>
Housing	
Air Quality Management Area	>5km
Special Protection Area / Ramsar	4.2km
Special Area of Conservation	4.2km
Site of Special Scientific Interest	1625m
Local Nature Reserve	4.3km
Site of Importance for Nature Conservation	144m
Bus stop	694m
Train station	>5km
City/district centre	<p>1575m to local centre  1212m to district centre</p> <p>From middle of the site, across A48(M)</p>
Heritage asset	<p>1724m historic landscape  1142m historic parks &amp; gardens  2267m ancient monument</p>
Conservation area	1133m
Archaeologically sensitive area	1584m

Employment	
Open space	<10% proposed
Previously developed land	Greenfield
Agricultural land quality	Grade 2
Special Landscape Area	2600m
Water body	Adjacent on N side
Flooding	<p>Minor (&lt;10%) surface water flooding</p> 

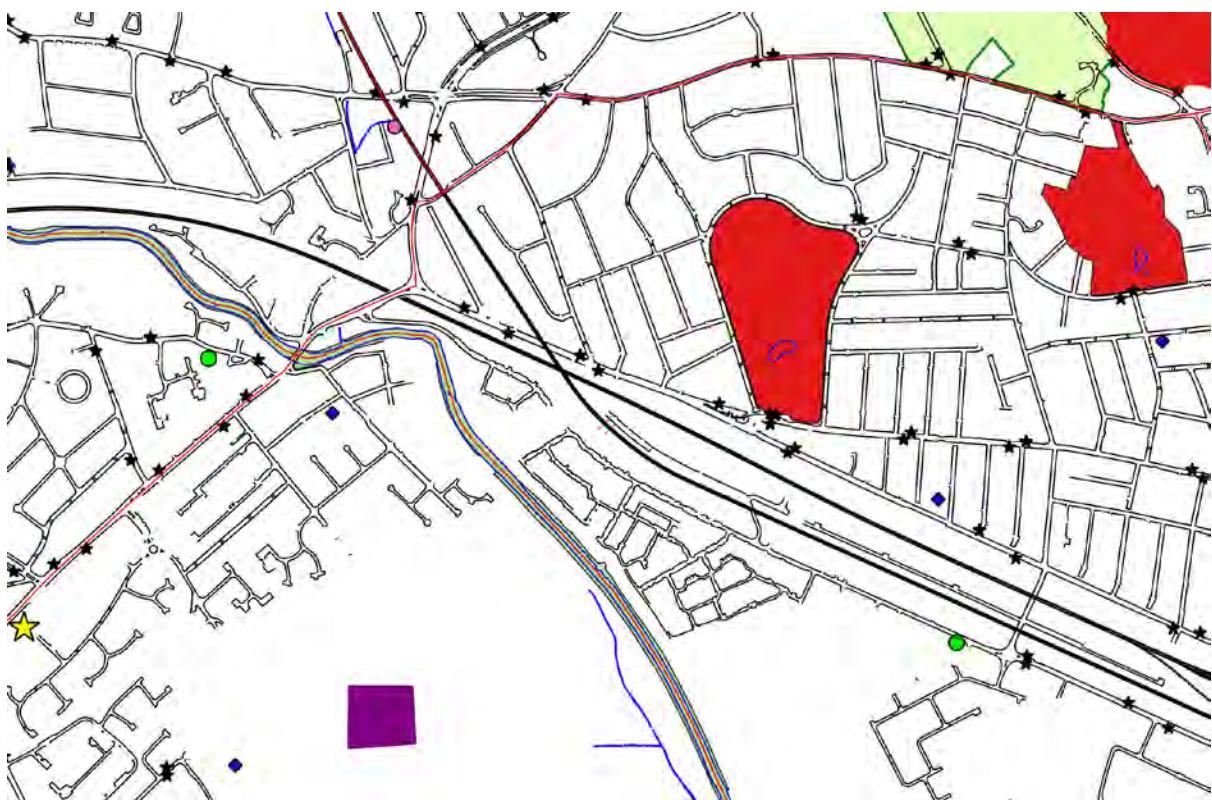
**Sustainability constraints:**

- Far from many existing services
- Greenfield
- Grade 2 agricultural land
- Near SINC
- Stream adjacent to site



Land at Ely Mill, Victoria Park / 11

0.25ha, new station, platform and access



Welsh Index of Multiple Deprivation	1/2
Community facility	<p>537m primary school</p> <p>1150m secondary school</p> <p>1518m health centre</p> <p>777m GP</p> <p>325m allotments</p> <p>1201m hub</p> <p>From middle of the site</p> <p>Ely Trail passes by site</p>
Housing	
Air Quality Management Area	519m
Special Protection Area / Ramsar	>5k
Special Area of Conservation	>5km
Site of Special Scientific Interest	>5km
Local Nature Reserve	4.0km
Site of Importance for Nature Conservation	175m
Bus stop	107m
Train station	711km
City/district centre	<p>1127m to local centre</p> <p>1361m to district centre</p> <p>From middle of the site</p>
Heritage asset	<p>&gt;5km historic landscape</p> <p>303m historic parks &amp; gardens</p>

	609m ancient monument
Conservation area	926m
Archaeologically sensitive area	1121m
Employment	
Open space	No
Previously developed land	Yes
Agricultural land quality	Built up
Special Landscape Area	872m
Water body	184m River Ely
Flooding	

**Sustainability constraints:** None

## Land at Goitre Farm, St. Mellons / 54

13ha, residential and care home



Welsh Index of Multiple Deprivation	1
Community facility	814m primary school 2167m secondary school 1952m health centre 1118m GP surgery 1366m allotments 1624m hub From middle of the site Traversed by PRoW
Housing	
Air Quality Management Area	>5km
Special Protection Area / Ramsar	3340m
Special Area of Conservation	3340m
Site of Special Scientific Interest	849m
Local Nature Reserve	4.5km
Site of Importance for Nature Conservation	Adjacent – essentially encircles SINC
Bus stop	633m
Train station	>5km
City/district centre	1199m to local centre 1243m to district centre From middle of the site
Heritage asset	963m historic landscape 1711m historic parks & gardens 1988m ancient monument
Conservation area	866m

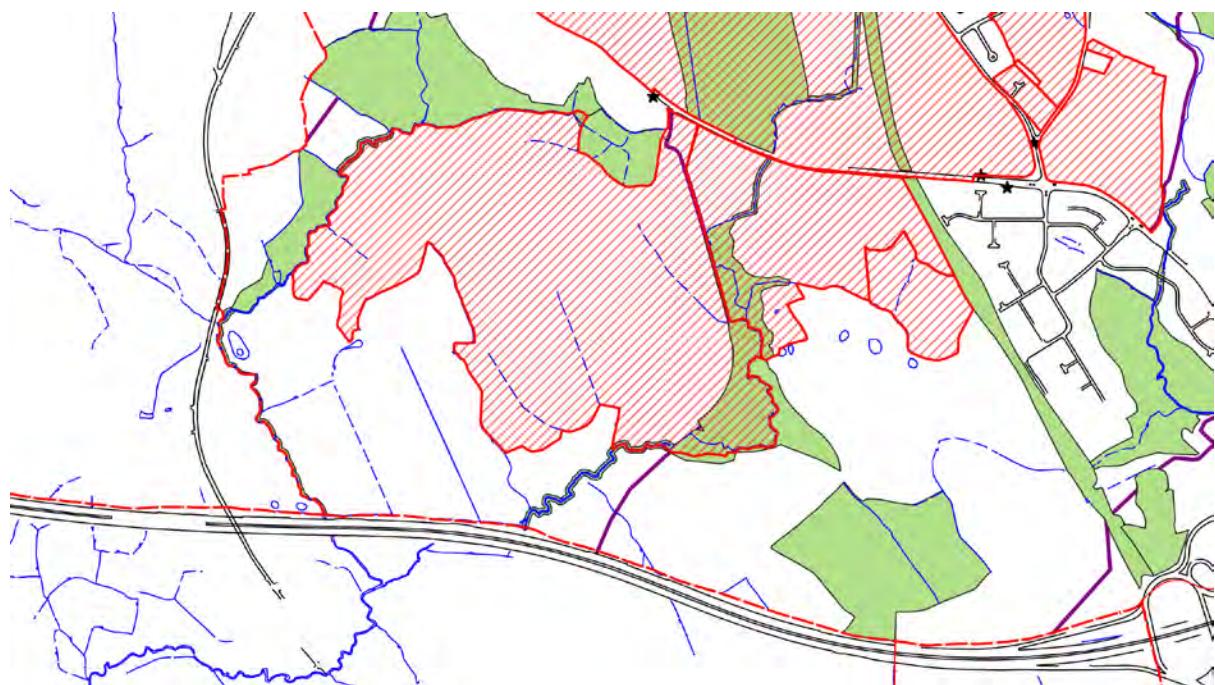
Archaeologically sensitive area	800m
Employment	
Open space	None proposed
Previously developed land	Greenfield
Agricultural land quality	Grade 2
Special Landscape Area	2262m
Water body	Several streams on site
Flooding	

**Sustainability constraints:**

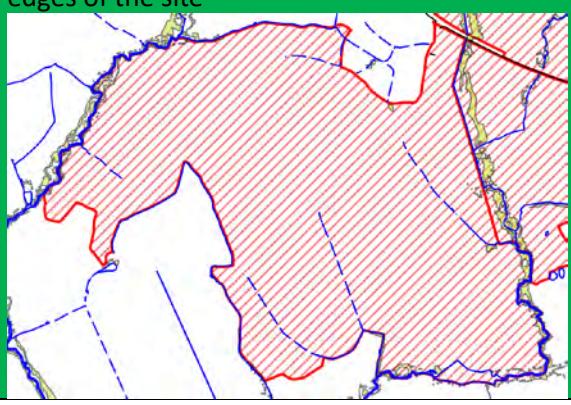
- Greenfield
- Grade 2 agricultural land
- Far from many existing services
- Streams on site
- Footpath on site

Land at Henstaff Court / 17

41ha, residential



Welsh Index of Multiple Deprivation	1
Community facility	<p>1376m primary school</p> <p>&gt;5km secondary school</p> <p>&gt;5km health centre</p> <p>2884m GP</p> <p>&gt;5km allotments</p> <p>&gt;5km hub</p> <p>From middle of the site. All except primary school and GP across M4</p> <p>PRoW cuts through site</p>
Housing	
Air Quality Management Area	>5km
Special Protection Area / Ramsar	>5km
Special Area of Conservation	3.5km
Site of Special Scientific Interest	2163m
Local Nature Reserve	>5km
Site of Importance for Nature Conservation	SW corner of site encompasses SINC
Bus stop	488m
Train station	>5km
City/district centre	<p>&gt;5km to local centre</p> <p>&gt;5km to district centre</p> <p>From middle of the site</p>
Heritage asset	<p>&gt;5km historic landscape</p> <p>1046m historic parks &amp; gardens</p> <p>3015m ancient monument</p>
Conservation area	1394m
Archaeologically sensitive area	2770m
Employment	

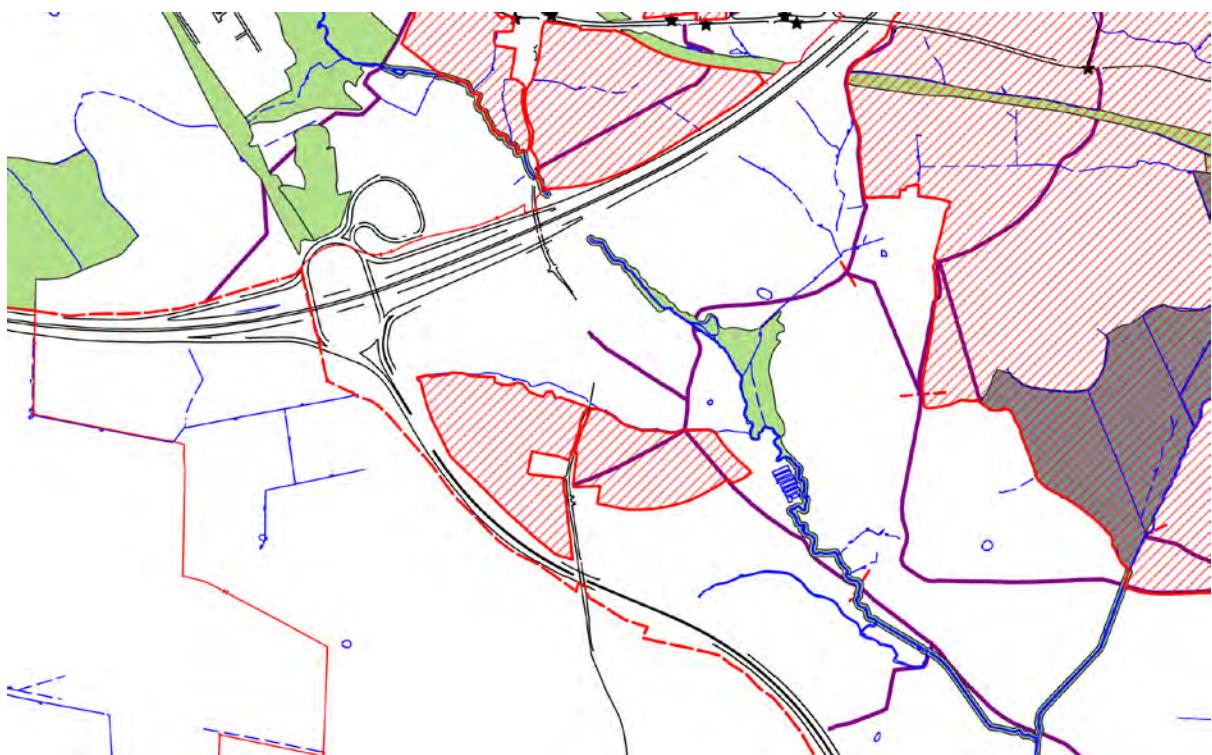
Open space	About 10% proposed
Previously developed land	Greenfield
Agricultural land quality	Grade 3b
Special Landscape Area	574m
Water body	Several on site
Flooding	<p>Minor stream-related flooding around the edges of the site</p> 

**Sustainability constraints:**

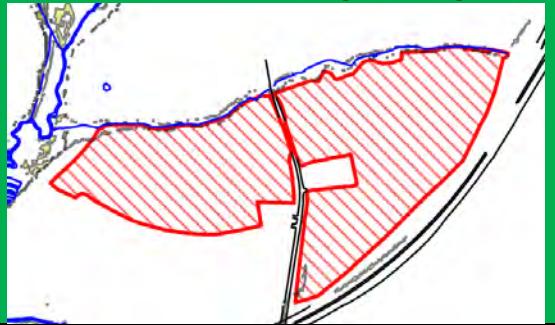
- In SINC
- Far from existing services
- Greenfield
- Footpath

Land at Llanfair, Junction 33 / 14

9ha, Housing, retail, industrial



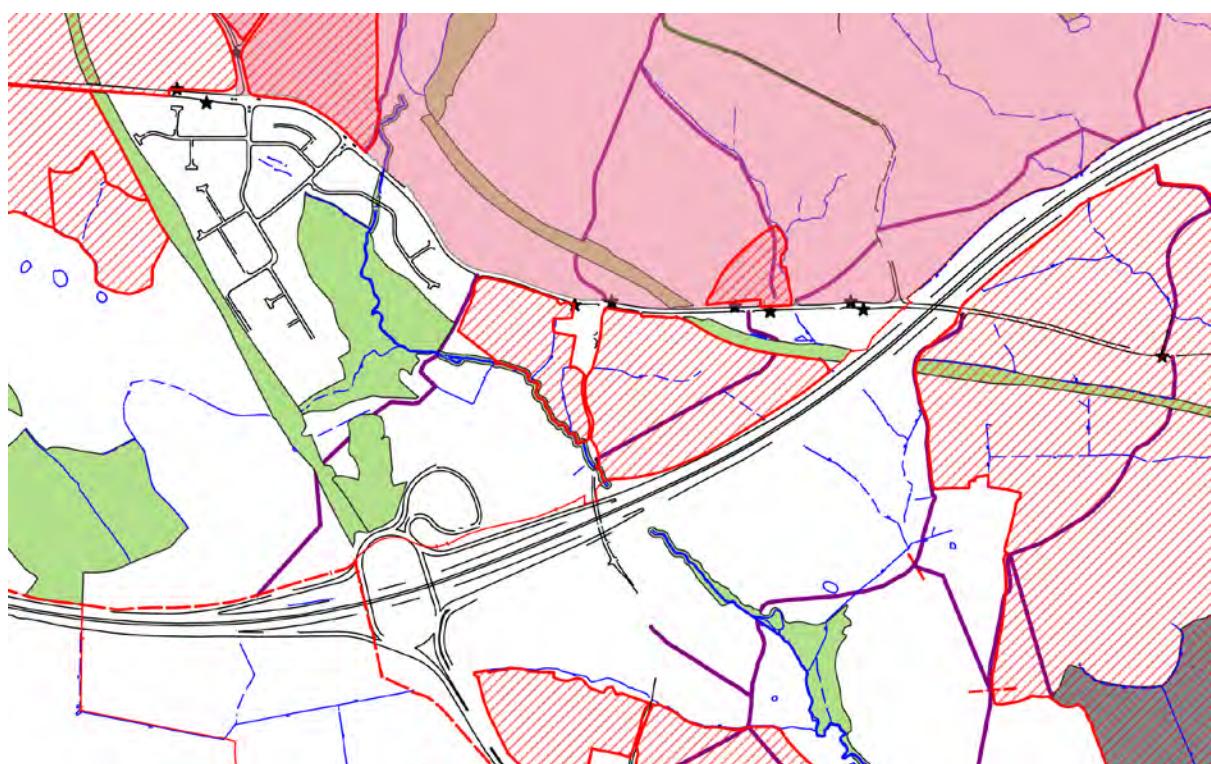
Welsh Index of Multiple Deprivation	1
Community facility	3.7km primary school 4.0m secondary school 4.7km health centre 3.8km GP 4.2km allotments 4.8km hub From middle of the site Two PRoWs run through site
Housing	
Air Quality Management Area	>5km
Special Protection Area / Ramsar	>5km
Special Area of Conservation	3.8km
Site of Special Scientific Interest	465m
Local Nature Reserve	4.1km
Site of Importance for Nature Conservation	60m
Bus stop	775m over M4
Train station	>5km
City/district centre	4.0km to local centre >5km to district centre From middle of the site
Heritage asset	>5km historic landscape 1742m historic parks & gardens 2070m ancient monument
Conservation area	1742m
Archaeologically sensitive area	1612m

Employment	
Open space	None proposed
Previously developed land	Greenfield
Agricultural land quality	Grade 3b
Special Landscape Area	680m
Water body	Adjacent stream
Flooding	<p>Minor surface water flooding on N edge of site</p> 

**Sustainability constraints:**

- Far from existing services
- Greenfield
- Near SINC
- Adjacent stream
- Footpaths on site

8.73ha, residential



Welsh Index of Multiple Deprivation	1
Community facility	3.2km primary school 3.9km secondary school 4.8m health centre 3.8m allotments 5km hub 2.5km GP From middle of the site Footpath goes through site
Housing	
Air Quality Management Area	>5km
Special Protection Area / Ramsar	>5km
Special Area of Conservation	2.8m
Site of Special Scientific Interest	711m
Local Nature Reserve	3.7km
Site of Importance for Nature Conservation	Adjacent along N end of site
Bus stop	Adjacent end of site, 200m from middle of site
Train station	4.9km
City/district centre	3.7km to local centre >5km to district centre From middle of the site
Heritage asset	>5Km historic landscape 511m historic parks & gardens 1395m ancient monument
Conservation area	721m

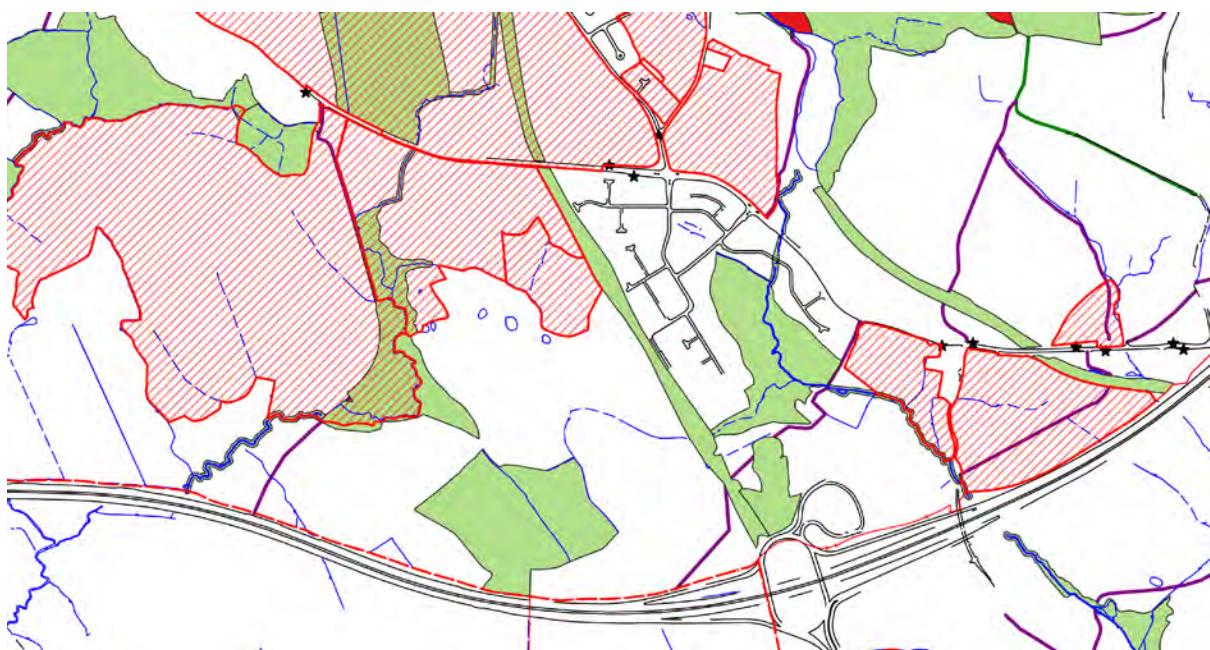
Archaeologically sensitive area	1973m
Employment	
Open space	None proposed
Previously developed land	Greenfield
Agricultural land quality	About 80% grade 3b, 20% grade 2
Special Landscape Area	11m
Water body	Streams/ditches run through ad adjacent to site
Flooding	

**Sustainability constraints:**

- Far from existing services
- Near Special Landscape Area
- Greenfield
- Streams/ditches
- Sensitive landscape area across road
- Footpath

## Land at Llwynioli Farm, north of Junction 33 / 81

3.4ha, mixed use



Welsh Index of Multiple Deprivation	1
Community facility	<p>1610m primary school          4.9km secondary school          &gt;5km health centre          2382m GP          &gt;5km allotments          &gt;5km hub</p> <p>From middle of the site, all but primary school and GP over M4          No PRoW</p>
Housing	
Air Quality Management Area	>5km
Special Protection Area / Ramsar	>5km
Special Area of Conservation	3.2km
Site of Special Scientific Interest	1990m
Local Nature Reserve	4.8km
Site of Importance for Nature Conservation	Adjacent SINC
Bus stop	290m
Train station	4.8km
City/district centre	<p>&gt;5km to local centre          &gt;5km to district centre          From middle of the site, over M4</p>
Heritage asset	<p>&gt;5km historic landscape          669m historic parks &amp; gardens          2214m ancient monument</p>
Conservation area	1207m
Archaeologically sensitive area	2675m

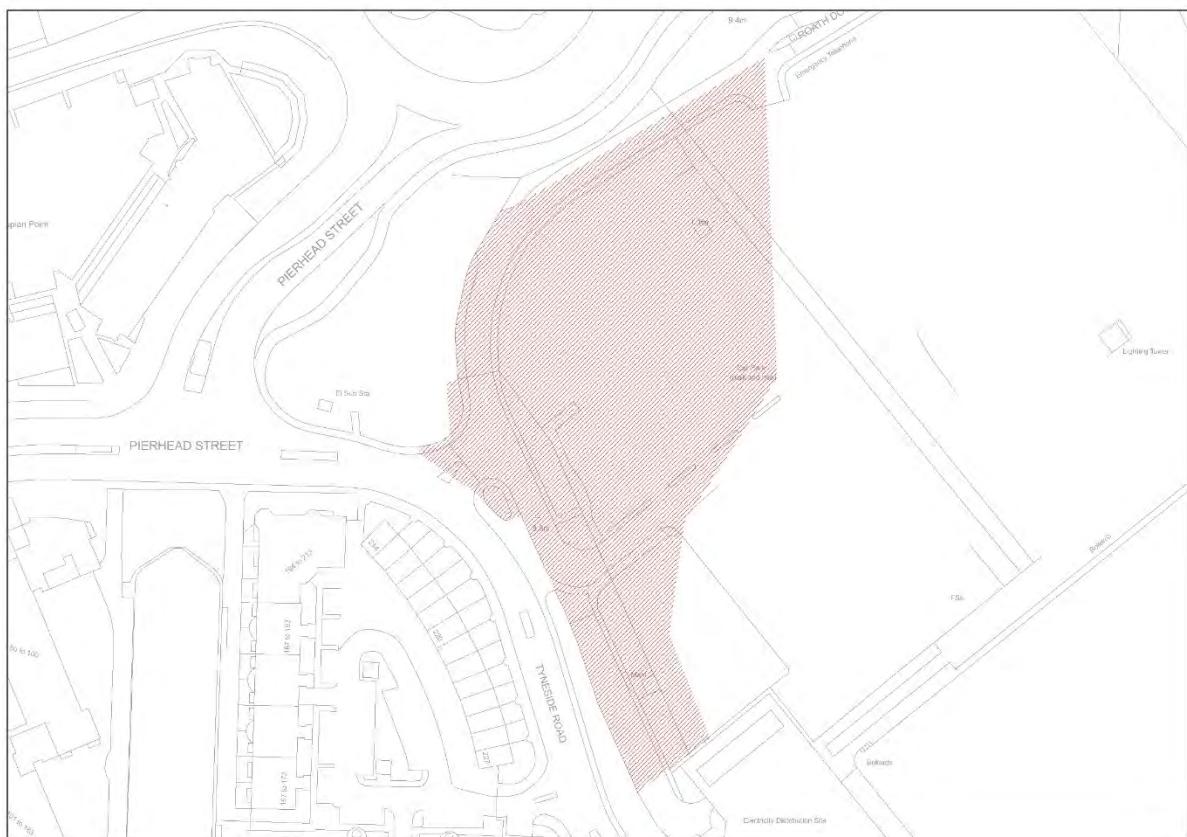
Employment	
Open space	None proposed
Previously developed land	Greenfield
Agricultural land quality	Grade 3b
Special Landscape Area	715m
Water body	Stream/ditch runs through site
Flooding	<p>&lt;10% surface water flooding in centre of site</p> 

**Sustainability constraints:**

- Adjacent SINC
- Far from existing services
- Greenfield
- Stream/ditch on site

## Land at Pierhead Street / 5

0.9ha, Safeguarding corridor for future possible extension of Bayline



Welsh Index of Multiple Deprivation	1
Community facility	1048m primary school 2325m secondary school 1065m health centre 2073m GP 3149m allotments 1081m hub From middle of the site No PRoWs
Housing	
Air Quality Management Area	2121m
Special Protection Area / Ramsar	922m
Special Area of Conservation	922m
Site of Special Scientific Interest	922m
Local Nature Reserve	1124m
Site of Importance for Nature Conservation	777m
Bus stop	306m
Train station	789m
City/district centre	1036m to local centre 765m to district centre From middle of the site
Heritage asset	1553m historic landscape 1715m historic parks & gardens 2251m ancient monument
Conservation area	383m
Archaeologically sensitive area	1549m
Employment	
Open space	None proposed
Previously developed land	Yes
Agricultural land quality	Built up
Special Landscape Area	>5km
Water body	Adjacent: dock
Flooding	

#### Sustainability constraints:

- Flooding
- Adjacent dock

## Land at Rover Way, Pengam Green / 66

21ha, B1, B2 and B8 class uses



Welsh Index of Multiple Deprivation	3/5
Community facility	630m primary school 476m secondary school (adjacent) 3125m health centre 655m GP 1053m allotments 847m hub From middle of the site Coastal Path runs adjacent site
Housing	
Air Quality Management Area	1842km
Special Protection Area / Ramsar	All 25m across road. Individually amber, but but red because of cumulative impacts /
Special Area of Conservation	closeness of site to internationally important designations
Site of Special Scientific Interest	
Local Nature Reserve	3.6km
Site of Importance for Nature Conservation	Almost entire site is SINC
Bus stop	504m
Train station	2755m
City/district centre	1406m to local centre 1846m to district centre From middle of the site
Heritage asset	973m historic landscape – across Rhymney River so v visible 1601m historic parks & gardens 3.1km ancient monument
Conservation area	1564m

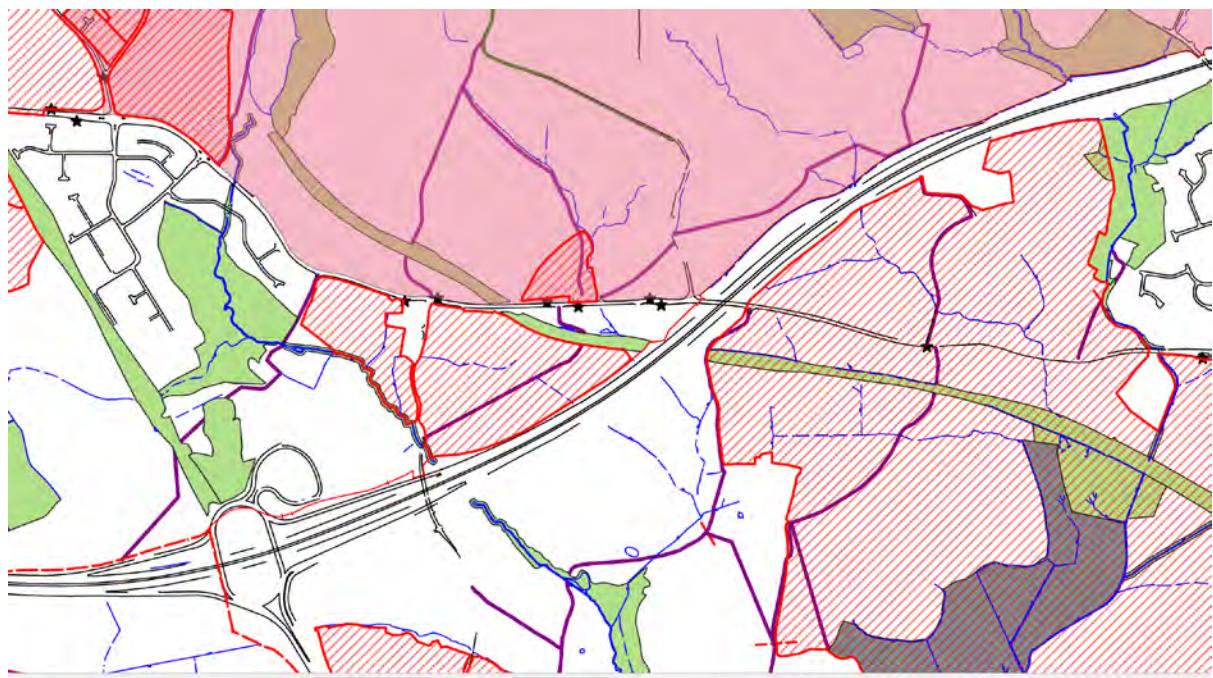
Archaeologically sensitive area	adjacent
Employment	
Open space	None proposed
Previously developed land	Greenfield
Agricultural land quality	Grade 4
Special Landscape Area	1198m across estuary - visible
Water body	151m Rhymney River + estuary (no buffer)
Flooding	

**Sustainability constraints:**

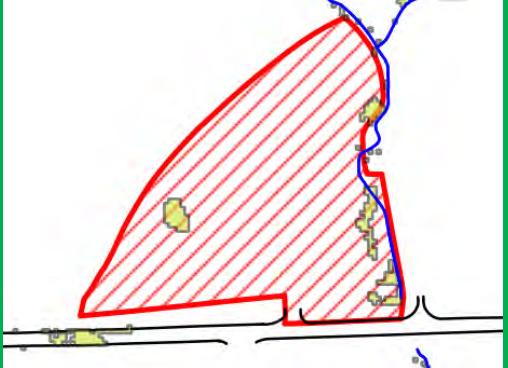
- Adjacent SPA/SAC/SSSI (across road) – would probably require HRA-related mitigation measures
- Almost entire site is SINC
- Visual impact on Special Landscape Area and historic landscape (across estuary)
- Greenfield
- Coastal path adjacent site

## Land at Old Forge Capel Llanilltern / 13

1.2ha, residential



Welsh Index of Multiple Deprivation	1
Community facility	3.3km primary school 3.7km secondary school 4.7m health centre 3.3km GP 3.5km allotments 4.8km hub From middle of the site, all across the M4 Crossed by PRoW
Housing	
Air Quality Management Area	>5km
Special Protection Area / Ramsar	>5km
Special Area of Conservation	2663m
Site of Special Scientific Interest	867m
Local Nature Reserve	3.7km
Site of Importance for Nature Conservation	29m
Bus stop	Adjacent
Train station	3.8km across M4
City/district centre	3.5km to local centre >5km to district centre From middle of the site, across the M4
Heritage asset	>5km 640m historic parks & gardens 1255m ancient monument
Conservation area	790m

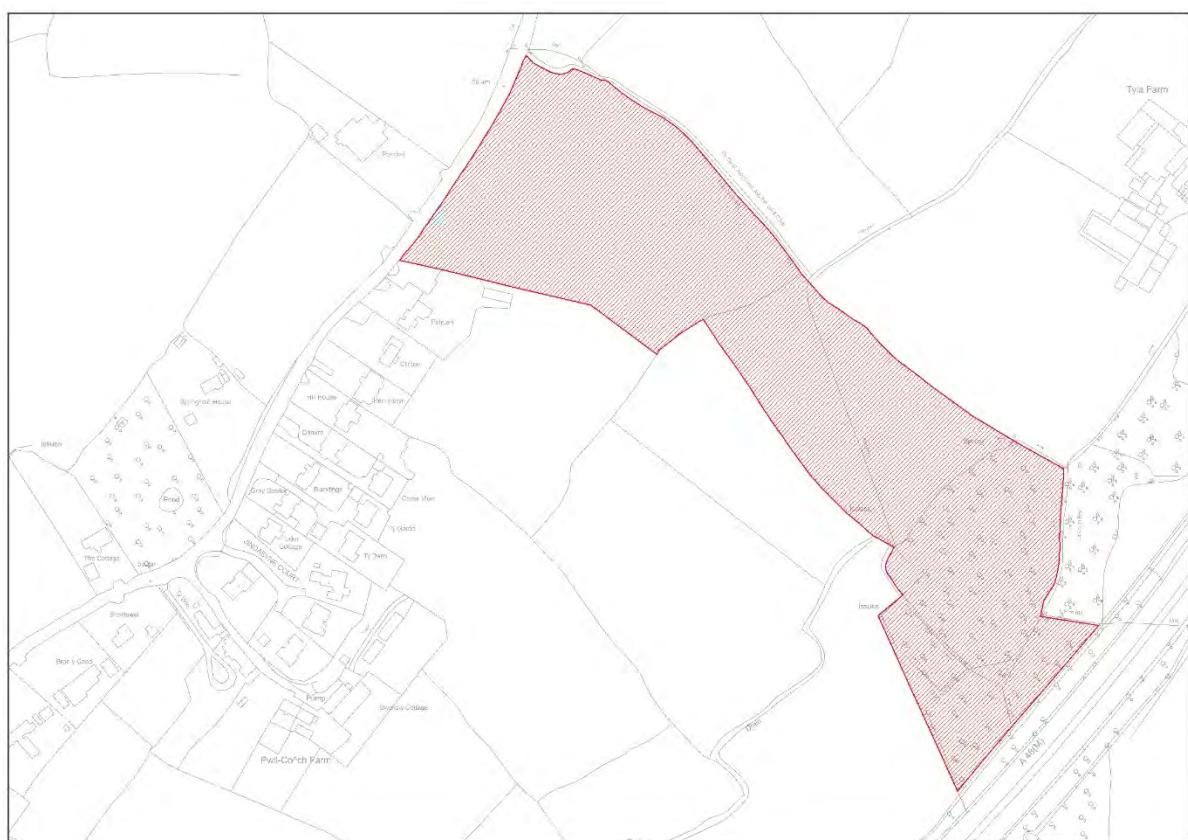
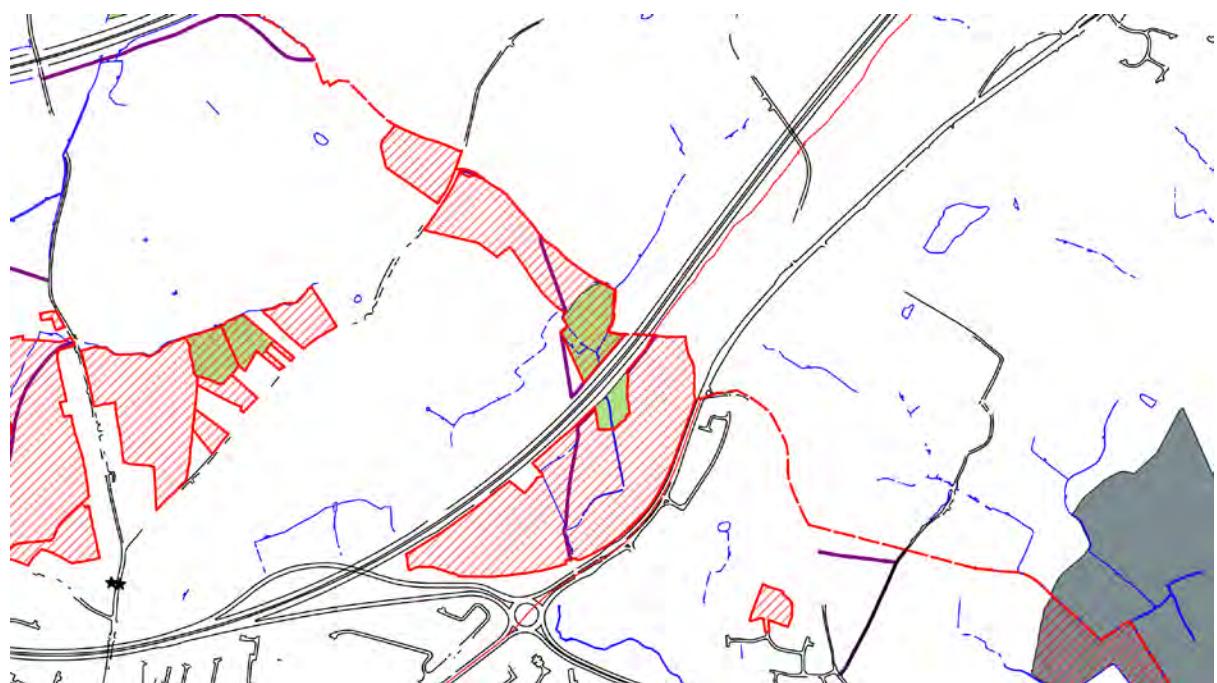
Archaeologically sensitive area	2259m
Employment	
Open space	About 10% proposed
Previously developed land	Greenfield
Agricultural land quality	About half grade 3a, half 3b
Special Landscape Area	In SLA
Water body	Stream on E edge of site
Flooding	<p>&lt;10% surface water flooding</p> 

**Sustainability constraints:**

- In Special Landscape Area
- Far from existing services
- Greenfield
- Stream on site
- Footpath

**Land at Tyla Farm, Tyla Lane / 48**

5.33ha, residential



Welsh Index of Multiple Deprivation	1
Community facility	1255m primary school 2557m secondary school 2378m health centre 1486m GP 1611m allotments 1610m hub From middle of the site, all across A48(M) PRoW cuts through site
Housing	
Air Quality Management Area	>5km
Special Protection Area / Ramsar	3.7km
Special Area of Conservation	3.7km
Site of Special Scientific Interest	1046m
Local Nature Reserve	4.7km
Site of Importance for Nature Conservation	About 1/3 of site is SINC
Bus stop	1028m across A48(M)
Train station	>5km
City/district centre	1510m to local centre 1390m to district centre From middle of the site, across A48(M)
Heritage asset	1257m historic landscape 1349m historic parks & gardens 3.3km ancient monument
Conservation area	1360m
Archaeologically sensitive area	1153m
Employment	
Open space	SINC proposed as open space
Previously developed land	Greenfield
Agricultural land quality	Grade 2
Special Landscape Area	2279m
Water body	Streams/ditches run through site
Flooding	

#### Sustainability constraints:

- In SINC
- Far from many existing services
- Greenfield
- Grade 2 agricultural
- Streams/ditches
- Footpath

0.36ha, residential



Welsh Index of Multiple Deprivation	1
Community facility	<p>564m primary school 3.7km secondary school 5.6km health centre 1684m GP 2728m allotments 5.9km hub</p> <p>From middle of the site, all except primary school across the M4 No PRoW</p>
Housing	
Air Quality Management Area	>5km
Special Protection Area / Ramsar	>5km
Special Area of Conservation	8m – across road from SAC. Would normally be amber, but SAC is sensitive to recreational activities
Site of Special Scientific Interest	8m – across road from SSSI
Local Nature Reserve	1843m
Site of Importance for Nature Conservation	Adjacent SINC
Bus stop	55m from centre of site, 18m from edge
Train station	582m across River Taff
City/district centre	<p>2.9km to local centre 4.4km to district centre</p> <p>From middle of the site, across M4</p>

Heritage asset	>5km historic landscape 2580m historic parks & gardens 1092m ancient monument
Conservation area	30m
Archaeologically sensitive area	>5km
Employment	
Open space	None proposed
Previously developed land	Greenfield
Agricultural land quality	Grade 5 / urban
Special Landscape Area	In SLA
Water body	Adjacent SINC stream
Flooding	<p>Very minor surface water flooding on N end of site</p> 

#### Sustainability constraints:

- In Special Landscape Area
- Adjacent (across road) Cardiff Beech Woods SAC which is sensitive to recreational disturbance
- Far from existing services
- Greenfield

## Land at Wentloog Avenue / 83

14.6ha, B1, B2 and B8 uses



Welsh Index of Multiple Deprivation	3
Community facility	<p>818m primary school 1395m secondary school 1388m health centre 1314m GP 2094m allotments 1440m hub</p> <p>From middle of the site, all on other side of railway No PRow</p>
Housing	
Air Quality Management Area	>5km
Special Protection Area / Ramsar	953m across SINC
Special Area of Conservation	953m across SINC
Site of Special Scientific Interest	In SSSI
Local Nature Reserve	3.5m
Site of Importance for Nature Conservation	71m – across railway line
Bus stop	761m across railway line
Train station	>5km, though adjacent to railway
City/district centre	<p>997m to local centre 1240m to district centre</p> <p>From middle of the site</p>
Heritage asset	<p>2/3 of site inside historic landscape 4.7km historic parks &amp; gardens 1562m ancient monument</p>
Conservation area	1774m
Archaeologically sensitive area	Inside ASA

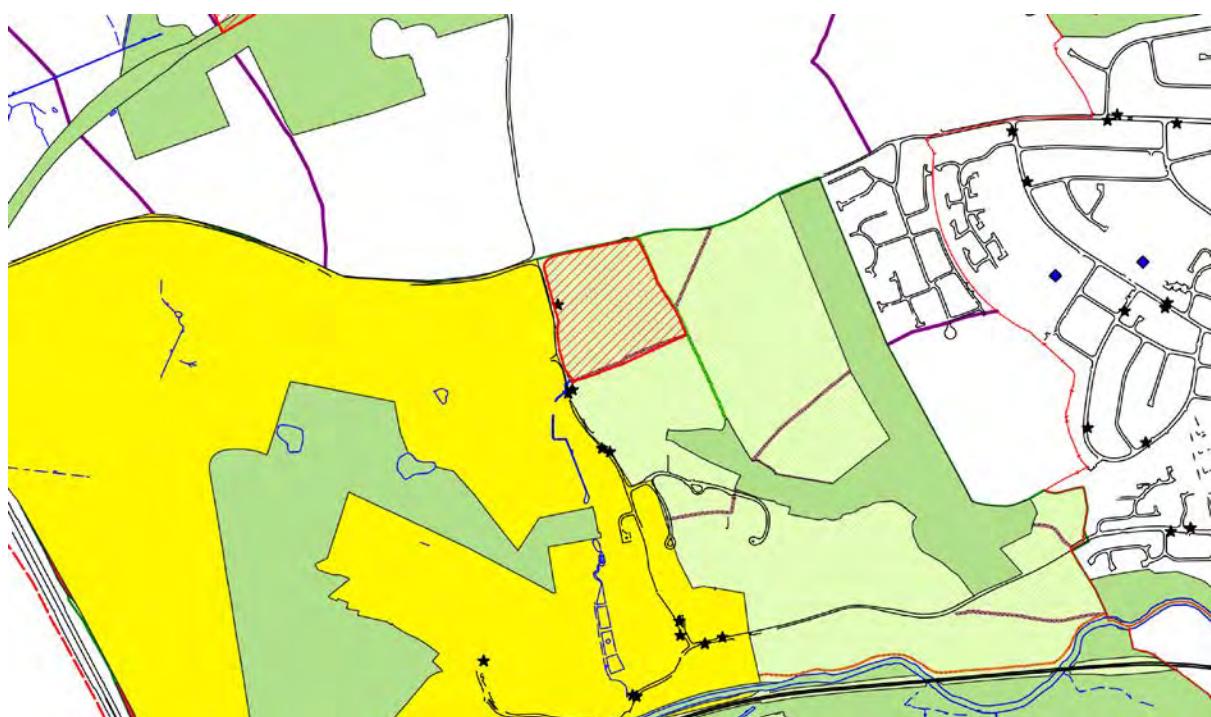
Employment	
Open space	
Previously developed land	Greenfield
Agricultural land quality	Grade 4
Special Landscape Area	Adjacent to SLA
Water body	Several ditches cross site
Flooding	

Sustainability constraints:

- In SSSI
- In historic landscape
- In Archaeologically Sensitive Area
- Adjacent Special Landscape Area
- Possible indirect impacts on SPA/SAC through changes in hydrological regime and water quality
- Greenfield
- Ditches/reeens on site

## Land East of Croft y Genau Road and South of Pentrebane Road / 16

6.1ha, playing fields



Welsh Index of Multiple Deprivation	1
Community facility	955m primary school 2508m secondary school 2011m health centre 2341m GP 1614m allotments 2121m hub From middle of the site PRow on S border of site
Housing	
Air Quality Management Area	2590m
Special Protection Area / Ramsar	>5km
Special Area of Conservation	>5km
Site of Special Scientific Interest	1483m
Local Nature Reserve	2367m
Site of Importance for Nature Conservation	170m
Bus stop	adjacent
Train station	2370m
City/district centre	1992m to local centre 4.1km to district centre From middle of the site
Heritage asset	>5km historic landscape Adjacent historic parks & gardens 2962m ancient monument
Conservation area	Within CA
Archaeologically sensitive area	Adjacent ASA
Employment	

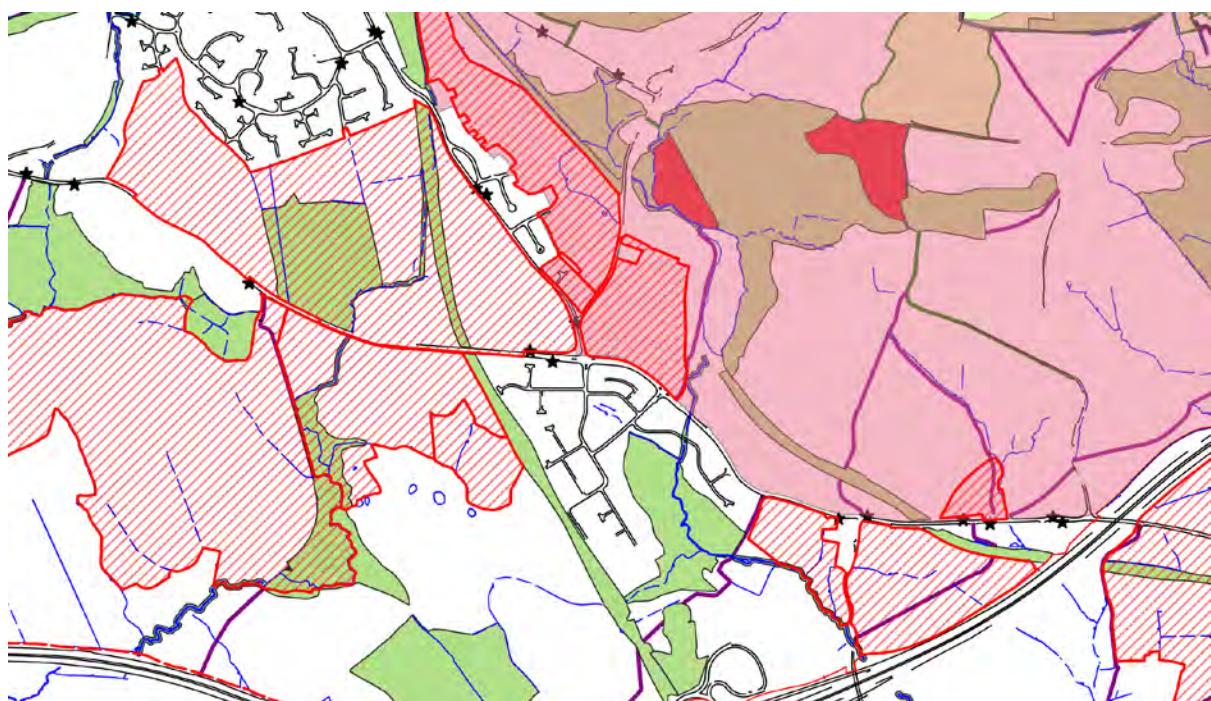
Open space	None proposed
Previously developed land	Greenfield
Agricultural land quality	Grade 3b
Special Landscape Area	Within SLA
Water body	Adjacent at SW end
Flooding	

Sustainability constraints:

- In Special Landscape Area
- In conservation area
- Far from existing services (difficult to access other than by car)
- Greenfield
- Footpath

## Land east of Heol Pant-Y-Gored, Creigiau / 22

5.3ha, residential



Welsh Index of Multiple Deprivation	1
Community facility	1554m primary school 4.6km secondary school >5km health centre 4.2km GP 4.3km allotments >5km hub From middle of the site, all except primary school across M4 PRoW along SE edge of site
Housing	
Air Quality Management Area	>5km
Special Protection Area / Ramsar	>5km
Special Area of Conservation	2583m
Site of Special Scientific Interest	1625m
Local Nature Reserve	4.3km
Site of Importance for Nature Conservation	Adjacent SINC stream on SE corner
Bus stop	82m from centre of site, adjacent edge
Train station	>5km
City/district centre	4.3km to local centre >5km to district centre From middle of the site, both across M4
Heritage asset	>5km historic landscape 103m historic parks & gardens 1683m ancient monument
Conservation area	426m

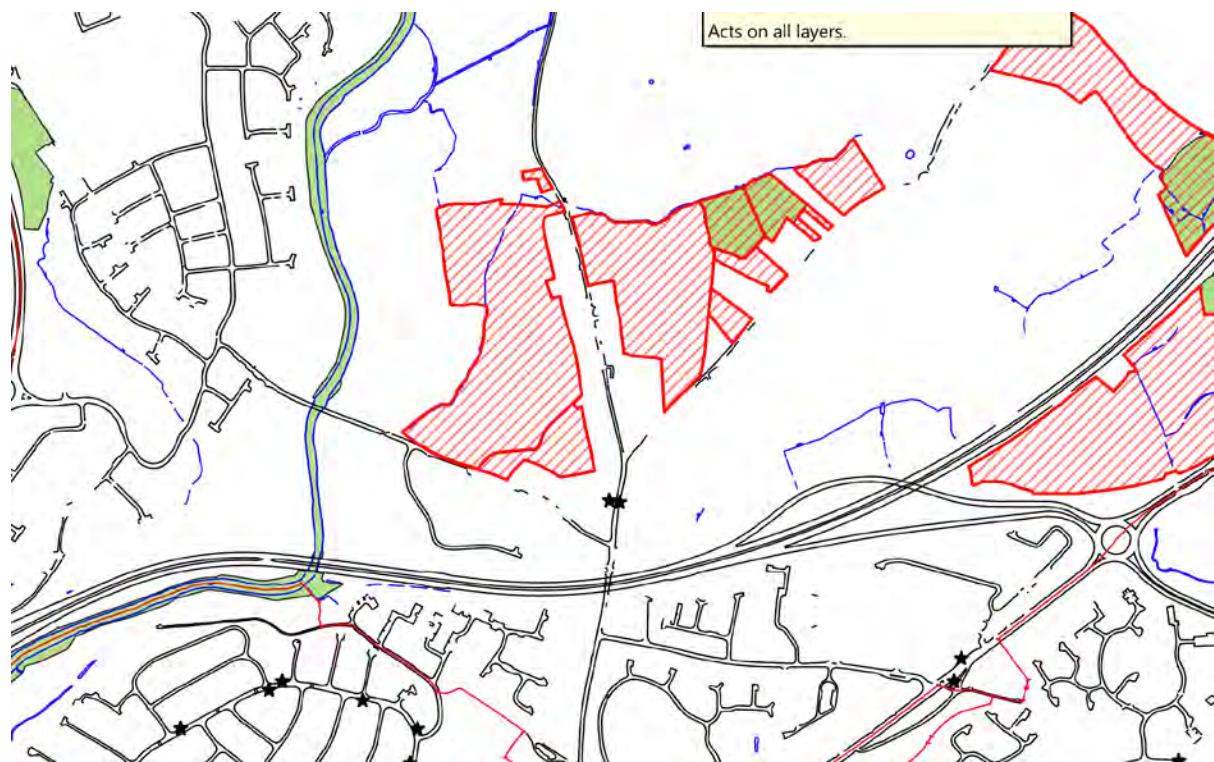
Archaeologically sensitive area	2690m
Employment	
Open space	None proposed
Previously developed land	Greenfield
Agricultural land quality	About 80% grade 2, 20% grade 3b
Special Landscape Area	In SLA
Water body	Adjacent SINC stream on SE corner
Flooding	<p>Very minor surface water flooding on S end of site</p> 

Sustainability constraints:

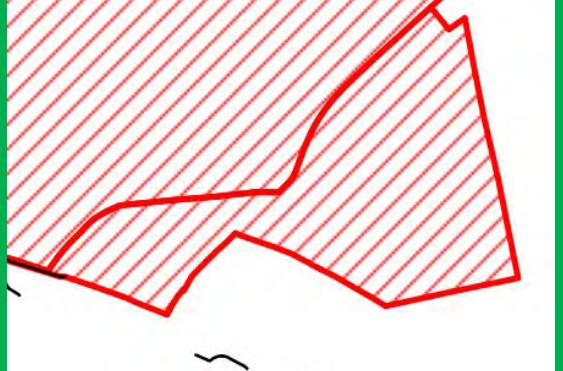
- Far from existing services
- In Special Landscape Area
- Adjacent SINC stream
- Greenfield
- Mostly grade 2 agricultural land

## Land north of Bridge Road, Old St Mellons / 56

1.17ha, residential



Welsh Index of Multiple Deprivation	1
Community facility	1022m primary school 1706m secondary school 1715m health centre 1124m GP 605m allotments <b>2191m hub</b> From middle of the site, across A48(M) No PRoW
Housing	
Air Quality Management Area	>5km
Special Protection Area / Ramsar	3.9km
Special Area of Conservation	3.9km
Site of Special Scientific Interest	1783m
Local Nature Reserve	3.5km
Site of Importance for Nature Conservation	280m
Bus stop	132m
Train station	>5km
City/district centre	1259m to local centre 983m to district centre From middle of the site, across A48(M)
Heritage asset	2148m historic landscape 1208m historic parks & gardens 1837m ancient monument

Conservation area	642m
Archaeologically sensitive area	1786m
Employment	
Open space	None proposed
Previously developed land	Greenfield
Agricultural land quality	Grade 2
Special Landscape Area	2474m
Water body	250m
Flooding	<p>No flooding</p> 

**Sustainability constraints:**

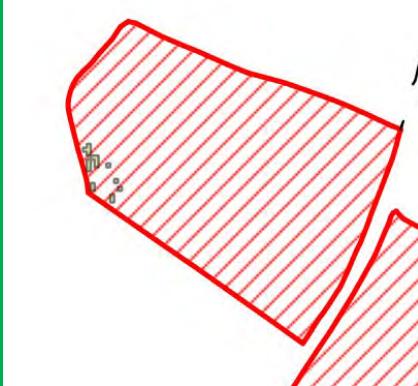
- Greenfield
- Grade 2 agricultural land

## Land north of Druidstone Road / 50

1.6ha, residential



Welsh Index of Multiple Deprivation	1
Community facility	<p>1510m primary school  2717m secondary school  2588m health centre  1728m GP  1684m allotments  1808m hub</p> <p>From middle of the site  All across A48(M)  No PRoW</p>
Housing	
Air Quality Management Area	>5km
Special Protection Area / Ramsar	4.2km
Special Area of Conservation	4.2km
Site of Special Scientific Interest	1509m
Local Nature Reserve	4.8km
Site of Importance for Nature Conservation	358m
Bus stop	1094m
Train station	>5km
City/district centre	<p>1684m to local centre  1478m to district centre</p> <p>From middle of the site, across A48(M)</p>
Heritage asset	<p>171m historic landscape  1192 historic parks &amp; gardens  2849m ancient monument</p>
Conservation area	1724m
Archaeologically sensitive area	1631m
Employment	
Open space	None proposed

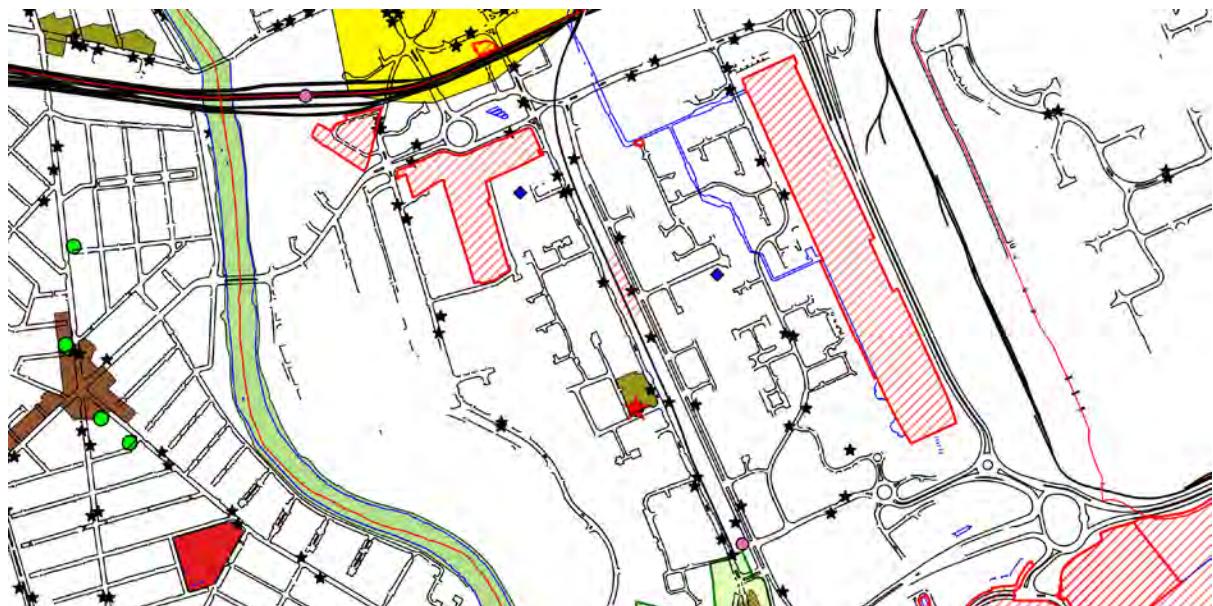
Previously developed land	Greenfield
Agricultural land quality	Grade 3a
Special Landscape Area	2740m
Water body	119m
Flooding	<p>&lt;10% surface water flooding on W end of site</p> 

**Sustainability constraints:**

- Far from existing services
- Greenfield
- Grade 3a agricultural land

## Land north of Loudon Square / 7

0.25ha, new station/platforms



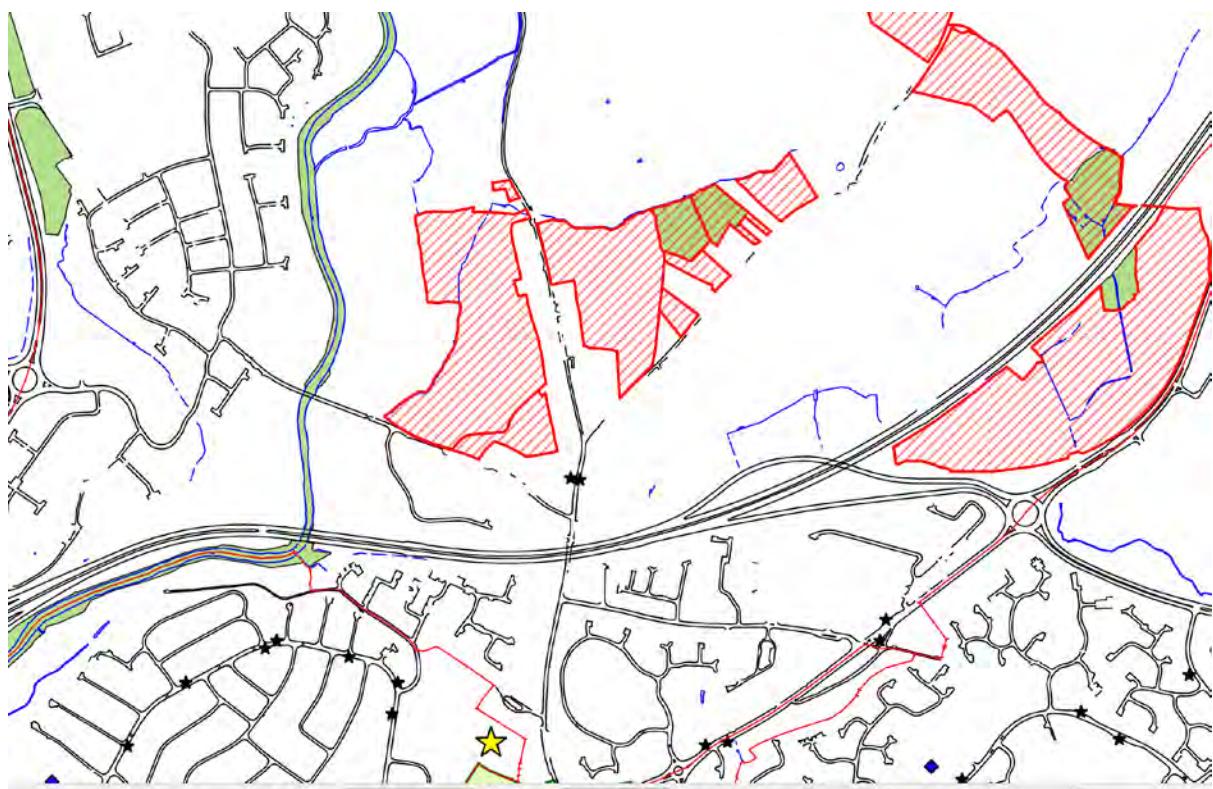
Welsh Index of Multiple Deprivation		4
Community facility		283m primary school 2634m secondary school 263m health centre 1081 GP 2105m allotments 192m hub
		From middle of the site No PRoW
Housing		
Air Quality Management Area		1542m
Special Protection Area / Ramsar		2040m
Special Area of Conservation		2040m
Site of Special Scientific Interest		2040m
Local Nature Reserve		1158m
Site of Importance for Nature Conservation		761m
Bus stop		Within site
Train station		585m
City/district centre		192m to local centre 708m to district centre
		From middle of the site
Heritage asset		4.3km historic landscape 935m historic parks & gardens 1137ancient monument
Conservation area		571m
Archaeologically sensitive area		438m
Employment		
Open space		None proposed
Previously developed land		Yes
Agricultural land quality		Urban

Special Landscape Area	4.5Km
Water body	761m River Taff
Flooding	

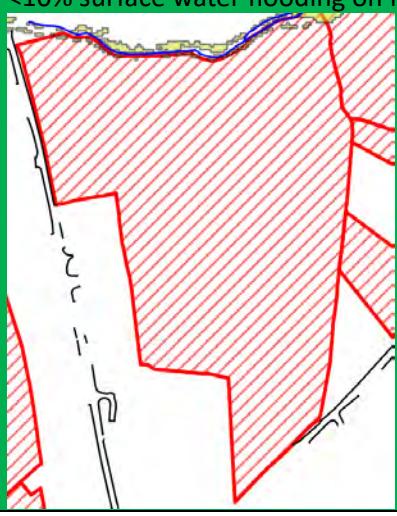
**Sustainability constraints:** None

## Land northwest of Druidstone Road / 51

5ha, residential



Welsh Index of Multiple Deprivation	1
Community facility	1104m primary school 1972m secondary school 1957m health centre 1290m GP 910m allotments 1452m hub From middle of the site, all across A48(M) No PRoW
Housing	
Air Quality Management Area	>5km
Special Protection Area / Ramsar	3.9km
Special Area of Conservation	3.9km
Site of Special Scientific Interest	1848m
Local Nature Reserve	3.9km
Site of Importance for Nature Conservation	Adjacent
Bus stop	403m
Train station	>5km
City/district centre	1580m to local centre 1144m to district centre From middle of the site, across A48(M)
Heritage asset	3.3km historic landscape 888m historic parks & gardens

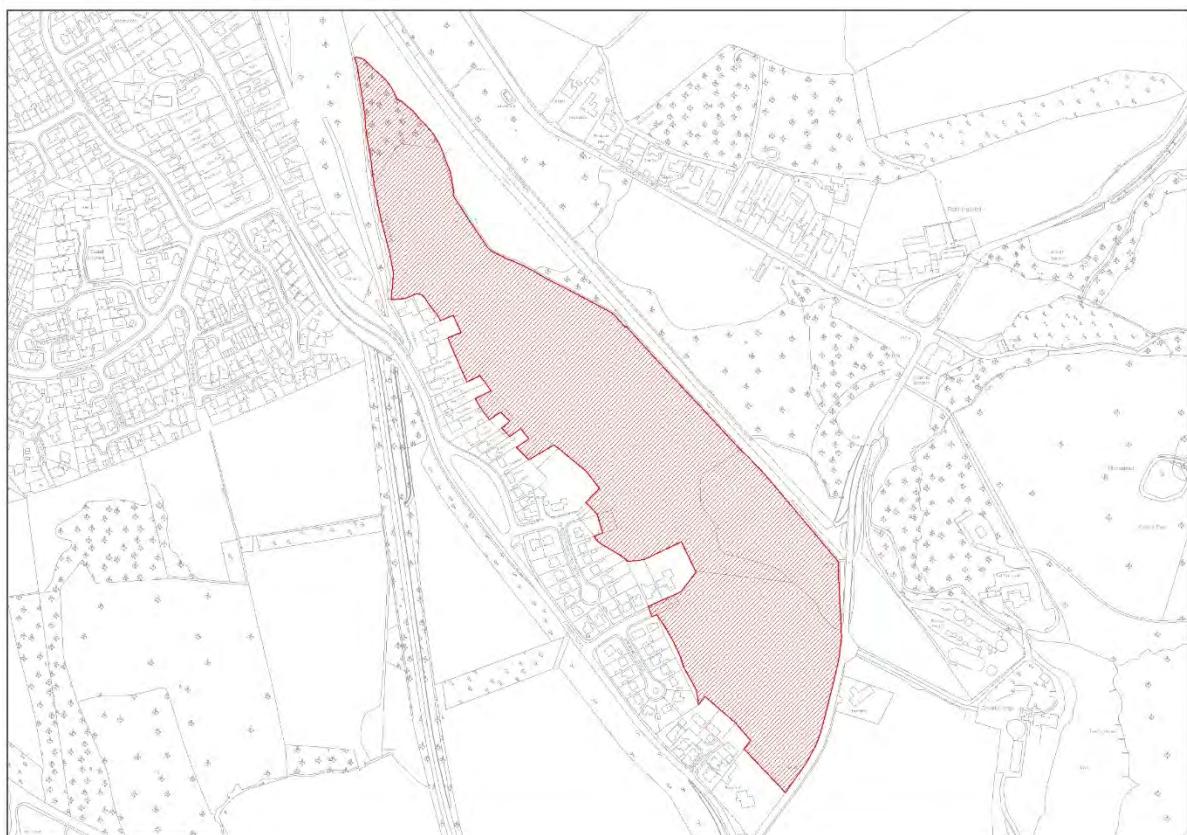
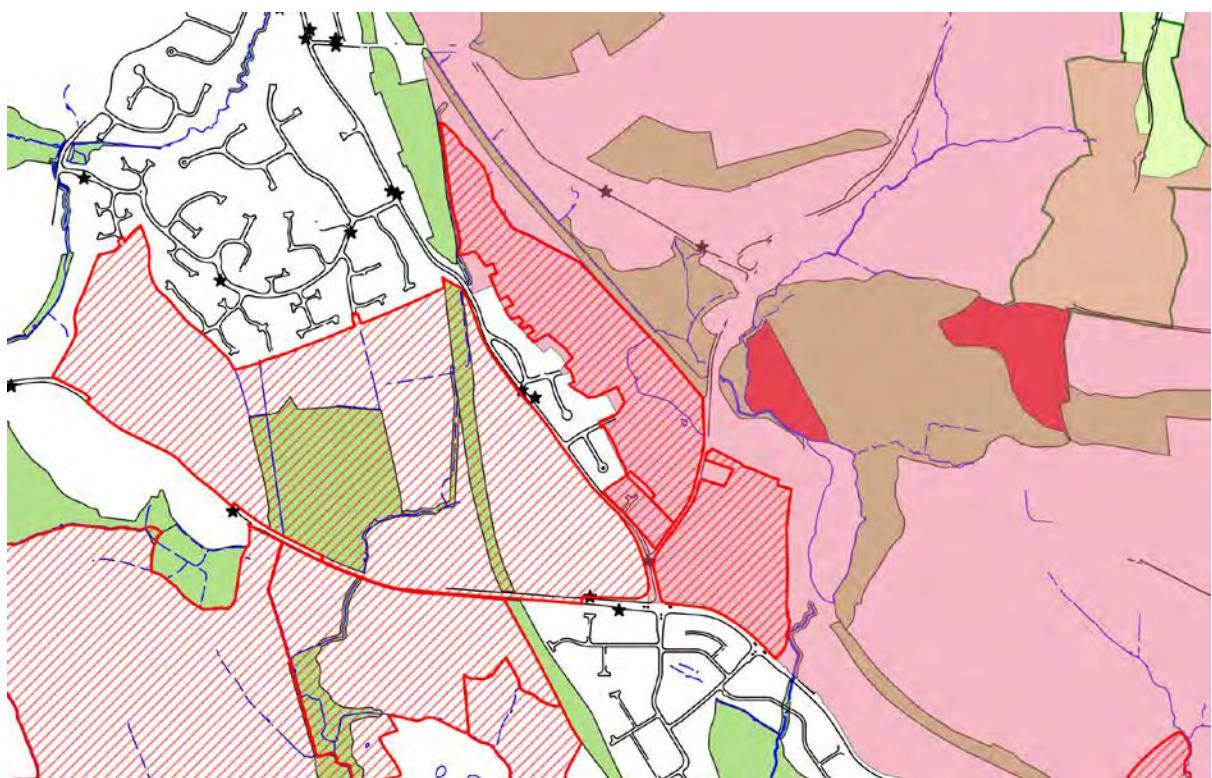
	1885m ancient monument
Conservation area	794m
Archaeologically sensitive area	1672m
Employment	
Open space	About 1/3 of site proposed
Previously developed land	Greenfield
Agricultural land quality	Grade 2
Special Landscape Area	4.3km
Water body	Stream on N boundary of site
Flooding	<p>&lt;10% surface water flooding on N edge of site</p> 

#### Sustainability constraints:

- Greenfield
- Grade 2 agricultural land

**Land off Brummel Drive, Creigiau / 20**

10.5ha, residential



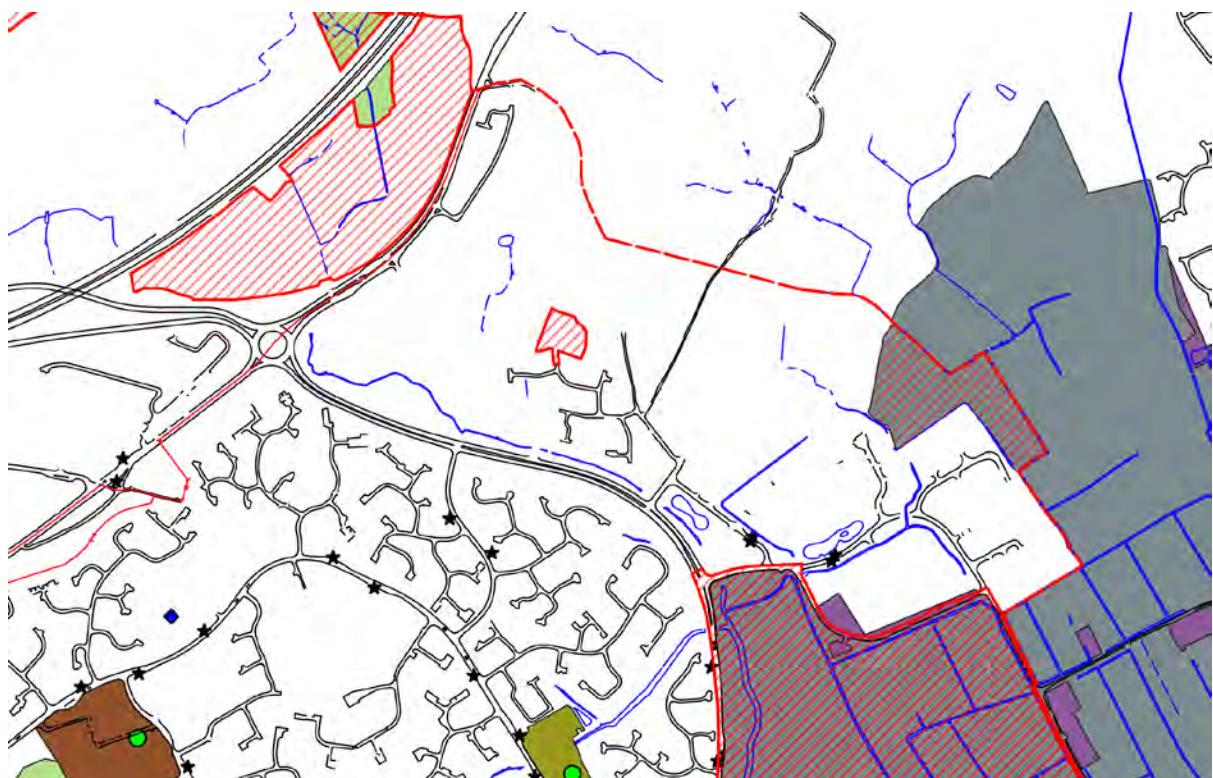
Welsh Index of Multiple Deprivation	1
Community facility	1161m primary school 4.9km secondary school 4.4km GP >5km health centre 4.6km allotments 4.5km hub From middle of the site, all except for primary school across M4 or railway line + River Taff No PRow
Housing	
Air Quality Management Area	>5km
Special Protection Area / Ramsar	>5km
Special Area of Conservation	2633m
Site of Special Scientific Interest	1941m
Local Nature Reserve	4.3km
Site of Importance for Nature Conservation	Adjacent two SINCs
Bus stop	178m
Train station	4.3km across River Taff
City/district centre	>5km to local centre >5km to district centre From middle of the site, across M4
Heritage asset	>5km historic landscape 53m historic parks & gardens 1833m ancient monument
Conservation area	483m
Archaeologically sensitive area	3.0km
Employment	
Open space	<10% proposed at N end
Previously developed land	Greenfield
Agricultural land quality	Grades 4 and 5
Special Landscape Area	Within SLA
Water body	Stream goes through site
Flooding	

#### Sustainability constraints:

- In Special Landscape Area
- Adjacent SINCs
- Flooding
- Far from existing services
- Greenfield
- Stream through site

Land off Clos Medwyn, Old St Mellons / 70

0.55ha, residential



Welsh Index of Multiple Deprivation	1
Community facility	860m primary school 2244m secondary school 1940m health centre 1051m GP 1618m allotments 1084m hub From middle of the site No PRoW
Housing	
Air Quality Management Area	>5km
Special Protection Area / Ramsar	3.1km
Special Area of Conservation	3.1km
Site of Special Scientific Interest	516m
Local Nature Reserve	4.6km
Site of Importance for Nature Conservation	462m
Bus stop	372
Train station	>5km
City/district centre	674m to local centre 1014m to district centre From middle of the site
Heritage asset	606m historic landscape

	2308m historic parks & gardens 2346m ancient monument
Conservation area	1372m
Archaeologically sensitive area	516m
Employment	
Open space	None proposed
Previously developed land	Greenfield
Agricultural land quality	Urban
Special Landscape Area	1625m
Water body	186m
Flooding	No flooding

**Sustainability constraints:**

- Greenfield

## Land off Forest Road, Tongwynlais / 84

7ha, include within settlement boundary



Welsh Index of Multiple Deprivation	1
Community facility	1028m primary school 3.2km secondary school 2.8km health centre 970m GP 2.8m allotments 4.1km hub From middle of the site No PRoWs on site, though one runs near/on N edge
Housing	
Air Quality Management Area	4.9km
Special Protection Area / Ramsar	>5km
Special Area of Conservation	Adjacent
Site of Special Scientific Interest	Adjacent
Local Nature Reserve	Adjacent
Site of Importance for Nature Conservation	About 20% of site is SINC
Bus stop	521m from centre of site, 30m from S end of site
Train station	1401m
City/district centre	2.8km to local centre 3.2km to district centre From middle of the site
Heritage asset	>5km historic landscape 1559m historic parks & gardens 280m ancient monument
Conservation area	1587m

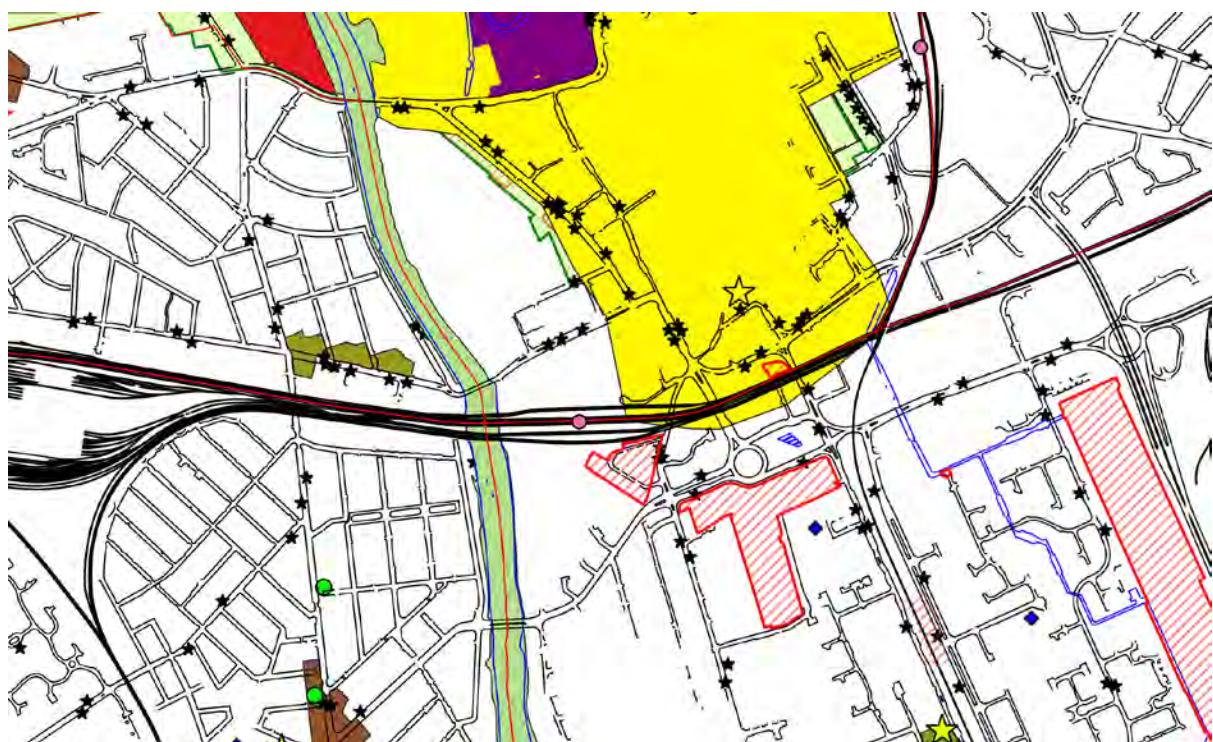
Archaeologically sensitive area	4.8km
Employment	
Open space	>50% proposed
Previously developed land	Greenfield
Agricultural land quality	Mostly grade 5, some grade 3b and 4
Special Landscape Area	Within SLA
Water body	Adjacent stream on N end, stream runs through S end
Flooding	<p>&lt;10% surface water flooding</p> 

**Sustainability constraints:**

- In Special Landscape Area
- In SINC
- Greenfield
- Far from most existing services
- Streams

## Land south of Cardiff Central Station (Car Park) / 6

1ha, mixed use



Welsh Index of Multiple Deprivation	3
Community facility	352m primary school

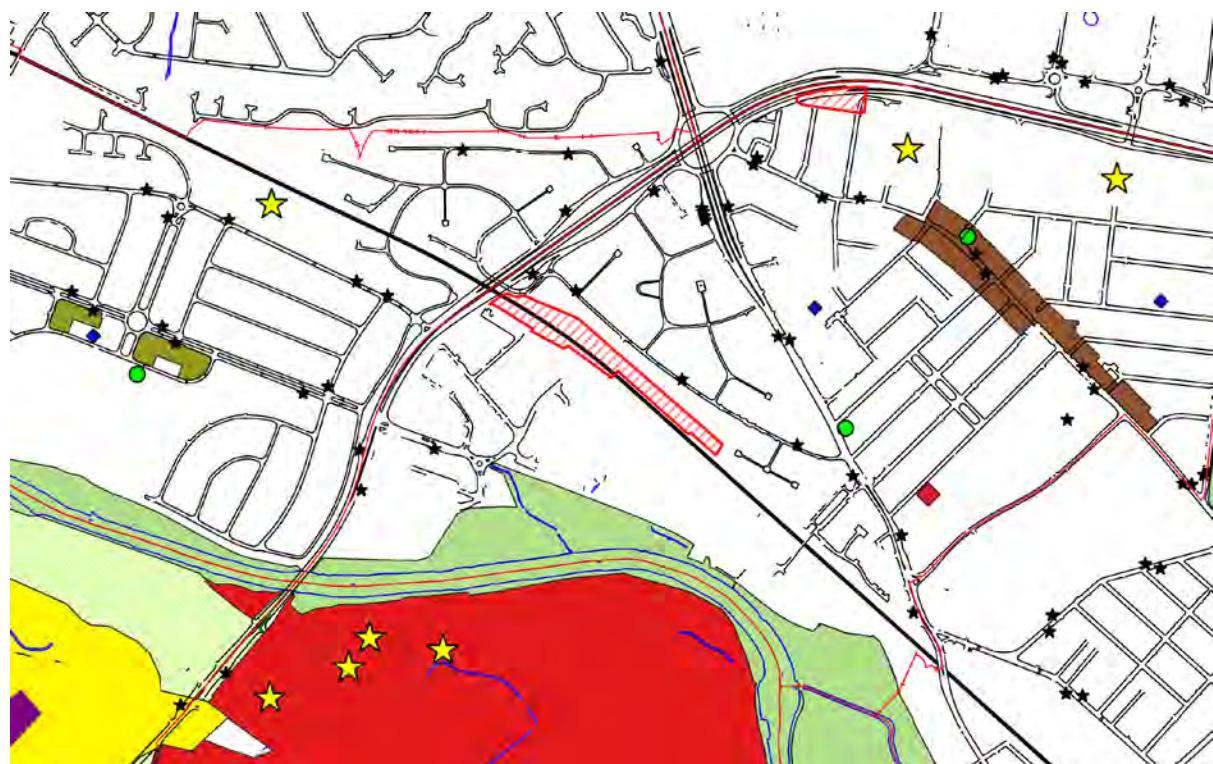
	2361m secondary school 1091m health centre 614m GP 1619m allotments 365m hub From middle of the site No PRow
Housing	
Air Quality Management Area	108m
Special Protection Area / Ramsar	2640m
Special Area of Conservation	2640m
Site of Special Scientific Interest	2640m
Local Nature Reserve	1327m
Site of Importance for Nature Conservation	148m
Bus stop	Bus stop on site
Train station	Adjacent
City/district centre	734m to local centre 715m to district centre From middle of the site
Heritage asset	4.5Km historic landscape 693m historic parks & gardens 693m ancient monument
Conservation area	102m
Archaeologically sensitive area	Adjacent at NE end
Employment	
Open space	None proposed
Previously developed land	Yes
Agricultural land quality	Urban
Special Landscape Area	4.0Km
Water body	148m River Taff
Flooding	

**Sustainability constraints:**

- Adjacent archaeologically sensitive area
- Nearby conservation area

## Land south of Mynachdy Road, Gabalfa / 30

1.83ha, new station and affordable homes



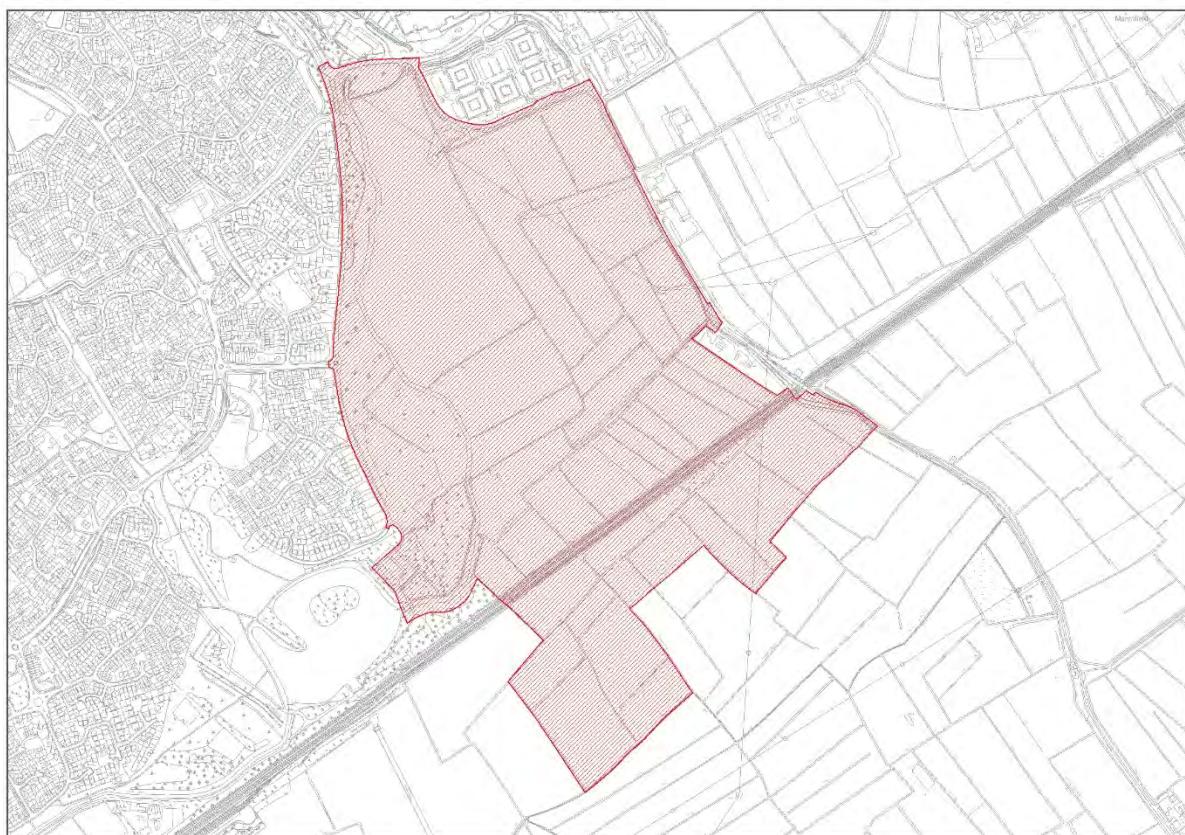
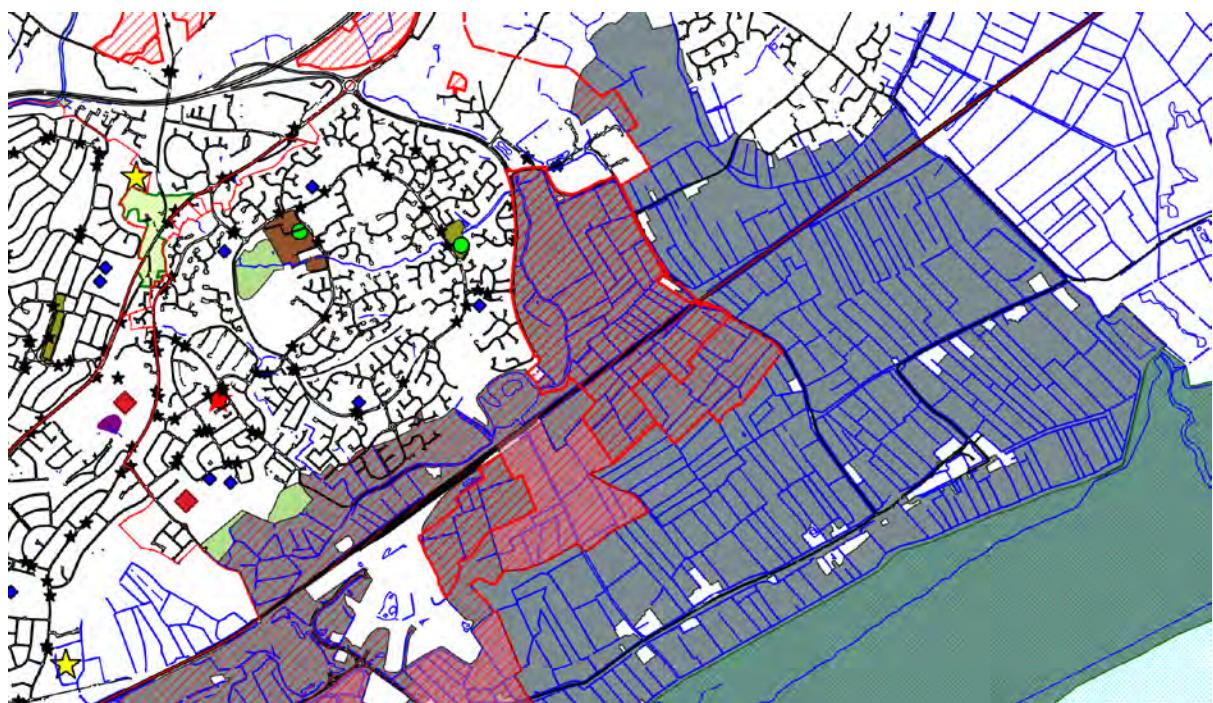
Welsh Index of Multiple Deprivation	1
Community facility	428m primary school 688m secondary school 3029m health centre 499m GP 683m allotments 1391m hub From middle of the site No PRoW
Housing	
Air Quality Management Area	1403m
Special Protection Area / Ramsar	>5km
Special Area of Conservation	4.9km
Site of Special Scientific Interest	4.9km
Local Nature Reserve	2961m
Site of Importance for Nature Conservation	235m
Bus stop	137m
Train station	2018m
City/district centre	746m to local centre 627m to district centre From middle of the site
Heritage asset	>5km historic landscape 225m historic parks & gardens 1212m ancient monument
Conservation area	721m
Archaeologically sensitive area	966m

Employment	
Open space	None proposed
Previously developed land	Yes
Agricultural land quality	Urban
Special Landscape Area	3.0Km
Water body	236m River Taff
Flooding	

**Sustainability constraints:** none

### Land south of St. Mellons Business Park: Hendre Lakes / 73

80.2ha, employment, transport hub and ancillary



Welsh Index of Multiple Deprivation	1
Community facility	664m primary school 2218m secondary school

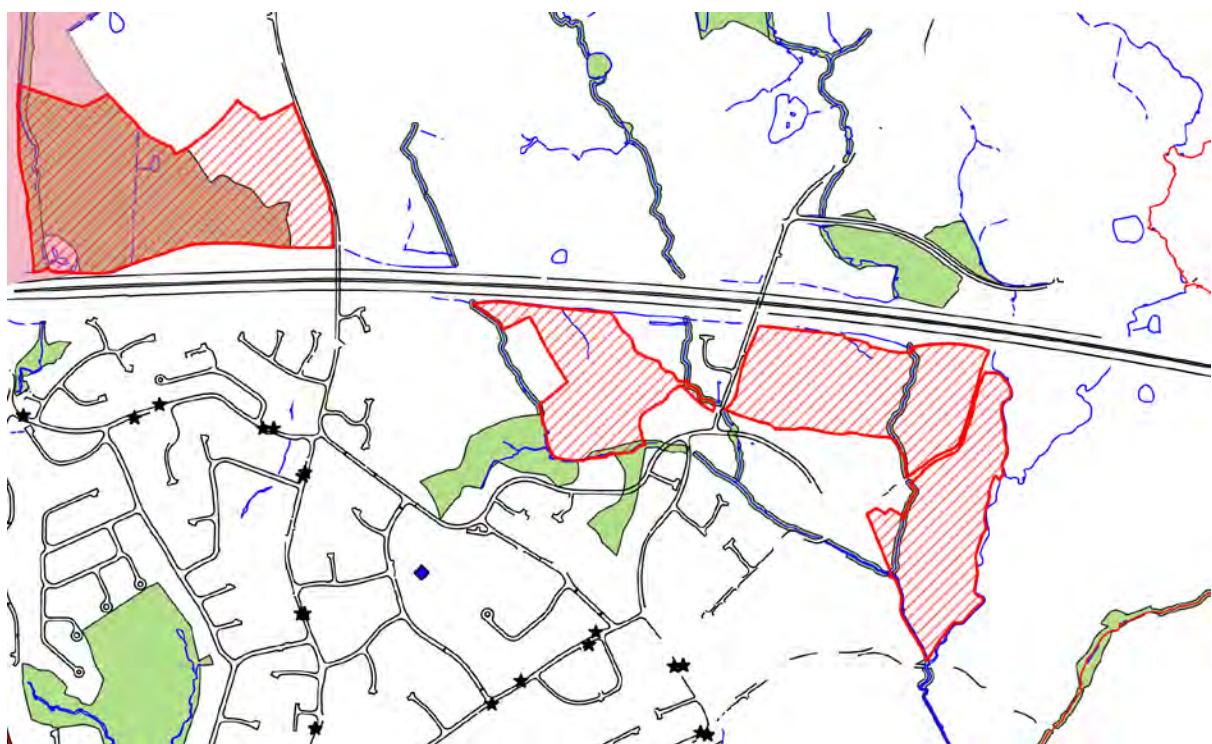
	1940m health centre 857m GP 2496m allotments 1448m hub From middle of the site PRoW crosses N end of site
Housing	
Air Quality Management Area	>5km
Special Protection Area / Ramsar	1033m
Special Area of Conservation	1033m
Site of Special Scientific Interest	Entirely in SSSI
Local Nature Reserve	4.7km
Site of Importance for Nature Conservation	Contains SINC
Bus stop	641m from centre of site, adjacent to N end of site
Train station	>5km but on railway
City/district centre	759m to local centre 1430m to district centre From middle of the site
Heritage asset	Within historic landscape 2825m historic parks & gardens 2268m ancient monument
Conservation area	1668m
Archaeologically sensitive area	Within ASA
Employment	
Open space	About 10% of site on NW end
Previously developed land	Greenfield
Agricultural land quality	Grade 2 S of railway, Grade 3b north of railway
Special Landscape Area	Adjacent SLA
Water body	Criss-crossed by reens/ditches
Flooding	

**Sustainability constraints:**

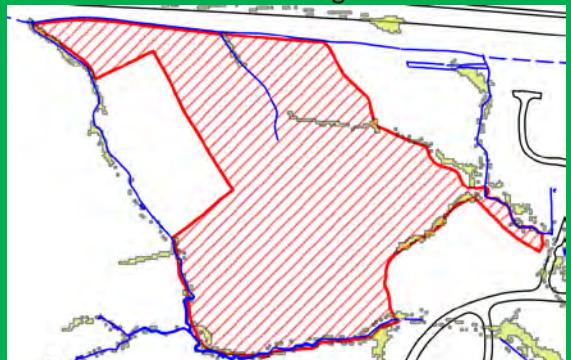
- In SSSI
- In historic landscape
- In Archaeologically sensitive area
- In SINC
- Adjacent Special Landscape Area
- Possible indirect impact on SPA/SAC through changes in hydrology and water quality
- Greenfield
- Footpath
- Grade 2 agricultural land
- Reens/ditches

Land to the south of the M4 motorway, West of Rudry Road, Lisvane / 33

4.995ha, residential



Welsh Index of Multiple Deprivation	1
Community facility	<p>471m primary school</p> <p>1950m secondary school</p> <p>2096m health centre</p> <p>1975m GP</p> <p>1539m allotments</p> <p>2166m hub</p> <p>From middle of the site</p> <p>No PRoW</p>
Housing	
Air Quality Management Area	>5km
Special Protection Area / Ramsar	>5km
Special Area of Conservation	>5km
Site of Special Scientific Interest	1280m
Local Nature Reserve	4.1km
Site of Importance for Nature Conservation	<10% of S edge of site is SINC
Bus stop	455m
Train station	1107m
City/district centre	<p>2170m to local centre</p> <p>1745m to district centre</p> <p>From middle of the site</p>
Heritage asset	<p>&gt;5km historic landscape</p> <p>859m historic parks &amp; gardens</p> <p>1912m ancient monument</p>
Conservation area	3.1km
Archaeologically sensitive area	>5km

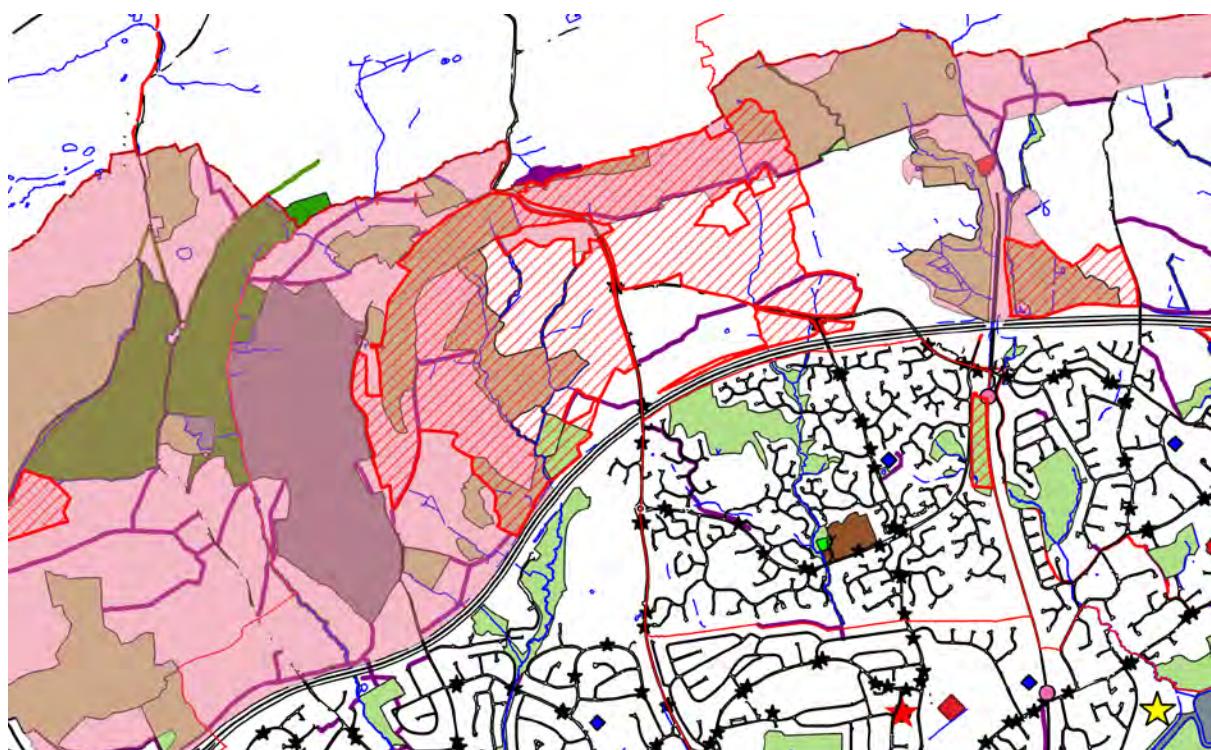
Employment	
Open space	<10% SINC area proposed as open space
Previously developed land	Greenfield
Agricultural land quality	Grade 2
Special Landscape Area	349m
Water body	SINC stream runs on S edge of site, other stream/ditch on N end
Flooding	<p>&lt;10% surface water flooding</p> 

#### Sustainability constraints:

- Far from existing services
- Greenfield
- Grade 2 agricultural land
- Adjacent SINC
- streams

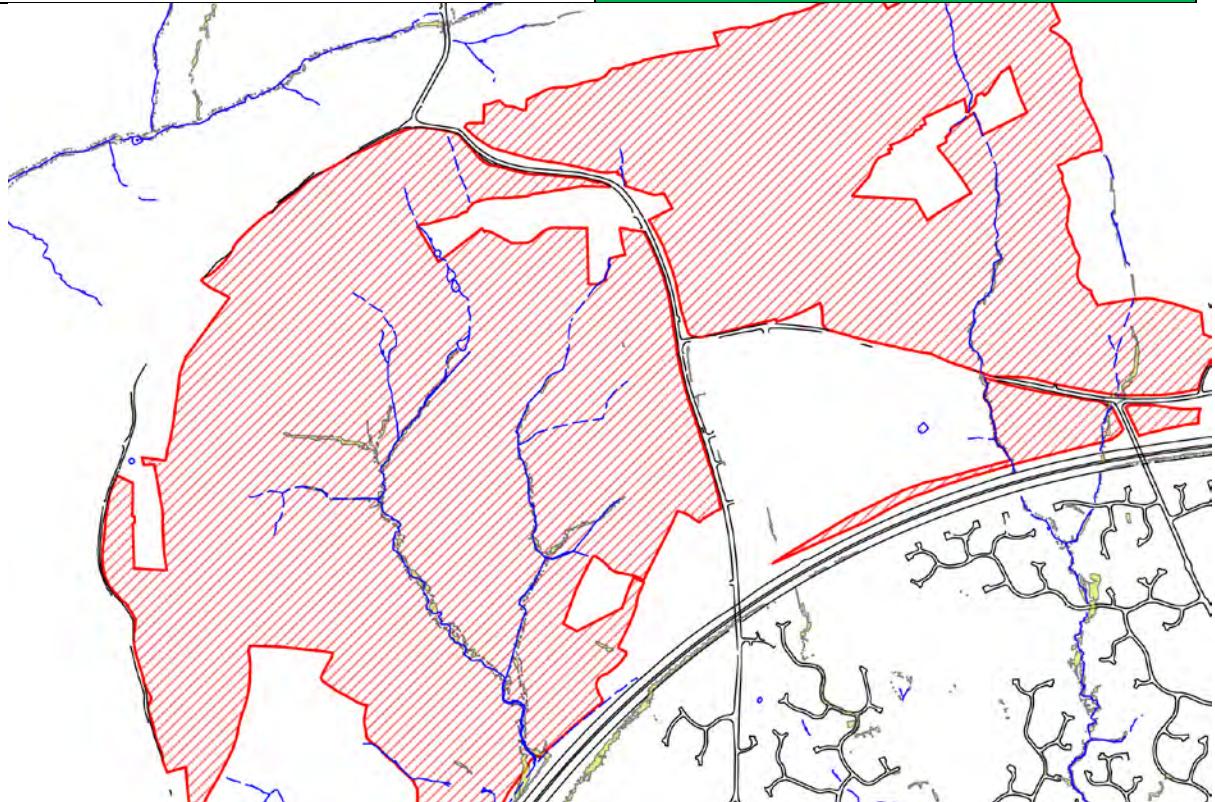
Land to the east and west of Thornhill Road and to the north and south of Capel Gwilym Road / 62

164ha, residential led mixed use development



Welsh Index of Multiple Deprivation	1
Community facility	1479m primary school 2411m secondary school 2303m health centre 1529m GP 3053m allotments 2630m hub From middle of the site, all across the M4 Several PRoWs cross site
Housing	
Air Quality Management Area	>5km
Special Protection Area / Ramsar	>5km
Special Area of Conservation	553m
Site of Special Scientific Interest	Adjacent
Local Nature Reserve	530m
Site of Importance for Nature Conservation	About 30% of site is SINC
Bus stop	148m
Train station	1724m across M4 for bulk of site, adjacent rail station for small SE component
City/district centre	2670m to local centre 1482m to district centre From middle of the site, across the M4
Heritage asset	>5km historic landscape 234m historic parks & gardens ancient monument on N end of site
Conservation area	1601m

Archaeologically sensitive area	4650m
Employment	
Open space	SINC area (approx. 30% of site) proposed
Previously developed land	Greenfield
Agricultural land quality	SINC land (approx.. 30%) is Grade NA, most of the rest is Grade 3a
Special Landscape Area	About 60% of site is in SLA
Water body	Stream on site
Flooding	<10% surface water flooding along streams, mostly on western part of site

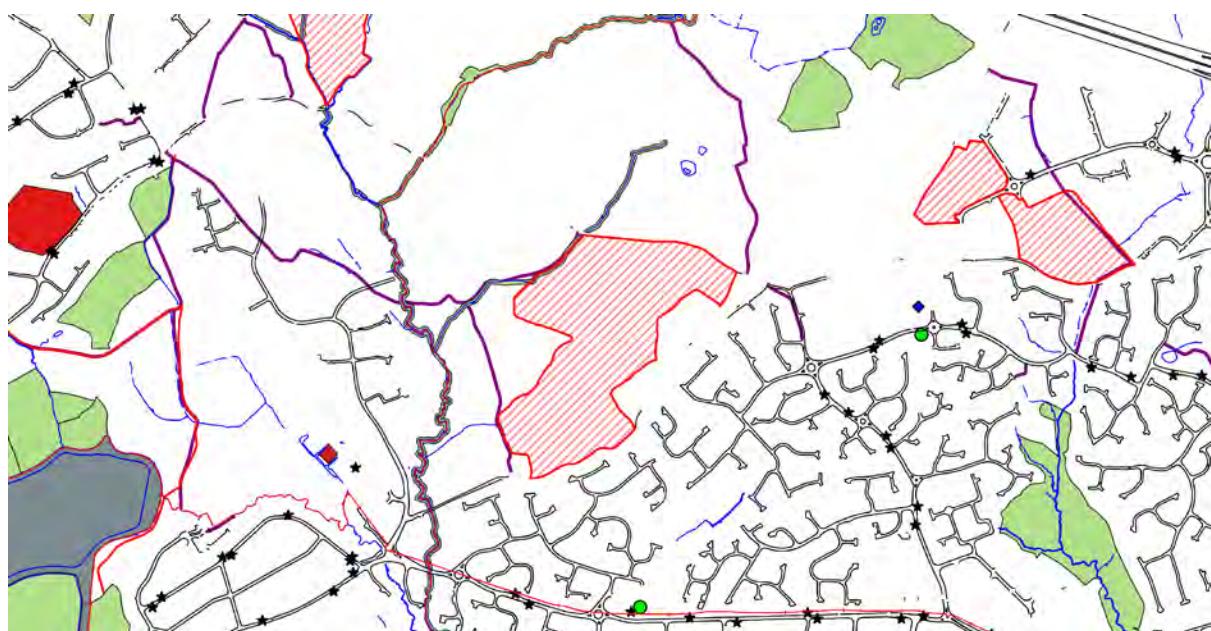


#### **Sustainability constraints:**

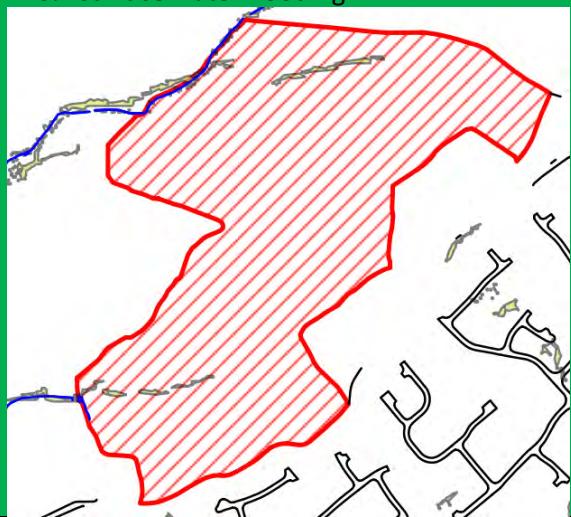
- In Special Landscape Area
- In SINC
- Far from existing services
- Greenfield
- Streams
- Footpaths

## Land to the north of Ty-Draw Road / 57

15.33ha, residential



Welsh Index of Multiple Deprivation	1
Community facility	<p>741m primary school      704m secondary school      2750m health centre      738m GP      1680m allotments      2574m hub</p> <p>From middle of the site      No PRoW</p>
Housing	
Air Quality Management Area	>5km
Special Protection Area / Ramsar	>5km
Special Area of Conservation	>5km
Site of Special Scientific Interest	806m
Local Nature Reserve	>5km
Site of Importance for Nature Conservation	SINC stream runs on N edge of site
Bus stop	654m
Train station	2101m
City/district centre	<p>2550m to local centre      2810m to district centre</p> <p>From middle of the site</p>
Heritage asset	<p>&gt;5km historic landscape      1300m historic parks &amp; gardens      1245 ancient monument</p>
Conservation area	2445m
Archaeologically sensitive area	3.5km
Employment	
Open space	None proposed

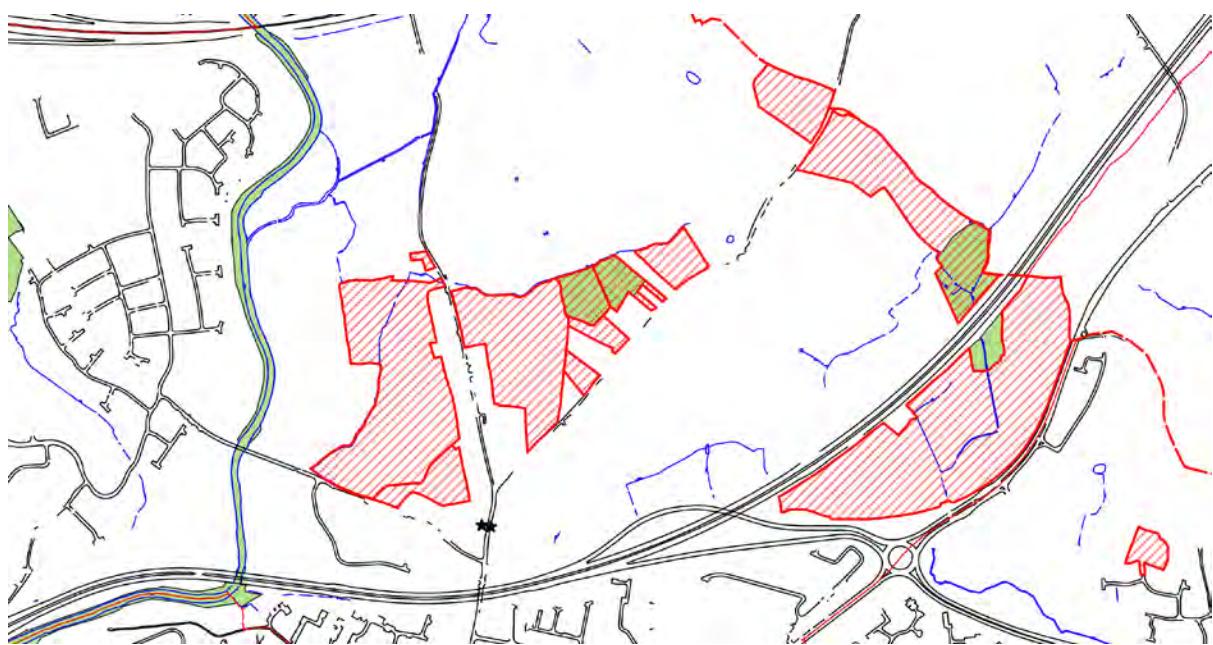
Previously developed land	Greenfield
Agricultural land quality	About half Grade 3a and half Grade 3b
Special Landscape Area	2030m
Water body	Adjacent NW edge
Flooding	<p>&lt;10% surface water flooding</p> 

**Sustainability constraints:**

- SINC stream
- Greenfield

Land to the rear of Charters, North of Druidstone Road / 58

0.68ha, residential



Welsh Index of Multiple Deprivation	1
Community facility	1145m primary school 2180m secondary school 2104m health centre 1358m GP 1120m allotments 1132m hub From middle of the site, All across A48(M) No PRoW
Housing	
Air Quality Management Area	>5km
Special Protection Area / Ramsar	4.0km
Special Area of Conservation	4.0km
Site of Special Scientific Interest	1608m
Local Nature Reserve	4.2km
Site of Importance for Nature Conservation	Most of the site is SINC
Bus stop	525m
Train station	>5km
City/district centre	1669m to local centre 1250m to district centre From middle of the site, across A48(M)
Heritage asset	1760m historic landscape 1065m historic parks & gardens 2205m ancient monument
Conservation area	1079m
Archaeologically sensitive area	1688m
Employment	
Open space	Approx 10% of site proposed

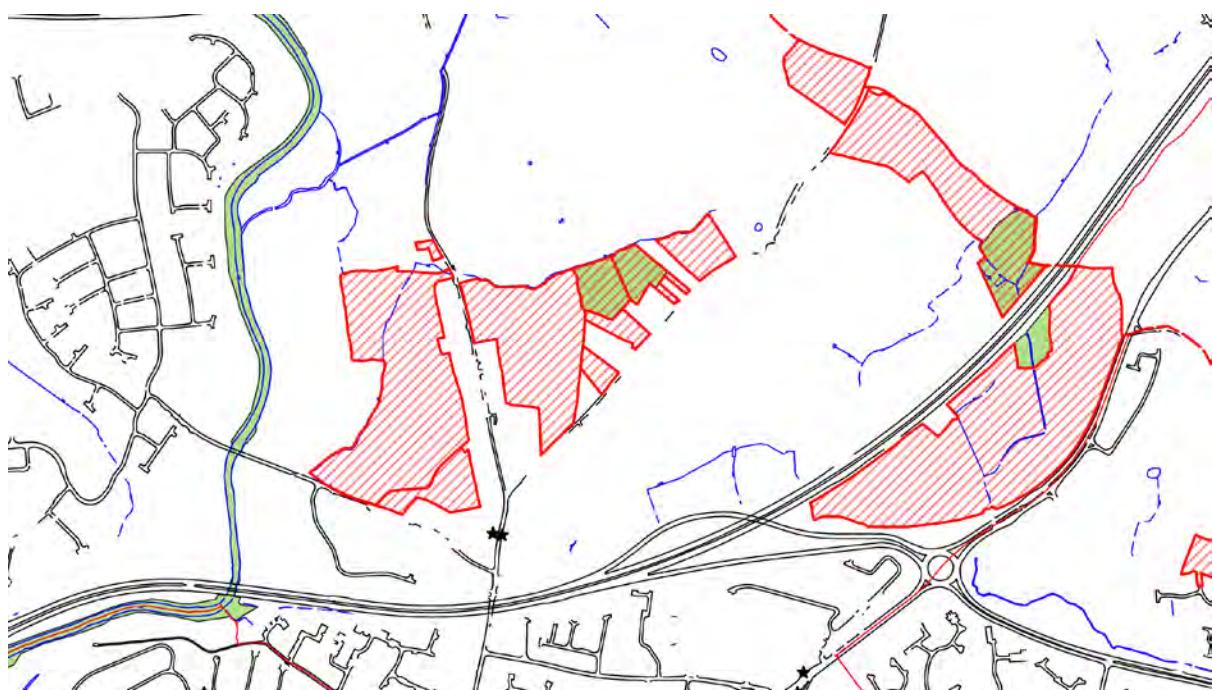
Previously developed land	Greenfield
Agricultural land quality	Grade 2
Special Landscape Area	2588m
Water body	Adjacent, N of site
Flooding	<p>&lt;10% surface water flooding on N edge of site</p> 

**Sustainability constraints:**

- In SINC
- Far from existing services
- Greenfield
- Grade 2 agricultural land
- Stream

Land to the rear of Mainbrace, Druidstone Road / 59

0.9ha, residential



Welsh Index of Multiple Deprivation	1
Community facility	<p>1151m primary school</p> <p>2095m secondary school</p> <p>2084m health centre</p> <p>1340m GP</p> <p>1050m allotments</p> <p>1637m hub</p> <p>From middle of the site, all across A48(M) No PRoW</p>
Housing	
Air Quality Management Area	>5km
Special Protection Area / Ramsar	4.1km
Special Area of Conservation	4.1km
Site of Special Scientific Interest	1692m
Local Nature Reserve	4.2m
Site of Importance for Nature Conservation	Entirely SINC
Bus stop	523m
Train station	>5km
City/district centre	<p>1731m to local centre</p> <p>1231m to district centre</p> <p>From middle of the site, across A48(M)</p>
Heritage asset	<p>1829m historic landscape</p> <p>1053m historic parks &amp; gardens</p> <p>2155m ancient monument</p>
Conservation area	1038m
Archaeologically sensitive area	1717m
Employment	
Open space	About half of site proposed

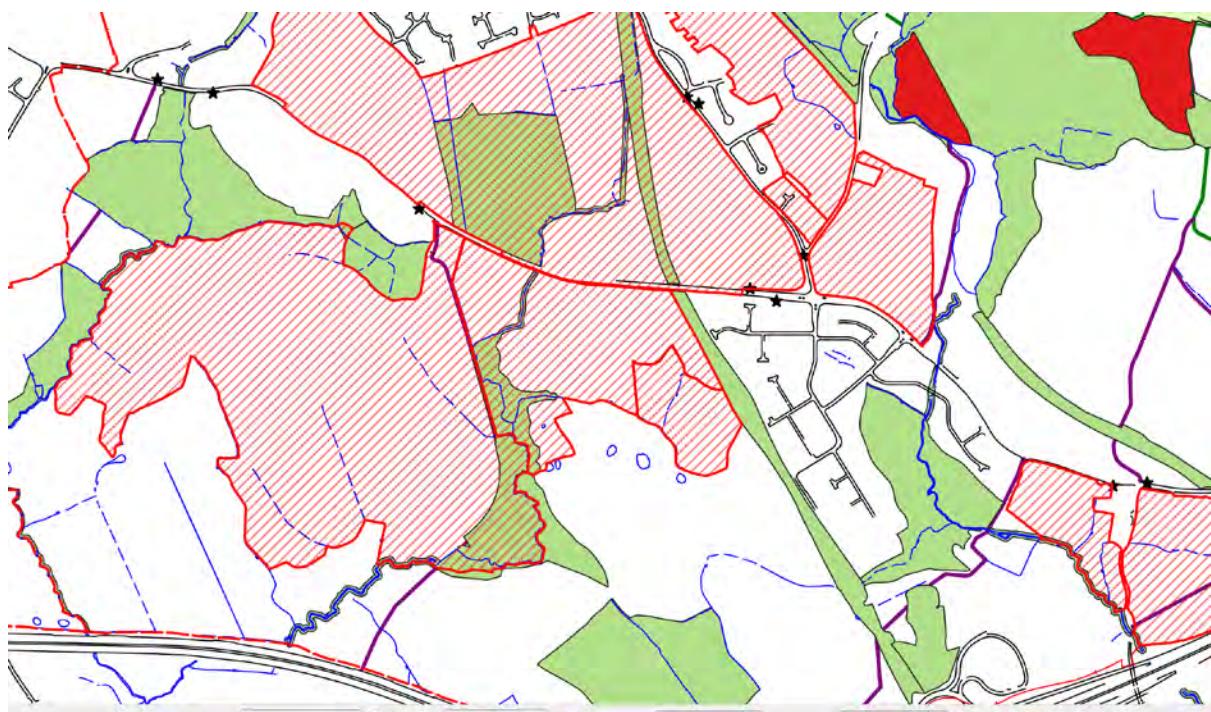
Previously developed land	Greenfield
Agricultural land quality	Grade 2
Special Landscape Area	4.3km
Water body	Stream adjacent to N of site
Flooding	<p>&lt;10% surface water flooding on N edge of site</p> 

#### Sustainability constraints:

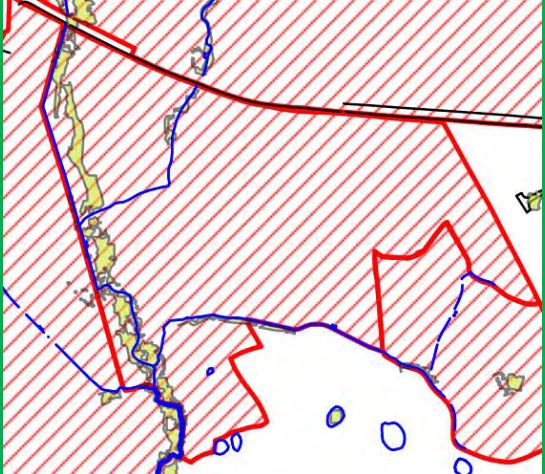
- In SINC
- Far from existing services
- Greenfield
- Grade 2 agricultural land
- Stream

## Land to the south of Llantrisant Road (Part of Site D) / 19

13ha, residential



Welsh Index of Multiple Deprivation	1
Community facility	1342m primary school >5km secondary school >5km health centre 4.8km GP 5.0km allotments >5km hub From middle of the site, all except primary school across M4 or river + railway No PRoW
Housing	
Air Quality Management Area	>5km
Special Protection Area / Ramsar	>5km
Special Area of Conservation	3.1km
Site of Special Scientific Interest	1945m
Local Nature Reserve	4.7km
Site of Importance for Nature Conservation	About 20% of site on SW end is SINC
Bus stop	390m
Train station	4.9km
City/district centre	>5km to local centre >5km to district centre From middle of the site
Heritage asset	>5km historic landscape 583m historic parks & gardens 2240m ancient monument
Conservation area	965m

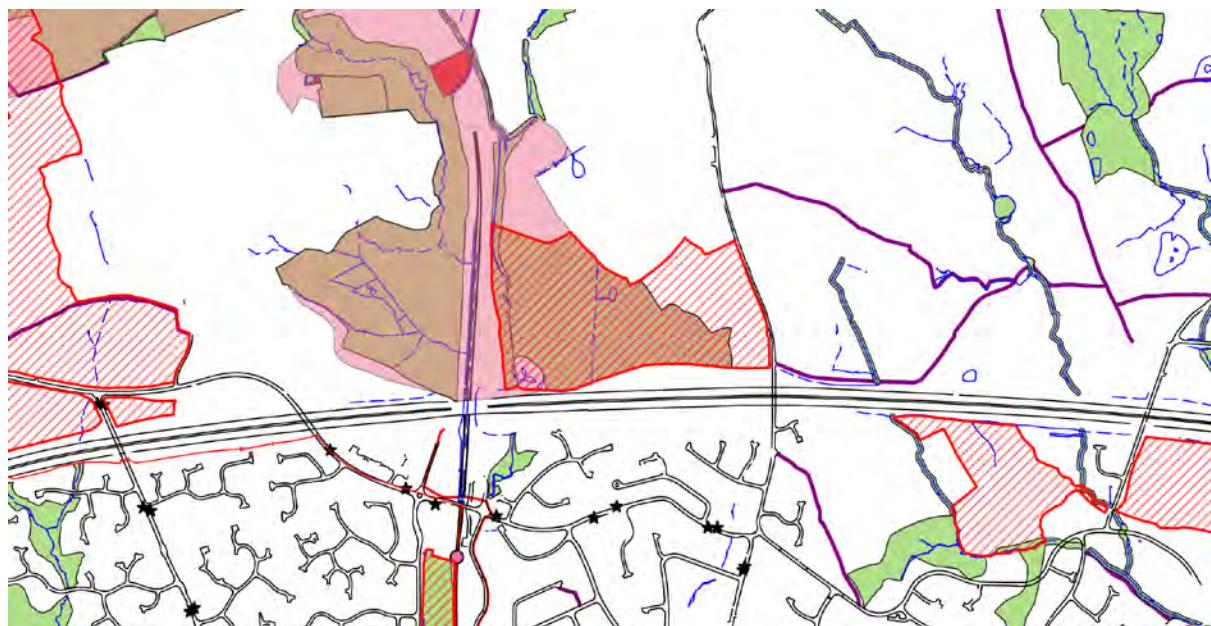
Archaeologically sensitive area	2830m
Employment	
Open space	20% SINC proposed as open space
Previously developed land	Greenfield
Agricultural land quality	Grade 3b except for approx. 20% SINC (grade 5)
Special Landscape Area	264m
Water body	Stream cuts through site
Flooding	<p>&lt;10% surface water flooding</p> 

**Sustainability constraints:**

- In SINC
- Far from existing services
- Greenfield
- Stream

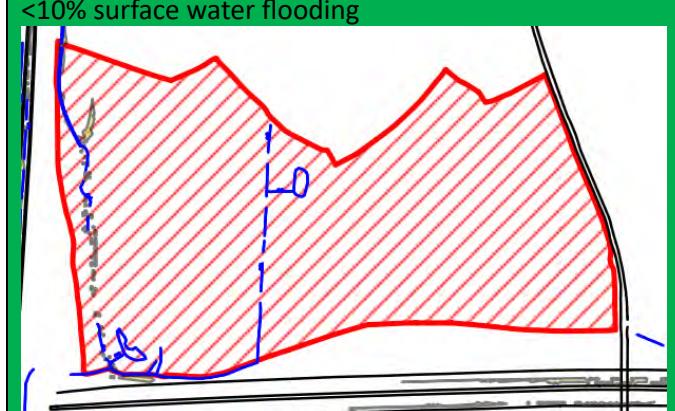
## Land to the west of Graig Road and north of the M4 / 35

13.2ha, residential



Welsh Index of Multiple Deprivation	1
Community facility	828m primary school 1868m secondary school 1949m health centre 1498m GP 1841m allotments 2138m hub From middle of the site, all across M4 No PRoW
Housing	
Air Quality Management Area	>5km
Special Protection Area / Ramsar	>5km
Special Area of Conservation	4.5km
Site of Special Scientific Interest	1684m
Local Nature Reserve	3.2km
Site of Importance for Nature Conservation	About 70% of site is SINC
Bus stop	373m across M4
Train station	>5km
City/district centre	2117m to local centre 1273m to district centre From middle of the site, across M4
Heritage asset	>5km historic landscape 278m historic parks & gardens 1810m ancient monument
Conservation area	3.3km
Archaeologically sensitive area	>5km
Employment	
Open space	70% SINC component proposed as open space
Previously developed land	Greenfield

Agricultural land quality	About 85% Grade 3a, most of rest 3b
Special Landscape Area	About 70% of site (the SINC component) in SLA
Water body	Two streams/ditches pass through site
Flooding	<10% surface water flooding

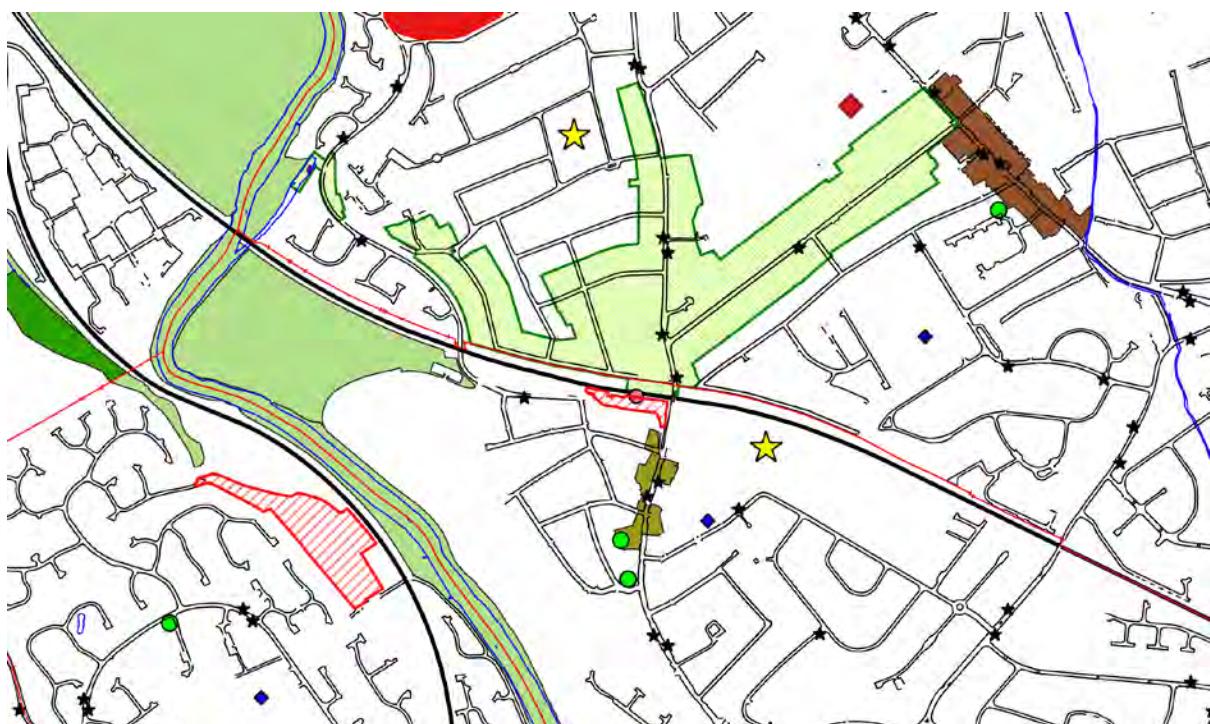


#### Sustainability constraints:

- In Special Landscape Area
- In SINC
- Far from many existing services
- Greenfield
- Streams/ditches

## Llandaff Station car park / 39

0.45ha, reconfiguration of car park to deliver transport measures and employment/residential



Welsh Index of Multiple Deprivation	1
Community facility	<p>260m primary school</p> <p>686m secondary school</p> <p><b>2143m health centre</b></p> <p>258m GP</p> <p>257m allotments</p> <p>884m hub</p> <p>From middle of the site</p> <p>No PRoW</p>
Housing	
Air Quality Management Area	1261m
Special Protection Area / Ramsar	>5km
Special Area of Conservation	3.2km
Site of Special Scientific Interest	3.2km
Local Nature Reserve	876m
Site of Importance for Nature Conservation	219m
Bus stop	83m
Train station	At site
City/district centre	<p>60m to local centre</p> <p>774m to district centre</p> <p>From middle of the site</p>
Heritage asset	<p>&gt;5km historic landscape</p> <p>712m historic parks &amp; gardens</p> <p>1531m ancient monument</p>
Conservation area	11m across railway line

Archaeologically sensitive area	1215m
Employment	
Open space	None proposed
Previously developed land	Built up
Agricultural land quality	Urban
Special Landscape Area	2785m
Water body	439m River Taff
Flooding	

**Sustainability constraints:**

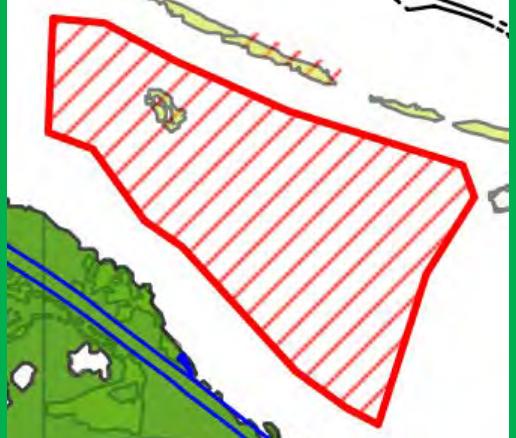
- Adjacent conservation area

## Northern Meadows / 77

9.3ha, community greenspace



Welsh Index of Multiple Deprivation	4
Community facility	273m primary school 1295m secondary school 3.6km health centre 737m GP 838m allotments 2351m hub From middle of the site PRoWs run through site
Housing	
Air Quality Management Area	2580m
Special Protection Area / Ramsar	>5km
Special Area of Conservation	1562m
Site of Special Scientific Interest	1562m
Local Nature Reserve	Adjacent on 2 long sides
Site of Importance for Nature Conservation	Entire site is SINC
Bus stop	183m
Train station	501m
City/district centre	995m to local centre, across River Taff 1415m to district centre From middle of the site
Heritage asset	>5km historic landscape 76m historic parks & gardens 1413m ancient monument
Conservation area	828m
Archaeologically sensitive area	2581m
Employment	
Open space	100% open space proposed
Previously developed land	Greenfield

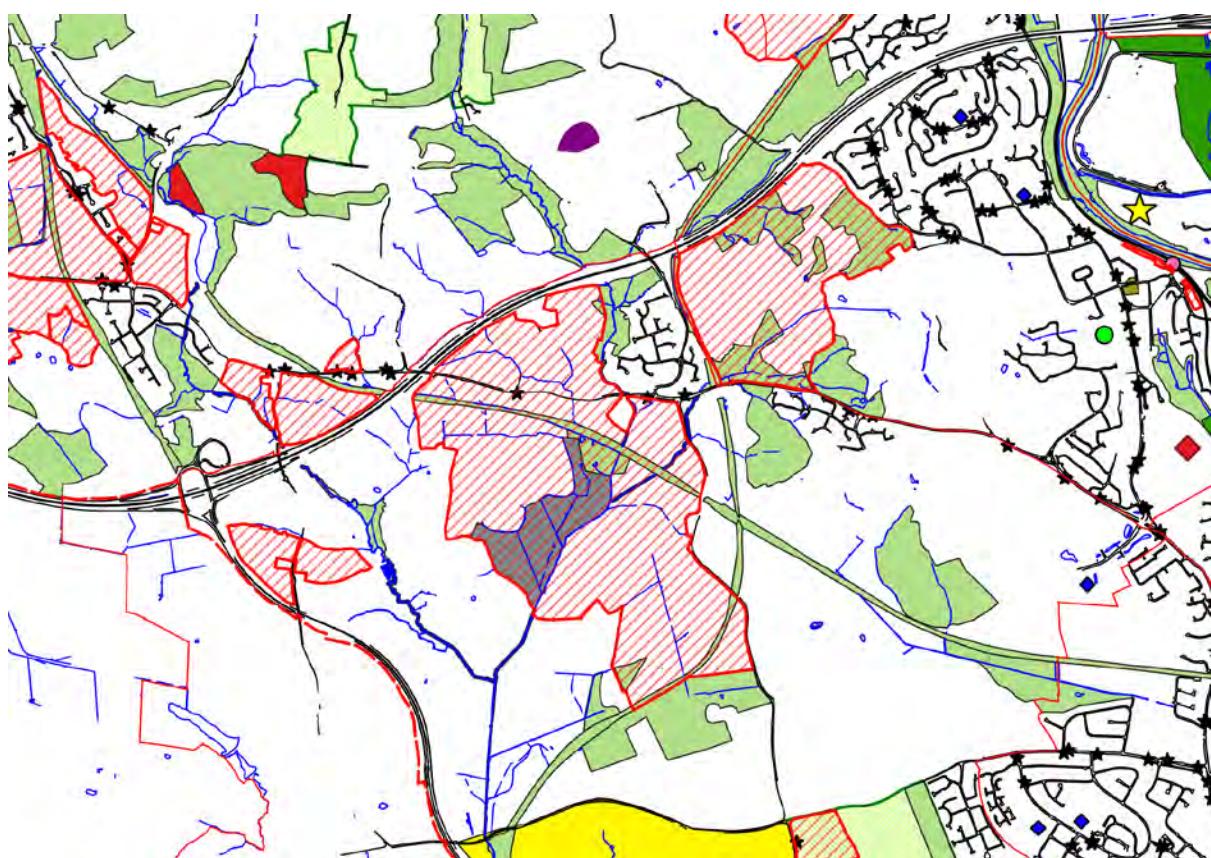
Agricultural land quality	Grade 5
Special Landscape Area	1890m
Water body	48m stream
Flooding	<p>&lt;10% surface water flooding</p> 

**Sustainability constraints:**

- In SINC
- Adjacent Local Nature Reserve
- Greenfield
- Stream nearby
- Footpaths

## Plasdwr Uchaf / 23

144ha, residential led, mixed use



Welsh Index of Multiple Deprivation	1
Community facility	2286m primary school 2635m secondary school 3.6km health centre 2346m GP 2710m allotments 3.7km hub From middle of the site Several PRoWs on site
Housing	
Air Quality Management Area	3.4km
Special Protection Area / Ramsar	>5m
Special Area of Conservation	2194m
Site of Special Scientific Interest	About 15% of site is SSSI
Local Nature Reserve	2351m
Site of Importance for Nature Conservation	About 5-10% of site is SINC
Bus stop	Bus stop inside site
Train station	2755m
City/district centre	3.6km to local centre 4.5km to district centre From middle of the site
Heritage asset	>5km historic landscape 890m historic parks & gardens

	608m ancient monument
Conservation area	690m
Archaeologically sensitive area	404m
Employment	
Open space	SSSI and SINC area (approx. 25% of site) proposed
Previously developed land	Greenfield
Agricultural land quality	About 75% Grade 3b, 25% Grade 2
Special Landscape Area	56m, across M4
Water body	Site is criss-crossed by multiple streams/ditches
Flooding	

**Sustainability constraints:**

- In SSSI
- In SINC
- Special Landscape Area across M4
- Far from existing services
- Greenfield
- Streams/ditches
- Footpaths

## Port of Cardiff / 9

289.25ha, port uses and mixed development



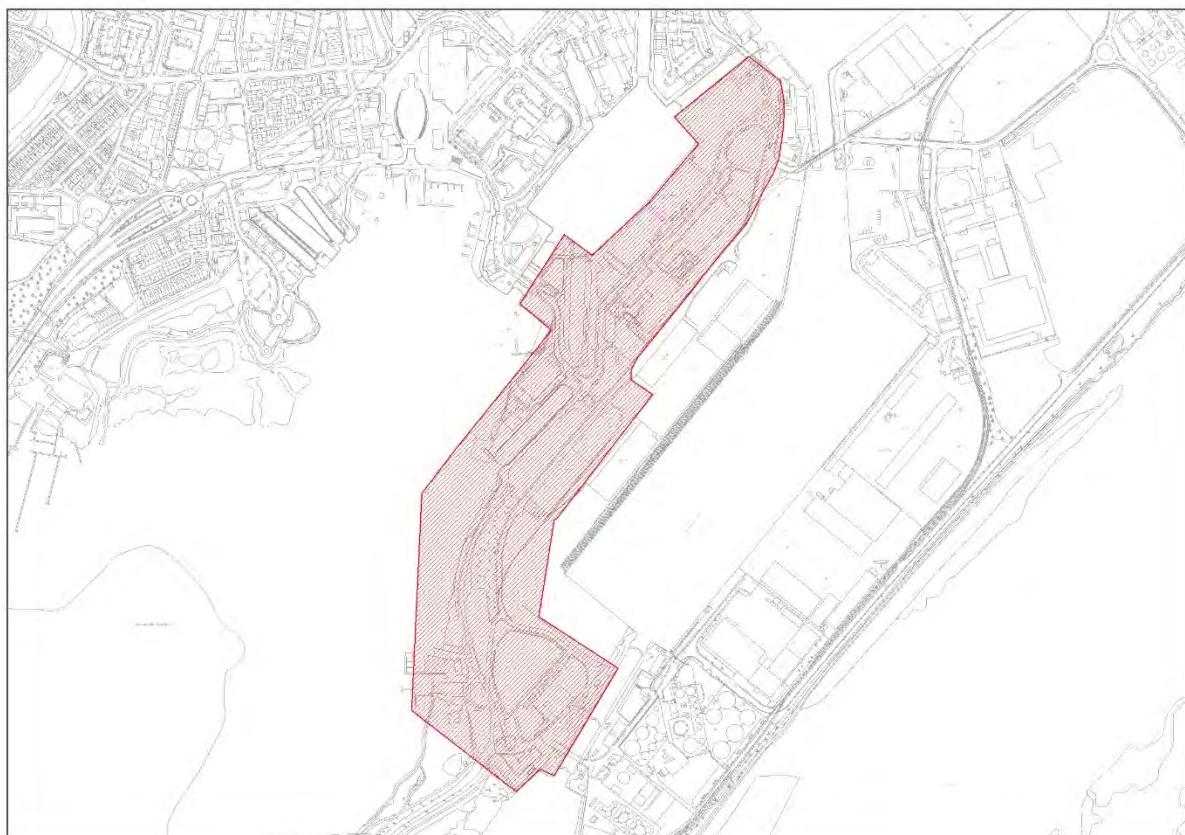
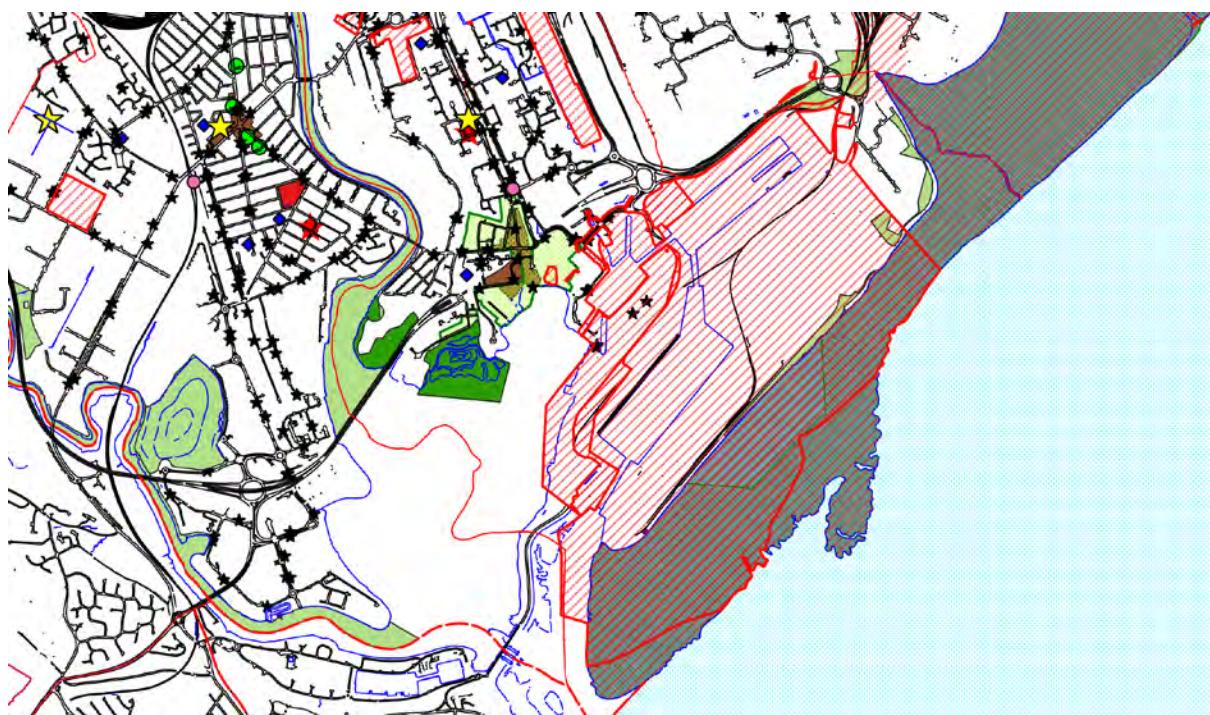
Welsh Index of Multiple Deprivation	1
Community facility	<p>1505m primary school</p> <p>2678m secondary school</p> <p>2265m health centre</p> <p>2647m GP</p> <p>3.6km allotments</p> <p>1747m hub</p> <p>From middle of the site. Large site, so many facilities are much closer to edge of site</p> <p>Coastal path crosses small part of site.</p>
Housing	
Air Quality Management Area	1859m
Special Protection Area / Ramsar	25-30% of site is SPA
Special Area of Conservation	About 1/3 of site is SAC
Site of Special Scientific Interest	About 1/3 of site is SSSI
Local Nature Reserve	394m
Site of Importance for Nature Conservation	SINC within site
Bus stop	Several within the site
Train station	1352m. Railway line runs through site
City/district centre	<p>2240m to local centre</p> <p>1093m to district centre</p> <p>From middle of the site. Closer to edge of site</p>
Heritage asset	<p>3.2km historic landscape</p> <p>1529m historic parks &amp; gardens</p> <p>small ancient monument within site</p>
Conservation area	96m
Archaeologically sensitive area	1540m
Employment	
Open space	None proposed
Previously developed land	About half PDL and half not. Most of remaining is foreshore.
Agricultural land quality	Half urban, about 10% Grade 4, the rest is foreshore.
Special Landscape Area	>5km
Water body	Encompasses estuary
Flooding	

#### Sustainability constraints:

- In SPA/SAC: HRA-related issues
- In SSSI
- On estuary / encompasses part of estuary
- Ancient monument on site
- Flooding
- Far from existing services
- Some greenfield land
- Coastal path

Porth Teigr and Alexandra Head / 4

27ha, mixed use



Welsh Index of Multiple Deprivation	1
Community facility	814m primary school 3.2km secondary school

	1583m health centre 2007m GP 3.1km allotments 1425m hub From middle of the site Coastal Path goes through site
Housing	
Air Quality Management Area	1912m
Special Protection Area / Ramsar	295m
Special Area of Conservation	295m
Site of Special Scientific Interest	295m
Local Nature Reserve	231m
Site of Importance for Nature Conservation	231m
Bus stop	Two bus stops within site
Train station	994m
City/district centre	2647m to local centre 546m to district centre From middle of the site
Heritage asset	4.5km historic landscape 1598m historic parks & gardens 265m ancient monument
Conservation area	172m
Archaeologically sensitive area	1915m
Employment	
Open space	Estuary and foreshore proposed, approx. 20% of site
Previously developed land	About 80% PDL, rest estuary/foreshore
Agricultural land quality	About 80% urban, 2% Grade 4
Special Landscape Area	>5km
Water body	Estuary and ditches within site
Flooding	

**Sustainability constraints:**

- Flooding
- Far from most existing services
- Near SPA/SAC/SSSI – possible HRA-related issues
- Impacts on estuary/foreshore
- Ditches on site
- Coastal path goes through site

## Pengam Green: Proposed extension to Rover Way Gypsy and Traveller Site

### Gypsy and traveller site



Welsh Index of Multiple Deprivation	5
Community facility	401m primary school 254m secondary school (adjacent) <b>3007m health centre</b> 573m GP 881m allotments 648m hub From middle of the site
Housing	yes
Air Quality Management Area	1842km
Special Protection Area / Ramsar	563m
Special Area of Conservation	563m
Site of Special Scientific Interest	563m
Local Nature Reserve	1676m
Site of Importance for Nature Conservation	Entire site is SINC
Bus stop	313m

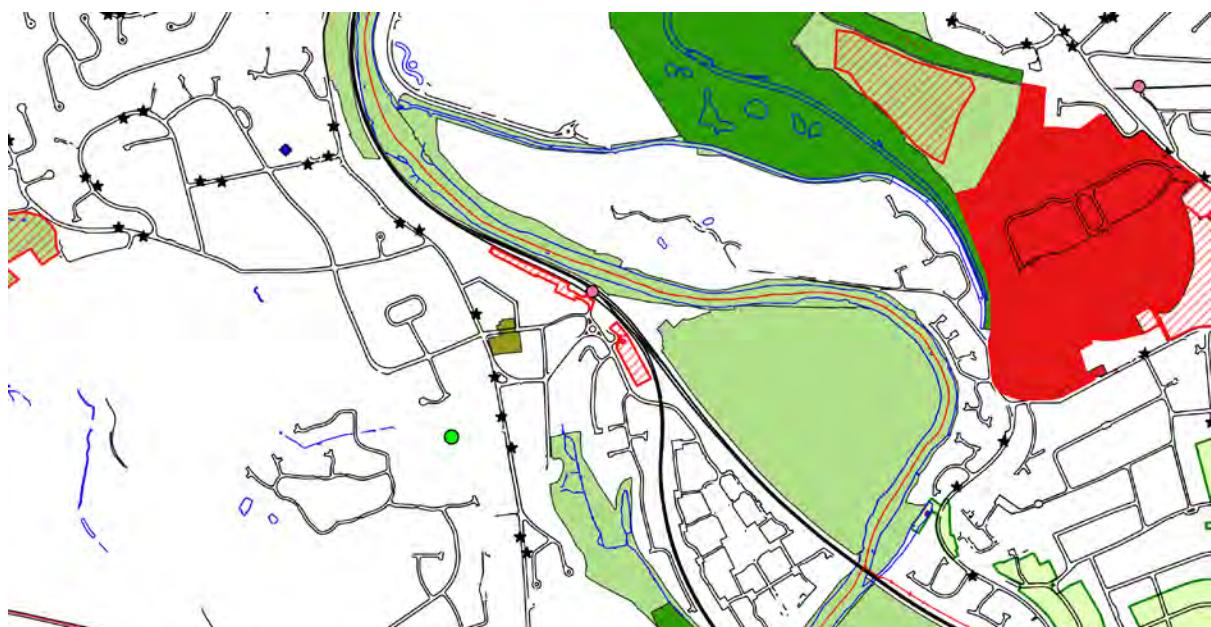
Train station	2566m
City/district centre	1160m to local centre 1573m to district centre
	From middle of the site
Heritage asset	1378m historic landscape 1601m historic parks & gardens 3.0km ancient monument
Conservation area	1551m
Archaeologically sensitive area	501m
Employment	
Open space	None proposed
Previously developed land	Previously developed
Agricultural land quality	Grade 4
Special Landscape Area	1633m
Water body	564m Rhymney River
Flooding	

**Sustainability constraints:**

- Entire site is SINC
- Within 1km of SPA/SAC/SSSI – may require HRA-related mitigation measures
- Greenfield

## Radyr Station car park / 60

0.93ha, reconfiguration of car park to deliver transport measures and employment/residential



Welsh Index of Multiple Deprivation	1
Community facility	<p>732m primary school</p> <p>811m secondary school</p> <p>4.4km health centre</p> <p>423m GP</p> <p>301m allotments</p> <p><b>2465m hub</b></p> <p>From middle of the site No PRow</p>
Housing	
Air Quality Management Area	2460m
Special Protection Area / Ramsar	>5km
Special Area of Conservation	1504m
Site of Special Scientific Interest	1504m
Local Nature Reserve	402m
Site of Importance for Nature Conservation	20m across railway, River Taff
Bus stop	250m
Train station	At train station
City/district centre	<p>164m to local centre</p> <p><b>1924m to district centre</b></p> <p>From middle of the site</p>
Heritage asset	<p>&gt;5km historic landscape</p> <p>788m historic parks &amp; gardens</p> <p>1377m ancient monument</p>
Conservation area	687m
Archaeologically sensitive area	2563m
Employment	
Open space	None proposed

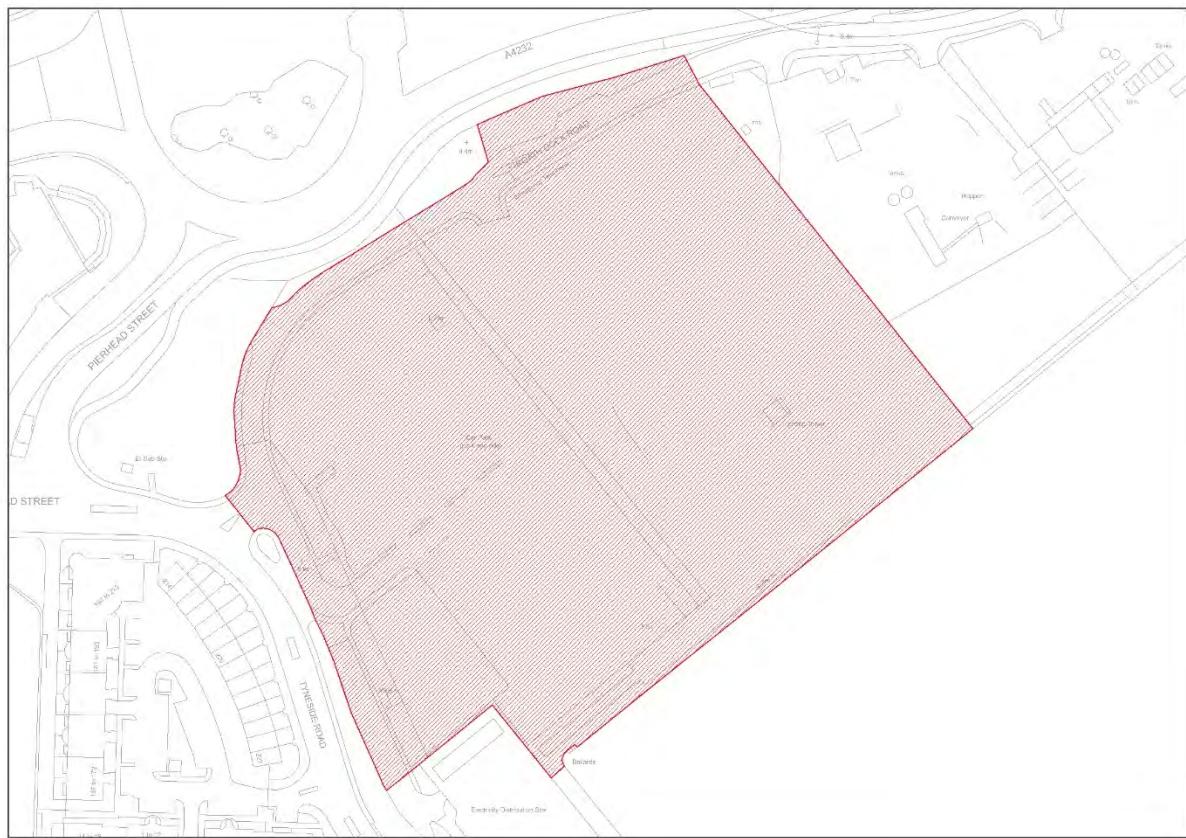
Previously developed land	Yes
Agricultural land quality	Urban
Special Landscape Area	1347m
Water body	20m across railway, River Taff
Flooding	<p>&lt;10% of site prone to surface water flooding</p> 

**Sustainability constraints:**

- SINC/River Taff across railway line

## Roath Dock North / 8

3.67ha, port uses and mixed development



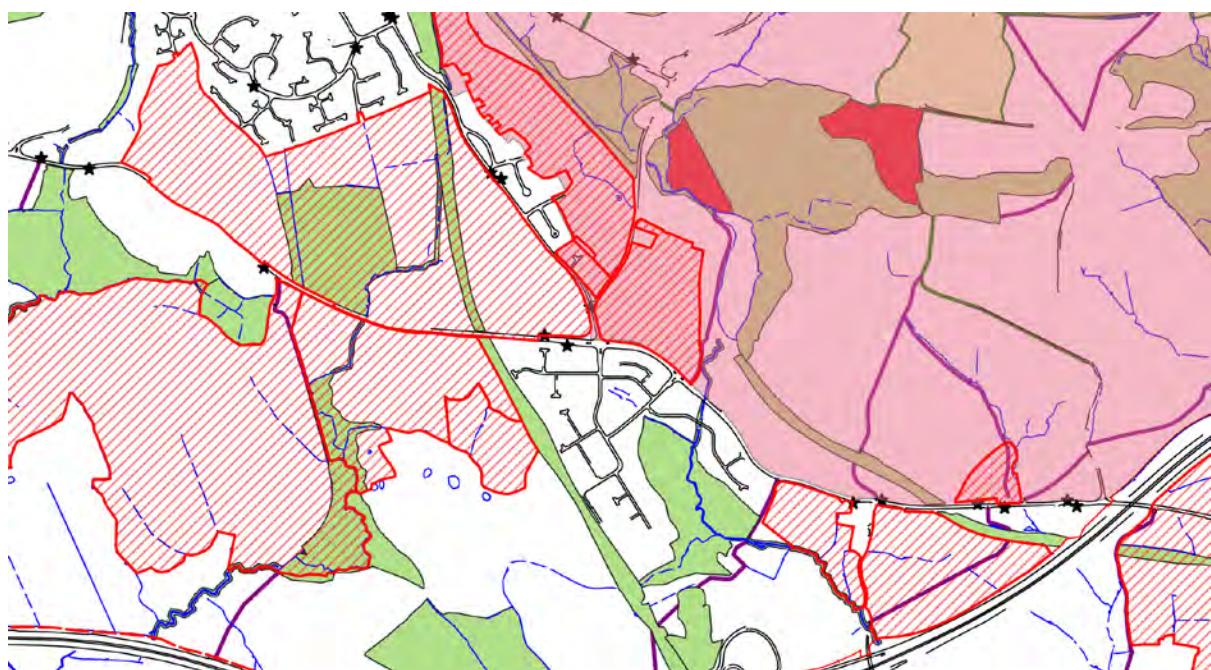
Welsh Index of Multiple Deprivation	1
Community facility	1050m primary school 2312m secondary school 1078m health centre 1732m GP 3.1km allotments 1087m hub From middle of the site No PRoW
Housing	
Air Quality Management Area	1764m
Special Protection Area / Ramsar	937m
Special Area of Conservation	937m
Site of Special Scientific Interest	937m
Local Nature Reserve	1010m
Site of Importance for Nature Conservation	893m
Bus stop	1175m
Train station	771m
City/district centre	1780m to local centre 392m to district centre From middle of the site
Heritage asset	4.0km historic landscape 1820m historic parks & gardens 1546m ancient monument
Conservation area	370m
Archaeologically sensitive area	1536m
Employment	
Open space	None proposed
Previously developed land	PDL
Agricultural land quality	Urban
Special Landscape Area	>5km
Water body	Adjacent dock
Flooding	

#### Sustainability constraints:

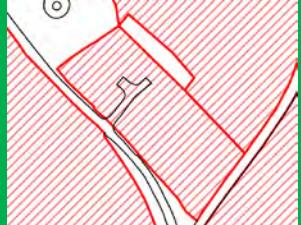
- Flooding

## Robin Hill, Creigiau / 15

0.4ha, residential



Welsh Index of Multiple Deprivation	1
Community facility	<p>1380m primary school 4.8km secondary school &gt;5m health centre 4.5km allotments &gt;5km hub</p> <p>From middle of the site. All but primary school on other side of M4 No PRoW</p>
Housing	
Air Quality Management Area	>5km
Special Protection Area / Ramsar	>5km
Special Area of Conservation	2803m
Site of Special Scientific Interest	1934m
Local Nature Reserve	4.5km
Site of Importance for Nature Conservation	307m
Bus stop	238m
Train station	4.6km
City/district centre	<p>4.5km to local centre &gt;5km to district centre</p> <p>From middle of the site, both across the M4</p>
Heritage asset	<p>&gt;5Km historic landscape 258m historic parks &amp; gardens 1960m ancient monument</p>
Conservation area	634m
Archaeologically sensitive area	2963m
Employment	

Open space	None proposed
Previously developed land	Greenfield
Agricultural land quality	Grade 4
Special Landscape Area	Within SLA
Water body	160m
Flooding	<p>No flooding</p> 

**Sustainability constraints:**

- In Special Landscape Area
- Flooding
- Greenfield

## Rookwood Hospital / 37

3.4ha, residential



Welsh Index of Multiple Deprivation	1
Community facility	<p>340m primary school 422m secondary school 1180m health centre 489m GP 1071m allotments 1129m hub</p> <p>From middle of the site No PRoW</p>
Housing	
Air Quality Management Area	127m
Special Protection Area / Ramsar	>5km
Special Area of Conservation	4.8km
Site of Special Scientific Interest	4.3km
Local Nature Reserve	1778m
Site of Importance for Nature Conservation	297m, River Taff
Bus stop	119m from centre of site, on boundary of site
Train station	579m
City/district centre	<p>1110m to local centre 1917m to district centre</p> <p>From middle of the site</p>
Heritage asset	<p>&gt;5km historic landscape About 60% of site is historic parks &amp; gardens 323m ancient monument</p>
Conservation area	Adjacent
Archaeologically sensitive area	95m
Employment	

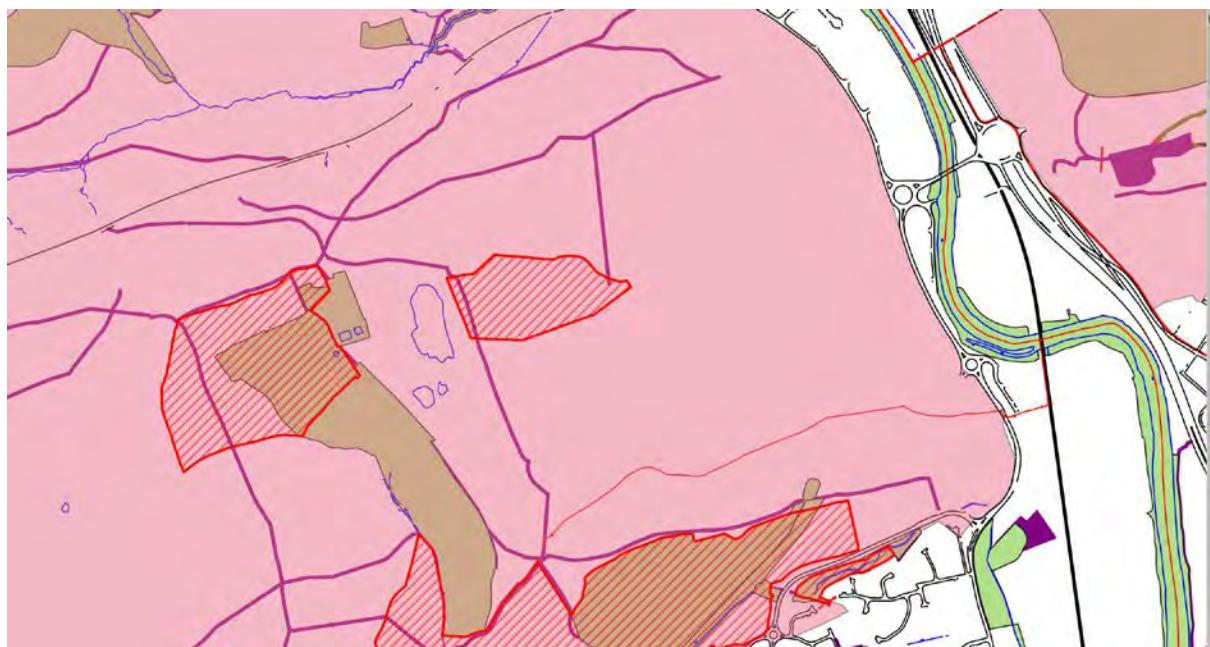
Open space	None proposed
Previously developed land	Yes
Agricultural land quality	Urban
Special Landscape Area	1132m
Water body	297m, River Taff
Flooding	<p>Very minor surface water flooding</p> 

**Sustainability constraints:**

- In Historic Parks & Gardens
- Adjacent conservation area

## Taffs Well Quarry / 44

4.6ha, extension to quarry



Welsh Index of Multiple Deprivation	1
Community facility	1191m primary school 3.2km secondary school >5km health centre 4.1km GP 2267m allotments 5.0km hub From middle of the site. Except for primary school, all on the other side of the M4 or River Taff + railway PRow on W edge of site
Housing	
Air Quality Management Area	>5km
Special Protection Area / Ramsar	>5km
Special Area of Conservation	Adjacent
Site of Special Scientific Interest	Adjacent
Local Nature Reserve	1487m
Site of Importance for Nature Conservation	198m
Bus stop	770m
Train station	1048m across River Taff
City/district centre	2.5km to local centre 4.2km to district centre From middle of the site, on other side of M4
Heritage asset	>5km historic landscape 2466m historic parks & gardens 923m ancient monument
Conservation area	1265m
Archaeologically sensitive area	4.3km
Employment	
Open space	None proposed

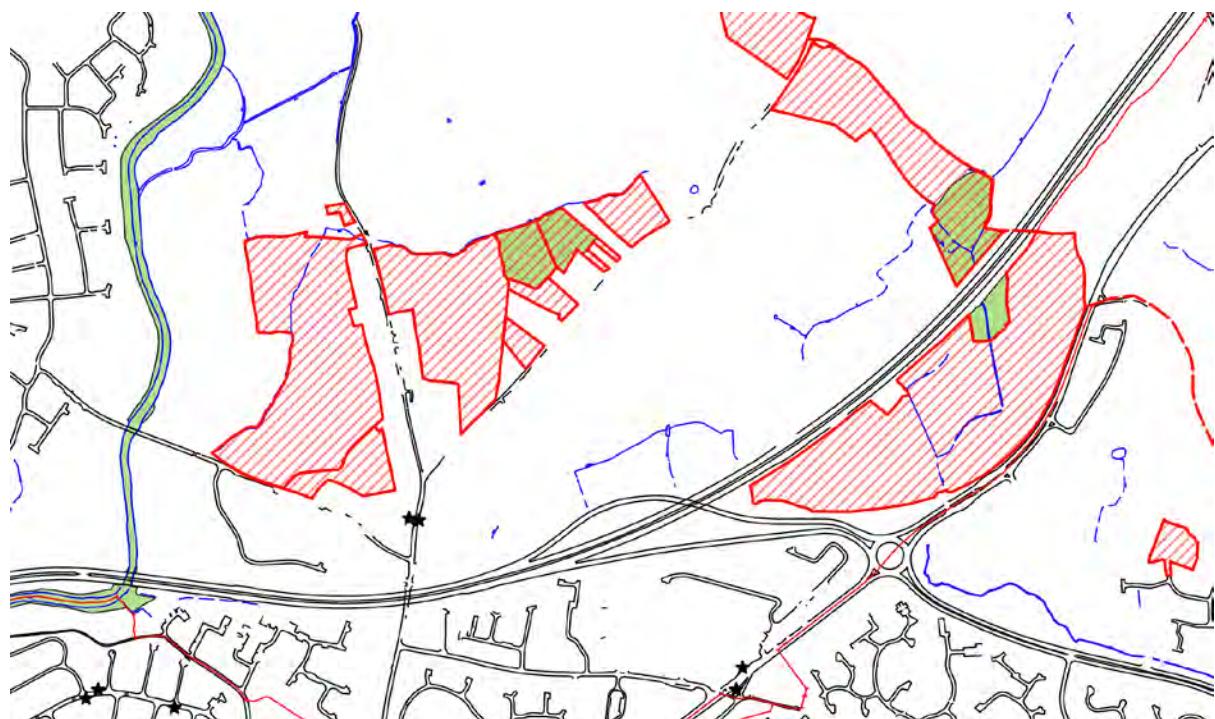
Previously developed land	Greenfield
Agricultural land quality	Partly grade 3a, the rest NA
Special Landscape Area	Within SLA
Water body	29m water body to W
Flooding	<p>&lt;10% surface water flooding</p> 

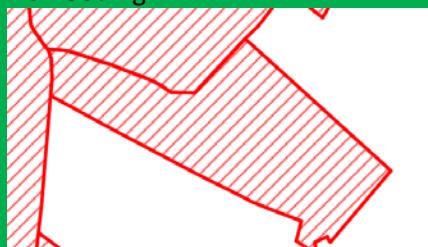
**Sustainability constraints:**

- In Special Landscape Area
- Adjacent SAC and SSSI – possible HRA issues
- Far from existing services
- Greenfield
- Footpath
- Water body near site

## The Manor, Druidstone Road / 82

0.44ha, residential



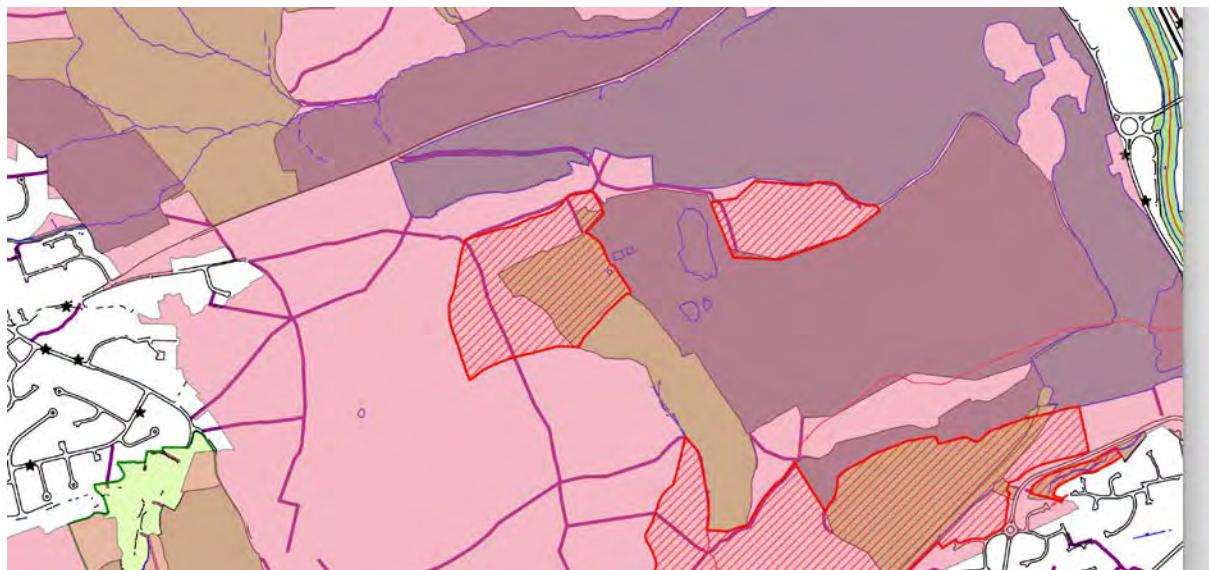
Community facility	1065m primary school 2053m secondary school 1989m health centre 1247m GP 1013m allotments 1433m hub From middle of the site, all across A48(M) No PRoW
Housing	
Air Quality Management Area	>5km
Special Protection Area / Ramsar	4.0km
Special Area of Conservation	4.0km
Site of Special Scientific Interest	1635m
Local Nature Reserve	4.1km
Site of Importance for Nature Conservation	Adjacent SINC
Bus stop	481m
Train station	>5km
City/district centre	1603m to local centre 1136m to district centre From middle of the site
Heritage asset	1983m historic landscape 1233m historic parks & gardens 2097m ancient monument
Conservation area	967m
Archaeologically sensitive area	1635m
Employment	
Open space	None proposed
Previously developed land	Greenfield
Agricultural land quality	Grade 2 / urban
Special Landscape Area	2538m
Water body	88m
Flooding	No flooding 

#### Sustainability constraints:

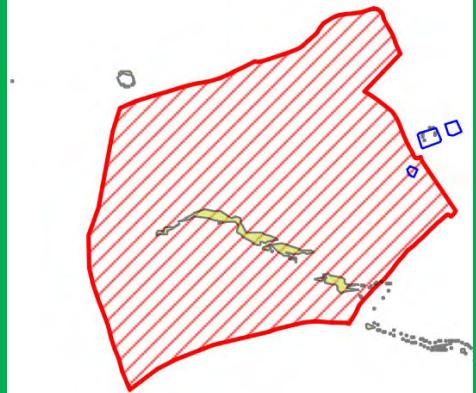
- Adjacent SINC
- Greenfield
- Grade 2 agricultural land

## Ton Mawr Quarry / 45

12 ha, extension of quarry



Welsh Index of Multiple Deprivation	1
Community facility	2194m primary school 3.5km secondary school >5km health centre 2137m GP 2588m allotments >5km hub From middle of the site. Except primary school and GP, all across M4 Two PRoWs cross site
Housing	
Air Quality Management Area	>5km
Special Protection Area / Ramsar	>5km
Special Area of Conservation	50m
Site of Special Scientific Interest	Adjacent SSSI
Local Nature Reserve	1922m
Site of Importance for Nature Conservation	About half of the site is SINC
Bus stop	1353m
Train station	1547m
City/district centre	2839m to local centre 4.6km to district centre From middle of the site, across M4
Heritage asset	>5km historic landscape 1823m historic parks & gardens 959m ancient monument
Conservation area	657m
Archaeologically sensitive area	4.5km
Employment	
Open space	None proposed
Previously developed land	Greenfield
Agricultural land quality	SINC 50% Grade, other 50% Grade 3b

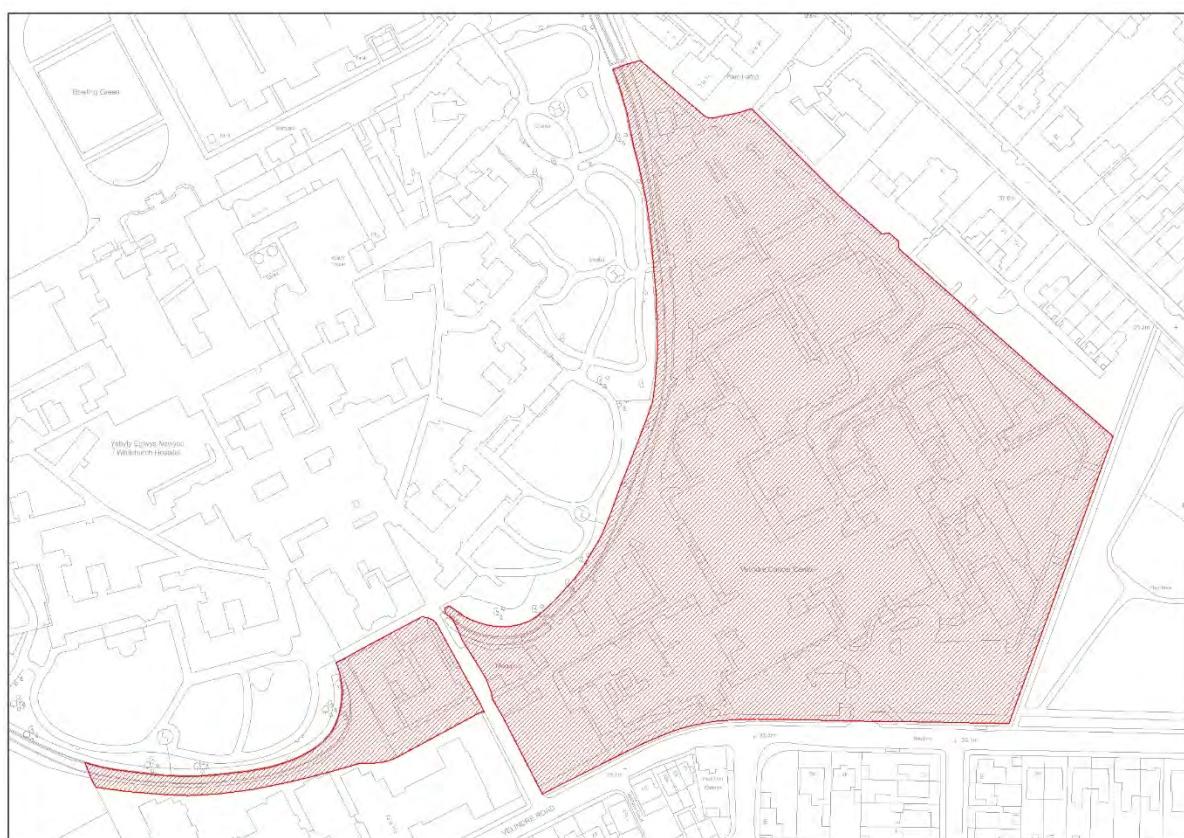
Special Landscape Area	In SLA
Water body	Small pond on site
Flooding	<p>&lt;10% surface water flooding</p> 

**Sustainability constraints:**

- In Special Landscape Area
- In SINC
- Adjacent SSSI
- Far from existing services
- Greenfield
- Pond on site
- Footpaths

## Velindre Cancer Centre / 76

3.98ha, residential and ancillary mixed uses



Welsh Index of Multiple Deprivation	4
Community facility	<p>831m primary school</p> <p>561m secondary school</p> <p>3.1km health centre</p>

	159m GP 1707m allotments 558m hub From middle of the site No PRoW
Housing	
Air Quality Management Area	2037m
Special Protection Area / Ramsar	>5km
Special Area of Conservation	2395m
Site of Special Scientific Interest	2395m
Local Nature Reserve	225m
Site of Importance for Nature Conservation	309m
Bus stop	115m from centre, adjacent to S edge
Train station	281m
City/district centre	995m to local centre 636m to district centre From middle of the site
Heritage asset	>5km historic landscape SW <10% of site is in historic parks & gardens 1667m ancient monument
Conservation area	232m
Archaeologically sensitive area	2121m
Employment	
Open space	None proposed
Previously developed land	Yes
Agricultural land quality	Urban
Special Landscape Area	1320m
Water body	235m
Flooding	

**Sustainability constraints:**

- In Historic Parks & Gardens
- Flooding

## Velindre station / 79

1ha, metro station



Welsh Index of Multiple Deprivation	4
Community facility	<p>168m primary school</p> <p>1378m secondary school</p> <p>3.5km health centre</p>

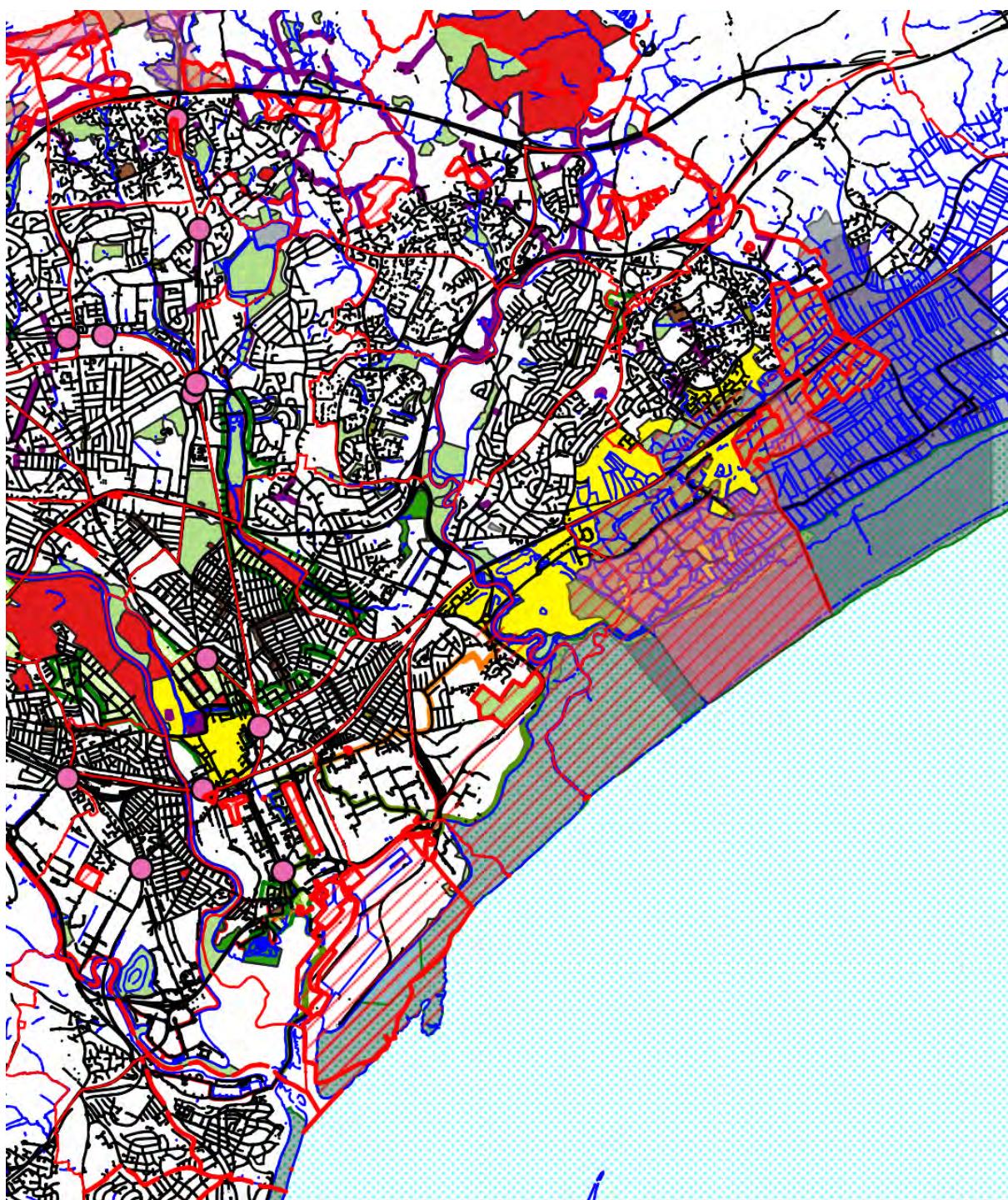
	764m GP 894m allotments 3.6km hub From middle of the site On PRoW
Housing	
Air Quality Management Area	2907m
Special Protection Area / Ramsar	>5km
Special Area of Conservation	1683m
Site of Special Scientific Interest	147m
Local Nature Reserve	Within LNR
Site of Importance for Nature Conservation	16m
Bus stop	92m
Train station	487m
City/district centre	1046m to local centre 1466m to district centre From middle of the site
Heritage asset	>5km historic landscape 19m historic parks & gardens 3.2km ancient monument
Conservation area	1340m
Archaeologically sensitive area	2880m
Employment	
Open space	None proposed
Previously developed land	Greenfield
Agricultural land quality	NA
Special Landscape Area	909m
Water body	218m Glamorganshire canal
Flooding	Most of site subject to surface water flooding 

#### Sustainability constraints:

- In Local Nature Reserve
- V near SINC
- Flooding
- Greenfield
- Footpath

Wentloog Levels – Rhymney and Peterstone SSSI / 74

5700ha, biodiversity and active travel





Welsh Index of Multiple Deprivation	1/3
Community facility	Scattered near S end of site Coastal path adjacent
Housing	
Air Quality Management Area	2838m
Special Protection Area / Ramsar	All SPA
Special Area of Conservation	All SAC
Site of Special Scientific Interest	All SSSI
Local Nature Reserve	1020m
Site of Importance for Nature Conservation	About 10% of site is SINC
Bus stop	Scattered near S part of site, closest about 500m
Train station	1628m
City/district centre	1332m to local centre 1186m to district centre From middle of the site
Heritage asset	About 15% of site is historic landscape 2297m historic parks & gardens adjacent ancient monument
Conservation area	1072m
Archaeologically sensitive area	About 25% of site is ASA
Employment	
Open space	Whole area proposed?
Previously developed land	Greenfield
Agricultural land quality	Not agricultural
Special Landscape Area	About 15% of site is SLA

Water body	Adjacent - estuary
Flooding	

**Sustainability constraints:**

- In SPA/SAC/SSSI
- In SINC
- In historic landscape
- In Archaeologically sensitive area
- In Special Landscape Area

... but the intention is presumably to protect these designations

Also flooding

## Whitchurch Hospital / 78

22.2ha, mixed uses and playing fields



Welsh Index of Multiple Deprivation	4
Community facility	597m primary school 823m secondary school <b>3050m health centre</b> 309m GP 561m allotments <b>3.3km hub</b> From middle of the site No PRoW
Housing	
Air Quality Management Area	2036m
Special Protection Area / Ramsar	>5km
Special Area of Conservation	1969m
Site of Special Scientific Interest	1969m
Local Nature Reserve	Adjacent
Site of Importance for Nature Conservation	Adjacent
Bus stop	252m from centre, adjacent to edge
Train station	321m
City/district centre	1260m to local centre 922m to district centre From middle of the site
Heritage asset	>5km historic landscape <b>90% of site is historic parks &amp; gardens</b> 1798m ancient monument
Conservation area	262m
Archaeologically sensitive area	2074m
Employment	
Open space	About 40%, N section proposed

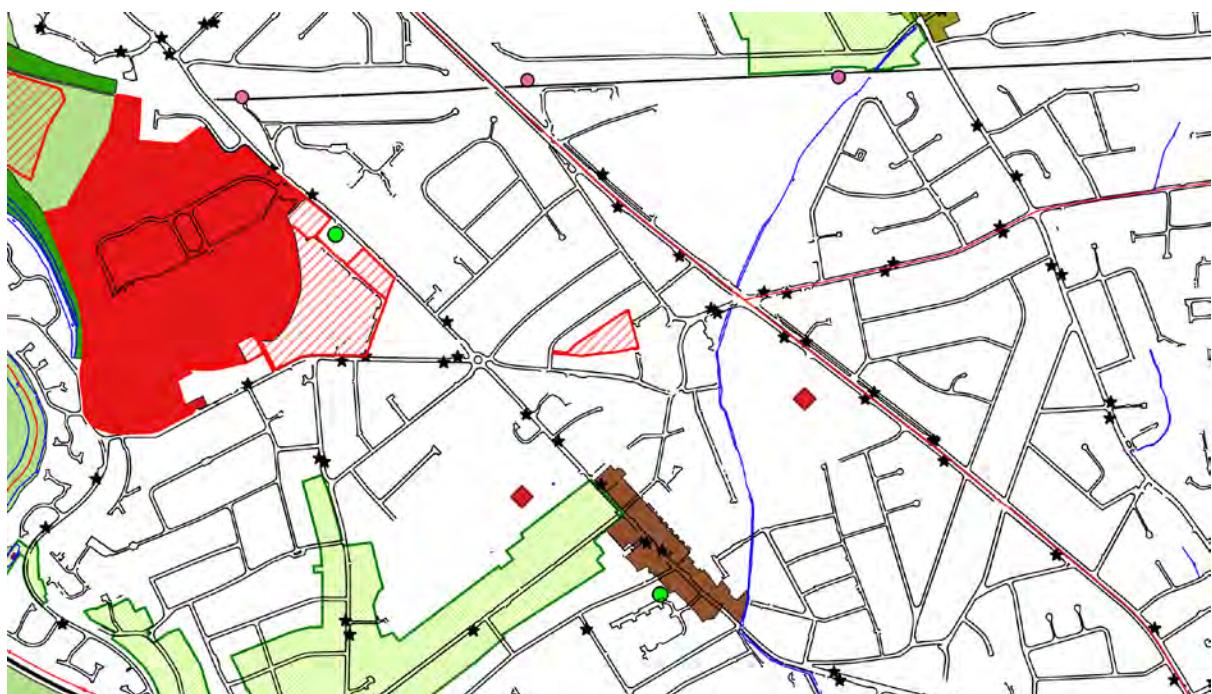
Previously developed land	Yes
Agricultural land quality	Urban
Special Landscape Area	999m
Water body	Adjacent: Glamorganshire Canal
Flooding	<p>About 10% of site subject to surface water flooding</p> 

**Sustainability constraints:**

- In Historic Parks & Gardens
- Adjacent Local Nature Reserve
- Adjacent SINC
- Adjacent Glamorganshire Canal

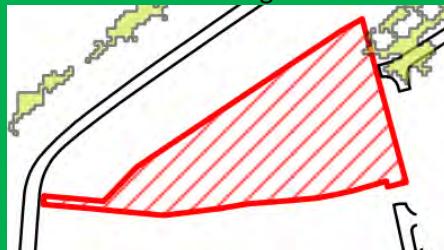
## Whitchurch Tennis Club / 75

Sporting facility / community facility / open space



Welsh Index of Multiple Deprivation	1
Community facility	<p>878m primary school</p> <p>486m secondary school</p> <p><b>2711m health centre</b></p> <p>586m GP</p> <p>793m allotments</p> <p><b>1556m hub</b></p> <p>From middle of the site</p> <p>No PRoW</p>
Housing	
Air Quality Management Area	2071m
Special Protection Area / Ramsar	>5km
Special Area of Conservation	2993m
Site of Special Scientific Interest	2993m
Local Nature Reserve	960m
Site of Importance for Nature Conservation	1075m
Bus stop	215m
Train station	539m
City/district centre	<p>868m to local centre</p> <p><b>264m to district centre</b></p> <p>From middle of the site</p>
Heritage asset	<p>&gt;5km historic landscape</p> <p>631m historic parks &amp; gardens</p> <p>2270m ancient monument</p>
Conservation area	243m
Archaeologically sensitive area	2025m

Employment	
Open space	Central 80-85% proposed
Previously developed land	Yes
Agricultural land quality	Urban
Special Landscape Area	1740m
Water body	1077m: Glamorganshire Canal
Flooding	No flooding, though current access prone to surface water flooding



**Sustainability constraints:** None

## APPENDIX B. APPRAISAL OF STRATEGIC POLICIES

This appendix appraises the impacts of the strategic policies of the Deposit RLDP. It mostly duplicates the assessment of the draft strategic policies at App. C of the Initial ISA, but has been updated to reflect changes made to the strategic policies between May 2023 and October 2024. Where the appraisal refers to “ISA comments and suggestions round 1” (or does not specify the round), it refers to ISA comments made in 2023 as part of the Initial ISA. Where the appraisal refers to “round 2”, it refers to comments on the 2024 Deposit RLDP. “Changes to policy as a result of the ISA” are the council’s response to these comments – part of the mitigation measures triggered by the ISA.

SP1: PROVIDING FOR SUSTAINABLE GROWTH		
To effectively meet evidenced economic and social needs whilst maintaining and enhancing Cardiff’s environment and natural resources, the plan sets out a strategy to make provision for 26,400 (including a 10% flexibility allowance) dwellings and 32,300 new jobs over the plan period.		
ISA Objective	Impact	Comments
1. Help deliver equality of opportunity and access for all	+	Will help to meet the needs of Cardiff’s population for homes and jobs
2. Maintain and improve air quality	-	More people, homes and jobs will generate more air pollution
3. Protect and enhance biodiversity, flora and fauna	-	More people, homes and jobs will increase pressure on natural areas and biodiversity, esp. at sensitive areas such as Wentloog and in the north of the city
4. Reduce emissions of greenhouse gases and adapt to the effects of climate change	-	More people, homes and jobs will increase greenhouse gas emissions. Development on greenfield land is likely to reduce the area’s ability to fix carbon.
5. Protect and enhance historic and cultural heritage, including the Welsh Language	+/-	Redevelopment of some brownfield areas for housing and employment may improve the quality of, and enhance access to, the historic and cultural heritage. However development of greenfield areas could have negative impacts on the historic and cultural heritage.
6. Help deliver the growth of a sustainable and diversified economy	+	The policy is consistent with the National Plan 2040’s ambitions for Cardiff as a National Growth Area.
7. Improve health and well-being	+/-	New homes can help to reduce overcrowding and homelessness, with associated health benefits. However it could also reduce access to open space and exacerbate environmental impacts, with negative health impacts.
8. Use soils and natural resources efficiently and safeguard their quality	+/-	The policy says nothing about how housing will be provided. In practice, the RLDP will focus new development on brownfield sites, but with some development of greenfield sites.
9. Protect and enhance the landscape	+/-	The policy says nothing about the landscape or design. In practice, the RLDP’s focus on redevelopment of brownfield sites is likely to enhance the landscape, but some necessary greenfield development is likely to negatively affect the landscape.
10. Minimise resource use and waste, increase re-use and recycling	-	Development of 26,400 new homes and employment land for 32,200 new jobs will require more resources.
11. Maintain and enhance water quality and resources, and manage flooding	-	Any greenfield land that is developed for the houses/jobs/ infrastructure is likely to exacerbate flooding

<b>ISA comments and suggestions round 1:</b> None
<b>ISA comments and suggestions round 2:</b> The current version has lost reference to “the environment”, replacing it with “Cardiff’s natural resources” (which suggests that the environment is valued primarily because of the resources it provides, e.g. minerals). The supporting text does not refer to either the environment or natural resources. Suggest referring to “Cardiff’s environment and natural resources”, and adding some information about this in the supporting text.
<b>Changes to policy as a result of ISA:</b> Agree changes made to policy and additional information will be added to supporting text.

<b>SP2: SUSTAINING ECONOMIC GROWTH AND RESILIENCE</b>		
ISA Objective	Impact	Comments
1. Help deliver equality of opportunity and access for all	+	Helps to meet the need of Cardiff’s population for jobs
2. Maintain and improve air quality	-	Increased jobs and associated commuting will lead to more air pollution
3. Protect and enhance biodiversity, flora and fauna	-	Employment space on greenfield land, or on brownfield land that is biodiverse, is likely to negatively affect biodiversity in Cardiff.
4. Reduce emissions of greenhouse gases and adapt to the effects of climate change	-	Increased jobs and associated commuting will lead to more greenhouse gas emissions. Development on greenfield land is likely to reduce the area’s ability to fix carbon.
5. Protect and enhance historic and cultural heritage, including the Welsh Language	-	Development of greenfield areas could have negative impacts on the historic and cultural heritage.
6. Help deliver the growth of a sustainable and diversified economy	++	The policy is consistent with the National Plan 2040’s ambitions for Cardiff as a National Growth Area.
7. Improve health and well-being	+?	Increased jobs will help to reduce unemployment, with associated health benefits.
8. Use soils and natural resources efficiently and safeguard their quality	+/-	Many of the new employment sites are likely to be on brownfield sites, but some will be on greenfield, with impacts on soils and natural resources.
9. Protect and enhance the landscape	+/-	Regeneration of un- or under-used employment sites would be beneficial for the townscape. However new employment sites on greenfield land would have negative landscape impacts.
10. Minimise resource use and waste, increase re-use and recycling	-	32,200 new jobs will require more resources.
11. Maintain and enhance water quality and resources, and manage flooding	-	Any greenfield land that is developed for employment is likely to exacerbate flooding, particularly Wentloog
<b>ISA comments and suggestions:</b>		

**LDP response:**

Planning officers confirmed that loss of employment/retail space post-Covid as a result of home working has been taken into account in the future projections.

**Changes to policy as a result of ISA:**

Minor wording changes

**SP3: ENSURING A MASTERPLANNING APPROACH**

A master planning approach will be required for both existing and future strategic sites or development including more than 100 homes, or any project involving more than one phase of development. Plans for development sites which conform to these criteria should accord with:

- i. The following masterplanning general principles:
  - a) Masterplans will be prepared that encompass the whole of a development area regardless of land ownership patterns;
  - b) Schemes shall be planned in a comprehensive and integrated manner reflecting partnership working involving all relevant parties;
  - c) Higher density residential and mixed-use development will be focused along public transport corridors and in neighbourhood centres with lower densities provided elsewhere to deliver an overall range and choice of housing to meet different needs; and
  - d) The submission will include a Design and Access Statement (DAS) reviewing the site context and opportunities and constraints of development and illustrating the evolution of the urban and landscape design thinking. These should:
    - i. Concentrate a full range of social and community facilities within mixed use neighbourhood centres located along public transport corridors and easily accessed by walking and cycling;
    - ii. Aligns with the Local Area Energy Plan and energy hierarchy to strategically plan to deliver net zero development;
    - iii. Assess and take account of climate change adaptation requirements in relation to the nature and lifetime of development;
    - iv. Identify key connections and strategic links for low carbon/active travel;
    - v. Include the minimum and maximum heights of buildings necessary to deliver the highest practicable density which is suitable to maintain or enhance the character of the context of the development;
    - vi. Set out the arrangement and hierarchy of any green and urban public spaces, including what they may contain to deliver the public space requirements arising from the development;
    - vii. Reference key features of the planned urban form, townscape and landscape;
    - viii. Reference areas of character, illustrated with precedents;
    - ix. Identify positive, distinctive qualities of place and respond to unique features and opportunities of a location, including heritage, culture and Welsh Language;
    - x. Set out the provision of necessary infrastructure and utilities;
    - xi. Include an indicative masterplan framework illustrating a potential future layout;
    - xii. Include a more detailed design code and green infrastructure management strategy in a format to be agreed with the Local Planning Authority; and
    - xiii. Set out the phasing of the entire development.
- ii. Guidance set out in site-specific master planning frameworks, where prepared, and any subsequent design codes.

ISA Objective	Impact	Comments
1. Help deliver equality of opportunity and access for all	0	
2. Maintain and improve air quality	+/-	The green spaces, high density development supporting walking and cycling, and neighbourhood centres should all help to reduce the need to travel, and absorb/minimise air pollution. However the new

		developments are still likely to have an overall negative impact on air quality.
3. Protect and enhance biodiversity, flora and fauna	+/-	Although the green spaces will help to protect biodiversity, in practice new development is likely to have a negative impact on biodiversity.
4. Reduce emissions of greenhouse gases and adapt to the effects of climate change	+/-	The green spaces, pedestrian and cycling infrastructure and neighbourhood centres should all help to reduce the need to travel, and thus greenhouse gas emissions. The policy also aims to deliver net zero development. However the new developments are still likely to lead to overall increase in greenhouse gas emissions. Taking account of climate change adaptation requirements and providing green spaces are likely to help adapt to the effects of climate change.
5. Protect and enhance historic and cultural heritage, including the Welsh Language	0	
6. Help deliver the growth of a sustainable and diversified economy	0	No links to economy
7. Improve health and well-being	+	New green open spaces and access for pedestrians and cyclists will help to improve health and well-being for residents and neighbours
8. Use soils and natural resources efficiently and safeguard their quality	+	d)ii refers to the "highest practicable reasonable density which is suitable to maintain or enhance the character of the context of the development"
9. Protect and enhance the landscape	+/-	d)iv. and d)v. both aim to protect and enhance the landscape. However overall, development on greenfield sites is likely to negatively affect the landscape, turning it from rural to built-up.
10. Minimise resource use and waste, increase re-use and recycling	0	
11. Maintain and enhance water quality and resources, and manage flooding	+/-	High densities and green infrastructure will help to reduce impacts and may provide some benefits, but this will depend on the development.
<b>ISA comments and suggestions round 1:</b>		
a) Original SP3 had quite a lot of overlap with SP4, e.g. access by walking and cycling b) The policy refers to 'reasonable density of development' but this is very vague. Can it be specified a bit more clearly? SP4 vi. talks about "the highest practicable density which is suitable to maintain or enhance the character of any context" which sounds like a higher density than 'reasonable density' c) Refer to biodiversity gain and protection of quality of surface waters? d) Should the policy require a statement about the proportion of affordable homes that will be delivered?		
<b>LDP response / changes to policy as a result of the ISA:</b>		
a) Overlap reduced by amending SP3 and SP4 b) 'Reasonable density of development' reworded to say "the highest practicable reasonable density which is suitable to maintain or enhance the character of the context of the development" c) Biodiversity gain is now mentioned at SP4 d) Affordable housing is covered under policy SP10. We will be working up the percentage requirements for affordable housing over the next twelve months as part of the viability work we will be undertaking on the plan and we can revisit this at the Deposit stage.		
<b>ISA comments and suggestions round 2:</b>		
Policy uses a mixture of 'will' and 'shall'. Need for consistency? Does d) fit better into a development policy rather than a strategic policy? Should ii. be more specific, e.g. "plan for to minimise the operational energy use of the development"?		
<b>Changes to policy as a result of ISA:</b>		

- Agree - "Shall" amended to "will" for consistency in the policy.
- For ease of reference it is considered that d) relating to the requirement to submit a Design and Access Statement should remain within the overall strategic master planning policy. This reflects the approach taken in the adopted LDP.
- ii. revised to "deliver next zero development".

#### SP4: SECURING GOOD QUALITY AND SUSTAINABLE DESIGN

All new development will be required to be of the highest architectural quality, sustainable design and make a positive contribution to the creation of distinctive and healthy communities, places and spaces by:

- i. Character: Development must be designed to maintain or enhance the character of places. Schemes should sustain or enhance the quality and function of any townscape and landscape setting. Schemes will ensure that the layout, scale and massing, roof form, height, density, visual appearance, materials and any architectural detailing result in good design.
- ii. Important features: Sympathetically integrating the existing landscape, biodiversity and historic/linguistic features of the site into the development, taking opportunities to protect, enhance and manage important features along with mitigation and enhancement measures to provide satisfactory compensation;
- iii. Multi-functional and connected green open spaces: Integrate water, topography, trees and other features of the site's ecology to provide multi-functional and connected green spaces that deliver biodiversity benefit, create strategically important links to surrounding areas and provide routes for people and wildlife as well as open spaces for sports, recreation and play;
- iv. Accessibility and Permeability: Development must be within acceptable walking and cycling distances of key local uses, open spaces, facilities and services, or a public transport service that reasonably links to them. Development should also result in a permeable network of distinct streets and other public routes that are appropriate for people moving by foot, cycle, public transport or other vehicles both within a development that recognises the local context, including how new development responds to local deficiencies and provides good connectivity to adjoining areas informed by feedback from existing communities;
- v. Legibility: Development must provide continuity and enclosure of existing and new streets and public spaces to maintain, enhance or provide legible routes through development which result in places that feel safe, are easy to get around, understand and therefore navigate;
- vi. Energy efficient and climate responsive development: Developments must be energy efficient and be designed to be climate responsive, minimise energy demands in construction and use, maximise renewable energy generation, provide sustainable waste and water management solutions that protect water quality, minimise emissions from transport, homes and industry and reduce the impact of climate related impacts such as heat and flooding;
- vii. Mixed use sustainable neighbourhoods: Providing a diversity of land in the city, district- and local centres to establish and maintain a mix of mutually supportive neighbourhood uses close to people's homes. Land uses will also be located and designed to contribute to neighbourhood vitality, business viability, active commercial frontages and maintain or establish an interesting townscape;
- viii. Community safety: Development must create public spaces that feel safe as a result of passive or community surveillance. Routes must be overlooked where possible and lit to ensure that they are safe and well used;
- ix. Density: Development must promote the efficient use of land, developing at the highest practicable density which is suitable to maintain or enhance the character of any context. Higher densities, tall buildings and mixed-use development will be supported in areas that are highly accessible to public transport and where it is responsive to any established local character, so long as all other design matters are dealt with appropriately;
- x. Reuse of existing notable buildings: Development must exploit the potential for sensitive and sustainable re-use of existing buildings where they form local landmark buildings that make a positive contribution to the character and appearance of the area, either individually and/or as part of a group;

- xi. Inclusive design: Development must create inclusive environments in which buildings and resulting streets and spaces are accessible to all users throughout the day and, where possible, adaptable to future changes in health and social, economic, technological and environmental requirements;
- xii. Resident Amenities: Developments must ensure high quality the amenity for future occupants, ensure no undue effect on the amenity of neighbouring occupiers and connect positively to surrounding communities.
- xiii. Identity: Development must be designed to maintain or enhance the positive, distinctive qualities of places and build in features and take advantage of opportunities provided by a location including heritage, culture and Welsh language; and

Proposals will align with or exceed any minimum standards and should seek to accord with guidance set out separately in relevant SPGs.

ISA Objective	Impact	Comments
1. Help deliver equality of opportunity and access for all	+	xi. is about ensuring that new developments are designed for a range of users
2. Maintain and improve air quality	?	Impacts on air quality uncertain
3. Protect and enhance biodiversity, flora and fauna	?	The policy makes no comments about biodiversity
4. Reduce emissions of greenhouse gases and adapt to the effects of climate change	+?	vi. talks about energy efficiency and climate responsive development.
5. Protect and enhance historic and cultural heritage, including the Welsh Language	+	ii. aims to integrate existing historic and linguistic features of the site into the development x. promotes to reuse of notable buildings
6. Help deliver the growth of a sustainable and diversified economy	0	No links to economy
7. Improve health and well-being	+	Access for pedestrians and cyclists (iv) will help to improve health and well-being for residents and neighbours
8. Use soils and natural resources efficiently and safeguard their quality	+	ix. promotes “the highest practicable density which is suitable to maintain or enhance the character of any context”
9. Protect and enhance the landscape	+	The entire policy is about ensuring that new developments are designed sensitively and enhance the landscape
10. Minimise resource use and waste, increase re-use and recycling	0	No mention of resource use etc.
11. Maintain and enhance water quality and resources, and manage flooding	0	vi. supports “sustainable waste and water management solutions that protect [but not enhance] water quality”.
<b>ISA comments and suggestions round 1:</b>		
a) Reduce overlap between SP3 and SP4. b) xii. notes that development should be ‘energy efficient’ but Objective 1 states that the plan will “require new homes to be zero carbon by 2025”. Shouldn’t that be in this policy then? c) Mention biodiversity gain/protection? The policy really doesn’t touch on them at all. Also water quality and resources. d) Should x. go beyond reusing existing notable buildings but extend to e.g. trees, sightlines/ viewpoints, other elements of existing/historic character?		
<b>LDP response / change to policy as a result of the ISA:</b>		
a) Overlap reduced/removed by rewording SP3 b) The energy efficiency target will be fully considered when drafting the detailed policies over the next twelve months c) Biodiversity benefit now included at ix.		

d) Trees are referenced in other policies

**ISA comments and suggestions round 2:**

- Does ii. need a 'title' like the rest of the bullet points?
- vi. the clause "so they maximise renewable energy generation" has been removed. Reinstate?
- vi. "minimising" should be "minimise"
- The bullet points aren't consistently written, e.g. "integrating / providing" v. "include..." v. "development must"

**Changes to policy as a result of ISA:**

Agree – title "Important Features" added to bullet ii.

Agree to reinstate "so they maximise renewable energy generation" and amend "minimising" to "minimise" in clause vi.

Amend "include" to "provide" in bullet point iii. for consistency.

**SP5: SECURING NEW INFRASTRUCTURE**

New development will make appropriate provision for, or contribute towards, all essential, enabling and necessary infrastructure required as a consequence of the development in accordance with Planning Policy Guidance. Such infrastructure will be delivered in a timely manner to meet the needs of existing and planned communities and includes the following aspects which may be required having regard to the nature, scale and location of the proposed development and any current under-provision:

Essential / Enabling Infrastructure:

- Transportation and highways including access, circulation, parking, public transport provision, walking and cycling;
- Utility services (including telecoms);
- Flood mitigation / defences;

Necessary Infrastructure:

- Affordable Housing;
- Schools and education;
- Health and social care;
- Community buildings and facilities including District and Local Centre improvements;
- Social value such as local employment and training including replacement employment opportunities and affordable workspace where relevant;
- Community safety initiatives;
- Open space, recreational facilities, playgrounds, allotments;
- Protection, management, enhancement and mitigation measures relating to the natural and built environment;
- Sustainable Drainage Systems (SuDS)
- Public realm improvements and public art;
- Waste management facilities including recycling and services;
- District heating and sustainable energy infrastructure;
- Enhancement measures relating to the Welsh Language.

ISA Objective	Impact	Comments
1. Help deliver equality of opportunity and access for all	0	The policy makes no mention of providing infrastructure in areas where it is currently under-provided
2. Maintain and improve air quality	?	The impact depends on the location of development
3. Protect and enhance biodiversity, flora and fauna	?	and infrastructure needed, e.g. new road v. open space v. district heating
4. Reduce emissions of greenhouse gases and adapt to the effects of climate change	?	

5. Protect and enhance historic and cultural heritage, including the Welsh Language	0	Refers to enhancing and mitigating impacts related to the Welsh language, but impact is not likely to be significant.
6. Help deliver the growth of a sustainable and diversified economy	+	Will help to provide the infrastructure needed for both new employment sites and the housing to serve workers. Reference to providing affordable workspace is likely to be particularly useful.
7. Improve health and well-being	+	Will help to ensure infrastructure for health, e.g. wastewater treatment, health and social care
8. Use soils and natural resources efficiently and safeguard their quality	?	The impact depends on the location of development and infrastructure needed, e.g. new road v. open space v. district heating
9. Protect and enhance the landscape	?	
10. Minimise resource use and waste, increase re-use and recycling	+	Will help to provide the infrastructure needed for waste management
11. Maintain and enhance water quality and resources, and manage flooding	+	Provision of utilities (wastewater treatment, SUDS) will help to protect water quality.
<b>ISA comments and suggestions round 1:</b>		
a) Consider including requirement for provision of infrastructure in areas where it is currently under-provided, rather than just in new development		
b) Does the list need to include SUDS?		
<b>LDP response / changes to policy as a result of the ISA:</b>		
a) Reference to under-provision added in the first paragraph		
b) SUDS added		

<b>SP6: SECURING PLANNING OBLIGATIONS</b>		
Planning obligations will be sought to mitigate any impacts directly related to the development and will be assessed on a case-by-case basis in line with Planning Policy Guidance.		
ISA Objective	Impact	Comments
1. Help deliver equality of opportunity and access for all	?	Implementation of the policy will be case by case, depending on the location and character of the site, and the proposed development.
2. Maintain and improve air quality	?	
3. Protect and enhance biodiversity, flora and fauna	?	
4. Reduce emissions of greenhouse gases and adapt to the effects of climate change	?	
5. Protect and enhance historic and cultural heritage, including the Welsh Language	?	
6. Help deliver the growth of a sustainable and diversified economy	?	
7. Improve health and well-being	?	
8. Use soils and natural resources efficiently and safeguard their quality	?	
9. Protect and enhance the landscape	?	
10. Minimise resource use and waste, increase re-use and recycling	?	

11. Maintain and enhance water quality and resources, and manage flooding	?	
<b>ISA comments and suggestions:</b> Can the policy say anything about taking the local character of the site and <i>any deficiencies in current infrastructure</i> into account? That would help in terms of equality and possibly biodiversity.		
<b>LDP response:</b> Community benefits are referenced in the supporting text		
<b>Changes to policy as a result of the ISA:</b> None		

<b>SP7: SUPPORTING PLACEMAKING PLANS</b>		
The preparation of community Placemaking Plans which support the delivery of the Replacement LDP will be considered where appropriate for approval as Supplementary Planning Guidance (SPG) to promote collaborative action, improve well-being and placemaking.		
ISA Objective	Impact	Comments
1. Help deliver equality of opportunity and access for all	+?	Preparation of Place Plans should help to identify and improve problematic aspects of local communities, helping to ensure equality of opportunity and access. The other impacts of Place Plans will depend on the contents of the plans, so are currently uncertain.
2. Maintain and improve air quality	?	
3. Protect and enhance biodiversity, flora and fauna	?	
4. Reduce emissions of greenhouse gases and adapt to the effects of climate change	?	
5. Protect and enhance historic and cultural heritage, including the Welsh Language	?	
6. Help deliver the growth of a sustainable and diversified economy	?	
7. Improve health and well-being	?	
8. Use soils and natural resources efficiently and safeguard their quality	?	
9. Protect and enhance the landscape	?	
10. Minimise resource use and waste, increase re-use and recycling	?	
11. Maintain and enhance water quality and resources, and manage flooding	?	

**ISA comments and suggestions:** No change

<b>SP8: SUPPORTING THE CENTRAL AND BAY BUSINESS AREA</b>	
The following uses are considered appropriate within the Central and Bay Business Areas:	
i.	New offices, Commercial leisure uses within the Central and Bay Business Areas;
ii.	Residential uses above ground floor level and/or where it does not result in the loss of a ground floor commercial unit within the Central and Bay Business Areas.
iii.	Enhanced retail, leisure and complementary facilities within the Central Retail and Commercial Area; and

iv. Other uses most appropriately located in city centres, including uses that support the night time economy and music scene.

ISA Objective	Impact	Comments
1. Help deliver equality of opportunity and access for all	0	This policy essentially maintains city centre land for high-density city centre uses, with no significant change to impacts
2. Maintain and improve air quality	0	
3. Protect and enhance biodiversity, flora and fauna	0	
4. Reduce emissions of greenhouse gases and adapt to the effects of climate change	0	
5. Protect and enhance historic and cultural heritage, including the Welsh Language	0	
6. Help deliver the growth of a sustainable and diversified economy	+	
7. Improve health and well-being	0	
8. Use soils and natural resources efficiently and safeguard their quality	+	Intensive use of city centre land is an efficient use of land
9. Protect and enhance the landscape	0	
10. Minimise resource use and waste, increase re-use and recycling	0	
11. Maintain and enhance water quality and resources, and manage flooding	0	
<b>ISA comments and suggestions round 2:</b> Should i. be “commercial and leisure uses”? <b>Changes to policy as a result of the ISA:</b> No change.		

SP9: SUPPORTING THE ROLE OF CARDIFF PORT		
Cardiff Port shall be protected to continue its primary role through the provision of traditional port specific employment activities. Further employment generating activities, including the provision of industrial and logistical uses, and green energy generation will be supported. There will also be flexibility to allow leisure, residential and mixed uses, within appropriate areas provided they are compatible with surrounding (port-related) uses.		
ISA Objective	Impact	Comments
1. Help deliver equality of opportunity and access for all	+	Cardiff Port provides industrial and logistics-based employment near areas of deprivation.
2. Maintain and improve air quality	?	
3. Protect and enhance biodiversity, flora and fauna	-?	The port is adjacent to the River Severn SPA, SAC and Ramsar site. Currently the port includes some large green areas that could be developed under this policy.
4. Reduce emissions of greenhouse gases and adapt to the effects of climate change	?	Impact depends on the type of future uses and their location, e.g. recreational v. industrial uses
5. Protect and enhance historic and cultural heritage, including the Welsh Language	+	Helps to maintain Cardiff's traditional role as a port
6. Help deliver the growth of a sustainable and diversified economy	+	Supports and helps to maintain the diversity of employment in Cardiff

7. Improve health and well-being	?	Impact depends on the type of future uses and their location, e.g. recreational v. industrial uses
8. Use soils and natural resources efficiently and safeguard their quality	?	
9. Protect and enhance the landscape	?	
10. Minimise resource use and waste, increase re-use and recycling	0	
11. Maintain and enhance water quality and resources, and manage flooding	?	

<b>ISA comments and suggestions:</b>
<ol style="list-style-type: none"> <li>Refer to constraints on development set by the River Severn SPA/SAC/Ramsar</li> <li>Clarify wording about other employment generating activities</li> </ol>
<b>LDP response / changes to policy as a result of the ISA:</b>

- Now referenced in the supporting text: *“Future proposals will need to have regard to the Severn Estuary SSSI/SAC/SPA and Ramsar site and where they are likely to have a significant effect on an international site, an appropriate assessment of the proposal will need to be undertaken.”*
- Wording clarified

<b>SP10: SUPPORTING TOURISM</b>		
Appropriate sustainable tourism developments to build upon Cardiff's role as a Capital City and a major tourist, art, cultural and sporting destination will be supported and promoted where proposals meet with all other relevant LDP policies. Tourism development linked to regeneration initiatives will be promoted including:		
<ul style="list-style-type: none"> <li>A new 17,000-seater Indoor Arena in Cardiff Bay.</li> <li>Redevelopment of Metro Central and Central Quay.</li> <li>Redevelopment of the Canal Quarter, including reopening the canal and creating new public and commercial spaces on Churchill Way.</li> <li>Further sport-related development at the International Sports Village (ISV).</li> </ul>		
ISA Objective	Impact	Comments
1. Help deliver equality of opportunity and access for all	+?	New tourism development would help to meet the need of Cardiff's population for community / leisure facilities, and support the regeneration of deprived areas
2. Maintain and improve air quality	-	Major tourism facilities draw people from beyond the neighbouring area, with associated traffic movements and air quality impacts
3. Protect and enhance biodiversity, flora and fauna	+/-	The impact on biodiversity depends on the location and type of tourism development, but could have negative impacts on sensitive coastal areas.
4. Reduce emissions of greenhouse gases and adapt to the effects of climate change	-	See 2.
5. Protect and enhance historic and cultural heritage, including the Welsh Language	?	New tourism development has the potential to showcase Cardiff and provide new opportunities for cultural activities
6. Help deliver the growth of a sustainable and diversified economy	+	Tourism is important to Cardiff's economy. Further tourism development could help to deliver a sustainable and diversified economy.
7. Improve health and well-being	+?	Tourism developments, for instance a new velodrome, can provide a sports venue and an impetus for sporting activity, which is positive for health

8. Use soils and natural resources efficiently and safeguard their quality	0	
9. Protect and enhance the landscape	?	The landscape/townscape impact of tourism development is dependent on its location and design
10. Minimise resource use and waste, increase re-use and recycling	0	
11. Maintain and enhance water quality and resources, and manage flooding	-?	Tourism developments use water, and can create runoff which can affect water quality and flooding.
<b>ISA comments and suggestions round 1:</b> None. This is a new policy which emerged from ISA comments on SP12.		
<b>ISA comments and suggestions round 2:</b> The title of the policy is different from that of the other strategic policies. Consistency?		
<b>LDP response / changes to policy as a result of the ISA:</b> "Supporting" added to title		

<b>SP11: MAINTAINING A SUPPLY OF MINERALS</b>		
ISA Objective	Impact	Comments
1. Help deliver equality of opportunity and access for all	0	
2. Maintain and improve air quality	-	Mineral extraction and recycling cause dust pollution and increase traffic, although locating mineral extraction near where minerals are needed helps to minimise traffic
3. Protect and enhance biodiversity, flora and fauna	-	Mineral extraction and recycling has negative impacts on biodiversity.
4. Reduce emissions of greenhouse gases and adapt to the effects of climate change	-	Mineral extraction and recycling increase traffic, although locating mineral extraction near where minerals are needed helps to minimise traffic
5. Protect and enhance historic and cultural heritage, including the Welsh Language	0?	
6. Help deliver the growth of a sustainable and diversified economy	+	Minerals are essential for construction of homes and employment sites
7. Improve health and well-being	-	Mineral extraction and recycling cause dust pollution, traffic and noise, affecting people's health
8. Use soils and natural resources efficiently and safeguard their quality	+/-	The policy supports the provision of needed minerals but aims to minimise the need for new mineral extraction

9. Protect and enhance the landscape	-	Mineral extraction and recycling has negative impacts on the landscape during operation
10. Minimise resource use and waste, increase re-use and recycling	+	The policy aims to minimise the need for new minerals, and supports the recycling of minerals
11. Maintain and enhance water quality and resources, and manage flooding	-?	Mineral extraction and recycling can negatively affect nearby water bodies
<b>ISA comments and suggestions:</b> Specify expected afteruses for mineral extraction sites, e.g. agriculture, ponds?		
<b>LDP response / changes to policy as a result of the ISA:</b> Clause vi. added to require adequate reinstatement		

<b>SP12: DELIVERING SUSTAINABLE NEIGHBOURHOODS, SOCIAL COHESION AND AFFORDABLE HOUSING</b>		
To ensure liveable, efficient, well balanced and cohesive communities, with improved quality of life and access to employment opportunities and affordable housing, the creation of sustainable neighbourhoods will be promoted and enhanced. This will be achieved through: <ul style="list-style-type: none"> <li>i. Providing a range of dwelling sizes, tenures, types and locations that meet the full range of housing needs, particularly affordable accommodation, accommodation that meets the needs of an ageing population, and family units to meet the needs of children and young people. Provision will also be made for the accommodation needs of Gypsy and Travellers;</li> <li>ii. Supporting the vitality, viability and attractiveness of existing District and Local Centres and their regeneration, including retail and other commercial development and housing of an appropriate scale;</li> <li>iii. Encouraging the provision of a full range of social, health, play, leisure and education facilities and community infrastructure for both existing and new communities that are accessible to all by walking and cycling and public transport;</li> <li>iv. Supporting the regeneration of deprived communities within the city and maximising the additional benefits that new communities can bring to adjoining or surrounding communities;</li> <li>v. Encouraging the enhancement of communities through better equality of access to services for all including people with disabilities, providing assisted living, providing facilities that support the Welsh Language, promoting cultural and wider diversity for all groups in society, and creating places that encourage social interaction and cohesion;</li> <li>vi. Designing out crime and creating communities which are safer and feel safer; and</li> <li>vii. Establishing strict controls for the sub-division of existing homes, including flat conversions and HMOs.</li> </ul>		
ISA Objective	Impact	Comments
1. Help deliver equality of opportunity and access for all	++	The policy aims to provide housing for all. It also supports the provision of facilities and services close to where people live, supporting people with poor mobility and/or no access to cars. It also supports regeneration of deprived communities.
2. Maintain and improve air quality	+	Provision of services near where people live helps to support walking and cycling, reducing car use and improving air quality
3. Protect and enhance biodiversity, flora and fauna	0	
4. Reduce emissions of greenhouse gases and adapt to the effects of climate change	+	Provision of services near where people live helps to support walking and cycling, reducing car use and reducing emissions of greenhouse gases
5. Protect and enhance historic and cultural heritage, including the Welsh Language	0	
6. Help deliver the growth of a sustainable and diversified economy	0	

7. Improve health and well-being	+	The policy aims to reduce inequality, which is associated with poor health. By supporting the provision of facilities and services close to where people live, it also encourages walking and cycling (active travel) and supports people with poor mobility.
8. Use soils and natural resources efficiently and safeguard their quality	0	
9. Protect and enhance the landscape	0	
10. Minimise resource use and waste, increase re-use and recycling	0	
11. Maintain and enhance water quality and resources, and manage flooding	0	
<b>ISA comments and suggestions:</b> “vi. Developing new cultural and sporting facilities to build upon Cardiff’s role as a major tourist, cultural and sporting destination for visitors and residents alike” feels out of place in this policy that is otherwise about neighbourhoods (local issues). Objective 11 is about tourism and otherwise the strategic policies don’t cover tourism. Should there be a tourism-specific strategic policy?		
<b>LDP response / changes to policy as a result of the ISA</b> New policy SP10 on tourism has now been included.		

SP13: SECURING HEALTH AND WELL-BEING AND RESILIENCE		
ISA Objective	Impact	Comments
1. Help deliver equality of opportunity and access for all	+	The policy aims to reduce health inequalities
2. Maintain and improve air quality	0	
3. Protect and enhance biodiversity, flora and fauna	0	The policy supports ‘accessible and useable green and blue spaces’ but would not actively improve biodiversity
4. Reduce emissions of greenhouse gases and adapt to the effects of climate change	+?	The policy supports active travel which should help to reduce greenhouse gas emissions
5. Protect and enhance historic and cultural heritage, including the Welsh Language	0	
6. Help deliver the growth of a sustainable and diversified economy	0	
7. Improve health and well-being	++	The whole aim of the policy is to improve health and reduce health inequalities
8. Use soils and natural resources efficiently and safeguard their quality	0	
9. Protect and enhance the landscape	0	
10. Minimise resource use and waste, increase re-use and recycling	0	

11. Maintain and enhance water quality and resources, and manage flooding	0	
<b>ISA comments and suggestions round 1:</b>		
This is a fine policy, but all aspects of it seem to already be covered by the other plan policies. It also feels a bit antiquated now that Covid restrictions have been lifted for several years. Focus on resilience to shocks instead of post-Covid recovery?		
<b>LDP response / changes to policy as a result of the ISA:</b> It is one of the Council's priorities and, whilst Covid restrictions have been lifted, the economy and health sector are still reeling. If anything, Covid has made people more aware of where they live and put greater value on access to local community facilities and shops including open space. Policy title has been changed from 'post pandemic recovery' to 'resilience'.		

<b>SP14: PROTECTING AND ENHANCING BUILT HERITAGE AND CULTURE</b>		
Cardiff's distinctive heritage assets will be protected, managed and enhanced, in particular archaeological remains and the character and setting of its Scheduled Ancient Monuments; Listed Buildings; Registered Historic Landscapes, Parks and Gardens; Conservation Areas; Locally Listed Buildings and other features of local interest that contribute positively to the visual and cultural distinctiveness of the city.		
ISA Objective	Impact	Comments
1. Help deliver equality of opportunity and access for all	0	
2. Maintain and improve air quality	0	
3. Protect and enhance biodiversity, flora and fauna	0	
4. Reduce emissions of greenhouse gases and adapt to the effects of climate change	0	
5. Protect and enhance historic and cultural heritage, including the Welsh Language	+?	The policy would protect Cardiff's cultural and heritage assets. It may enhance them, e.g. through improved access or support for the Welsh Language
6. Help deliver the growth of a sustainable and diversified economy	0	
7. Improve health and well-being	0	
8. Use soils and natural resources efficiently and safeguard their quality	0	
9. Protect and enhance the landscape	0	
10. Minimise resource use and waste, increase re-use and recycling	0	
11. Maintain and enhance water quality and resources, and manage flooding	0	
<b>ISA comments and suggestions:</b>		
Does the policy need to say more about the Welsh Language?		
<b>LDP response:</b>		
Support for the Welsh Language is referenced in SP10 v) where it better fits in the context of enhancement of communities rather than heritage assets.		
<b>Changes to policy as a result of ISA:</b>		
None		

SP15: WELSH LANGUAGE		
The Cardiff Local Authority area is an Area of Linguistic Importance, the LDP supports development proposals that protect, promote and strengthen the interests of the Welsh language to ensure a Bilingual Cardiff. Where appropriate, development proposals are expected to identify positive measures that enhance the interests of the Welsh language, that increase the opportunities to speak the language on a daily basis as well as identify any mitigation measures in the case of adverse effects. Land use proposals that have a significant adverse or disadvantageous effect on the viability and vitality of the Welsh language and Welsh culture will not be permitted – unless there are specific measures that strengthen the positive impacts and/or remove/mitigate the negative impacts.		
ISA Objective	Impact	Comments
1. Help deliver equality of opportunity and access for all	0	The policy actively works to support people who speak Welsh. However in practice its impact is likely to be limited.
2. Maintain and improve air quality	0	No significant impact
3. Protect and enhance biodiversity, flora and fauna	0	
4. Reduce emissions of greenhouse gases and adapt to the effects of climate change	0	
5. Protect and enhance historic and cultural heritage, including the Welsh Language	+	The policy supports and promotes use of the Welsh language.
6. Help deliver the growth of a sustainable and diversified economy	0	The policy promotes Cardiff as an area of linguistic importance. This supports jobs such as Welsh teachers, translators, and historical experts. However in practice the policy is likely to have a limited impact on Cardiff's economy.
7. Improve health and well-being	0	The policy may have indirect impacts such as giving pride and a feeling of community to Welsh-speaking residents. However its impact is likely to be limited.
8. Use soils and natural resources efficiently and safeguard their quality	0	No significant impact
9. Protect and enhance the landscape	0	
10. Minimise resource use and waste, increase re-use and recycling	0	
11. Maintain and enhance water quality and resources, and manage flooding	0	
ISA comments and suggestions: None		

SP16: PROTECTING THE SETTING OF THE CITY THROUGH A GREEN WEDGE		
To strategically manage the urban form of Cardiff and to protect the setting of the urban area, a Green Wedge is proposed on land North of the M4. Within this area development which prejudices the open nature of this land will not be permitted. Positive biodiversity, landscape, climate change mitigation and informal recreational management and enhancement measures will be encouraged in this area to further enhance the long-term role of the area as a key natural resource benefiting the city.		
ISA Objective	Impact	Comments
1. Help deliver equality of opportunity and access for all	-	Although the general concept of a Green Wedge is excellent, the wedge would be in the wealthier north of the city, north of the M4, and accessible primarily by car. This would exacerbate existing differences in access to open space between the more and less deprived parts of the city.
2. Maintain and improve air quality	0	Much of the Green Wedge area comprises either woodland or agriculture. The policy is unlikely to lead to significant additional tree planting etc. that would improve air quality, although it would help to maintain air quality.
3. Protect and enhance biodiversity, flora and fauna	+?	Much of the Green Wedge area comprises either woodland or agriculture. To the extent that the policy helps to change these to be more biodiversity-friendly, it could have a positive effect on biodiversity. The effect is unlikely to be major significant.
4. Reduce emissions of greenhouse gases and adapt to the effects of climate change	0	Much of the Green Wedge area comprises either woodland or agriculture. The policy is unlikely to lead to significant additional tree planting etc. that would absorb greenhouse gases, although it would help to adapt to the effects of climate change.
5. Protect and enhance historic and cultural heritage, including the Welsh Language	0	
6. Help deliver the growth of a sustainable and diversified economy	0	
7. Improve health and well-being	+	A Green Wedge would act as a recreational area; help to absorb greenhouse gases and air pollution; and help to protect water quality.
8. Use soils and natural resources efficiently and safeguard their quality	0	A Green Wedge would help to protect greenfield land from development, but would not actively improve soil quality or resource efficiency.
9. Protect and enhance the landscape	+?	A Green Wedge would protect and possibly enhance the landscape to the north of the M4
10. Minimise resource use and waste, increase re-use and recycling	0	
11. Maintain and enhance water quality and resources, and manage flooding	0	The Green Wedge would help to prevent urbanisation of the area and associated flooding and poor water quality. However it would not enhance water quality and resources.
ISA comments and suggestions: None		

SP17: MANAGING SPATIAL GROWTH THROUGH SETTLEMENT BOUNDARIES		
To strategically manage the spatial growth of Cardiff, settlement boundaries are proposed. In all areas outside the defined settlement boundaries, otherwise referred to as countryside, there will be a corresponding presumption against inappropriate development.		
ISA Objective	Impact	Comments
1. Help deliver equality of opportunity and access for all	0	
2. Maintain and improve air quality	0	Concentrating development within settlement boundaries prevents sprawl and the associated increased need to travel, although it does not actively improve air quality.
3. Protect and enhance biodiversity, flora and fauna	0	Concentrating development within settlement boundaries helps to prevent development of greenfield sites, thus protecting biodiversity, but it does not actively improve biodiversity.
4. Reduce emissions of greenhouse gases and adapt to the effects of climate change	0	Concentrating development within settlement boundaries prevents sprawl and the associated increased need to travel, although it does not actively reduce greenhouse gas emissions.
5. Protect and enhance historic and cultural heritage, including the Welsh Language	0	
6. Help deliver the growth of a sustainable and diversified economy	0	
7. Improve health and well-being	0	Concentrating development within settlement boundaries helps to protect the countryside, and associated health and recreational benefits, but it does not actively improve health.
8. Use soils and natural resources efficiently and safeguard their quality	+	Concentrating development within settlements reduces the need to inefficiently provide infrastructure to more sprawling land use; and it helps to protect agricultural soil.
9. Protect and enhance the landscape	+	Concentrating development within settlements actively helps to protect the countryside and associated undeveloped landscape.
10. Minimise resource use and waste, increase re-use and recycling	0	
11. Maintain and enhance water quality and resources, and manage flooding	0	Concentrating development helps to keep land undeveloped, and thus protecting its capacity to absorb water and protect water quality. However it would not actively improve water quality or resources.
<b>ISA comments and suggestions:</b> Specify what is meant by 'inappropriate development'. For instance, would equine-related proposals and farm diversification be 'inappropriate'?		
<b>LDP response:</b> This is covered in the supporting text.		
<b>Changes to policy as a result of ISA:</b> None		

#### SP18: DELIVERING SUSTAINABLE TRANSPORT AND ACTIVE TRAVEL

Development will be integrated with transport infrastructure and services and expected to help to:

- i. Achieve the target for 75% of all journeys to be made by sustainable transport modes by 2030 as detailed in the Cardiff Transport White Paper;
- ii. Improve the wellbeing of Cardiff residents with developments following the goals in the Wellbeing of Future Generations (Wales) Act, Llwybr Newydd: the Wales Transport Strategy 2021 and the Cardiff Wellbeing Strategy;
- iii. Reduce travel demand and dependence on the car;
- iv. Enable and maximise use of sustainable and active modes of transport;
- v. Integrate travel modes;
- vi. Provide for people with particular access and mobility requirements;
- vii. Improve safety for all travellers;
- viii. Improve the place making function of transport infrastructure;
- ix. Maintain and improve the efficiency and reliability of the transport network;
- x. Improve air quality;
- xi. Support the movement of freight by rail or water; and
- xii. Manage freight movements by road, minimise their impacts and where possible transfer long-haul freight to electric vehicles, smaller vans or e-cargo bikes for last-mile deliveries via multi-modal hubs.

ISA Objective	Impact	Comments
1. Help deliver equality of opportunity and access for all	+	Increasing active travel will help to support equality of access for all, e.g. those without a car
2. Maintain and improve air quality	+	Increasing active travel will help to reduce the need to travel by car, and associated air pollution
3. Protect and enhance biodiversity, flora and fauna	0	
4. Reduce emissions of greenhouse gases and adapt to the effects of climate change	+	Increasing active travel will help to reduce the need to travel by car, and associated greenhouse gas emissions
5. Protect and enhance historic and cultural heritage, including the Welsh Language	0	
6. Help deliver the growth of a sustainable and diversified economy	0	
7. Improve health and well-being	+	Increasing walking and cycling will help to improve physical and mental health. Reduced car use would reduce air pollution, also improving health.
8. Use soils and natural resources efficiently and safeguard their quality	+?	Reducing the need to travel by car could reduce the amount of car parking needed, helping to use soil and natural resources efficiently.
9. Protect and enhance the landscape	0	Reduced car use and associated infrastructure would help to protect (though not enhance) the landscape
10. Minimise resource use and waste, increase re-use and recycling	+	Transfer of journeys from the car to walking, cycling and public transport would reduce energy use per person-km, and reduce the need for more roads, parking spaces etc.
11. Maintain and enhance water quality and resources, and manage flooding	0	

#### ISA comments and suggestions round 1:

The 'active' element of the policy is limited to "Development will be integrated with transport infrastructure and services in order to increase active travel". The rest is about what the policy hopes to achieve (not how

it will deliver these aims, despite the policy title). Should a second sentence be added, e.g. "Developments will be expected to help to..."? Or should the policy be more specifically about what developments can do, e.g. limit car parking, provide cycle parking

**LDP response / changes to policy as a result of the ISA:**

Added "Developments will be expected to help to:"

**SP19: SECURING NEW TRANSPORTATION INFRASTRUCTURE**

Developments that support the delivery of the following new infrastructure projects in Cardiff will be supported:

- North West Corridor
- North and South East Corridors
- South West Corridor
- Northern Corridor
- Eastern Bay Link
- St Mellons rail interchange including Park and Ride

ISA Objective	Impact	Comments
1. Help deliver equality of opportunity and access for all	+	The policy aims to provide strategic transportation infrastructure to facilitate access to services. This will improve access to jobs, homes and facilities/services. It is a mixture of public transport and road projects, so will have mixed impact in terms of providing access for all.
2. Maintain and improve air quality	++/-	The first four schemes would encourage non-car modes of transport, helping to improve air quality. The two Park and Ride projects would increase air pollution near the P&R but help to reduce it in the city centre. In the short term, construction of the schemes is likely to increase dust and possibly air pollution. The Eastern Bay Link is a road development so increases air pollution (though it reduces congestion elsewhere so improves air quality there).
3. Protect and enhance biodiversity, flora and fauna	--	The St. Mellons rail interchange would be in an SSSI and near the Severn Estuary SPA/SAC/Ramsar sites. It would facilitate the development of land around the interchange, with associated severe impacts on biodiversity. Please see the Habitats Regulations Assessment. The impacts of the other schemes on biodiversity are unclear.
4. Reduce emissions of greenhouse gases and adapt to the effects of climate change	++/-	See 2.
5. Protect and enhance historic and cultural heritage, including the Welsh Language	-	The St. Mellons rail interchange would be in an Archaeologically Sensitive Area, and adjacent a historic landscape. The other schemes would not affect designated heritage assets.
6. Help deliver the growth of a sustainable and diversified economy	+	The schemes would help to reduce congestion, improve the speed and reliability of travel, and link Cardiff to neighbouring areas. They would help to support Cardiff's economy by improving access to areas proposed for new housing and employment. In the short term, during construction, congestion may increase. It is dubious whether development at Wentloog can be called 'sustainable'.

7. Improve health and well-being	+	The schemes would support walking and cycling.
8. Use soils and natural resources efficiently and safeguard their quality	-	St. Mellons and North West would both be primarily on greenfield land. A P&R at St. Mellons would take considerable land. Agricultural soil quality at St. Mellons is low (Grade 5) but the North West Corridor is likely to run through Grade 2 agricultural land.
9. Protect and enhance the landscape	--	Construction of the infrastructure schemes will have temporary negative impacts on the landscape. In the longer term, the first four schemes should reduce the need for roads, parking etc., with associated landscape benefits.  The St. Mellons rail interchange would be next to a historic landscape, and would facilitate development adjacent to an LDP Special Landscape Area. It would be an urban development in an otherwise flat landscapes of reens. Depending on the route chosen for the North West Corridor, it could affect a Special Landscape Area.
10. Minimise resource use and waste, increase re-use and recycling	+/-	Construction of the infrastructure schemes will require resources, but in the longer term they should reduce the need for roads, parking etc., with associated reduction in the need for resources. The first four schemes will also be more energy efficient than car-based alternatives.
11. Maintain and enhance water quality and resources, and manage flooding	-/-	Both the St. Mellons and the North West Corridor projects would affect multiple watercourses. The St. Mellons site would be in the Gwent Levels SSSI, which is designated in part because of its extensive system of ditches/reens, and the flora/fauna these contain. Large scale development at St. Mellons, including a P&R, is likely to increase flooding.

**ISA comments and suggestions round 1:**

Clarify whether 'contribution' means 'contributions via CIL payments' or, if not, what it does mean.

**LDP response / changes to policy as a result of the ISA:**

"demonstrate contribution and alignment with" replaced with "support the delivery of"

**ISA comments and suggestions round 2:**

Eastern Bay Link and St. Mellons have been added since the last round of appraisal. Information now added from the appraisal of former policy T8. ISA recommendations from T8 were:

- The proposals map should include SSSIs, SACs and SPAs to more clearly show where proposed projects are in relation to these constraints.
- The Eastern Bay Link project seems to be finished – see <https://www.gov.wales/a4232-eastern-bay-link-queensgate-ocean-way> so remove that from this policy, as it is no longer needed.
- Also remove the St. Mellons Rail Interchange, which would be located in/adjacent to, and support development in, an SSSI, historic landscape, and archaeologically sensitive area.

**LDP response / changes to policy as a result of the ISA:**

- In accordance with Welsh Government guidance I confirm that the SSSI, SAC and SPA boundaries will be shown on the Constraints Map which accompanies the Deposit Plan and Proposals Map.
- There is one section of the Eastern Bay Link which needs to be upgraded along Rover Way. See light blue line on map below. Plans for upgrading this section are currently being drawn up and the upgraded road will include cycling and walking routes as an integral part of the design and a reduced speed to minimise air pollution and noise. It will also free up capacity along Newport Road within the urban area so bus services can run more efficiently into the city centre.
- The St Mellons Rail Interchange forms part of the larger Cardiff Parkway scheme for a new Business Park linked to the new rail station and integral Park and Ride site. The scheme will also improve significantly public transport links for residents from the east of city or presently have no rail service access. This scheme is currently with Welsh Ministers for consideration with a decision expected shortly.

SP20: SECURING CLIMATE RESILIENCE, DE-CARBONISATION AND RENEWABLE ENERGY IN NEW DEVELOPMENTS		
To mitigate against the causes of climate change and to adapt to the effects of climate change, development proposals must follow the energy hierarchy and demonstrate how they have worked towards:		
<ul style="list-style-type: none"> <li>i. Preventing development that places additional de-carbonisation burden on the city;</li> <li>ii. Following the Energy Hierarchy principles reducing construction and operational carbon emissions to the lowest viable means having assessed a full range of options;</li> <li>iii. Protecting and increasing carbon sinks through protection of soils and vegetation and increasing tree planting;</li> <li>iv. Adapting to the implications of climate change at both a strategic and detailed design level;</li> <li>v. Increasing energy efficiency and the supply of renewable energy;</li> <li>vi. Preventing development that increases flood risk; and</li> <li>vii. Reducing the impact of heat.</li> </ul>		
ISA Objective	Impact	Comments
1. Help deliver equality of opportunity and access for all	0	
2. Maintain and improve air quality	+?	Actions to reduce climate change are also likely to reduce air pollution, e.g. switch to renewable energy production, reduced car use
3. Protect and enhance biodiversity, flora and fauna	+?	Reducing climate change will help to protect biodiversity. Protecting soils and vegetation
4. Reduce emissions of greenhouse gases and adapt to the effects of climate change	++	The whole purpose of the policy is about reducing climate change and adapting to it. Policy wording has been strengthened to include tree planting and reducing the impact of heat.
5. Protect and enhance historic and cultural heritage, including the Welsh Language	0	
6. Help deliver the growth of a sustainable and diversified economy	+?	The policy will help to prevent flooding, which would help to protect the economy but not help to grow it. Development and supply of renewable energy would help to support a growing economy.
7. Improve health and well-being	0	Current wording of the policy is vague, but protection from the impacts of climate change, including flooding, would help to protect health and wellbeing.
8. Use soils and natural resources efficiently and safeguard their quality	0	The policy would help to protect soils and associate carbon sinks, but not enhance them
9. Protect and enhance the landscape	-?	Depending on the type of renewable energy supported through the policy, the impacts on the landscape (e.g. of onshore wind farms or solar farms) could be negative.
10. Minimise resource use and waste, increase re-use and recycling	0	
11. Maintain and enhance water quality and resources, and manage flooding	0	
ISA comments and suggestions:		
<p>a) "...take into account the following factors" suggests that the factors are external to the developments rather than something that they should do. Maybe "show how they have worked towards", or "show how they have achieved"?</p>		

b) Given that Objective 1 refers to zero energy homes by 2025, should this policy be clearer about that requirement?

c) iii states "Protecting and increasing carbon sinks through protection of soils and vegetation" ... but I suspect that carbon sinks can really be 'increased' only through more vegetation, so maybe "... and increased tree planting" or similar?

**LDP response / changes to policy as a result of the ISA:**

a) "take into account" reworded to "show how they have worked towards"

b) The home energy efficiency target will be fully considered when drafting the detailed policies over the next twelve months

c) "and increasing tree planting" added to iii.

**SP21: PROTECTING, COMPENSATING AND ENHANCING GREEN INFRASTRUCTURE AND BIODIVERSITY**

Green (to include blue and aerial) infrastructure provides nature-based solutions to a range of environmental and societal issues, such as the climate emergency, nature emergency, flooding, air pollution, urban heat island effects, public health and mental well-being. Green infrastructure / biodiversity assets are key to Cardiff's character, value, distinctiveness and sense of place. Cardiff's green infrastructure assets include:

- i. Undeveloped countryside and coastline.
- ii. Non-statutory to statutorily protected sites.
- iii. Priority/protected habitats and species, and the general range of species across Cardiff.
- iv. Landscape, geological and heritage features which contribute to Cardiff's setting.
- v. Hydrological networks including strategically important river valleys of the Ely, Taff, Nant Fawr and Rhymney and streams, lakes and ponds.
- vi. Trees, woodlands and hedgerows.
- vii. Soils
- viii. Roadside verges, roundabout islands and screen planting along roads.
- ix. Strategic recreational routes, cycleways and the public rights of way network;
- x. A range of active and disused railway lines, providing habitat connectivity throughout.
- xi. Parks, playing fields, green play areas and open green spaces with opportunities to play.
- xii. Growing spaces including allotments, community orchards and private gardens.
- xiii. Freshwater habitats such as Cardiff Bay, Llanishen and Lisvane Reservoirs, and a network of ponds throughout the city, and
- xiv. Holistic integrated surface water management systems.

Development will be expected to protect and enhance the integrity, extent, diversity, quality and connectivity of green infrastructure assets; provide multi-functional green spaces; provide "Net Benefits for Biodiversity"; and ensure the resilience of ecosystems can be maintained. A Green Infrastructure Assessment covering existing green infrastructure and future opportunities will be required for all significant development proposals.

ISA Objective	Impact	Comments
1. Help deliver equality of opportunity and access for all	+	Good quality green infrastructure allows good access by walking and cycling, and helps to improve health for all. The policy works jointly with other policies that support networks of walking and cycling.
2. Maintain and improve air quality	+	Green infrastructure helps to absorb air pollutants. The policy aims to improve the city's green infrastructure.
3. Protect and enhance biodiversity, flora and fauna	++	The whole aim of the policy is to support and enhance biodiversity

4. Reduce emissions of greenhouse gases and adapt to the effects of climate change	+	Green infrastructure helps to absorb greenhouse gases and provide cooling and shade. The policy aims to improve the city's green infrastructure.
5. Protect and enhance historic and cultural heritage, including the Welsh Language	0	
6. Help deliver the growth of a sustainable and diversified economy	0	
7. Improve health and well-being	+	Green infrastructure helps to reduce air pollution, provide shade, and support walking and cycling
8. Use soils and natural resources efficiently and safeguard their quality	0	
9. Protect and enhance the landscape	0?	The policy will help to protect the existing landscape. It may help to improve it.
10. Minimise resource use and waste, increase re-use and recycling	0	
11. Maintain and enhance water quality and resources, and manage flooding	+	Green infrastructure, including SUDS, ponds and streams help to protect water quality and reduce flooding.

**ISA comments and suggestions round 1:**

- The policy uses the terms 'green and blue infrastructure', 'green infrastructure', 'network of green infrastructure', 'biodiversity', 'natural heritage assets' and 'natural heritage network'. Can this be simplified?
- Include streams, lakes and ponds in the list of natural heritage assets?
- "Protection and conservation of natural heritage network needs to be reconciled with the benefits of development" suggests a gradual erosion of natural heritage assets. Can the policy more clearly encourage a hierarchy of avoid – reduce – compensate, and 'improve' where possible? (SP20i is a good example of how this can be done)
- The Environment (Wales) Act 2016 requires local authorities to not only maintain and enhance biodiversity (which I'm not sure this policy fully does) but also promote the resilience of ecosystems. Resilience is also mentioned in Objective 10 of the plan. This should be included in the policy.
- Is there potential to specify how any compensation should be provided? E.g. in areas that are currently deficient in open space and biodiversity?

**LDP response / changes to policy as a result of the ISA:**

- Now simplified to green infrastructure
- Streams, lakes and ponds now included in the list of natural heritage assets
- The policy has been strengthened to be more protective
- The policy has been reworded to refer to the resilience of ecosystems
- Reference to compensation has been removed

**ISA comments and suggestions round 2:**

- Nice reference to non-statutory sites and general range of species
- I'm not clear about what 'aerial infrastructure' is. I imagine that impacts on aerial infrastructure could include large wind turbines affecting bird movements; tall buildings ditto; bat flight lines interrupted by new roads? Does this need to be explained more?

**LDP response / changes to policy as a result of the ISA:** No change.

In the interests of the long-term sustainable development of Cardiff, development proposals must take full account of the need to avoid impacts on the city's natural resources where ever possible and where not possible minimise and mitigate pollution, in particular the following elements:

- i. Safeguarding the best and most versatile agricultural land;
- ii. Safeguarding water resources and improving water quality, including underground surface and coastal waters;
- iii. Reducing air pollution by minimising effects from industrial, domestic and road transportation sources and managing air quality; and
- iv. Remediating land contamination through the redevelopment of contaminated sites.

ISA Objective	Impact	Comments
1. Help deliver equality of opportunity and access for all	0	
2. Maintain and improve air quality	+	Over time the policy should lead to a cumulative improvement in air quality
3. Protect and enhance biodiversity, flora and fauna	+	Protection/improvement in air, water and soil quality will have an indirect benefit for biodiversity
4. Reduce emissions of greenhouse gases and adapt to the effects of climate change	0	Protection/improvement in air, water and soil quality will indirectly reduce greenhouse gases and help to capture carbon. However the impact is likely to be limited.
5. Protect and enhance historic and cultural heritage, including the Welsh Language	0	
6. Help deliver the growth of a sustainable and diversified economy	0	In the long term, the economy can only grow if there are enough natural resources. However over the lifetime of the plan the impact of this policy on the economy is likely to be limited.
7. Improve health and well-being	+?	Protection/improvement in air, water and soil quality will have a minor, indirect benefit for human health. However these are likely to be limited.
8. Use soils and natural resources efficiently and safeguard their quality	+	Remediating land contamination will have a positive impact on soil quality
9. Protect and enhance the landscape	0	Protecting agricultural land helps to protect (but not enhance) the landscape
10. Minimise resource use and waste, increase re-use and recycling	0	The policy aims to minimise impacts on air, water and soil, but not to minimise their use
11. Maintain and enhance water quality and resources, and manage flooding	0?	The policy aims to protect (but not enhance) water quality and water resources. Unlikely to lead to an improvement over time as currently phrased.

**ISA comments and suggestions round 1:**

- Water resources could be better protected by setting limits on water use/person/day in new and retrofitted developments. Will this be set out in more detailed policies?
- Can the policy be more ambitious re. improvements, for instance for buffers around water courses, reduced per person water use, improving air quality in AQMAs etc?

**LDP response:**

These matters will be fully considered when drafting the detailed policies over the next twelve months.

**Changes to policy as a result of ISA:**

None

**ISA comments and suggestions round 2:**

Neither of the bullet points above seems to have been incorporated into development policies

**Changes to policy as a result of ISA:**

These issues are considered in detailed policies:

W1 Water Sensitive Design which refers to water cycle management;

W2 Protection of Water Resources, Policy;  
 PC1 Air, Noise, Light Pollution and Contaminated Land; and  
 CP4 River Corridors.

**SP23: MANAGING WASTE**

Waste arisings from Cardiff will be managed by:

- i. Supporting waste prevention and reuse and the provision of facilities that use recycled or composted products;
- ii. Promoting and supporting additional sustainable waste management facilities in a manner that follows the waste hierarchy and the principles of an integrated and adequate network of waste installations; nearest appropriate installation; self-sufficiency and protection of human health and the environment;
- iii. Encouraging the provision of in-building treatment facilities on existing and allocated areas of general industry; and
- iv. Supporting the provision and maintenance of sustainable waste management storage and collection arrangements in all appropriate new developments.

ISA Objective	Impact	Comments
1. Help deliver equality of opportunity and access for all	0	
2. Maintain and improve air quality	0	The policy will help to minimise transport movements associated with waste management, and the need to dispose of waste by burning
3. Protect and enhance biodiversity, flora and fauna	0	
4. Reduce emissions of greenhouse gases and adapt to the effects of climate change	0	The policy will help to minimise transport movements associated with waste management, and the need to dispose of waste by burning
5. Protect and enhance historic and cultural heritage, including the Welsh Language	0	
6. Help deliver the growth of a sustainable and diversified economy	0	
7. Improve health and well-being	0	The policy will help to minimise the production of waste, its transport, and inappropriate waste management. This will help to protect people's health although not necessarily improve it.
8. Use soils and natural resources efficiently and safeguard their quality	0	
9. Protect and enhance the landscape	0	
10. Minimise resource use and waste, increase re-use and recycling	++	The policy will help to reduce waste and manage it appropriately
11. Maintain and enhance water quality and resources, and manage flooding	0	The policy would indirectly help to protect water quality, but not actively improve it.

**ISA comments and suggestions:**

Should iv. (waste prevention, reuse and recycling) symbolically precede the waste management policies, in line with the waste hierarchy?

**LDP response / changes to policy as a result of the ISA:**

Waste prevention moved to the top

## APPENDIX C. APPRAISAL OF DETAILED POLICIES

This appendix appraises the impacts of the detailed policies of the Deposit RLDP. Where the appraisal refers to “ISA comments and suggestions round 1” (or does not specify the round), it refers to ISA comments made in 2023 and early 2024. Where the appraisal refers to “round 2”, it refers to comments from summer 2024 to November 2024. “Changes to policy as a result of the ISA” are the council’s response to these comments – part of the mitigation measures triggered by the ISA.

## HOUSING

H1A: STRATEGIC HOUSING SITES				
The following sites strategic or residual areas of strategic sites are allocated for housing:				
Site Ref	Site Name		Estimated Units	Site Size (Ha)
SH1.1	Land at Church Farm (Part of adopted LDP Strategic Site F)		205	14.16
SH1.2	Land south of the M4 Motorway, West of Rudry Road, Lisvane (Part of adopted LDP Strategic Site F)		100	4.96
SH1.3	Land to the north of Ty-Draw Road (Part of adopted LDP Strategic Site F)		350	15.33
SH1.4	Land south of Llantrisant Road (Part of adopted LDP Strategic Site D)		300	13
SH1.5	Land at Llantrisant Road (A4119) (Part of adopted LDP Strategic Site D)		150	8.73
SH1.6	Land at Llwynioli Farm (Part of adopted LDP Strategic Site D)		70	3.4
SH1.7	Former Gas Works, Ferry Road		500	3.98
ISA Objective	Impact	Comments		
1. Help deliver equality of opportunity and access for all	++/-	Sites would provide 1675 new homes, which would help to meet the need of Cardiff’s population for homes. However all of the sites are in Welsh Index of Multiple Deprivation level 1, which would not lead to the regeneration of deprived areas or clearly address existing imbalances of deprivation.		
2. Maintain and improve air quality	-/-	All the sites are far from existing services. Development of the sites should lead to the provision of some new services, but transport to/from the sites is still likely to be by car, with associated impacts on air quality.		
3. Protect and enhance biodiversity, flora and fauna	--	SH1.5, 1.6 and 1.7 are adjacent Sites of Importance for Nature Conservation (SINCs), which are a local level designation. A SINC stream runs through SH1.1. SH1.4 is about 20% SINC (this is expected to remain as open space), and SH1.1 is about 10% SINC. None of the sites are on or adjacent nationally or internationally important nature conservation sites. However, cumulatively they involve developing 54.6ha of greenfield land (though some of this will be kept for biodiversity and recreation). Cumulatively they will have a significant impact on biodiversity.		

4. Reduce emissions of greenhouse gases and adapt to the effects of climate change	--	All the sites are far from existing services. Development of the sites should lead to the provision of some new services, but transport to/from the sites is still likely to be by car, with associated greenhouse gas emissions. The sites are also on greenfield land, affecting carbon fixing potential.
5. Protect and enhance historic and cultural heritage, including the Welsh Language	0	None of the sites is in/near a heritage designation. No significant impact.
6. Help deliver the growth of a sustainable and diversified economy	+	The provision of 1675 new homes supports the delivery of economic growth in Cardiff
7. Improve health and well-being	+/-	The provision of 1675 new homes is likely to be good for the health and wellbeing of the residents of the new homes. However they will increase traffic movements and associated air pollution/greenhouse gas problems, and cause the loss of open space.
8. Use soils and natural resources efficiently and safeguard their quality	--	Most of the sites are greenfield: the policy would cause the loss of 54.6ha of greenfield land. On average, housing density on sites SH1.1-SH1.6 would be 18.8 homes/ha which is quite low.
9. Protect and enhance the landscape	--	None of the sites are near a historic landscape. However SH1.5 is adjacent a Special Landscape Area (SLA); SH1.4 is about 260m from a SLA; SH1.6 is 715m from a SLA; and SH1.1 is 848m from a SLA. AltSH1.2 is 350m from a SLA. Although there may be some screening of views to/from the SLA, overall the cumulative impact of the sites on SLAs is likely to be significant. Cumulatively, the sites will also result in the development of 54.6ha of greenfield land, changing the landscape from rural to urban/suburban.
10. Minimise resource use and waste, increase re-use and recycling	-/-	Development of 1675 homes on greenfield land will by definition increase the use of resources. The sites range from agricultural land quality 2 to 3b, except where they include SINCS (grade 5): as such, there would be a significant loss of good quality agricultural land.
11. Maintain and enhance water quality and resources, and manage flooding	-/-	All the sites except SH1.7 are not covered by any flood zone (i.e. they are unlikely to flood). SH1.7 is within defended zones for seas and rivers. Cumulatively, flooding of the sites is unlikely to be a significant issue. However cumulatively the development of 54.6ha of greenfield land has the potential to increase flooding elsewhere.  All of the sites either contain streams/ditches (SH1.1, 1.2, 1.4, 1.5, 1.6) or are adjacent to streams or the River Taff (SH 1.3, 1.7). Development of the sites has the potential to affect water quality in these water bodies.

**ISA comments and suggestions:**

Should the policy start with “The following strategic sites...”?

None of the strategic housing sites are fully sustainable: they are located far from existing services, are on greenfield land, would encourage car use and associated impacts, and would have significant impacts on biodiversity and water quality. Reconsider whether (all of) these greenfield sites are needed.

Consider increasing housing density on the sites, which may reduce the need to provide all of the sites for housing.

Do not develop the on-site SINCS, and include an undeveloped buffer zone around all the SINCS.

Include screening as appropriate to prevent views to/from Special Landscape Areas.

Ensure that water bodies on/near the sites are protected from development impacts.

**Changes made in response to the ISA:**

Policy amended to start with “The following strategic sites...”.

These greenfield strategic sites (excluding SH1.7 which is a brownfield site) are required to provide a range and choice of housing and to fully deliver the wider master plans for the sites and deliver the associated infrastructure in terms of transportation, schools, community facilities, etc.

As set out above these strategic sites have been fully master planned in the adopted LDP and the housing numbers are required to fully deliver these master plans and related infrastructure. The master plans for these sites have taken account of the need to protect SINCs, harm to the Special Landscape Areas and the need protect water bodies on or near the sites. These matters will also need be considered in detail when determining the planning applications for these sites.

**H1B: NON-STRATEGIC HOUSING SITES**

The following non-strategic sites are allocated for housing:

Site Ref	Site Name	Estimated Units	Site Size (Ha)
H1.1	Land at areas 9-12, St Mellons	150	3.98
H1.2	Rookwood Hospital	90	3.4

ISA Objective	Impact	Comments
1. Help deliver equality of opportunity and access for all	0	H1.2 is in WIMD rank 1, so would not help to regenerate a deprived area. H1.1 is in WIMD rank 3. Both sites are located relatively close to most existing services. Together, the sites provide 240 dwellings in accessible locations. They are located relatively close to most existing services, so would allow residents to walk and cycle to those services.
2. Maintain and improve air quality	-?	Neither site is in an Air Quality Management Area. Cumulatively, the sites would increase air pollution through greater vehicle use. However, this is unlikely to be significant on an individual site level.
3. Protect and enhance biodiversity, flora and fauna	-	About 5-10% of H1.1 is SSSI, and two-thirds is SINC. The site is also on the edge of a green corridor parallel to the railway line. Developing the site would have significant negative impacts on biodiversity. H1.2 is unlikely to have significant impacts on biodiversity.
4. Reduce emissions of greenhouse gases and adapt to the effects of climate change	0	Both sites are located in areas that are relatively close to services and employment sites, within 800m of a train station, and within 400m of a bus stop. Cumulatively, the sites would increase greenhouse gas emissions through greater vehicle use, but (especially compared to other possible development sites) this is unlikely to be significant.
5. Protect and enhance historic and cultural heritage, including the Welsh Language	-/--	About 15% of H1.1 is in a historic landscape. The site is entirely within an archaeologically sensitive area, so the impacts of developing the site would be significant negative.  About 60% of H1.2 is historic parks & gardens, and the site contains two listed buildings. Redevelopment of the site could help to preserve the listed buildings.
6. Help deliver the growth of a sustainable and diversified economy	+?	Cumulatively, the sites would support economic development in Cardiff, by providing housing in accessible locations (see 4.).
7. Improve health and well-being	+	Provision of 240 homes near green areas and jobs is likely to be good for the health and wellbeing of the residents of the new homes.
8. Use soils and natural resources efficiently and safeguard their quality	+	H1.2 is on previously developed land. H1.1 is greenfield land, mostly of agricultural land grade 3b. At 38 homes/ha, development at H1.1

		would be quite dense, which is efficient use of land, but this still would urbanise 4ha of previously greenfield land.
9. Protect and enhance the landscape	0	About 15% of H1.1 is in a historic landscape (HL), it is about 800m from a Special Landscape Area (SLA), and the overall site is greenfield in a flat, albeit not particularly visible area. H1.2 is more than 1km from a HL or SLA.
10. Minimise resource use and waste, increase re-use and recycling	0/-	The policy involves developing 240 new homes, which by definition will involve some resource use.
11. Maintain and enhance water quality and resources, and manage flooding	-	H1.2 is not covered by any flood zone (i.e. it is unlikely to flood). H1.1 is within defended zones for seas and rivers; it also lies near the reens of the SSSI, and could have a negative impact on them.
<b>ISA comments and suggestions:</b>		
<p>At H1.1, sustainability constraints are that the site is on an SSSI, SINC, in a historic landscape, in an archaeologically sensitive area, and on greenfield land. There are also possible impacts of runoff from the site on the reens of the SSSI. At H1.2, sustainability constraints are that the site includes historic parks &amp; gardens and is adjacent to a conservation area.</p> <p>Whilst site H1.2 is sustainable (with surmountable limitations in terms of heritage), H1.1 is definitely not, as it affects two national and one local level designation. There are more sustainable locations for housing, e.g. Allied Bakeries (2.7ha), Former Gas Works (10.2ha). Recommend choosing one of these sites instead.</p> <p>Should there be a policy on expected housing density? Working from home?</p>		
<b>Changes made in response to the ISA:</b>		
<p>Comments noted on the proposed sites designations. The assessment of the sites will set out mitigation measures to minimise the impact on these designations.</p> <p>The policy includes the expected number of dwellings the Council is seeking to deliver on each of the sites and this needs to be treated as an estimate so it is flexible should the need for the mitigation measures as set out above reduce the amount of housing the site can deliver.</p> <p>In terms of working from home Policy SP4 Securing Good Quality and Sustainable Design requires development to be designed so it is adaptable to future changes in social, economic and technological requirements among other considerations.</p>		

## H2: HOUSING LED REGENERATION AREAS

The following sites are identified as housing led regeneration areas that provide high density, sustainable, mixed use development:-

Site Ref	Site Name	Estimated Units	Site Size (Ha)
H2.1	International Sports Village	1,000	5.88
H2.2	Whitchurch Hospital/Velindre Site	410	26
H2.3	Cardiff Gate Business Park (West)	200	6.4
H2.4	Roath Dock (North side)	316	3.67
H2.5	Porth Teigr and Alexandra Head	2,310	27
H2.6	Hadfield Road	200	4.8
H2.7	Callaghan Square	315	3.36

ISA Objective	Impact	Comments
1. Help deliver equality of opportunity and access for all	++/-	Sites H2.1, 2.3, 2.4 and 2.5 are all in WIMD rank 1, so would not help to regenerate a deprived area. H2.2 is WIMD rank 4, so would help to regenerate a deprived area. H.26 and 2.6 are

		respectively rank 2 and 3. The provision of nearly 5000 homes will significantly help in providing homes for people who need them.
2. Maintain and improve air quality	-	Sites H2.1*, 2.3 and 2.5 are all far from existing services, making future development likely to be car based. Sites H2.2, 2.4, 2.6 and 2.7 are nearer existing services. Cumulatively, development of these sites is likely to increase air pollution.  * Site H2.1 is near Cogan in Vale of Glamorgan, and so may be nearer to existing services than is shown on the Cardiff Council GIS maps
3. Protect and enhance biodiversity, flora and fauna	-	All the sites except H2.4 are adjacent Sites of Importance for Nature Conservation. Site H2.5 is also adjacent the Severn Estuary SPA/SAC/Ramsar site. Unless there is very good mitigation, it is likely that the regeneration sites will have a negative cumulative impact on biodiversity.
4. Reduce emissions of greenhouse gases and adapt to the effects of climate change	-	See 2. Although the policy calls for high density, sustainable development, it is still likely that much of the travel to/from the sites would be by car.
5. Protect and enhance historic and cultural heritage, including the Welsh Language	-?	Site H2.2 would affect a historic park and garden. Site H2.5 is adjacent a conservation area, and site H2.7 is adjacent an archaeologically sensitive area. Cumulatively, the sites could have a significant impact on the historic and cultural heritage.
6. Help deliver the growth of a sustainable and diversified economy	+	Jointly, the sites would provide employment and housing development. The aim would be to regenerate the sites, helping to revitalise and diversify the economy.
7. Improve health and well-being	+	Provision of a range of homes and jobs is likely to improve health and wellbeing for the new residents of the areas.
8. Use soils and natural resources efficiently and safeguard their quality	-	H2.3 is on greenfield land, and H2.1 and H2.5 are partly on greenfield land. The remaining sites are on previously developed land. Agricultural land quality at H2.1 and H2.3 is good, so there would be some loss of high quality soils.
9. Protect and enhance the landscape	+/-	None of the sites are near a special landscape area or historic landscape. Redevelopment of some of the sites may improve the landscape but overall the impact on the landscape is likely to be a mix of positive and negative impacts.
10. Minimise resource use and waste, increase re-use and recycling	-	The policy involves developing new homes and mixed use areas, which by definition will involve some resource use.
11. Maintain and enhance water quality and resources, and manage flooding	-	H2.4 and 2.5 are outside a defenced zone and within Zone 3 for seas or rivers: they are at significant risk of flooding. H2.2 is outside a defended zone and within Zone 2 for seas or rivers. The other sites are within defended zones or not covered by flood zones.
<b>ISA comments and suggestions:</b>		
Given how specifically the boundary of these sites has been shown on the map, it feels odd that the policy does not provide more detail for them, e.g. number of homes to be provided, density, types of services expected to be provided, expected mitigation measures. The supporting text notes that the sites "are likely to contribute significantly to meeting housing development requirements" but it is unclear how they will do this.		
Specify what is meant by "housing led regeneration areas that provide high density, sustainable, mixed use development" (n.b. the fact that 4 of the 7 sites are in WIMD rank 1 makes it unclear how they will "regenerate").		
Clarify how this policy relates to the employment policies.		

Reconsider International Sports Village (H2.1) as a site, unless it is clear that Cogan + new services on site will allow most services/facilities to be accessed by walking and cycling.

Reconsider Cardiff Gate West (H2.3) and Port Teigr (H2.5) as both sites are quite far from existing services, and so will be accessible primarily by car, making the concept of 'sustainable' dubious.

**Changes made in response to the ISA:**

These sites will be subject to detailed masterplanning in accordance with Policy SP3 which will set out in detail the number of homes, density, infrastructure and mitigation measures required to support the development of these sites. In advance of this for clarity I have provided estimates of the number of dwellings for each of the sites based on the candidate site submissions:

- H2.1 International Sports Village – 1000 homes
- H2.2 Whitchurch Hospital/Velindre Site – 410 homes
- H2.3 Cardiff Gate Business Park (West) – 200 homes
- H2.4 Roath Dock (North side) – 316 homes
- H2.5 Porth Teigr and Alexandra Head – 2,310 homes
- H2.6 Hadfield Road – 200 homes
- H2.7 Callaghan Square – 315 homes

**Total – 4,751 homes**

The explanatory text provides more detail on what is meant by the term "housing led regeneration areas" which is derived from the definition in PPW (paragraph 4.2.19). As set out in PPW (paragraph 4.2.18) they seek to maximise the use of suitable previously developed and/or underutilised land for housing development to assist regeneration and relieve pressure for development on greenfield sites.

In terms of the relationship with employment policies the areas do not overlap with the protected employment areas in the plan with the exception of H2.6 where employment uses are proposed on the frontage to Hadfield Road. In addition mixed uses are encouraged within these areas including employment uses.

An outline application for International Sports Village (H2.1) has now been submitted which provides more details on the uses and infrastructure proposed for the site and how they will be accessed by walking and cycling - see details [here](#)

As set out above masterplans will be prepared for the Cardiff Gate West (H2.3) and Port Teigr and Alexandra Head (H2.5) areas which will set out the required infrastructure to support the development of the areas. This will include proposals for sustainable modes of transport including public transport, walking and cycling. In respect of Porth Teigr and Alexandra Head (H2.5) this includes provision of a planned extension to the Cardiff Metro.

**H3: AFFORDABLE HOUSING**

The Council will require 20% affordable housing on Brownfield sites and 30% affordable housing on Greenfield sites in all residential proposals that:

- Contain 5 or more dwellings; or
- Sites of or exceeding 0.1 hectares in gross site area; or
- Where adjacent and related residential proposals result in combined numbers of dwellings or site size areas exceeding the above thresholds, the Council will seek affordable housing based on the affordable housing target percentages set out above.

Affordable housing will be sought to be delivered on-site in all instances unless there are exceptional circumstances.

ISA Objective	Impact	Comments
1. Help deliver equality of opportunity and access for all	++/-	The policy will help to provide affordable housing to people who need it, although it will not provide housing for everyone on the council housing register.
2. Maintain and improve air quality	0	
3. Protect and enhance biodiversity, flora and fauna	0	No significant impact

4. Reduce emissions of greenhouse gases and adapt to the effects of climate change	0	
5. Protect and enhance historic and cultural heritage, including the Welsh Language	0	
6. Help deliver the growth of a sustainable and diversified economy	+?	The policy will help to provide housing for people who need it, supporting Cardiff's role as a thriving economic centre.
7. Improve health and well-being	+	Provision of adequate accommodation supports good physical and mental health
8. Use soils and natural resources efficiently and safeguard their quality	0	
9. Protect and enhance the landscape	0	
10. Minimise resource use and waste, increase re-use and recycling	0	
11. Maintain and enhance water quality and resources, and manage flooding	0	
<b>ISA comments and suggestions:</b> Presumably the numbers are supported by an analysis of viability?		
<b>Changes made in response to the ISA:</b> Avison Young have undertaken a Viability Appraisal which supports these targets.		

<b>H4: CONVERSIONS TO FLATS</b>		
ISA Objective	Impact	Comments
1. Help deliver equality of opportunity and access for all	+	The policy would help to deliver new flats, which would help to meet Cardiff's need for housing, and particularly cheaper accommodation for more deprived groups.
2. Maintain and improve air quality	0	
3. Protect and enhance biodiversity, flora and fauna	0	
4. Reduce emissions of greenhouse gases and adapt to the effects of climate change	0	
5. Protect and enhance historic and cultural heritage, including the Welsh Language	0	
6. Help deliver the growth of a sustainable and diversified economy	+?	The policy would help to support Cardiff's role as a thriving economic centre by providing relatively cheap accommodation in already-developed areas.
7. Improve health and well-being	0	Nationally Described Space Standards would ensure that the flats are of a reasonable size, and would not affect nearby residents' health and wellbeing

8. Use soils and natural resources efficiently and safeguard their quality	+	The policy would increase the amount of available housing without increasing the use of land.
9. Protect and enhance the landscape	0	
10. Minimise resource use and waste, increase re-use and recycling	0	
11. Maintain and enhance water quality and resources, and manage flooding	0	No significant impact. Waste and recycling facilities mentioned at iii.
<b>ISA comments and suggestions:</b> None		

<b>H5: HOUSES IN MULTIPLE OCCUPATION</b>		
Proposals for any development of, or conversion to Houses in Multiple Occupation (HMO) will only be permitted where:		
<ul style="list-style-type: none"> <li>i. Within the Cathays and Plasnewydd wards, it would not lead to more than 20% of all residential properties within a 50 metre radius of the proposal being HMOs;</li> <li>ii. Outside of these wards, it would not lead to more than 10% of all residential properties within a 50 metre radius of the proposal being HMOs;</li> <li>iii. The development would not result in a Class C3 dwelling being “sandwiched” between adjoining HMO properties;</li> <li>iv. The property is of a size whereby the layout, room sizes, range of facilities, outlook and external amenity space of the resulting property would ensure an adequate standard of residential amenity sufficient to meet the requirements of the intended number of residents;</li> <li>v. There would be no material harm to the amenity of existing nearby residents by virtue of general disturbance, noise or overlooking;</li> <li>vi. There is no adverse effect on local parking provision and there are adequate cycle storage facilities; and</li> <li>vii. There are dedicated areas for waste and recycling storage facilities.</li> </ul>		
HMO proposals within small streets that do not breach the 50m radius maximum threshold will not be supported if the proposal would create a disproportionate over concentration of HMOs within that street.		
HMO proposals that would lead to a breach of the maximum thresholds will only be permitted where there are exceptional circumstances or overriding material considerations that demonstrably outweigh any concerns regarding harmful concentration or intensification.		
ISA Objective	Impact	Comments
1. Help deliver equality of opportunity and access for all	+?	The policy would help to deliver new accommodation, which would help to meet Cardiff’s need for housing, and particularly cheaper accommodation for more deprived groups. However it sets quite tight limits for where this could take place.
2. Maintain and improve air quality	0	No significant impact
3. Protect and enhance biodiversity, flora and fauna	0	
4. Reduce emissions of greenhouse gases and adapt to the effects of climate change	0	
5. Protect and enhance historic and cultural heritage, including the Welsh Language	0	
6. Help deliver the growth of a sustainable and diversified economy	+?	The policy would help to support Cardiff’s role as a thriving economic centre by providing relatively cheap accommodation in already-developed areas.

7. Improve health and well-being	0	The policy aims to ensure that the accommodation is of a reasonable size, and would not affect nearby residents' health and wellbeing
8. Use soils and natural resources efficiently and safeguard their quality	+	The policy would increase the amount of available housing without increasing the use of land.
9. Protect and enhance the landscape	-?	HMOs can lead to additional vehicles, rubbish containers etc., which can have a negative impact on the townscape.
10. Minimise resource use and waste, increase re-use and recycling	0	
11. Maintain and enhance water quality and resources, and manage flooding	0	No significant impact.
<b>ISA comments and suggestions:</b> Does the policy need to specify that there should be adequate parking (including cycle parking) for the new residents? Waste management facilities?		
<b>Changes made in response to the ISA:</b> Additional criteria added to address these comments.		

<b>H6: STUDENT ACCOMMODATION</b>		
Proposals for student accommodation will only be permitted when:		
i. Located in Central and Bay Business Area or;		
ii. Located in close proximity to existing university and college campuses.		
iii. It has appropriately sized and functionally designed individual rooms, affording a reasonable outlook, privacy and access to light.		
iv. They includes communal facilities and services that are sufficient to meet the requirements of the intended number of residents and offer convenient access to a communal kitchen, dining area as well as communal amenity spaces.		
v. It is of high-quality design, including how it interacts with surrounding uses, provides active ground floor uses and contributes positively to the existing streetscape.		
ISA Objective	Impact	Comments
1. Help deliver equality of opportunity and access for all	0	Supports access to education, life-long learning and training opportunities for students, but does little/nothing in terms of equality of opportunity
2. Maintain and improve air quality	-?	Helps to protect (but not improve) air quality by providing dense student accommodation near good public transport and/or university/college campuses.  St. Mary Street and Westgate Street are an air quality management area, so may have negative impacts on students' health if they are accommodated there.
3. Protect and enhance biodiversity, flora and fauna	0	Assuming that new student accommodation is on previously developed land, impacts on biodiversity will be limited.
4. Reduce emissions of greenhouse gases and adapt to the effects of climate change	0	The policy helps to limit (but not reduce) the emission of greenhouse gases. High density student accommodation is likely to be energy efficient.
5. Protect and enhance historic and cultural heritage, including the Welsh Language	0?	Depends on the location of the accommodation, but unlikely to have significant impacts.

6. Help deliver the growth of a sustainable and diversified economy	+	Provides accommodation for university students, thus supporting a key economic sector in Cardiff. Also helps to provide skills for a future workforce.
7. Improve health and well-being	0	The policy sets minimum space etc. requirements for student accommodation, to help protect (but not improve) health.
8. Use soils and natural resources efficiently and safeguard their quality	0	No significant impacts. New student accommodation is likely to be on previously developed land and high density. This will protect but not enhance soil quality and natural resources.
9. Protect and enhance the landscape	0	The policy refers to good design. This will help to protect, and possibly enhance the landscape (but not significantly)
10. Minimise resource use and waste, increase re-use and recycling	0	
11. Maintain and enhance water quality and resources, and manage flooding	0	No significant impact
<b>ISA comments and suggestions:</b>		
<ul style="list-style-type: none"> <li>“A minimum of between 16-20m<sup>2</sup>” is unclear. It may well be interpreted as “a minimum of 16m<sup>2</sup>”. Should the policy simply say that? Else clarify the circumstances when 16 v. 20 will be appropriate?</li> <li>Is v. necessary, given the design policy (and design isn’t mentioned in the other housing policies)?</li> </ul>		
<b>Changes made in response to the ISA:</b>		
<ul style="list-style-type: none"> <li>Minimum size has been removed from the policy.</li> <li>Criterion v. is considered necessary as it relates specifically to student developments which tend to comprise high rise development within the city centre. In these circumstances it is important to reinforce the need to ensure the provision of active ground floor uses that contribute positively to the existing streetscape.</li> </ul>		

<b>H7: CO-LIVING ACCOMMODATION</b>		
Proposals for co-living schemes will only be permitted when they:		
<ol style="list-style-type: none"> <li>Are located in sustainable locations that are well-connected to local services and employment by means of active travel.</li> <li>Include homes for rent with a minimum tenancy length of at least three months.</li> <li>Include private studios that have well-designed living spaces.</li> <li>Include conveniently located communal kitchen and dining facilities. These must be sufficient to meet the requirements of the intended number of residents.</li> <li>Provide adequate, secure, sheltered and convenient cycle storage.</li> <li>Include a management plan that, to the satisfaction of the Council, will appropriately mitigate potential harm to residential amenity.</li> </ol>		
ISA Objective	Impact	Comments
1. Help deliver equality of opportunity and access for all	+	Co-living schemes provide typically cheaper housing with shared facilities, allowing people access to housing and facilities that they might otherwise not be able to access
2. Maintain and improve air quality	0	No significant impacts
3. Protect and enhance biodiversity, flora and fauna	0	Depends on the location and type of development (e.g. greenfield or previously developed land) but unlikely to have significant impacts.
4. Reduce emissions of greenhouse gases and adapt to the effects of climate change	0	No significant impacts

5. Protect and enhance historic and cultural heritage, including the Welsh Language	0	
6. Help deliver the growth of a sustainable and diversified economy	0	
7. Improve health and well-being	0	Co-housing provides a form of communal housing that can be very good for people's wellbeing. However this impact is not likely to be significant.
8. Use soils and natural resources efficiently and safeguard their quality	0	Co-housing tends to use fewer resources than traditional housing, but this impact is likely to be limited due to the small number of co-living schemes.
9. Protect and enhance the landscape	0	No significant impact
10. Minimise resource use and waste, increase re-use and recycling	0/+	Co-housing provides accommodation and facilities in a more efficient (resource, finances, ecological footprint) way than other forms of housing.
11. Maintain and enhance water quality and resources, and manage flooding	0	No significant impact
<b>ISA comments and suggestions:</b>		
<p>i. does 'sustainable' add anything, or does it simply refer to good access by walking etc which is covered by the rest of i?</p> <p>ii. could co-housing be jointly owned, i.e. include no element of rental property? If so, should the policy say something like "Any homes that are rented must have a minimum tenancy length of at least three months"?</p> <p>ii. again, is "at a minimum, between 22 – 27m<sup>2</sup>" confusing, and will it be interpreted to mean "at a minimum 22m<sup>2</sup>?</p> <p>Does the co-housing need a management team of named individuals with contact details that is somehow publicly accessible?</p>		
<p><b>Changes made in response to the ISA:</b></p> <p>i. It is considered important to reference sustainable locations as it provides a strategic context for locations where co-living accommodation will be appropriate.</p> <p>ii. It is not considered appropriate to specify the minimum tenancy length in the policy and this is something that is better controlled by planning conditions and Obligations which can reflect the individual circumstances of each development .</p> <p>iii. Minimum size has been removed from the policy.</p> <p>The management team of named individuals with contact details is something that is better controlled by planning conditions and obligations which can reflect the individual circumstances of each development .</p>		

<b>H8: CHANGE OF USE OF RESIDENTIAL LAND OR PROPERTIES</b>		
Outside the Central and Bay Business Areas and District and Local Centres, identified on the Proposals Map, conversion, or redevelopment of residential properties to other uses will only be permitted where:		
<p>i. The premises or their location are no longer suitable for residential use; or</p> <p>ii. The proposal is for a community use necessary within a residential area.</p> <p>iii. There would be no unacceptable impact on residential amenity.</p>		
ISA Objective	Impact	Comments
1. Help deliver equality of opportunity and access for all	0	The policy aims to protect (but not increase) housing in Cardiff.
2. Maintain and improve air quality	?	The impact of the policy depends on the location and size of the development.
3. Protect and enhance biodiversity, flora and fauna	0	No significant impact, as development would be on previously developed land (or designated for development)

4. Reduce emissions of greenhouse gases and adapt to the effects of climate change	?	The impact of the policy depends on the location and size of the development.
5. Protect and enhance historic and cultural heritage, including the Welsh Language	0	No significant impact
6. Help deliver the growth of a sustainable and diversified economy	+/-	The policy limits the flexibility of businesses to locate on residential land in Cardiff, but it also helps to ensure that there is adequate housing in Cardiff which supports a sustainable economy.
7. Improve health and well-being	0	
8. Use soils and natural resources efficiently and safeguard their quality	+/0	The policy supports other plan policies to efficiently use land and provide adequate housing, by protecting housing land
9. Protect and enhance the landscape	0	No significant impacts
10. Minimise resource use and waste, increase re-use and recycling	0	
11. Maintain and enhance water quality and resources, and manage flooding	0	
<b>ISA comments and suggestions:</b> None		

<b>H9: CHANGE OF USE OR REDEVELOPMENT TO RESIDENTIAL USE ON UNALLOCATED SITES</b>		
Change of use of redundant premises or redevelopment of redundant previously developed land for residential use or mixed-use development that includes housing will be permitted where:		
<ul style="list-style-type: none"> <li>i. There is no overriding need to retain the existing use of the land or premises and no overriding alternative local land use requirement;</li> <li>ii. The resulting residential accommodation and amenity will be satisfactory;</li> <li>iii. There will be no unacceptable impact on the operating conditions of existing businesses;</li> <li>iv. Necessary community and transportation facilities are accessible or can be readily provided or improved; and</li> <li>v. It can be demonstrated that the change of use has been assessed in terms of land contamination risk and that there are no unacceptable risks to the end users; and</li> <li>vi. The resulting residential accommodation is accessible by walking, cycling or public transport.</li> </ul>		
ISA Objective	Impact	Comments
1. Help deliver equality of opportunity and access for all	+	The policy would allow non-housing land to be used for housing under certain conditions. This is likely to increase the amount of housing in Cardiff.
2. Maintain and improve air quality	?	The impact of the policy depends on the location of the new housing. Could be positive if the site is near existing services and not near an Air Quality Management Area, and negative if the inverse.
3. Protect and enhance biodiversity, flora and fauna	0	Unlikely to be a significant impact, especially if previously developed land is converted to housing.
4. Reduce emissions of greenhouse gases and adapt to the effects of climate change	?	See 2. Also depends on whether the existing building is used or new houses are erected.
5. Protect and enhance historic and cultural heritage, including the Welsh Language	0	No significant impact

6. Help deliver the growth of a sustainable and diversified economy	+/-	The policy could lead to the loss of employment land, but also allows for new housing which can support a sustainable economy.	
7. Improve health and well-being	0	Provision of housing helps to support good physical and mental health, but the policy is unlikely to lead to significant changes in housing supply.	
8. Use soils and natural resources efficiently and safeguard their quality	+/0	The policy supports other plan policies to efficiently use land and provide adequate employment land, by protecting employment land	
9. Protect and enhance the landscape	0	No significant impact	
10. Minimise resource use and waste, increase re-use and recycling	0		
11. Maintain and enhance water quality and resources, and manage flooding	0		
<b>ISA comments and suggestions:</b> At iv. specify that facilities should be accessible by walking, cycling or public transport.			
<b>Planning team response:</b> Policy amended to include additional criteria			

<b>H10: SITES FOR GYPSY AND TRAVELLER CARAVANS</b>		
ISA Objective	Impact	Comments
1. Help deliver equality of opportunity and access for all	+	Policy supports the provision of housing for Gypsies and Travellers
2. Maintain and improve air quality	0	No significant impact – policy sets criteria for locating G&T sites to protect biodiversity etc.
3. Protect and enhance biodiversity, flora and fauna	0	
4. Reduce emissions of greenhouse gases and adapt to the effects of climate change	0	
5. Protect and enhance historic and cultural heritage, including the Welsh Language	0	
6. Help deliver the growth of a sustainable and diversified economy	0	
7. Improve health and well-being	+	Policy aims to provide housing for Gypsies and Travellers, which supports future residents' physical and mental health
8. Use soils and natural resources efficiently and safeguard their quality	0	No significant impact – policy sets criteria for locating Gypsy and Traveller sites to protect biodiversity etc.

9. Protect and enhance the landscape	0		
10. Minimise resource use and waste, increase re-use and recycling	0		
11. Maintain and enhance water quality and resources, and manage flooding	0		
<b>ISA comments and suggestions round 1:</b> None.			
Please note that the proposed extension to the Rover Way gypsy and traveller site would contravene several aspects of this policy: multiple designations on the proposed site and prone to flooding.			
<b>Planning team response:</b> Works are currently taking place to improve the coastal defences along Rover Way. This £35 million pound scheme has been funded by the Council and Welsh Government and has been designed to protect this land and the adjoining residential development at Pengam Green from flooding – see <a href="#">press release</a> . However, the proposed extension cannot come forward until the existing Rover Way has been realigned to allow development of the site. At this stage there is no funding or timetable for this work.			
<b>ISA comments and suggestions round 2:</b> H11 now added, and Pengam Green taken forward. No further suggestions on this policy.			
<b>ISA comments and suggestions round 3:</b> In i, specify that access should be via walking, cycling or public transport.			
<b>Planning team response:</b> Criteria i. amended to reflect this.			

<b>H11: GYPSY AND TRAVELLER SITE</b>		
Land is allocated for the provision of temporary Gypsies and Travellers accommodation at Pengam Green as defined on the Proposals Map.		
ISA Objective	Impact	Comments
1. Help deliver equality of opportunity and access for all	++/-	Provides 80 Gypsy and Traveller pitches: more than current needs (73) but less than identified need to 2036 (117). Gypsies and Travellers are a disadvantaged group.
2. Maintain and improve air quality	0	Some vehicle movements, bonfires etc., but unlikely to be significant.
3. Protect and enhance biodiversity, flora and fauna	--	Entire site is a Site of Importance for Nature Conservation. It is also within 1km of the Severn Estuary SPA/SAC/Ramsar site, and may thus require Habitat Regulations Assessment related mitigation measures.
4. Reduce emissions of greenhouse gases and adapt to the effects of climate change	0	Some vehicle movements, but unlikely to be significant.
5. Protect and enhance historic and cultural heritage, including the Welsh Language	0	No significant heritage assets on or near the site
6. Help deliver the growth of a sustainable and diversified economy	0	No significant impacts
7. Improve health and well-being	+	Provides accommodation for a disadvantaged group.
8. Use soils and natural resources efficiently and safeguard their quality	0	Previously developed land. No significant impact.
9. Protect and enhance the landscape	-	Site is not near a Special Landscape Area, but development would change it from primarily rural to more urban
10. Minimise resource use and waste, increase re-use and recycling	0	No significant impact

11. Maintain and enhance water quality and resources, and manage flooding	-?	Flooding is a potential concern, but Phase 3 Strategic Flood Consequences Assessment suggests that site should be able to meet the acceptability criteria of TAN15: Flood Risk.
<b>ISA comments and suggestions:</b>		
Title is not consistent with the other plan policies that allocate sites (H1A, H1B). Rename e.g. "Gypsy and Traveller site"? Confirm that HRA does not identify significant issues re. Severn Estuary		
<b>Changes made in response to the ISA:</b> Title renamed to "Gypsy and Traveller Site". Policy BG7 provides HRA-related requirements.		

## ECONOMY

EC1: CARDIFF CENTRAL ENTERPRISE ZONE AND REGIONAL TRANSPORT HUB		
The Cardiff Central Enterprise Zone and Regional Transport Hub as shown on the Proposals Map is designated for the retention, development and redevelopment of land for employment opportunities, reflecting the area's role as the commercial driver of Wales. The area is focused on knowledge based business and also supports, as part of, an integrated regional public transport hub high density residential units together with a diversity of complementary mixed uses, including commercial, leisure and service uses where they support regeneration, renewal and enhancement and contribute to the vitality, attractiveness and viability of the CEZ.		
ISA Objective	Impact	Comments
1. Help deliver equality of opportunity and access for all	0/-	Provides for financial and professional sector, but unlikely to redress imbalances of inequity, provide significant affordable housing, or support the regeneration of deprived areas.
2. Maintain and improve air quality	+	Promotes high-density development near transport hubs
3. Protect and enhance biodiversity, flora and fauna	0	Already built up so unlikely to significantly change biodiversity etc.
4. Reduce emissions of greenhouse gases and adapt to the effects of climate change	+	Promotes high-density development near transport hubs, reducing building and transport energy needs
5. Protect and enhance historic and cultural heritage, including the Welsh Language	0	
6. Help deliver the growth of a sustainable and diversified economy	++	Increases the number and range of employment opportunities; supports the role of Cardiff as a key economic driver of South East Wales city region; promotes the city centre and mixed use development.
7. Improve health and well-being	0	
8. Use soils and natural resources efficiently and safeguard their quality	0/+	High density development helps to reduce the use of greenfield land
9. Protect and enhance the landscape	+/-	Helps to protect other landscapes; potential for landscape impacts associated with high density development
10. Minimise resource use and waste, increase re-use and recycling	+/-	High densities will facilitate provision of clean energy and waste management, but do use resources and generate waste
11. Maintain and enhance water quality and resources, and manage flooding	-?	In an area prone to flooding; uses water
<b>ISA comments and suggestions:</b> Refer to policy on tall buildings (if there will be one) Refer to policy on district heating (if there will be one)		
<b>Changes made in response to the ISA:</b> None		

EC2: LAND SOUTH OF ST MELLONS BUSINESS PARK		
Land is allocated South of St Mellons Business Park, as defined on the Proposals Map for a strategic employment site comprising up to 90,000 square metres of B1, B2 and B8 uses, ancillary uses and infrastructure associated with; biodiversity; landscape; drainage; walking, cycling and other transport modes, together with the construction of a new transport hub facility, comprising railway station buildings (up to 2,500m <sup>2</sup> - use class sui generis) including ancillary uses; 4 no. platforms; surface car park (up to 650 no. spaces) and associated infrastructure works.		
ISA Objective	Impact	Comments
1. Help deliver equality of opportunity and access for all	+	The site is WIMD rank 1, so it would not be helping to regenerate an area of deprivation. However, it would provide employment in B1, B2 and B8 uses which would help to address existing deprivation.
2. Maintain and improve air quality	-	The site is not in an Air Quality Management Area. The development would include a railway station and walking/cycling facilities, but also a large park& ride. Many of the transport movements to/from the site are likely to be by lorry or car, with associated impacts on air quality.
3. Protect and enhance biodiversity, flora and fauna	--	The entire site is in a nationally-important Gwent Levels: Rumney and Peterstone Site of Special Scientific Interest (SSSI), which is designated for its reen and ditch habitat and associated insects and other invertebrates. It contains a locally-important Site of Importance for Nature Conservation (SINC).
4. Reduce emissions of greenhouse gases and adapt to the effects of climate change	--	See 2. Much of the access to/from the site would be by car or lorry. The site is not near existing services.
5. Protect and enhance historic and cultural heritage, including the Welsh Language	--	The site is wholly within a historic landscape and Archaeologically Sensitive Area
6. Help deliver the growth of a sustainable and diversified economy	++	The site would provide up to 90,000m <sup>2</sup> of employment land
7. Improve health and well-being	+/-	Employment is generally associated with good health and well-being. However poor air quality and lack of open space is generally associated with poor health and well-being.
8. Use soils and natural resources efficiently and safeguard their quality	-/-	The policy would entail development of 44ha of greenfield land. Land north of the railway line is grade 3b.
9. Protect and enhance the landscape	--	The site is entirely within a historic landscape, and is adjacent to a Special Landscape Area. It would change 44ha of land from rural to urban. Given the flat nature of the ground, the site would be visible from a distance.
10. Minimise resource use and waste, increase re-use and recycling	-	By definition, development of 44ha of employment land will involve resource use.
11. Maintain and enhance water quality and resources, and manage flooding	-/-	The site is within a defended zone for seas and rivers, so unlikely to flood. The site is criss-crossed by reens/ditches. Development of the site is likely to increase runoff to the Gwent Levels SSSI, with indirect impacts on flooding, water quality and biodiversity.
<b>ISA comments and suggestions:</b> This is an unsustainable site. It affects two national-level designations (SSSI, historic landscape) and three local designations (SINC, archaeologically sensitive area, special landscape area). It may have an indirect impact on the internationally-important Severn Estuary through		

changes in hydrology and water quality. It is on previously developed land. There are more sustainable sites available (see Table 5.1 of main ISA report). Suggest remove this site from the plan.

**Changes made in response to the ISA:**

This allocation is in the adopted LDP and a planning application for the development of the business park is currently being considered by Welsh Ministers. The planning application has fully considered the issues highlighted and mitigation measures are proposed to avoid significant harm to the designations highlighted. These measures are being considered by Welsh Ministers and the Council will need to assess the implications for this policy when the final decision by Welsh Minister is issued.

**EC3: PROTECTED EMPLOYMENT LAND AND PREMISES**

The following designated protected employment areas (outside of the Central and Bay Business Areas) listed in the table below and identified on the Proposals Map will be protected for B Use Class employment generating uses (together with appropriate ancillary and/or complementary uses and activities as referred to in Policy EC4.

Site Ref	Site Name	Primary Use/Activity	Status
EC3.1	Ocean Park	B1, B2, B8	Primary
EC3.2	Foreshore Road (Heliport and surrounds)	B1, B2, B8	Primary
EC3.3	Rover Way (Celsa Steel Works, Tremorfa Industrial Estate, Seawall Road)	B2, B8	Primary
EC3.4	Wentloog Road (Capital Business Park, Lamby Way Industrial estate, Wentloog Corporate Park, Rail Freight Terminal)	B1, B2, B8	Primary
EC3.5	St Mellons Business Park	B1, B2, B8	Primary
EC3.6	Cardiff Gate Business Park	B1 (offices), ancillary B2	Primary
EC3.7	Cardiff Business Park & Land North of Maes y Coed Road, Llanishen	B1, B2, B8	Primary
EC3.8	Forest Farm, Longwood Drive	B1 (science, research and development), B2, B8	Primary
EC3.9	Green Meadow Springs	B1 (offices)	Primary
EC3.10	Penarth Road Area (includes Hadfield Road, Sloper Road, Bessemer Road)	B1, B2, B8	Primary
EC3.11	Ty Nant Road	B1, B2, B8	Local
EC3.12	Wentloog Road (North of railway line)	B1, B2, B8	Local
EC3.13	Pentwyn (Panasonic Plant, Avenue Industrial estate)	B1, B2, B8	Local
EC3.14	Eastern Business Park	B1 (offices)	Local
EC3.15	Willowbrook Business Technology Park	B1 (science, research and development)	Local
EC3.16	Excelsior Road	B1, B2, B8 & complementary trade counter	Local
EC3.17	Norbury Road Industrial Estate	B1, B2, B8	Local
EC3.18	Wroughton Place, Ely	B1, B2, B8	Local
EC3.19	Argyle Way, Caerau	B1, B2, B8	Local
EC3.20	Garth Industrial Estate and Heol Yr Ynys	B1, B2, B8	Local
EC3.21	Land at East Bay Close	B1, B2, B8	Local
EC3.22	Alexandra Gate Business Park	B1 (offices)	Local
EC3.23	Ipswich Road	B1, B2, B8	Local
EC3.24	Maindy Road	B1 (science, research and development)	Local
EC3.25	Eastern Avenue	B1, B2, B8 & complementary trade counter	Local

ISA Objective	Impact	Comments
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1. Help deliver equality of opportunity and access for all	++	Sites provide employment in a variety of uses
2. Maintain and improve air quality	-	Employment land is likely to generate air pollution through its activities and transport to/from the sites
3. Protect and enhance biodiversity, flora and fauna	--	Major concerns about sites 2.2, 2.3, and especially 2.4. 2.4 is in an SSSI, and in places about 500m from the SPA/SAC/Ramsar site. 2.2 and 2.3 are adjacent the SPA/SAC/Ramsar sites – see Habitats Regulations Assessment. The other sites are less problematic biodiversity-wise.
4. Reduce emissions of greenhouse gases and adapt to the effects of climate change	+/-	The sites will generate greenhouse gases through energy use on site and transport to/from site. The sites are in a variety of locations, allowing people to live close(r) to their place of work
5. Protect and enhance historic and cultural heritage, including the Welsh Language	-	Site 2.4 is in an archaeologically sensitive area. The other sites are less constrained.
6. Help deliver the growth of a sustainable and diversified economy	++	The sites together would provide a range of employment opportunities, and support the role of Cardiff as a key economic driver of South East Wales city region
7. Improve health and well-being	+/-	The sites would help to provide local jobs, thus indirectly supporting good mental and physical health. However to the extent that they take greenfield land and cause pollution, they could negatively affect health and wellbeing.
8. Use soils and natural resources efficiently and safeguard their quality	-	Several of the sites would involve urbanising greenfield land.
9. Protect and enhance the landscape	-/-	Several of the sites (e.g. 2.10, 2.4, 2.3) are in highly visible locations, and would have a significant negative impact on the landscape. Others are smaller and more integrated into the local landscape
10. Minimise resource use and waste, increase re-use and recycling	?	Depends on how sites are operated and type of business at sites
11. Maintain and enhance water quality and resources, and manage flooding	0/-	The proposed employment sites are generally not at risk of flooding, but are likely to require water resources and have the potential to affect water quality. Sites 2.1-2.4 and 2.24 are adjacent water bodies.

**ISA comments and suggestions:** Remove Site EC3.4 as it affects multiple designations. Sites EC3.2 and EC3.3 are also in particularly sensitive environments.

**Changes made in response to the ISA:**

*Site 2.4 Wentloog Road (Capital Business Park, Lamby Way Industrial estate, Wentloog Corporate Park, Rail Freight Terminal)*

This established employment area is considered to serve a strategic city-wide employment need for B1, B2, and B8 employment land uses. Wentloog Road is a predominantly industrial employment area that contains Capital Business Park, Lamby Way Industrial Estate, Wentloog Corporate Park, Waterside Business Park, Laurels Business Park, Spring Meadow Trading Estate and the Rail Freight Terminal. The centre of the site contains the Aldi Regional Office and Distribution Centre. Cardiff Employment Land and Premises Study (ELPS) (March 2022) recommends retention of this site, for employment protection.

*Site EC2.2 Foreshore Road Heliport and surrounds*

This established employment area is considered an established employment site, whereby the majority of the units in the site are classed as B2 (general industrial). Cardiff Employment Land and Premises Study (ELPS) (March 2022) recommends retention of this site, for employment protection. No change.

*Site EC2.3 Rover Way (Celsa Steel Works, Tremorfa Industrial Estate, Seawall Road)*

Rover Way is an industrial employment site that contains more than 80 units, of which the majority are classed as B2 (general industrial). Celsa Steelworks is the largest business located in Rover Way, occupying 123,400sqm at

the centre of the site. The remainder of the site is covered by Allied Industrial Park and Tremorfa Industrial Estate. The environmental quality of the site is generally low however this reflects both its location and use, and does not affect the suitability of the EC1 protection for this site. Cardiff Employment Land and Premises Study (ELPS) (March 2022) recommends retention of this site, for employment protection. The undeveloped land for employment in this designation has the following consent: Application 21/02182/MJR: Construction of up 50,000 sqm of industrial accommodation (B8 Use Class) and should be retained in the employment designation area. No change.

The following was added to the reasoned justification:

*“Furthermore, the Council will continue to support local business to reduce their carbon footprint by bringing together businesses concerned with the aim of improving their environmental performance and where one business can use another business’s waste as a resource, the co-location of these businesses that would encourage the reuse and recycling of waste would be supported.”*

#### **EC4: PROVISION OF COMPLEMENTARY FACILITIES FOR EMPLOYEES IN BUSINESS, INDUSTRIAL AND WAREHOUSING DEVELOPMENTS**

Provision for open space, public realm, leisure, food and drink, and child-care facilities will be appropriate in office, industrial and warehousing developments, provided, the facility is of an appropriate scale and nature intended primarily to meet the needs of workers in the vicinity, therefore not attracting significant levels of visitor traffic into the area, or exacerbating existing traffic conditions.

ISA Objective	Impact	Comments
1. Help deliver equality of opportunity and access for all	+	Helps to meet the need for community facilities etc. to meet the need of the working population. Helps to address imbalances of deprivation by facilitating access to work.
2. Maintain and improve air quality	+/-	Complementary facilities will generate some air pollutants, but provision of complementary facilities for employees should help to reduce need to travel by car to such facilities.
3. Protect and enhance biodiversity, flora and fauna	?	Impact will depend on type and location of facilities.
4. Reduce emissions of greenhouse gases and adapt to the effects of climate change	+/-	See 2.
5. Protect and enhance historic and cultural heritage, including the Welsh Language	?	Impact will depend on type and location of facilities.
6. Help deliver the growth of a sustainable and diversified economy	+	Supports local employment opportunities and mixed use development
7. Improve health and well-being	+?	Provision of open space and public realm should improve health and wellbeing, less clear about other services.
8. Use soils and natural resources efficiently and safeguard their quality	0	
9. Protect and enhance the landscape	0	
10. Minimise resource use and waste, increase re-use and recycling	0	
11. Maintain and enhance water quality and resources, and manage flooding	0	
<b>ISA comments and suggestions:</b> None		

**EC5A: ALTERNATIVE USE OF PROTECTED EMPLOYMENT LAND AND PREMISES****EC5B: NEW WORKSPACE WITHIN MIXED USE DEVELOPMENT**

**EC5A:** Development of protected business, industrial and warehousing land and premises identified within Policy EC3 (and defined on the proposals map) for alternative uses which are not considered a complementary use (as defined by Policy EC4) will only be permitted if:

- i. There is no need to retain the land or premises for business, industrial or warehousing use, having regard to the demand for such land and premises and the requirement to provide for a range and choice of sites available for such use; and
- ii. There is no realistic prospect of employment use on the site and/or the property is physically unsuitable for employment use, even after adaption/refurbishment or redevelopment; and
- iii. There will be no unacceptable impact on the operating conditions of existing businesses.

**EC5B:** Where the criteria of EC5A (i to iii) have been satisfied, and an alternative use is considered appropriate; provision should be made for new employment workspace and community facilities as part of a mixed-use residential redevelopment. The new employment workspace provided should be in the form of accommodation for research and development, affordable workspace, light industrial, flexible office space, local distribution, or similar premises and may include premises for professional services and medical or health services.

ISA Objective	Impact	Comments
1. Help deliver equality of opportunity and access for all	+	Supports a variety of employment and community facilities.
2. Maintain and improve air quality	?	Impact will depend on type and location of development
3. Protect and enhance biodiversity, flora and fauna	0	
4. Reduce emissions of greenhouse gases and adapt to the effects of climate change	?	Impact will depend on type and location of development
5. Protect and enhance historic and cultural heritage, including the Welsh Language	?	Impact will depend on type and location of development
6. Help deliver the growth of a sustainable and diversified economy	+	Policy acknowledges that types of employment may change over time, and helps to ensure that employment sites are efficiently used
7. Improve health and well-being	0	
8. Use soils and natural resources efficiently and safeguard their quality	+	Policy helps to ensure that land in employment sites is efficiently used
9. Protect and enhance the landscape	?	Impact will depend on type and location of development
10. Minimise resource use and waste, increase re-use and recycling	?	Impact will depend on type and location of development
11. Maintain and enhance water quality and resources, and manage flooding	?	Impact will depend on type and location of development

**ISA comments and suggestions:**  
In EC4A, 'complimentary' should be 'complementary'.

**Changes made in response to ISA comments:**  
Wording changed.

**EC6: PROTECTING OFFICES IN THE CENTRAL AND BAY BUSINESS AREAS**

The alternative use of offices within the Central and Bay Business Areas will only be permitted where:

- i. It can be demonstrated that there is no need to retain the site or premises for office use in its current format having regard to the demand for offices and the requirement to provide a range and choice of sites available for such use.

ii. Proposals for the alternative use of offices to non-employment (residential) uses retain a significant element of office and/or commercial floorspace as part of a mixed-use development.

ISA Objective	Impact	Comments
1. Help deliver equality of opportunity and access for all	+	Supports a variety of employment and other facilities.
2. Maintain and improve air quality	?	Impact will depend on type and location of development
3. Protect and enhance biodiversity, flora and fauna	0	
4. Reduce emissions of greenhouse gases and adapt to the effects of climate change	?	Impact will depend on type and location of development
5. Protect and enhance historic and cultural heritage, including the Welsh Language	?	Impact will depend on type and location of development
6. Help deliver the growth of a sustainable and diversified economy	+	Policy acknowledges that types of employment may change over time, and helps to ensure that the Central and Bay Business Area is efficiently used
7. Improve health and well-being	0	
8. Use soils and natural resources efficiently and safeguard their quality	+	Policy helps to ensure that land in the Cardiff and Bay Business Area is efficiently used
9. Protect and enhance the landscape	?	Impact will depend on type and location of development
10. Minimise resource use and waste, increase re-use and recycling	?	Impact will depend on type and location of development
11. Maintain and enhance water quality and resources, and manage flooding	?	Impact will depend on type and location of development
<b>ISA comments and suggestions:</b> None		

**EC7: ALTERNATIVE USE OF EMPLOYMENT LAND AND PREMISES NOT IDENTIFIED WITHIN POLICY EC3 (PROTECTED EMPLOYMENT LAND) OR POLICY EC6 (PROTECTING OFFICES IN THE CENTRAL AND BAY BUSINESS AREA)**

Alternative uses of employment land and premises outside of the designated employment protection areas for residential development and/or mixed use will be favourably considered provided:

- The site or premises are vacant/redundant, or where premises are still occupied the relocation of existing occupiers to other suitable accommodation will need to be demonstrated.
- Residential proposals will need to satisfy the tests of Policy H8. In such circumstances, Affordable Housing development may be more favourably considered.

Proposals for mixed use residential development that include provision for new employment workspace, community facilities or health services will be favoured subject to detailed considerations.

ISA Objective	Impact	Comments
1. Help deliver equality of opportunity and access for all	+	Supports a variety of housing, employment and community facilities.
2. Maintain and improve air quality	?	Impact will depend on type and location of development
3. Protect and enhance biodiversity, flora and fauna	?	Impact will depend on type and location of development
4. Reduce emissions of greenhouse gases and adapt to the effects of climate change	?	Impact will depend on type and location of development
5. Protect and enhance historic and cultural heritage, including the Welsh Language	?	Impact will depend on type and location of development

6. Help deliver the growth of a sustainable and diversified economy	?	Policy acknowledges that types and location of employment may change over time.
7. Improve health and well-being	0	
8. Use soils and natural resources efficiently and safeguard their quality	+	Policy helps to ensure that land is effectively used
9. Protect and enhance the landscape	?	Impact will depend on type and location of development
10. Minimise resource use and waste, increase re-use and recycling	?	Impact will depend on type and location of development
11. Maintain and enhance water quality and resources, and manage flooding	?	Impact will depend on type and location of development

**ISA comments and suggestions:** The last sentence of the policy feels redundant, given the title of the policy.

**Changes made in response to the ISA:** Last sentence added to the start of the reasoned justifications instead of in the policy wording.

<b>EC8: EMPLOYMENT PROPOSALS ON LAND NOT IDENTIFIED FOR EMPLOYMENT USE</b>		
ISA Objective	Impact	Comments
1. Help deliver equality of opportunity and access for all	?	Impact will depend on type and location of development, and current use of the site
2. Maintain and improve air quality	-?	Impact will depend on type and location of development; negative impacts likely for greenfield sites
3. Protect and enhance biodiversity, flora and fauna	-	Impact will depend on type and location of development; negative impacts likely for greenfield sites
4. Reduce emissions of greenhouse gases and adapt to the effects of climate change	-?	Impact will depend on type and location of development; negative impacts likely for greenfield sites
5. Protect and enhance historic and cultural heritage, including the Welsh Language	-?	Impact will depend on type and location of development; negative impacts possible for greenfield sites
6. Help deliver the growth of a sustainable and diversified economy	+?	Supports the economic development of Cardiff, although impact will depend on type and location of development, and current use of the site
7. Improve health and well-being	?	Impact will depend on type and location of development, and current use of the site
8. Use soils and natural resources efficiently and safeguard their quality	-?	Impact will depend on type and location of development; negative impacts likely for greenfield sites
9. Protect and enhance the landscape	?	Impact will depend on type and location of development, and current use of the site
10. Minimise resource use and waste, increase re-use and recycling	?	Impact will depend on type and location of development, and current use of the site
11. Maintain and enhance water quality and resources, and manage flooding	-	Impact will depend on type and location of development; negative impacts likely for greenfield sites

<b>ISA comments and suggestions:</b> For clarity, should v. be rewritten to either "...and the Climate and Nature Emergency will be addressed" or have a new bullet point "vi. The Climate and Nature Emergency are addressed"
<b>Changes made in response to the ISA:</b> Changed to "ecological receptors are protected and the Climate and Nature Emergency are addressed"
<b>ISA comments and suggestions round 2:</b> the fifth point ("Green infrastructure and ecological receptors will be protected and address the Climate and Nature Emergency") has been removed. Reinstate, as it provided mitigation for some of the policy's other impacts.
<b>Changes made in response to the ISA:</b> None

<b>EC9: HOTEL DEVELOPMENT</b>			
Proposals for hotel development, including extensions and changes of use of suitable properties will be favoured:			
ISA Objective	Impact	Comments	
1. Help deliver equality of opportunity and access for all	0	Policy unlikely to have significant impacts	
2. Maintain and improve air quality	0		
3. Protect and enhance biodiversity, flora and fauna	0		
4. Reduce emissions of greenhouse gases and adapt to the effects of climate change	0		
5. Protect and enhance historic and cultural heritage, including the Welsh Language	0		
6. Help deliver the growth of a sustainable and diversified economy	+	Hotel development supports tourism and business visits to Cardiff.	
7. Improve health and well-being	0	Policy unlikely to have significant impacts	
8. Use soils and natural resources efficiently and safeguard their quality	0		
9. Protect and enhance the landscape	0		
10. Minimise resource use and waste, increase re-use and recycling	-	Hotels use a disproportionate amount of water and generate a disproportionate amount of waste	
11. Maintain and enhance water quality and resources, and manage flooding	-		
<b>ISA comments and suggestions:</b> Will the plan have a policy on tall buildings? Large hotels can be quite tall and monolithic.			
<b>Changes made in response to the ISA:</b> Tall Building now added to the RLDP. This sets out a range of criteria to ensure the impacts of tall buildings are fully considered and unacceptable impacts mitigated.			

<b>EC10: NIGHT-TIME AND CULTURAL ECONOMY</b>		
Proposals for leisure, entertainment, and cultural uses that protect, promote, diversify and revitalise the city's evening and night-time economy will be favoured in:-		
i.	The City Centre (Central Business Area)	

- ii. The inner harbour/waterfront area of Cardiff Bay (Bay Business Area)
- iii. The International Sports Village
- iv. Atlantic Wharf and
- v. District and Local Centres (of a scale and nature appropriate to the centre)

The loss of Use Class D2 venues and public houses (Use Class A3) will be resisted unless it is demonstrated that the use is no longer viable, and the premises cannot accommodate another similar use.

ISA Objective	Impact	Comments
1. Help deliver equality of opportunity and access for all	+	Policy would improve access to leisure facilities
2. Maintain and improve air quality	0	Policy focuses night-time and cultural economy developments in accessible locations, helping to prevent (though not necessarily reduce) air pollution.
3. Protect and enhance biodiversity, flora and fauna	0	No significant impact
4. Reduce emissions of greenhouse gases and adapt to the effects of climate change	0	See 2.
5. Protect and enhance historic and cultural heritage, including the Welsh Language	0	No significant impact. Although the policy title includes 'cultural', the emphasis is on leisure and entertainment rather than the cultural heritage.
6. Help deliver the growth of a sustainable and diversified economy	+	Some increase in jobs as a result of new night-time economy developments
7. Improve health and well-being	-?	Possible conflict with policy R9 which would allow vacant spaces over commercial units to be converted to housing use. Noise, odours etc. generated by the nighttime economy could negatively affect the health and wellbeing of new and existing residents.
8. Use soils and natural resources efficiently and safeguard their quality	+?	Some more efficient use of land where daytime and night-time economy uses overlap
9. Protect and enhance the landscape	-?	Potential for light pollution
10. Minimise resource use and waste, increase re-use and recycling	0	No significant impact
11. Maintain and enhance water quality and resources, and manage flooding	0	Likely to be some limited increase in water use, not likely to be significant

#### ISA comments and suggestions on first version of EC9:

- i. It's not clear from the policy and supporting text whether night-time economy developments are most appropriate EVERYWHERE in the City Centre and Bay Business areas, District Centres and Local Centres, or only in some areas. If only in some areas, should the policy explain where these are?
- ii. It's not clear what a 'neighbourly' use is. Does this need to be specified more clearly? E.g. limited noise impacts, limited light impacts outside central/district centres

#### Changes made in response to the ISA:

Policy rewritten to specify where in the city centre and Bay business area the evening/nighttime economy will be favoured. Reference to 'neighbourly uses' removed, with more detail inserted in the supporting text.

#### ISA comments and suggestions on second version of EC9:

- i. Concern about possible conflict between this policy and new policy R9 which supports conversion of vacant space above commercial properties to housing use. Possible impacts of noise, odour etc. of nighttime economic uses on residents of new over-the-shop accommodation.
- ii. The title of the policy is 'night-time and cultural economy', but the rest of the policy and text are about the night-time and evening economy. Remove 'and cultural' from the policy title? And is a policy needed on the cultural economy (I think there is one in the current plan)?

#### Changes made in response to the ISA:

- Criterion v will only allow such uses where they are of a scale and nature appropriate to the centre. The size and character of District Centres means they are more likely to be able to satisfactorily accommodate a greater range of non-retail uses including commercial leisure facilities. Local centres are more residential and therefore accommodating such uses will be less likely. In all instances the main consideration in determining applications for such uses will be based on an assessment of the impact of the proposals on the amenity of residents.
- Reference to 'CULTURAL' removed

## DESIGN

D1: TALL BUILDINGS																				
<p>Tall buildings will be encouraged in highly accessible locations and in areas where the scale and visibility of a development can be accommodated without adversely compromising an established neighbourhood character. A tall building in the city centre or Cardiff Bay will be 8 storeys+ or circa 25m+ in height. Outside the city centre they are any building which is double or more the height of surrounding properties or significantly taller in terms of actual height and number of floors.</p> <p>When developing tall buildings, it is important to ensure that the development does not compromise the continuity and quality of neighbouring streets and public spaces and that residential development creates a liveable environment for future and neighbouring occupiers.</p> <p>Tall buildings will be generally supported where they:</p> <ul style="list-style-type: none"> <li>• Don't negatively impact on the character and setting of listed buildings, conservation areas or registered parks and gardens</li> <li>• Accommodate a mixture of uses</li> <li>• Achieve attractive, original and distinctive architectural and landscape design quality commensurate with their high visibility in the city and any position in a streetscape.</li> <li>• Contribute positively to the overall townscape by providing an elegant silhouette against the sky and in relation to any distinct building group within any relevant vista.</li> <li>• Enhance the biodiversity of their site or immediate context, and in particular through the accommodation of trees and green infrastructure.</li> <li>• Make a visually seamless connection with the ground plane, integrating with the street scene and neighbouring public realm</li> <li>• Take into account the needs of people at the human scale, providing active commercial or residential interfaces at ground floor on key frontages and creating neighbouring spaces that allow for trade, play, sport or relaxation within an attractive landscape that in particular benefits residents.</li> <li>• Provide any refuse, cycle or car parking and building servicing provision in a recessive location where it has limited impact on the vitality and attractiveness of the public realm</li> <li>• Don't form an overbearing relationship with neighbouring development or compromise the reasonable development of neighbouring sites.</li> <li>• Provide reasonable living space and residential amenity for future and existing residents affected by the development in line with policy SP4 and any relevant SPG standards and guidance related to privacy, ambient light and the provision of both shared or communal amenity space</li> <li>• Demonstrate that the development does not adversely impact on the microclimate of the application site and the surrounding streets and public spaces in relation to sunlight and wind</li> <li>• Consider public safety requirements as part of the overall design, including the provision of evacuation routes</li> <li>• Provide an "adaptability statement" to show that the building could accommodate alternative use, subject to the necessary consents.</li> </ul>																				
<table border="1"> <thead> <tr> <th>ISA Objective</th><th>Impact</th><th>Comments</th></tr> </thead> <tbody> <tr> <td>1. Help deliver equality of opportunity and access for all</td><td>0</td><td>No significant impact</td></tr> <tr> <td>2. Maintain and improve air quality</td><td>0</td><td></td></tr> <tr> <td>3. Protect and enhance biodiversity, flora and fauna</td><td>0</td><td>The policy would aim to enhance biodiversity on site, but the impact is unlikely to be significant</td></tr> <tr> <td>4. Reduce emissions of greenhouse gases and adapt to the effects of climate change</td><td>0</td><td>No significant impact</td></tr> <tr> <td>5. Protect and enhance historic and cultural heritage, including the Welsh Language</td><td>+?/-</td><td>The policy aims to protect heritage assets. Tall buildings are not part of the local vernacular, so could negatively affect cultural heritage. However, they could also provide new attractive development that could in future become part of Cardiff's heritage.</td></tr> </tbody> </table>			ISA Objective	Impact	Comments	1. Help deliver equality of opportunity and access for all	0	No significant impact	2. Maintain and improve air quality	0		3. Protect and enhance biodiversity, flora and fauna	0	The policy would aim to enhance biodiversity on site, but the impact is unlikely to be significant	4. Reduce emissions of greenhouse gases and adapt to the effects of climate change	0	No significant impact	5. Protect and enhance historic and cultural heritage, including the Welsh Language	+?/-	The policy aims to protect heritage assets. Tall buildings are not part of the local vernacular, so could negatively affect cultural heritage. However, they could also provide new attractive development that could in future become part of Cardiff's heritage.
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6. Help deliver the growth of a sustainable and diversified economy	+	The policy encourages a mixture of uses. Tall buildings are an efficient/sustainable use of land.
7. Improve health and well-being	0	The policy aims to ensure that tall buildings provide adequate living spaces, and don't have negative impacts in terms of wind tunnels, overshadowing etc.
8. Use soils and natural resources efficiently and safeguard their quality	0	Tall buildings are an efficient use of land
9. Protect and enhance the landscape	+/-	Tall buildings can be eyesores or interesting landmarks, depending on their design and location. The policy aims to ensure that tall buildings are attractive and fit well into the local environment.
10. Minimise resource use and waste, increase re-use and recycling	0	The policy aims to minimise negative impacts associated with waste management.
11. Maintain and enhance water quality and resources, and manage flooding	0	No significant impact.
<b>ISA comments and suggestions:</b> I was unsure about the two first sentences: "Tall buildings will be encouraged in highly accessible locations and in areas where the scale and visibility of a development can be accommodated without adversely compromising an established neighbourhood character. A tall building in the city centre or Cardiff Bay <u>will be</u> 8 storeys or more or over 25 metres in height." I assume that it means "This policy defines a tall building in the city centre of Cardiff Bay to be 8+ storeys or circa 25+ metres in height. It applies to tall buildings located in highly accessible etc... Tall buildings in other areas will not be approved." Or is this not correct?		
<b>Changes made in response to the ISA:</b> The opening paragraph defines a tall building in the city centre and Cardiff Bay as being 8+ storeys or circa 25m in height. The definition of a tall building however differs outside of the city centre where this could instead mean it is double the prevailing height or significantly taller than what is typically characteristic of the area. It is not to say that consideration for such a building would not be approved but would be assessed in respect of the areas established neighbourhood character, which it must not compromise.		

## RETAIL

R1 RETAIL HIERARCHY AND TOWN CENTRE FIRST APPROACH		
<p>Proposals for retail (including changes of use, redevelopment and subdivision), commercial, leisure, education, health, community, public service facilities, appropriate employment developments (B1) and residential uses will be focussed according to the following hierarchy, having regard to the nature, scale and location of the proposed development being compatible with the defined role and function of the centre in line with the Town Centre First approach.</p> <p>Active uses (use classes A1, A2, A3, B1, C1, C2, C3, D1 or D2 of the use classes order or a sui generis use normally found in centres, or any mixed use comprising one or more of these classes) which contribute to maintaining the vitality, viability and diversity of centres will be favoured.</p> <p>New residential development which makes positive use of upper floors of properties and on underused and vacant space away from commercial frontages will be encouraged within centres.</p>		
Hierarchy of Centres		
	Role	Centres
Central Shopping Area (or 'Central Retail and Commercial Area')	Provides a broad range of shops, retail and non-retail services, businesses, cultural, leisure and community facilities to serve the City and a significant hinterland beyond. It is both the focus for the community and public transport networks.	Central Shopping Area
District Centres	Provides (or has the potential to provide) a range of shops, retail and non-retail services, businesses and community facilities to a suburb and potentially neighbouring suburbs.	Albany Road/ Wellfield Road City Road Clifton Street Cowbridge Road East Crwys Road/ Woodville Road Bute Street/ James Street Merthyr Road, Whitchurch Penarth Road/ Clare Road St Mellons Thornhill Whitchurch Road
Local Centres	Provides (or has the potential to provide) a small grouping of units, typically comprising a small convenience store, other small shops of a local nature, and some retail or non-retail services. Will typically serve its immediate suburb.	Birchgrove Bute Street (Loundon Square) Cathedral Road Countisbury Avenue Caerau Lane Fairwater Green Gabalfa Avenue Grand Avenue High Street, Llandaff Maelfa, Lalnderyn Newport Road, Rumney Rhiwbina Village Salisbury Road Splott Road Station Road, Llanishen Station Rd, Llandaff North Station Road, Radyr Tudor Street Willowbrook Drive Wilson Road

ISA Objective	Impact	Comments	
1. Help deliver equality of opportunity and access for all	++	The local and district centres will help to meet the need of Cardiff's population for community facilities and services, including retail.	
2. Maintain and improve air quality	+/-	The policy will help to allow people to access a range of services at city, district and local centres, reducing the need to travel by car and helping to reduce air pollution. However some areas (see suggestions below) are sparsely served by district/local centres.	
3. Protect and enhance biodiversity, flora and fauna	0	No significant impact.	
4. Reduce emissions of greenhouse gases and adapt to the effects of climate change	+/-	See 2.	
5. Protect and enhance historic and cultural heritage, including the Welsh Language	0	No significant impact.	
6. Help deliver the growth of a sustainable and diversified economy	+	The policy helps to promote and support city and local centres, local employment opportunities and mixed use development	
7. Improve health and well-being	+	Local and district centres can provide a venue for GPs and health centres. They provide a social focus, and allow people to access services by walking and cycling.	
8. Use soils and natural resources efficiently and safeguard their quality	0	No significant impact	
9. Protect and enhance the landscape	0		
10. Minimise resource use and waste, increase re-use and recycling	0		
11. Maintain and enhance water quality and resources, and manage flooding	0		
<b>ISA comments and suggestions:</b> There is a notable lack of district or local centres at Cyncoed/Mynydd Bychan, Llys-faen/Pontprennau, and north of the M4 . Should land for any of these be earmarked?			
<b>Changes made in response to the ISA:</b> The empirical household survey work undertaken by Nexus as part of the Retail and Commercial Leisure study was analysed to assesses whether there were any notable market shares derived by other centres beyond the thirty-two centres currently contained within the hierarchy, with a view that they might be classified in the retail hierarchy as either 'District Centres' or 'Local Centres'. Based on the household survey there were no other obvious candidates for inclusion. In a rural area, it is typical to find smaller villages or enclaves which offer important provision to residents, and which over time, may reach a gravity of provision which would warrant inclusion within the retail hierarchy. In a tight-knit urban conurbation such as Cardiff most of the provision outside of existing identified centres, is out-of-centre provision and which is potentially harmful to the vitality and viability of existing centres. Moreover, the study identified no significant gaps in retail provision as there was no evidence of expenditure 'leakage' elsewhere, that might warrant a geographic intervention. For these reasons, it was recommended that no new centres were included in the hierarchy.			

<b>R2: DEVELOPMENT IN THE CENTRAL RETAIL AND COMMERCIAL AREA</b>			
Development proposals within the Central Retail and Commercial Area (CRCA) will be assessed against the following criteria:			
<ul style="list-style-type: none"> <li>i. Whether the proposal involves the loss of shop uses (Class A1) from within Protected Shopping Frontages;</li> <li>ii. Whether the proposal involves retail and other uses which enhance the vitality, viability and attractiveness of the city centre;</li> <li>iii. Whether the development allows for, or retains the effective use of, upper floors; and</li> <li>iv. Supports the regeneration, renewal and enhancement of the city centre.</li> </ul>			
ISA Objective	Impact	Comments	
1. Help deliver equality of opportunity and access for all	0	The policy focuses on ensuring that the Central Retail and Commercial Area is and remains vibrant. This helps to support and enhance the role of Cardiff as a key economic driver of South East Wales city region, but has no other obvious impacts.	
2. Maintain and improve air quality	0		
3. Protect and enhance biodiversity, flora and fauna	0		
4. Reduce emissions of greenhouse gases and adapt to the effects of climate change	0		
5. Protect and enhance historic and cultural heritage, including the Welsh Language	0		
6. Help deliver the growth of a sustainable and diversified economy	+		
7. Improve health and well-being	0		
8. Use soils and natural resources efficiently and safeguard their quality	0		
9. Protect and enhance the landscape	0		
10. Minimise resource use and waste, increase re-use and recycling	0		
11. Maintain and enhance water quality and resources, and manage flooding	0		
<b>ISA comments and suggestions:</b>			
The policy is very much about keeping and increasing the 'energy' of the city centre, but says nothing about constraints. E.g. should the policy also refer to the design policy, or a policy on tall buildings?			
<b>Changes made in response to the ISA:</b>			
These themes are covered in the relevant policies. This policy is specific to retail.			

<b>R3: PROTECTED SHOPPING FRONTAGES</b>		
Development proposals involving the loss of Class A1 (shop) uses within Protected Shopping Frontages will be assessed against the following criteria:		
<ul style="list-style-type: none"> <li>i. The balance and distribution of existing and committed non-shop uses;</li> <li>ii. The amount of A1 floorspace and frontage length being lost;</li> <li>iii. Whether, and for how long, the premises have been vacant and actively marketed;</li> <li>iv. The location, character and prominence of individual premises or frontages;</li> <li>v. The nature of the proposed use, including whether an appropriate shop front and window display is to be provided; and</li> <li>vi. The impact of the proposed use upon the amenity of adjacent or nearby residents.</li> </ul>		
ISA Objective	Impact	Comments

1. Help deliver equality of opportunity and access for all	0	The policy aims to maintain (but not increase) the vibrancy and attractiveness of Protected Shopping Frontages. Its purpose is to prevent the negative impact of shopping areas losing shops, and thus their vitality and their ability to provide services to people within easy travelling distance.
2. Maintain and improve air quality	0	
3. Protect and enhance biodiversity, flora and fauna	0	
4. Reduce emissions of greenhouse gases and adapt to the effects of climate change	0	
5. Protect and enhance historic and cultural heritage, including the Welsh Language	0	
6. Help deliver the growth of a sustainable and diversified economy	0	
7. Improve health and well-being	0	
8. Use soils and natural resources efficiently and safeguard their quality	0	
9. Protect and enhance the landscape	0	
10. Minimise resource use and waste, increase re-use and recycling	0	
11. Maintain and enhance water quality and resources, and manage flooding	0	
<b>ISA comments and suggestions:</b> None		

#### **R4: DISTRICT CENTRES**

Proposals for retail (including changes of use, redevelopment and subdivision), commercial, leisure, education, health, community, public service facilities, appropriate employment developments (B1) and residential uses will be favoured within the following district centres identified on the proposals map.

1. Albany Road/Wellfield Road
2. City Road
3. Clifton Street
4. Cowbridge Road East
5. Crwys Road/Woodville Road
6. Bute Street/James Street
7. Merthyr Road, Whitchurch
8. Penarth Road/Clare Road
9. St. Mellons
10. Thornhill
11. Whitchurch Road

This will be subject to:

- i. The proposal being of a scale and function appropriate to the particular centre;
- ii. The location of any business offices (Use class B1) above the ground floor;
- iii. The proposal not impeding the effective use of the upper floors;
- iv. Proposals for uses other than Class A1 (shop) not resulting in unacceptable harm to the vitality, viability and attractiveness of the centre or a specific frontage, in particular increasing the number of units which would not be available to the public during the normal working day;
- v. The proposal not resulting in unacceptable harmful impact on residential amenity and traffic which could not be overcome by the imposition of conditions;
- vi. The proposal providing a community benefit or addressing an identified deficiency in provision in the area which can be shown to outweigh the loss of a retail use.
- vii. The location of any new residential development above the ground floor and on underused and vacant space away from commercial frontages.

Unacceptable harm should take account of:

- The existing level of non-retail, leisure or community uses within the centre as a whole;
- The size of the retail unit in relation to the overall size of a centre or a specific groups of frontages;
- The distribution and proximity of non-retail, leisure or community uses within a frontage.

Proposals that result in, or add to a continuous stretch of non-retail, leisure or community uses (3 or more units in a row) will be less favourably considered and applications for such uses will be considered against the following:

- The vacancy rate in the centre and/or specific frontage
- Whether, and for how long, the premises have remained vacant whilst being actively marketed for their existing or previous use

ISA Objective	Impact	Comments
1. Help deliver equality of opportunity and access for all	+	The policy aims to maintain and improve the vitality of district centres, which provide local services and facilities
2. Maintain and improve air quality	0	
3. Protect and enhance biodiversity, flora and fauna	0	
4. Reduce emissions of greenhouse gases and adapt to the effects of climate change	0	
5. Protect and enhance historic and cultural heritage, including the Welsh Language	0	
6. Help deliver the growth of a sustainable and diversified economy	0	
7. Improve health and well-being	0	
8. Use soils and natural resources efficiently and safeguard their quality	0	
9. Protect and enhance the landscape	0	
10. Minimise resource use and waste, increase re-use and recycling	0	
11. Maintain and enhance water quality and resources, and manage flooding	0	

**ISA comments and suggestions:**

- Is it necessary to list the district centres in both R1 and R4?
- Clauses ii and vii make it sound like the development should definitely include business offices and residential above the ground floor. Should they be rephrased as “The location of *any* business offices” and “The location of *any* residential”?
- Be consistent about how to describe use classes. R3 describes them as “Class A1 (shop)”. R4 describes them as “business offices (use class B1)” and “class A1”. R5 describes them as “employment developments (B1)”.
- Clarify that “Unacceptable harm to the vitality, viability and attractiveness of a centre/frontage should take account of...”. Should the ‘unacceptable harm’ paragraph be in the explanatory text rather than policy?

**Changes made in response to the ISA:**

- R1 defines the retail hierarchy considering the size, form, function, and location of centres. District centres are listed again in R4 for clarity.
- ‘Any’ included in clauses ii and vii.
- Description of use classes made more consistent.
- The ‘unacceptable harm’ paragraph is in the same policy in the adopted plan. As this is a review of existing policy it was felt it is still appropriate to include it in this policy.

## R5: LOCAL CENTRES

Proposals for retail (including changes of use, redevelopment and subdivision), commercial, leisure, education, health, community, public service facilities, appropriate employment developments (B1) and residential uses will be favoured within the following local centres identified on the proposals map.

1. Birchgrove
2. Bute Street (Loudoun Square)
3. Cathedral Road
4. Countisbury Avenue
5. Caerau Lane
6. Fairwater Green
7. Gabalfa Avenue
8. Grand Avenue
9. High Street, Llandaff
10. Maelfa, Llanederyn
11. Newport Road, Rumney
12. Rhiwbina Village
13. Salisbury Road
14. Splott Road
15. Station Road, Llanishen
16. Station Road, Llandaff North
17. Station Road, Radyr
18. Tudor Street
19. Willowbrook Drive
20. Wilson Road

This will be subject to:

- i. The proposal being of a scale and function appropriate to the particular centre;
- ii. The retention of residential accommodation at upper floors;
- iii. Proposals for uses other than Class A1 (shop) not resulting in unacceptable harm to the vitality, viability and attractiveness of the centre or a specific frontage, in particular increasing the number of units which would not be available to the public during the normal working day;
- iv. The proposal not resulting in unacceptable harmful impact on residential amenity and traffic which could not be overcome by the imposition of conditions;
- v. The proposal providing a community benefit or addressing an identified deficiency in provision in the area which can be shown to outweigh the loss of a retail use.

Unacceptable harm should take account of:

- The existing level of non-retail, leisure or community uses within the centre as a whole
- The size of the retail unit in relation to the overall size of a centre or a specific groups of frontages;
- The distribution and proximity of non-retail, leisure or community uses within a frontage.

Proposals that result in, or add to a continuous stretch of non-retail, leisure or community uses (3 or more units in a row) will be less favourably considered and applications for such uses will be considered against the following:

- The vacancy rate in the centre and/or specific frontage
- Whether, and for how long, the premises have remained vacant whilst being actively marketed for their existing or previous use

ISA Objective	Impact	Comments
1. Help deliver equality of opportunity and access for all	+	The policy aims to maintain and improve the vitality of local centres, which provide local services and facilities
2. Maintain and improve air quality	0	
3. Protect and enhance biodiversity, flora and fauna	0	
4. Reduce emissions of greenhouse gases and adapt to the effects of climate change	0	The policy primarily aims to maintain the vibrancy of district centres, and so has no significant impacts.

5. Protect and enhance historic and cultural heritage, including the Welsh Language	0		
6. Help deliver the growth of a sustainable and diversified economy	0		
7. Improve health and well-being	0		
8. Use soils and natural resources efficiently and safeguard their quality	0		
9. Protect and enhance the landscape	0		
10. Minimise resource use and waste, increase re-use and recycling	0		
11. Maintain and enhance water quality and resources, and manage flooding	0		
<b>ISA comments and suggestions:</b>			
<ul style="list-style-type: none"> <li>• Please see comments on R4, which also apply to R5.</li> <li>• Is it worth specifying anywhere that provision of new local services may be needed where access to existing services by walking/cycling/PT (e.g. in large new developments) is not possible?</li> </ul>			
<b>Changes made in response to the ISA:</b>			
<ul style="list-style-type: none"> <li>• R1 defines the retail hierarchy considering the size, form, function, and location of centres. Local centres are listed again in R5 for clarity.</li> <li>• Description of use classes made more consistent.</li> <li>• The 'unacceptable harm' paragraph is included in the policy in the adopted plan. As this is a review of existing policy it was felt it is still appropriate to include it in the policy.</li> <li>• Policy R7 refers to the creation of new facilities.</li> </ul>			

<b>R6: TOWN CENTRE FIRST APPROACH</b>		
Proposals for new retail and commercial developments out of centre, including changes of use, extensions, the merger or subdivision of existing units or amendments to existing planning conditions relating to the sale of goods will only be permitted where: -		
i.	It can be demonstrated there is a need for the proposed floorspace (with precedence accorded to establishing quantitative need) and that need cannot be accommodated within the central retail and commercial area, or within a district or local centre;	
ii.	The proposal would not cause unacceptable harm to the vitality, attractiveness and viability of the central retail and commercial area, district or local centre or a proposal or strategy for the protection and enhancement of these centres;	
iii.	The site is accessible by a choice of means of transport and;	
iv.	The proposal is not on land allocated for other uses. This especially applies to land designated for employment and housing, where retail and commercial development can be shown to limit the range and quality of sites for such uses.	
ISA Objective	Impact	Comments
1. Help deliver equality of opportunity and access for all	+	The policy aims to ensure that retail and commercial development is focused where possible on designated centres. This helps to maintain the vitality and viability of the designated centres, and hence their ability to provide services close to where people live. As such, it has a neutral/protective impact, preventing a negative impact rather than having a specific positive impact.
2. Maintain and improve air quality	0	
3. Protect and enhance biodiversity, flora and fauna	0	
4. Reduce emissions of greenhouse gases and adapt to the effects of climate change	0	
5. Protect and enhance historic and cultural heritage, including the Welsh Language	0	

6. Help deliver the growth of a sustainable and diversified economy	0	
7. Improve health and well-being	0	
8. Use soils and natural resources efficiently and safeguard their quality	0	
9. Protect and enhance the landscape	0	
10. Minimise resource use and waste, increase re-use and recycling	0	
11. Maintain and enhance water quality and resources, and manage flooding	0	

**ISA comments and suggestions:**

- The title of the policy is “town centre”, but the rest of the policy is about city, district and local centres... Does the title need to reflect this?
- Rephrase i. as “..within the central retail and commercial area, *or* within a district or local centre”

**Changes made in response to the ISA:**

- This policy embodies the ‘Town Centre First’ sequential approach to site selection as enshrined in national planning guidance, in TAN4 and Policy 6 of Future Wales – no change.
- i. rephrased

**R7: THE CREATION OF NEW CENTRES**

The development of new centres to provide services, facilities and a community focus in areas of growth and regeneration proposing residential development will be assessed against Policy R6: retail development (out of centre) and will be supported where:

- I. The development is of an appropriate scale which satisfies an identified local need;
- II. The development will not negatively impact on the vitality, viability and attractiveness of designated centres;
- III. The development is located along public transport corridors and easily accessible by walking and cycling; and
- IV. The development forms part of a planned centre which reinforces a sense of place.

ISA Objective	Impact	Comments
1. Help deliver equality of opportunity and access for all	++	Helps to provide services that can be accessed by all
2. Maintain and improve air quality	+	Reduces the need to travel to services by car (by both new and existing residents), so reducing air pollution.
3. Protect and enhance biodiversity, flora and fauna	-?	Depends on location of new centre, but could be on greenfield land and/or previously developed land that is biodiverse
4. Reduce emissions of greenhouse gases and adapt to the effects of climate change	+	Reduces the need to travel to services by car
5. Protect and enhance historic and cultural heritage, including the Welsh Language	-?	Depends on location of new centre, but could affect sites of historical/cultural heritage
6. Help deliver the growth of a sustainable and diversified economy	++	Promotes and supports local centres, supports Cardiff's economy
7. Improve health and well-being	+/-	Depends on location of new centre. Could help to increase walking and cycling, but could also increase air pollution/noise/etc. to some residents.
8. Use soils and natural resources efficiently and safeguard their quality	-?	Depends on location of new centre, but could be on greenfield land and/or previously developed land

9. Protect and enhance the landscape	-?	Depends on location of new centre, but is likely to convert greenfield or less intensively used land to taller, more massive development
10. Minimise resource use and waste, increase re-use and recycling	+?	Depends on the facilities available at the centre.
11. Maintain and enhance water quality and resources, and manage flooding	-?	Depends on location of new centre, but could increase flooding or be prone to flooding if in the flood zone.
<b>ISA comments and suggestions:</b>		
<ul style="list-style-type: none"> <li>• Please see comments on R1: will new centres emerge spontaneously, or does the council need to proactively identify sites for new centres? And are there some areas that need new centres more than others?</li> <li>• Does anything need to be said about proposals for new centres that are NOT in areas of growth and regeneration proposing residential development?</li> <li>• Maybe refer to development that responds to the climate and nature emergencies?</li> <li>• Should new centres include a component of reuse (e.g. charity shops) and/or recycling (recycling banks)?</li> </ul>		
<b>Changes made in response to the ISA:</b>		
<ul style="list-style-type: none"> <li>• See response to R1.</li> <li>• The Retail and Commercial Leisure Study quantitative assessment of capacity found there to be no capacity to support further convenience and comparison goods floorspace across the City to 2036 and recommended no new sites are brought forward over the plan period.</li> <li>• Climate and nature emergencies issues are included in relevant policies.</li> <li>• Centres will probably contain a component of re-use but it would be too detailed and prescriptive to include this in the policy.</li> </ul>		

<b>R8: FOOD AND DRINK USES</b>		
Food and Drink Uses are most appropriately located in:		
ISA Objective	Impact	Comments
1. Help deliver equality of opportunity and access for all	0	
2. Maintain and improve air quality	0	
3. Protect and enhance biodiversity, flora and fauna	0	
4. Reduce emissions of greenhouse gases and adapt to the effects of climate change	0	
5. Protect and enhance historic and cultural heritage, including the Welsh Language	0	No significant impacts not covered by appraisal of previous policies.
6. Help deliver the growth of a sustainable and diversified economy	0	
7. Improve health and well-being	0	
8. Use soils and natural resources efficiently and safeguard their quality	0	
9. Protect and enhance the landscape	0	
10. Minimise resource use and waste, increase re-use and recycling	0	

11. Maintain and enhance water quality and resources, and manage flooding	0	
<b>ISA comments and suggestions:</b> None		

#### **R9: CONVERSION TO RESIDENTIAL**

Within the Central and Bay Business Area, District and Local Centres, the conversion of suitable vacant space above commercial premises to residential use will be favoured where:

- i. The ground floor frontage is retained in commercial use;
- ii. Adequate servicing and security can be maintained to the existing commercial use(s);
- iii. Appropriate provision can be made for parking, access, pedestrian access, amenity space, green infrastructure and refuse disposal together with any appropriate external alterations and;
- iv. The residential use does not compromise the ground floor use and result in unacceptable impact on the operating conditions of existing businesses.

ISA Objective	Impact	Comments
1. Help deliver equality of opportunity and access for all	+	The policy supports conversion of vacant space above shops in city/district/local where this can be done so without negative impacts. It would also help centres to remain busy in the evening, increasing safety. By definition, these new residential units would be close to amenities, allowing access by walking.
2. Maintain and improve air quality	+/-	Provision of housing in central areas would minimise the need to drive to services. However, three of the city's four Air Quality Management Areas – Cardiff City Centre, Llandaff and Stephenson Court – are in or near city/district/local centres. These areas may have a negative impact on the health of new residents.
3. Protect and enhance biodiversity, flora and fauna	0	
4. Reduce emissions of greenhouse gases and adapt to the effects of climate change	+	The new residential units would be close to amenities, allowing access by walking. They would also not require new construction, so would not increase the level of embodied energy.
5. Protect and enhance historic and cultural heritage, including the Welsh Language	0	
6. Help deliver the growth of a sustainable and diversified economy	+/-	New residential units in commercial areas would indirectly support Cardiff's economy, but would decrease the amount of usable retail space.
7. Improve health and well-being	-	Accommodation of shops often suffers from noise, odours etc, affecting people's health. There may be a conflict between this policy and policy EC9 which specifies that proposals for evening and night-time leisure uses will be favoured in some of the city centre, and in district and local centres.
8. Use soils and natural resources efficiently and safeguard their quality	+	Use of vacant premises is an efficient use of land, obviating the need to provide accommodation elsewhere, possibly on greenfield land.
9. Protect and enhance the landscape	0	
10. Minimise resource use and waste, increase re-use and recycling	0	

11. Maintain and enhance water quality and resources, and manage flooding	0	
<b>ISA comments and suggestions:</b> Policy EC9 specifies that proposals for evening and night-time leisure uses will be favoured in district and local centres. Would there be a clash between that policy and this one? Does this policy need to specify that there should be adequate ventilation (against odours) and sound-proofing of the accommodation?		
<b>Changes made in response to the ISA:</b> Please see response to EC9		

## COMMUNITY

C1: COMMUNITY FACILITIES		
Proposals within the settlement boundary for new and improved community facilities, health and religious facilities will be encouraged, subject to the following criteria being satisfied:		
ISA Objective	Impact	Comments
1. Help deliver equality of opportunity and access for all	++	The policy aims to help provide community facilities, which in turn will help to reduce inequalities.
2. Maintain and improve air quality	-?	Although the policy focuses on walking, cycling and public transport, in practice community facilities will often be accessed by car, worsening air pollution.
3. Protect and enhance biodiversity, flora and fauna	-?	Impact depends on location and type of facilities, but facilities on greenfield sites, or existing biodiverse sites, would have a negative impact on biodiversity
4. Reduce emissions of greenhouse gases and adapt to the effects of climate change	-?	See 2.
5. Protect and enhance historic and cultural heritage, including the Welsh Language	0	No significant impact
6. Help deliver the growth of a sustainable and diversified economy	+?	Community facilities help to make Cardiff a more attractive location for businesses and employees.
7. Improve health and well-being	++	The policy supports the provision of health facilities, and community facilities that improve mental and physical health.
8. Use soils and natural resources efficiently and safeguard their quality	-?	Impact depends on location and type of facilities, but the policy says nothing about protecting greenfield land or minimising the building envelope (including parking), so some impacts could be expected.
9. Protect and enhance the landscape	+/-?	Impact depends on location and type of facilities. Redevelopment of existing run-down facilities can help to improve the townscape, but new community facilities on greenfield land can worsen it.
10. Minimise resource use and waste, increase re-use and recycling	0	No significant impact
11. Maintain and enhance water quality and resources, and manage flooding	-?	Impact depends on location and type of facilities. However, new facilities could be on greenfield sites and/or involve making permeable surfaces less permeable (e.g. paving over grass).
<b>ISA comments and suggestions:</b>		
<ul style="list-style-type: none"> <li>Are parks and playing fields = "community facilities"? What about cemeteries, prisons, footpaths/cycleways, soup kitchens and homeless shelters, emergency services etc? Is there a comprehensive list somewhere that the policy could refer to?</li> <li>At minimum, the second sentence of the supporting text could be rephrased as "This <del>constitutes</del> <u>includes</u> community centres"....</li> </ul>		

- The point made in the third para of the supporting text (“If development occurs without...”) is a good one. Should/can this be made the subject of another policy, i.e. development that overloads existing community facilities must provide its own (or additional) community facilities?
- The policy says nothing about environmental effects. Presumably this will be covered, at least in part, by other policies. But should the last supporting para (“.. will be favoured within District or Local Centres”) be part of the policy itself?
- Should the amount of parking at the community facility be limited to the minimum necessary?
- Does the policy need to say anything about good design, or refer to the design policy?

**Changes made in response to the ISA:**

- There is no comprehensive list of what constitutes a community facility. Text changed to include health, education and religious purposes. Parks and playing fields are community facilities but they are covered by open space policies. Footways/cycleways are covered by transport policies, and should there be an identified need for cemeteries and prisons these would be separate allocations in the LDP.
- Second sentence of supporting text rephrased to ‘This includes community centres.....’
- Para 4 of the supporting text states that ‘The provision of community facilities should go hand in hand and be integrated with new development’. Policies for masterplanning, design, new infrastructure and securing planning obligations are designed to ensure that new development does no overload existing community facilities. Policy C1 recognises the potential for development where it occurs to place a strain on existing facilities. Consequently, the adequacy of existing facilities such as healthcare is an important consideration. As a result, the policy seeks to ensure that adequate facilities are provided to meet the future demands of local communities.
- Environmental impact will be covered by other policies.
- The last supporting paragraph is already covered in the district and local centre policies so not necessary to include in policy itself.
- Issues regarding parking and design are also covered by other policies.

**C2: PROTECTION OF COMMUNITY FACILITIES**

Proposals that result in the loss or change of use of buildings currently or last used for community facilities, including ‘corner shops’, public houses and/or non-commercial community facilities, including libraries, community centres, health and religious facilities will only be supported where:

- i. An alternative facility of at least equal quality and scale to meet community needs is available or will be provided within the vicinity or;
- ii. The use is no longer viable and all attempts to let or sell the business have proved unsuccessful; or
- iii. It can be demonstrated that the existing provision is surplus to the needs of the community and it does not play a part in supporting the educational, cultural or sporting opportunities available to pupils of schools in the area.
- iv. The community facility can be fully retained, enhanced, or reinstated as part of any redevelopment of the building or land.

ISA Objective	Impact	Comments
1. Help deliver equality of opportunity and access for all	0/+	The policy aims to maintain or enhance the level of service currently provided by community facilities
2. Maintain and improve air quality	0	The policy aims to broadly maintain (with some possible improvements) existing facilities, i.e. it is a protective (no change) policy.
3. Protect and enhance biodiversity, flora and fauna	0	
4. Reduce emissions of greenhouse gases and adapt to the effects of climate change	0	
5. Protect and enhance historic and cultural heritage, including the Welsh Language	0	
6. Help deliver the growth of a sustainable and diversified economy	0	
7. Improve health and well-being	0	

8. Use soils and natural resources efficiently and safeguard their quality	0		
9. Protect and enhance the landscape	0		
10. Minimise resource use and waste, increase re-use and recycling	0		
11. Maintain and enhance water quality and resources, and manage flooding	0		
<b>ISA comments and suggestions:</b>			
<ul style="list-style-type: none"> <li>Again, is it worth having a formal definition of 'community facilities' so that the policy doesn't need to say "including 'corner shops' ...?"?</li> <li>Does iv. need to specify a timescale? So my sports centre can be torn down and will be replaced by a new one in the new development.... but where do I go swimming in the meanwhile?</li> </ul>			
<b>Changes made in response to the ISA:</b>			
<ul style="list-style-type: none"> <li>Please see response to C1</li> <li>iv it would be difficult to specify a timescale</li> </ul>			

<b>C3: COMMUNITY SAFETY/CREATING SAFE ENVIRONMENTS</b>		
All new development and redevelopment shall be designed to promote a safe and secure environment and minimise the opportunity for crime. In particular development shall:		
<ol style="list-style-type: none"> <li>Maximise natural surveillance of areas which may be vulnerable to crime such as publicly accessible spaces, open space, car parking areas, public transport stops and footpaths;</li> <li>Have well defined routes, spaces and entrances that provide convenient movement without compromising security;</li> <li>Maintain perceptible distinction between public and private spaces through well-defined boundaries and defensible space;</li> <li>Provide a good standard of lighting to public spaces, public transport stops and routes while minimising energy use and light pollution; and</li> <li>Be designed with management and maintenance in mind, to discourage crime in the present and future.</li> </ol>		
ISA Objective	Impact	Comments
1. Help deliver equality of opportunity and access for all	+	A safe and secure environment is particularly important for vulnerable members of the community such as children and elderly people
2. Maintain and improve air quality	0	No significant impacts
3. Protect and enhance biodiversity, flora and fauna	0	
4. Reduce emissions of greenhouse gases and adapt to the effects of climate change	0	The policy supports people to walk and cycle, although it could be more explicit in giving precedence to non-vehicular forms of transport
5. Protect and enhance historic and cultural heritage, including the Welsh Language	0	No significant impacts
6. Help deliver the growth of a sustainable and diversified economy	0	
7. Improve health and well-being	+	The aim of the policy is to promote a safe environment, which is good for both physical (encouraging walking and cycling) and mental health.
8. Use soils and natural resources efficiently and safeguard their quality	0	No significant impacts

9. Protect and enhance the landscape	0	Although a safe environment may look different than a less safe environment, there are no significant landscape differences between the two.
10. Minimise resource use and waste, increase re-use and recycling	0	
11. Maintain and enhance water quality and resources, and manage flooding	0	No significant impacts
<b>ISA comments and suggestions:</b>		
<ul style="list-style-type: none"> <li>• Should this policy be placed in the plan alongside the design policy (since it applies to all development) rather than under community facilities?</li> <li>• Should the policy say anything about giving priority to pedestrians and cyclists over vehicles?</li> </ul>		
<b>Changes made in response to the ISA:</b>		
<ul style="list-style-type: none"> <li>• The policy is not intended to be specific to community facilities. The policy is intended to design out crime in the community and promote the creation of safe places.</li> </ul>		

<b>C4: PLANNING FOR SCHOOLS</b>		
Where a need has been identified for new and improved school facilities as a result of development, the Council will seek contributions towards the cost of additional education provision. Negotiated contributions will be fairly and reasonably related in scale and kind to the proposed development. Where appropriate on site provision will be required.		
ISA Objective	Impact	Comments
1. Help deliver equality of opportunity and access for all	+	The policy helps to ensure that adequate school provision is made, which supports young people. The focus on shared use of space also supports other activities which benefit the community.
2. Maintain and improve air quality	0	The policy aims to minimise air pollution by calling for schools to be easily accessible by non-car modes.
3. Protect and enhance biodiversity, flora and fauna	0	No significant impact
4. Reduce emissions of greenhouse gases and adapt to the effects of climate change	0	See 2. This does not reduce greenhouse gas emissions but minimises their increase.
5. Protect and enhance historic and cultural heritage, including the Welsh Language	+?	Supports Welsh Language by helping to ensure adequate educational facilities for Welsh-speaking children.
6. Help deliver the growth of a sustainable and diversified economy	+	Adequate school provision helps to support the economy in the long term.
7. Improve health and well-being	0	
8. Use soils and natural resources efficiently and safeguard their quality	+	The focus on shared use of space helps to make efficient use of soil and resources
9. Protect and enhance the landscape	0	
10. Minimise resource use and waste, increase re-use and recycling	0	No significant impact

11. Maintain and enhance water quality and resources, and manage flooding	0	
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**ISA comments and suggestions:**

This policy – and the fact that there are no similar policies for other community facilities – makes it sound like schools are the only community facilities for which cost contributions will be sought. Is that the case? If not, add other policies or amend this one?

**Changes made in response to the ISA:**

- Schools are not the only community facilities for which contributions will be sought and such contributions will be sought on a case-by-case basis. However, the Council has a statutory duty as local education authority to ensure that there is a sufficient number and variety of school places at primary and secondary level, available to meet the needs of the population of the County.

## HERITAGE

HE1: THE HISTORIC ENVIRONMENT
<p><b>Safeguarding Cardiff's Heritage Assets</b></p> <ol style="list-style-type: none"><li>1. Development that has an impact on a heritage asset will be expected to preserve or enhance its significance and/or setting, and make a positive contribution to its character or appearance.</li><li>2. Applications which affect the significance of any 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 <i>Heritage Impact Assessment in Wales</i>.</li><li>3. Substantial weight will be given to the conservation of the city's heritage assets. Any harm to the significance of a designated or non-designated heritage asset 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 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.</li><li>4. If harm can be fully justified, the Council will, where relevant, require appropriate archaeological excavation and/or historic building recording, to include analysis and publication of the results.</li><li>5. In addition, the following will apply to specific asset types as listed below:<ol style="list-style-type: none"><li>i. Archaeology and Scheduled Monuments: The Historic Environment Record (HER) will be used to inform the consideration of future development, including potential conservation and enhancement measures. Scheduled monuments and other non-designated archaeological sites of equivalent significance should be preserved in situ. Within Archaeologically Sensitive Areas, undertaking a desk-based assessment or field evaluation may be required prior to submitting a planning application.</li><li>ii. Listed Buildings: Development will sustain or enhance the significance of listed buildings. Appropriate repair and reuse of listed buildings will be encouraged. Alterations, extensions, changes of use, or development in their vicinity will be expected to have no adverse impact on those elements which contribute to their special architectural or historic interest, including their settings.</li><li>iii. Conservation Areas: Development within or adjacent to a conservation area will only be permitted if it would preserve or enhance the character and appearance of the conservation area, or its setting. All development in such locations must also be of a high standard of design, must respond to the area's special characteristics, and must pay particular regard to:<ol style="list-style-type: none"><li>a) The retention or exact replacement of important features as outlined within Conservation Area Appraisals, particularly timber windows and doors, roof form and detailing, and landscaped front gardens.</li><li>b) Important views, vistas, street scenes, roofscapes, trees, open spaces, gaps, and other features that contribute to the character or appearance of the conservation area.</li><li>c) The retention of historically significant boundaries or other elements that contribute to the established form of development.</li><li>d) The relationship to existing buildings and spaces, and pattern of development.</li><li>e) Scale, height and massing, architectural design and detailing, the use of materials, boundary treatment, and public realm materials.</li><li>f) The retention and reinstatement of traditional shop fronts and signage.</li></ol></li><li>iv. Registered Historic Landscapes, Parks and Gardens: Development will be expected to respect the design, character, appearance and settings of Registered Historic Landscapes, Parks and Gardens, and to safeguard those features which contribute to their integrity and coherence.</li><li>v. Locally Listed Buildings: Development affecting a locally listed building, or its setting, will only be permitted where it can be demonstrated that it preserves or enhances its architectural quality, historic and cultural significance, character, and integrity. Article 4 Directions will be issued to remove permitted development rights relating to demolition. There will be a general presumption in favour of retaining locally listed buildings, and applications proposing their demolition will be</li></ol></li></ol>

<p>assessed against the same broad criteria as proposals to demolish listed buildings (see <i>Planning Policy Wales Technical Advice Note 24: The Historic Environment</i>).</p> <p>vi. Non-designated Heritage Assets: Proposals affecting heritage assets that lack a specific designation, such as unscheduled archaeology, unlisted structures and local parks and gardens, will be expected to preserve their contribution to local character.</p>		
ISA Objective	Impact	Comments
1. Help deliver equality of opportunity and access for all	0	This policy may restrict the development of some housing or community facilities, but its impact is likely to be limited.
2. Maintain and improve air quality	0	No significant impact
3. Protect and enhance biodiversity, flora and fauna	0	
4. Reduce emissions of greenhouse gases and adapt to the effects of climate change	0	
5. Protect and enhance historic and cultural heritage, including the Welsh Language	0	The policy aims to protect (rather than enhance) Cardiff's heritage assets
6. Help deliver the growth of a sustainable and diversified economy	0	The policy may restrict the development of some employment sites, but its impact is likely to be limited.
7. Improve health and well-being	0	No significant impact
8. Use soils and natural resources efficiently and safeguard their quality	0	
9. Protect and enhance the landscape	0	No mention of the historic landscape
10. Minimise resource use and waste, increase re-use and recycling	0	No significant impact
11. Maintain and enhance water quality and resources, and manage flooding	0	
<p><b>ISA comments and suggestions:</b></p> <ul style="list-style-type: none"> <li>• Is the first line ("Safeguarding...") necessary?</li> <li>• Should the policy say anything about enhancing (not just protecting) Cardiff's heritage, e.g. in relation to Welsh language, interpretation of heritage significance, remediation of heritage assets at risk?</li> </ul> <p><b>Changes made in response to the ISA:</b></p> <ul style="list-style-type: none"> <li>• First line removed</li> <li>• The policy includes five references to 'enhance'. Legislation (including enforcement provisions) and national guidance sets out how these matters should be weighted within decision making. Interpretation or buildings at risk are not really a development plan matter.</li> <li>• It is difficult to see how enhancement of Welsh Language can be included within this development management policy (there is nothing in <a href="#">TAN20</a> or <a href="#">TAN24</a>, for example).</li> </ul>		

## HEALTH

HF1: HEALTH, WELLBEING AND DEVELOPMENT		
The Council will support developments that:		
<ul style="list-style-type: none"> <li>i. Provide and promote infrastructure that prioritises walking and inclusive cycling and access to public transport</li> <li>ii. Provide and promote road safety measures to reduce vehicle speed</li> <li>iii. Provide accessible and well-maintained green infrastructure, open green spaces and blue spaces</li> <li>iv. Provide a food growing and food retail environment that enhances access to healthy food choices</li> <li>v. Provide local facilities that enable access to community, healthcare and social care services</li> <li>vi. Consider the capacity of existing healthcare facilities and help provide additional facilities where a need is identified</li> <li>vii. Ensure low levels of air pollution</li> <li>viii. Delivers a range of homes, according to population need, that are insulated, warm, naturally lit and well-ventilated and have adequate kitchen facilities, cycle storage and access to outdoor spaces</li> <li>ix. Are supported by a Health Impact Assessment for major developments where appropriate.</li> </ul>		
Developments that are considered to have an unacceptable impact on health and wellbeing will not be permitted.		
ISA Objective	Impact	Comments
1. Help deliver equality of opportunity and access for all	++	Very positive in terms of providing needed services and amenities. Could be even better, e.g. if it considered the capacity of other facilities (not just healthcare) and green infrastructure, and provided more where needed.
2. Maintain and improve air quality	++	Provision of green infrastructure, measures that prioritise walking and cycling, and ensure low levels of air pollution all help to maintain and improve air quality.
3. Protect and enhance biodiversity, flora and fauna	+?	Indirectly, green infrastructure, walking, cycling and good air quality help to support biodiversity.
4. Reduce emissions of greenhouse gases and adapt to the effects of climate change	++	See 2.
5. Protect and enhance historic and cultural heritage, including the Welsh Language	0	No significant impact
6. Help deliver the growth of a sustainable and diversified economy	+	A healthy environment, accessible facilities, green infrastructure etc. all help to support Cardiff as an attractive city in which to work.
7. Improve health and well-being	++	The policy aims to improve (not just maintain) health by providing good infrastructure, clean air, opportunities for walking and cycling etc. Promotion of healthy food and allotments also supports good health.
8. Use soils and natural resources efficiently and safeguard their quality	0	No significant impacts (but, if anything, an indirect positive impact)
9. Protect and enhance the landscape	0	No significant impact
10. Minimise resource use and waste, increase re-use and recycling	+?	Indirectly, promoting walking and cycling, green infrastructure, good air quality etc. helps to reduce Cardiff's ecological footprint and improve water quality.
11. Maintain and enhance water quality and resources, and manage flooding	+?	
ISA comments and suggestions:		
<p>A lovely, positive policy that seriously promotes sustainable development.</p> <ul style="list-style-type: none"> <li>• “Considers” and “delivers” should be “consider” and “deliver” (they relate to multiple developments)</li> </ul>		

- vi (Considers the capacity of existing healthcare facilities and help provide additional facilities where a need is identified) is so positive: can it also apply to other things like accessible open space and other community facilities beyond healthcare?

**Changes made in response to the ISA:**

- “Considers” and “delivers” changed to “consider” and “deliver”.
- As the policy relates to health it overlaps with other policy areas in the plan. The capacity and need for additional accessible open space and other community facilities are assessed in policies SP5 Securing New Infrastructure, OS2 Provision for Open Space, Outdoor Recreation and Children’s Play and Sport and C1 Community Facilities.

**HF2: THE PROVISION OF ALLOTMENTS / HF3: PROVISION OF FOOD GROWING SPACE IN NEW DEVELOPMENTS**

These policies have been appraised jointly as their impacts are essentially the same.

HF2: Residential development will be expected to contribute one statutory allotment plot of 250m<sup>2</sup> for every 45 dwellings it creates. Where it is not practicable to make provision on site, off-site provision or a financial contribution to support the improvement or rehabilitation of other allotment sites will be acceptable.

HF3: All new residential developments intended for permanent or long-term occupation are expected to provide suitable space for on-site food growing by residents. New space for food growing as part of a development will be expected to:

- Be of an appropriate size and quality, with larger developments providing appropriately scaled food growing opportunities and/or planting.
- Be appropriately designed to be safe, usable, accessible to all residents and integrated into the development site.

ISA Objective	Impact	Comments
1. Help deliver equality of opportunity and access for all	+	Allotments and on-site food growing provide an opportunity for residents to grow their own food (including culturally appropriate food), meet neighbours etc.
2. Maintain and improve air quality	0	
3. Protect and enhance biodiversity, flora and fauna	+/-	Allotments and food growing areas take land that could otherwise be used for biodiversity, but themselves are a source of biodiversity.
4. Reduce emissions of greenhouse gases and adapt to the effects of climate change	0	Provision of local food helps to reduce food miles and associated greenhouse gas emissions, although the impact is likely to be limited.
5. Protect and enhance historic and cultural heritage, including the Welsh Language	0	
6. Help deliver the growth of a sustainable and diversified economy	0	
7. Improve health and well-being	++	Allotments and on-site food growing promote physical exercise and a healthy diet.
8. Use soils and natural resources efficiently and safeguard their quality	++/-	On-site food provision can be part of a development’s landscaping and design, so being a land-efficient way of providing food. To the extent that allotments and on-site food growing take existing agricultural land, they may replace a more efficient way of growing food with a pleasant, sociable but less efficient way of growing food.
9. Protect and enhance the landscape	+	Allotments and on-site food growing provide green and varied elements to new development
10. Minimise resource use and waste, increase re-use and recycling	++/-	See 8

11. Maintain and enhance water quality and resources, and manage flooding	0	Allotments and on-site food growing may help to reduce run-off and flooding, but the impact is likely to be limited.
<b>ISA comments and suggestions:</b> None		

<b>HF4: THE PROTECTION OF EXISTING FOOD GROWING ENTERPRISES AND ALLOTMENTS</b>		
Development that increases the availability of locally grown food will be supported where it is consistent with other policies within the plan. Development which would result in the loss of active allotments, or which would have a harmful impact on their community food growing role will not be permitted.		
ISA Objective	Impact	Comments
1. Help deliver equality of opportunity and access for all	+?	Local food growing enterprises can help to provide jobs, particularly apprenticeships and other 'starter' jobs
2. Maintain and improve air quality	0	
3. Protect and enhance biodiversity, flora and fauna	0	
4. Reduce emissions of greenhouse gases and adapt to the effects of climate change	+?	Provision of locally-grown food reduces 'food miles' and prevents the need to transport food long distance, so avoiding greenhouse gas emissions
5. Protect and enhance historic and cultural heritage, including the Welsh Language	0	
6. Help deliver the growth of a sustainable and diversified economy	+?	See 1.
7. Improve health and well-being	+	Access to locally-grown healthy food helps to improve health
8. Use soils and natural resources efficiently and safeguard their quality	?	Depends on location and agricultural system used
9. Protect and enhance the landscape	?	
10. Minimise resource use and waste, increase re-use and recycling	+	Provision of locally-grown food minimises the need to package and transport food
11. Maintain and enhance water quality and resources, and manage flooding	?	Depends on location and agricultural system used
<b>ISA comments and suggestions:</b> Should this policy also protect Grade 2 agricultural land, even if it is not currently a local food growing enterprise? About 20% of the proposed development sites (22, 24, 33, 34, 44, 49, 51, 54, 55, 56, 58, 59, 73, 74, 80, 82) are on grade 2 agricultural land.		
<b>Changes made in response to the ISA:</b> Grades 1, 2 and 3a agricultural land are protected under Policy SP21 Minimising Impacts on Natural Resources.		

## WELSH LANGUAGE

WL1: WELSH LANGUAGE		
Where relevant, new development should promote, protect and strengthen the interests of the Welsh language and the city as an area of linguistic importance to ensure a Bilingual Cardiff by ensuring proposals: <ol style="list-style-type: none"> <li>Contribute meaningfully to Welsh Government's <i>Cymraeg 2050: A Million Welsh Speakers</i> ambition.</li> <li>Provide more opportunities to grow and retain young Welsh speakers in the city in terms of housing, work and community (including education and training) facilities.</li> <li>Provide opportunities for the increasing number of older speakers in the city so that there are more opportunities to speak Welsh at community level for all ages.</li> <li>Consider bilingual development signage and relevant information such as marketing material is bilingual and ensure the use of Welsh in development naming practice.</li> <li>In the case of major developments on windfall sites new proposals should be supported by a Welsh Language Situation Statement to help identify existing trends and patterns and to enable consideration of any potential positive and adverse impacts on the language – and in particular to understand the proposal's impact on the future growth in the number of Welsh speakers and the growth in the use of the language and identify any mitigation/enhancement measures required. Where the Welsh Language Situation Statement leads to concerns by the Council about potential significant adverse impacts, the developer will be required to undertake a Welsh Language Impact Assessment of the proposal, together with the submission of an Action Plan to promote and increase the use of Welsh.</li> </ol> Where relevant, planning permission will be subject to conditions or agreements to ensure the promotion and/or mitigation measures agreed in the Action Plan to promote and increase Use of Welsh are implemented effectively.		
ISA Objective	Impact	Comments
1. Help deliver equality of opportunity and access for all	0	The policy actively works to support people who speak Welsh. However in practice its impact is likely to be limited.
2. Maintain and improve air quality	0	No significant impact
3. Protect and enhance biodiversity, flora and fauna	0	
4. Reduce emissions of greenhouse gases and adapt to the effects of climate change	0	
5. Protect and enhance historic and cultural heritage, including the Welsh Language	+	The policy supports and promotes use of the Welsh language.
6. Help deliver the growth of a sustainable and diversified economy	0	The policy promotes Cardiff as an area of linguistic importance. This supports jobs such as Welsh teachers, translators, and historical experts. However in practice the policy is likely to have a limited impact on Cardiff's economy.
7. Improve health and well-being	0	The policy may have indirect impacts such as giving pride and a feeling of community to Welsh-speaking residents. However its impact is likely to be limited.
8. Use soils and natural resources efficiently and safeguard their quality	0	No significant impact
9. Protect and enhance the landscape	0	
10. Minimise resource use and waste, increase re-use and recycling	0	
11. Maintain and enhance water quality and resources, and manage flooding	0	
ISA comments and suggestions: None		

## COUNTRYSIDE

CP1: COUNTRYSIDE PROTECTION		
Development in the countryside, beyond the settlement boundaries identified on the Proposals Map, will only be permitted where the use is appropriate in the countryside, respects the landscape character, quality, green infrastructure and biodiversity of the site and surrounding area and where it is appropriate in scale and design. A landscape assessment and landscaping scheme will be required for significant development proposals. Proposals for new housing, rural diversification and rural enterprise will only be permitted where they comply with National Planning Policy.		
ISA Objective	Impact	Comments
1. Help deliver equality of opportunity and access for all	+/-	The policy restricts where new housing can be built. However it helps to ensure that new housing is near public transport and services, so that access by walking, cycling and public transport is possible.
2. Maintain and improve air quality	0	The policy aims to protect (not enhance) the countryside, including air quality, biodiversity and heritage.
3. Protect and enhance biodiversity, flora and fauna	0	
4. Reduce emissions of greenhouse gases and adapt to the effects of climate change	0	
5. Protect and enhance historic and cultural heritage, including the Welsh Language	0	The policy restricts employment development in the countryside. However it helps to ensure that new employment opportunities are accessible by walking, cycling and public transport, and are near areas of population.
6. Help deliver the growth of a sustainable and diversified economy	+/-	
7. Improve health and well-being	0	
8. Use soils and natural resources efficiently and safeguard their quality	0	The policy aims to protect (not enhance) the countryside, including soils and the landscape. Protecting air and soil quality helps to protect (but not improve) health.
9. Protect and enhance the landscape	0	
10. Minimise resource use and waste, increase re-use and recycling	0	No significant impact
11. Maintain and enhance water quality and resources, and manage flooding	0	The policy restricts development in the countryside, helping to protect (but not improve) water quality and resources.
ISA comments and suggestions: none		

CP2: CONVERSION, EXTENSION AND REPLACEMENT BUILDINGS IN THE COUNTRYSIDE	
There will be a presumption against conversion, replacement and extension of buildings in Cardiff's countryside except where:	
(a) The proposed conversion must: <ul style="list-style-type: none"> <li>i. Be structurally sound and capable of being made so without major alterations, reconstructing or extensions;</li> <li>ii. Be possible without materially changing the existing character of the building or have a harmful effect on the countryside;</li> <li>iii. Not give rise to a demand for additional buildings; and</li> <li>iv. Be suitable for the proposed re-use.</li> </ul>	

(b) The proposed extension must:

- Be the subordinate part of the existing building; and
- Respect the scale, character and design of the original part of the building within its countryside and landscape setting.

(c) The proposed replacement building must :

- Not result in any greater impact on the quality and character of the surrounding area in terms of its proposed scale and design, including any residential curtilage;
- Be on the footprint of the existing building unless relocation can be justified in terms of either being part of an existing group or improving the countryside or landscape setting; and
- Not replace any building of architectural, historic or visual merit.
- For replacement dwellings only permanent buildings that have been used as a dwelling or last been used as a dwelling and retain a lawful residential use and are habitable or capable of being made habitable without substantial reconstruction will be considered as a replacement dwelling.

All proposals should be of an appropriate scale and design and be at least as sympathetic in its setting as the existing building.

ISA Objective	Impact	Comments
1. Help deliver equality of opportunity and access for all	0	
2. Maintain and improve air quality	0	
3. Protect and enhance biodiversity, flora and fauna	0	
4. Reduce emissions of greenhouse gases and adapt to the effects of climate change	0	
5. Protect and enhance historic and cultural heritage, including the Welsh Language	0	
6. Help deliver the growth of a sustainable and diversified economy	0	
7. Improve health and well-being	0	
8. Use soils and natural resources efficiently and safeguard their quality	0	
9. Protect and enhance the landscape	0	
10. Minimise resource use and waste, increase re-use and recycling	0	
11. Maintain and enhance water quality and resources, and manage flooding	0	

**ISA comments and suggestions:**

- At the moment the wording is inconsistent: "is demonstrated to", "must", "should be"
- Does anything need to be said about replacements/conversions achieving energy efficiency standards in line with new-build?

**Changes made in response to the ISA:**

- "Is demonstrated" changed to "must".
- Explanatory text added to the energy efficiency standards policy.

**CP3: LANDSCAPE PROTECTION**

Development will only be permitted where it would not cause unacceptable harm to the character and quality of the landscape and setting of the city. Particular priority will be given to protecting, managing and enhancing the character and quality of the following Special Landscape Areas:

- St Fagans Lowlands and the Ely Valley;

- Garth Hill and Pentyrch Ridges;
- Fforest Fawr and Caerphilly Ridge;
- Wentloog Levels; and
- Flat Holm.

A landscape assessment and landscaping scheme will be required for significant development proposals.

ISA Objective	Impact	Comments
1. Help deliver equality of opportunity and access for all	+/-	The policy restricts housing development. However it helps to ensure that Cardiff is an attractive place to live and work.
2. Maintain and improve air quality	0	
3. Protect and enhance biodiversity, flora and fauna	0	
4. Reduce emissions of greenhouse gases and adapt to the effects of climate change	0	The policy aims to protect the character and quality of the landscape, which in turn helps to protect air quality, biodiversity, carbon fixing and the heritage.
5. Protect and enhance historic and cultural heritage, including the Welsh Language	0	
6. Help deliver the growth of a sustainable and diversified economy	+/-	The policy restricts employment development. However it helps to ensure that Cardiff is an attractive place to live and work.
7. Improve health and well-being	0	
8. Use soils and natural resources efficiently and safeguard their quality	0	The policy aims to protect the character and quality of the landscape, which in turn helps to protect soils, natural resources and landscape quality.
9. Protect and enhance the landscape	0	
10. Minimise resource use and waste, increase re-use and recycling	0	No significant impact
11. Maintain and enhance water quality and resources, and manage flooding	0	The policy aims to protect the character and quality of the landscape, which in turn helps to protect water quality and resources.
<b>ISA comments and suggestions:</b> none		

#### **CP4: RIVER CORRIDORS**

Development will not be permitted that would cause unacceptable harm to the character and quality of the Ely, Taff (including the Nant Fawr Corridor) and Rhymney River Corridors. The natural heritage, character, important green infrastructure function and other key features of Cardiff's river corridors will be protected, promoted and enhanced, together with facilitating sustainable access and recreation. Development proposals will need to demonstrate that the function of a river corridor remains unimpeded, provides appropriate mitigation and ensures access does not lead to unacceptable harm, including perceived urbanisation of natural/naturalised areas.

ISA Objective	Impact	Comments
1. Help deliver equality of opportunity and access for all	+/-	The policy restricts housing development. However it helps to ensure that Cardiff is an attractive place to live and work.
2. Maintain and improve air quality	0	
3. Protect and enhance biodiversity, flora and fauna	0	
4. Reduce emissions of greenhouse gases and adapt to the effects of climate change	0	The policy aims to protect river corridors, which in turn helps to protect air quality, biodiversity, carbon fixing and the heritage.

5. Protect and enhance historic and cultural heritage, including the Welsh Language	0	
6. Help deliver the growth of a sustainable and diversified economy	+/-	The policy restricts employment development. However it helps to ensure that Cardiff is an attractive place to live and work.
7. Improve health and well-being	0	
8. Use soils and natural resources efficiently and safeguard their quality	0	
9. Protect and enhance the landscape	0	
10. Minimise resource use and waste, increase re-use and recycling	0	
11. Maintain and enhance water quality and resources, and manage flooding	+?	The policy mentions enhancement of the ecosystem services provided by Cardiff's rivers, but is not clear about how this will be achieved.
<b>ISA comments and suggestions:</b>		
<ul style="list-style-type: none"> <li>The explanatory text mentions river buffers, but the policy doesn't. The buffers are a key form of enhancement: should the policy make a clearer statement about them?</li> <li>Are there any areas that currently negatively affect the rivers? If so, can enhancement be suggested for these areas?</li> </ul> <p>[Essentially this policy is protective but it includes the word "enhanced" and I'm wondering whether forms of enhancement could be specified a bit more]</p>		
<b>Changes made in response to the ISA:</b>		
<ul style="list-style-type: none"> <li>References to river buffers explained in the explanatory text to avoid confusion, but essentially the river corridors shown on the Proposals Map are the river buffers referenced in the explanatory text.</li> <li>The Green Infrastructure Assessment will set out proposed enhancements to the River Corridors and these will be set out in the Green Infrastructure SPG linked to this policy.</li> </ul>		

## BIODIVERSITY

<b>BG1: DESIGNATED SITES</b>																																						
<p>Development will only be permitted if it does not cause harm to sites of international, national nature conservation importance or unacceptable harm to locally designated sites of nature conservation and/or geological importance. Development proposals will be expected to demonstrate how they enhance the nature conservation and/or geological importance of the designations where they are within the Zone of Influence.</p> <p>For all sites where there is potential for harm, developments will only be accepted where appropriate and proportionate compensation and mitigation measures identify that there is no reduction in the overall nature conservation value of the area or feature.</p> <p>Statutory Nature Conservation Organisations will be consulted in consideration of any international and national sites. The consideration of a Habitats Regulations Assessment including screening, appropriate assessment or derogations may also be required.</p> <p>All mitigation for such sites, will be realistic and achievable in line with best practice and available scientific evidence.</p>																																						
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<p><b>ISA comments and suggestions:</b></p> <ul style="list-style-type: none"> <li>The policy says that "development proposals will be expected to demonstrate how they enhance the... importance of the designations", but it is unclear 1. Whether this applies to all development, 2. how this should be done and 3. whether it is feasible to do so. There is no information on this in the explanatory text. Should there be? Otherwise the policy feels like 'protection' rather than 'protection and enhancement'.</li> </ul> <p><b>Changes made in response to the ISA:</b></p> <ul style="list-style-type: none"> <li>Added to end of first para "where they are within the Zone of Influence".</li> </ul>																																						

<b>BG2: ECOLOGICAL NETWORKS AND FEATURES OF IMPORTANCE FOR BIODIVERSITY</b>		
Development proposals will only be permitted if it does not cause unacceptable harm to:		
i. Features of importance for wild flora and fauna, including green infrastructure connectivity and 'stepping stones' which enable the dispersal, reproduction and genetic viability of protected and priority species; ii. Green infrastructure of importance, fulfilling Biodiversity and Resilience of Ecosystems Duties and green infrastructure which contributes to overall landscape value (which includes more "abundant" "common" habitats and species).		
Particular priority will be given to the protection, enlargement, connectivity, management and enhancement of retained semi natural habitats. Where the need for the development outweighs the overall nature conservation/ecological importance of the site, it will be clearly demonstrated that there is no satisfactory alternative location for the development and long term compensatory provisions secured through proposals.		
ISA Objective	Impact	Comments
1. Help deliver equality of opportunity and access for all	+/-	Likely to restrict possible housing development, but also helps to provide good green infrastructure for current and future residents.
2. Maintain and improve air quality	0	
3. Protect and enhance biodiversity, flora and fauna	+?	This policy aims to protect and enhance green infrastructure. GI indirectly also support air quality and carbon fixing, but enhancement of GI is unlikely to significant change these.
4. Reduce emissions of greenhouse gases and adapt to the effects of climate change	0	
5. Protect and enhance historic and cultural heritage, including the Welsh Language	0	No significant impact
6. Help deliver the growth of a sustainable and diversified economy	-	Likely to restrict possible employment development
7. Improve health and well-being	+?	This policy aims to protect and enhance GI, which indirectly also support people's health, soil quality and the landscape.
8. Use soils and natural resources efficiently and safeguard their quality	0	
9. Protect and enhance the landscape	0	
10. Minimise resource use and waste, increase re-use and recycling	0	No significant impact
11. Maintain and enhance water quality and resources, and manage flooding	0	This policy aims to protect and enhance GI, which indirectly also supports water quality and resources. However the enhancement of GI is unlikely to significant change these.
<b>ISA comments and suggestions:</b>		
Should "...having taken into account green infrastructure and ecological resilience..." be accompanied by reference to relevant other policies?		
Two grammatical/clarity issues:		
<ul style="list-style-type: none"> <li>“Development proposals... will only be permitted if <del>it does</del> <ins>they</ins> do not cause...”</li> <li>Green infrastructure of importance, fulfilling Biodiversity and Resilience of Ecosystems Duties and <del>that</del> <ins>and</ins> green infrastructure which contributes to overall landscape value (which includes more "abundant" "common" habitats and species). [or else turn ii. into two points, one on GI of importance, and one on GI which contributes to landscape]</li> </ul>		
<b>Changes made in response to the ISA:</b>		
<ul style="list-style-type: none"> <li>Grammatical changes made.</li> </ul>		

<b>BG3: PRIORITY HABITATS AND SPECIES</b>		
Development proposals that would have a significant adverse effect on the continued viability of habitats and species which are legally protected, or of significant value to Cardiff based on known distribution or population size, will only be permitted where:		
<ul style="list-style-type: none"> <li>i. The need for development outweighs the nature conservation/ecological importance of the site taking in to account the Step-wise Approach;</li> <li>ii. The developer clearly demonstrates that there is no satisfactory alternative location for the development which avoids nature conservation impacts; and</li> <li>iii. Mitigation measures that are considered both self-sustaining and sustainable financially are provided by the developer.</li> </ul>		
Where harm is unavoidable it will be minimised by effective mitigation to ensure that there is no reduction in the overall nature conservation/ecological value of the area or species/group. Where this is not possible compensation measures designed to conserve, enhance, manage and, where appropriate, restore natural habitats and species will be provided.		
ISA Objective	Impact	Comments
1. Help deliver equality of opportunity and access for all	0	May restrict possible development, but 'no policy' would still have very similar protections due to national policy.
2. Maintain and improve air quality	0	This policy helps to protect, but not enhance, priority habitats and species. Priority habitats indirectly also support air quality and carbon fixing. (Also, good air quality and limited carbon emissions are needed to protect priority habitats and species).
3. Protect and enhance biodiversity, flora and fauna	0	
4. Reduce emissions of greenhouse gases and adapt to the effects of climate change	0	
5. Protect and enhance historic and cultural heritage, including the Welsh Language	0	No significant impact
6. Help deliver the growth of a sustainable and diversified economy	0	May restrict possible development, but 'no policy' would still have very similar protections due to national policy.
7. Improve health and well-being	0	No significant impact
8. Use soils and natural resources efficiently and safeguard their quality	0	This policy helps to protect, but not enhance, priority habitats and species. Priority habitats indirectly also support good soil quality and landscape, and vice-versa.
9. Protect and enhance the landscape	0	
10. Minimise resource use and waste, increase re-use and recycling	0	No significant impact
11. Maintain and enhance water quality and resources, and manage flooding	0	This policy helps to protect, but not enhance, priority habitats and species. Priority habitats indirectly also support good water quality and resources, and vice-versa.
<b>ISA comments and suggestions:</b> None		

<b>BG4: NET BENEFITS FOR BIODIVERSITY AND THE GREEN INFRASTRUCTURE STATEMENT</b>		
Development will only be permitted where it can be evidenced through a Green Infrastructure (GI) Statement, that Net Benefits for Biodiversity (NBB) can be achieved. This should take in to account such important aspects as: the cumulative effects of development, ecological resilience and avoidance of impacts on habitats and species as set out as the first step in the Step-wise Approach.		
ISA Objective	Impact	Comments
1. Help deliver equality of opportunity and access for all	0	No significant impact
2. Maintain and improve air quality	0	
3. Protect and enhance biodiversity, flora and fauna	0/+?	Although the policy is about net <i>benefits</i> , in practice it is most likely to prevent harm rather than provide benefits.
4. Reduce emissions of greenhouse gases and adapt to the effects of climate change	0	
5. Protect and enhance historic and cultural heritage, including the Welsh Language	0	No significant impact
6. Help deliver the growth of a sustainable and diversified economy	0	
7. Improve health and well-being	0	The policy aims to protect the green infrastructure and biodiversity that supports health and well-being
8. Use soils and natural resources efficiently and safeguard their quality	0	Protection of biodiversity indirectly helps – and is helped by – healthy soils and an attractive natural landscape.
9. Protect and enhance the landscape	0	
10. Minimise resource use and waste, increase re-use and recycling	0	No significant impact
11. Maintain and enhance water quality and resources, and manage flooding	0	Protection of biodiversity indirectly helps – and is helped by – good water quality and resources.
<b>ISA comments and suggestions:</b> Comprehensively rewritten in response to previous round of appraisal. No suggestions for this round.		

<b>BG5: TREES, WOODLANDS AND HEDGEROWS</b>		
Development proposals should help protect and enhance a sustainable urban forest. Proposals which result in the permanent removal of and/or significant harm to trees, woodlands and hedgerows will not be permitted unless it is clearly shown that this can be mitigated and/or will achieve significant and clearly defined public amenity benefits.		
ISA Objective	Impact	Comments
1. Help deliver equality of opportunity and access for all	0	No significant impact
2. Maintain and improve air quality	0	Trees help to reduce air pollution, but overall impact of this policy is likely to be limited
3. Protect and enhance biodiversity, flora and fauna	+	The policy aims to help achieve 25% tree cover, which would help to enhance biodiversity, flora and fauna.
4. Reduce emissions of greenhouse gases and adapt to the effects of climate change	+	The policy aims to help achieve 25% tree cover, which would act as shading and help to fix carbon.

5. Protect and enhance historic and cultural heritage, including the Welsh Language	0	No significant impact
6. Help deliver the growth of a sustainable and diversified economy	0	No significant impact
7. Improve health and well-being	+	The policy aims to help achieve 25% tree cover. The shading, and pollution/carbon absorption from the trees will help to support good health, especially in the context of global warming.
8. Use soils and natural resources efficiently and safeguard their quality	0	No significant impact, although reasonable soil quality is needed for tree health
9. Protect and enhance the landscape	+	Increased tree cover will help to improve the landscape and townscape
10. Minimise resource use and waste, increase re-use and recycling	0	No significant impact
11. Maintain and enhance water quality and resources, and manage flooding	+?	Trees help to absorb water and so can help to reduce flooding. It is unclear how much of an impact this policy will have.
<b>ISA comments and suggestions:</b> None		

<b>BG6: SOILS</b>		
Development proposals shall evidence how they will protect and enhance important soil resources for the multiple benefits they afford. Permanent removal of, sealing of and/or significant harm to the functionality of soils will not be permitted unless it is clearly shown that this will achieve significant and clearly defined public amenity benefits.		
ISA Objective	Impact	Comments
1. Help deliver equality of opportunity and access for all	0	No significant impact
2. Maintain and improve air quality	0	
3. Protect and enhance biodiversity, flora and fauna	0	This policy aims to protect soil resources (the policy refers to enhancement, but significant enhancement is unlikely). This will indirectly protect (but not enhance) biodiversity and the carbon-fixing properties of soil.
4. Reduce emissions of greenhouse gases and adapt to the effects of climate change	0	
5. Protect and enhance historic and cultural heritage, including the Welsh Language	0	
6. Help deliver the growth of a sustainable and diversified economy	0	No significant impact
7. Improve health and well-being	0	
8. Use soils and natural resources efficiently and safeguard their quality	0	This policy aims to protect soil resources (the policy refers to enhancement, but significant enhancement is unlikely).
9. Protect and enhance the landscape	0	Indirectly, soils affect the topography and vegetation in the landscape, so protecting soils will also protect the landscape.
10. Minimise resource use and waste, increase re-use and recycling	0	Protecting soils is related to protecting resources
11. Maintain and enhance water quality and resources, and manage flooding	0	Protection of soils helps to protect water quality

<p><b>ISA comments and suggestions:</b></p> <ul style="list-style-type: none"> <li>• Should the policy provide additional protection for e.g. Grade 1 and 2 soils?</li> <li>• Can the explanatory text give additional information on how soils can be enhanced? The policy refers to enhancement and the explanatory text talks about tree planting and soil remediation – can this, and other measures to improve soils be listed more clearly?</li> </ul>
<p><b>Changes made in response to the ISA:</b></p> <ul style="list-style-type: none"> <li>• Protection of the Best and Most Versatile (Grades 1, 2 and 3a) agricultural land for agricultural production is covered in a strategic policy SP21 and is not considered appropriate in this policy.</li> <li>• Agreed additional explanatory text set out below: <p><i>Where permanent removal of, sealing of and/or significant harm to the functionality of soils is unavoidable, full details of mitigation measures shall be presented to evidence how this will be compensated for. The nature of enhancement or remediation will depend on the site in question and nature of the problem, but some examples of mitigation measures to enhance or remediate soil include:</i></p> <p><i>1) The planting of long-lived woody vegetation including deep rooted trees to restore soil structure, organic matter and both accrete soil and reduce soil erosion.</i></p> <p><i>2. Mechanical decompaction may be appropriate in some cases, especially where subsoil is compacted, with the type of equipment and methodology used dependent on the nature of the problem and size of the site. Ripping soils with a tined ripping tool may de-compact subsoil where it has been compacted by construction operations. At a smaller scale, the injection of compressed air may be effective in breaking up compacted layers and this may be combined with vertical and radial mulching.</i></p> <p><i>3) The incorporation of surface mulches, organic matter, Biochar, microbial inoculants or soil faunal inoculants may increase soil biodiversity and/or improve soil structure.</i></p> <p><i>4) On some sites allowing for natural succession so that soil decompaction and functionality return more slowly, is appropriate. Different soil faunal and floral communities are likely to dominate at different successional stages and in general terms the later the successional stage, the higher the organic matter content of the soil. Management intervention may be required to prevent or slow succession to favour a particular species, or group of species.</i></p> <p><i>5) Ensuring there is strong connectivity between soils to be remediated and adjoining soils on land that is comparatively undisturbed, such as woodland or older grasslands. This will allow species to colonise the remediated soil naturally though it must be recognised that some species such as earthworms are likely to colonise more rapidly than smaller, less mobile organisms such as mites, so the biodiversity and faunal composition of remediated soils will change over time, but may require very long timescales to achieve the complexity of a natural, undisturbed soil.</i></p> </li> </ul>

<b>BG7: SEVERN ESTUARY AND CARDIFF BEECH WOODS RECREATIONAL PRESSURE</b>		
Development proposals that would result in an increase in visitor pressure on features of the Severn Estuary SAC, SPA, Ramsar site and Cardiff Beech Woods SAC, impact on functionally linked land with respect of the Severn Estuary Marine Site (EMS), will not be supported unless it can be demonstrated that the integrity of the European Marine Site or Cardiff Beech Woods SAC can be maintained following the HRA staged process.		
ISA Objective	Impact	Comments
1. Help deliver equality of opportunity and access for all	-?	The policy, implemented through site-specific HRAs, would restrict recreational access to some green areas of Cardiff. The Severn Estuary is near the 'southern arc', where deprivation is higher and provision of open space is lower – restricting recreational access to the estuary could disproportionately affect people living in deprived areas. This is less likely for the Cardiff Beech Woods. Where this impacts such opportunities, developments need to in effect mitigate for this, by providing land for recreation.
2. Maintain and improve air quality	?	Restricting recreational access to the two sites could lead to fewer visits by car, but could also mean that people travel further (by car) to other areas of recreation.

3. Protect and enhance biodiversity, flora and fauna	0	The policy aims to protect, but not enhance, the integrity of the Severn Estuary SAC/SPA/Ramsar and Cardiff Beech Woods SAC
4. Reduce emissions of greenhouse gases and adapt to the effects of climate change	0	The Severn Estuary SAC/SPA/Ramsar and (particularly) Cardiff Beech Woods SAC act as carbon sinks. The policy aims to protect but not enhance this.
5. Protect and enhance historic and cultural heritage, including the Welsh Language	0	No significant impact
6. Help deliver the growth of a sustainable and diversified economy	0	
7. Improve health and well-being	-	See 1. The policy restricts recreational access by walking and cycling, with associated health disbenefits.
8. Use soils and natural resources efficiently and safeguard their quality	0	
9. Protect and enhance the landscape	0	
10. Minimise resource use and waste, increase re-use and recycling	0	
11. Maintain and enhance water quality and resources, and manage flooding	0	The policy aims to maintain (but not enhance) the integrity of the Severn Estuary SAC/SPA/Ramsar and Cardiff Beech Woods SAC. This also helps to maintain soil quality, the landscape, and water infiltration/ quality.
<b>ISA comments and suggestions:</b>		
The supporting text notes that a SAMM or SANG strategy “may” be developed by Cardiff Council. A lot of the new recreational impacts are likely to come from small-scale development (e.g. infill, sites not listed in the plan) which would struggle to show ‘no impact on integrity’ or to provide SANGs. Personally I don’t see a way around the council developing a strategy. I suggest that the “may” be replaced by “will” in the supporting text; the SPG is developed as a priority; and that the policy requires developments to be consistent with the SPG. Without an SPG that applies to all development (small as well as large), it is not clear that the plan can deliver 24,600 dwellings.		
The supporting text states “As a result, mitigation would be either in/nearby to these catchments.” I recommend that this be rephrased to “ <u>any</u> mitigation”, as ideally developments would avoid impacts first, and mitigate for them only afterwards.		
<b>Changes made in response to the ISA:</b>		
Agree with suggested amendments which have been incorporated into the plan.		

## TRANSPORT

### T1: PRIORITISING WALKING AND CYCLING

Planning permission will only be granted for development that minimises the need to travel and is laid out and designed in a way that prioritises access by walking, cycling and public transport as detailed in Llwybr Newydd: the Wales transport strategy 2021.

To enable people to access employment, essential services and community facilities by walking and cycling the Council will support developments that incorporate:

- i. High-quality, sustainable design that makes a positive contribution to the distinctiveness of communities and places following Welsh Active travel design guidance
- ii. Permeable and legible networks of safe, convenient and attractive walking and cycling routes that establish cohesive wayfinding;
- iii. Connections and extensions to the Cardiff Cycle Network and recreational walking course outlined in the Transport White Paper and Active Travel Network Map.
- iv. Measures to minimise vehicle speed to 20mph on urban streets and spaces where pedestrians will be present following Welsh Governments order and strategy and give priority to pedestrians and cyclists;
- v. Safe, convenient and attractive walking and cycling connections to existing developments, neighbourhoods, schools, jobs and services forming part of a sustainable neighbourhood;
- vi. Supporting facilities including, signing, secure cycle parking and, where necessary, shower and changing facilities;
- vii. Integrate with existing active travel infrastructure;
- viii. Improve safety for pedestrians and cyclists through design;
- ix. Integrate placemaking and net zero initiatives as part of the design and construction of active travel infrastructure

The Council will also support developments that promote the change to more sustainable modes and innovative measures to overcome existing barriers to active travel and sustainable transport.

ISA Objective	Impact	Comments
1. Help deliver equality of opportunity and access for all	++	Improves access to community facilities and services by non-car modes, especially important for people who do not own cars including the young and elderly people.
2. Maintain and improve air quality	++	Reduces the need to travel through provision of cycling and walking facilities
3. Protect and enhance biodiversity, flora and fauna	-?	Where new walking and cycling routes go through biodiverse areas, this could have a negative impact on biodiversity
4. Reduce emissions of greenhouse gases and adapt to the effects of climate change	++	Promotes sustainable modes of transport and helps to prevent/improve climate change
5. Protect and enhance historic and cultural heritage, including the Welsh Language	0	Unlikely to have a significant impact
6. Help deliver the growth of a sustainable and diversified economy	0	No significant impact
7. Improve health and well-being	++	Encourages and facilitates walking and cycling, particularly in green infrastructure; helps to improve pedestrian and cycle safety
8. Use soils and natural resources efficiently and safeguard their quality	0	Unlikely to have significant impacts
9. Protect and enhance the landscape	0	
10. Minimise resource use and waste, increase re-use and recycling	0	

11. Maintain and enhance water quality and resources, and manage flooding	0	
<b>ISA comments and suggestions:</b> Should pedestrian and cycle infrastructure be (water) permeable, to help with water infiltration and not pave over green areas?		
<b>Changes made in response to the ISA:</b> Including this requirement at this stage is considered inflexible and is more an issue for detailed design guidance and SPG to consider taking into account future Council policy and standards.		

<b>T2: STRATEGIC RAPID TRANSIT, BUS CORRIDORS AND BUS ENHANCEMENTS</b>		
ISA Objective	Impact	Comments
1. Help deliver equality of opportunity and access for all	++	Improves access to community facilities/services and jobs by public transport, especially important for people who do not own cars including the young and elderly people.
2. Maintain and improve air quality	++	Reduces the need to travel through provision of public transport facilities
3. Protect and enhance biodiversity, flora and fauna	-?	Where new public transport facilities involve development in biodiverse areas, this could have a negative impact on biodiversity
4. Reduce emissions of greenhouse gases and adapt to the effects of climate change	++	Promotes sustainable modes of transport and helps to prevent/improve climate change
5. Protect and enhance historic and cultural heritage, including the Welsh Language	-?	May affect the historic and cultural heritage, e.g. where public transport infrastructure runs near or through a heritage site
6. Help deliver the growth of a sustainable and diversified economy	++	Allows people to get to work by public transport – especially important for people who do not own a car
7. Improve health and well-being	+	Encourages and facilitates walking (to/from the bus); helps to improve road safety
8. Use soils and natural resources efficiently and safeguard their quality	++/-	Helps to reduce the need for parking areas, though may affect greenfield land
9. Protect and enhance the landscape	-?	May affect the landscape, e.g. where a new public transport corridor crosses a greenfield area
10. Minimise resource use and waste, increase re-use and recycling	+	Helps to reduce the need for parking areas and energy use

11. Maintain and enhance water quality and resources, and manage flooding	-?	Large scale public transport infrastructure may increase the risk of flooding
<b>ISA comments and suggestions:</b> Does the last sentence duplicate the rest of this policy? Is it needed?		
<b>Changes made in response to the ISA:</b> Last sentence deleted, and section above amended to make clear the expectations of new development.		

<b>T3: RAIL TRANSPORT</b>		
Support will be given to proposals to enhance Cardiff's rail network, in particular the regeneration north and south of Cardiff Central and additional rail capacity and improvements to existing and new stations identified in the Cardiff White Paper and Metro which:		
<ol style="list-style-type: none"> <li>i. Are designed with the Welsh placemaking charter to promote safety for vulnerable groups and accessibility for all users.</li> <li>ii. Can be easily accessed by walking and cycling with wayfinding.</li> <li>iii. Facilitate the easy interchange of passengers between national, regional and local rail and bus services where appropriate.</li> <li>iv. Provide high-quality passenger facilities, including but not limited to seating, information, toilet facilities and secure cycle parking;</li> <li>v. Is well integrated with development in the surrounding area and facilitates easy access to the centre of the city, Cardiff Bay and the Enterprise Zone;</li> <li>vi. Complement surrounding development, in particular the regeneration of land north and south of Central Railway Station and the wider Enterprise Zone;</li> <li>vii. Provide a public transport gateway of a high aesthetic and functional quality, which is commensurate to Cardiff's status as a European capital city.</li> <li>viii. Provides an attractive, legible and vibrant environment, and;</li> <li>ix. Are designed following the goals in the Wellbeing of Future Generations Act, Llwybr Newydd: the Wales transport strategy and Welsh Net Zero policy.</li> </ol>		

ISA Objective	Impact	Comments
1. Help deliver equality of opportunity and access for all	+	Improves access to community facilities/services and jobs by rail.
2. Maintain and improve air quality	+	Reduces the need to travel through provision of public transport facilities
3. Protect and enhance biodiversity, flora and fauna	-?	Where new rail lines/facilities involve development in biodiverse areas, this could have a negative impact on biodiversity
4. Reduce emissions of greenhouse gases and adapt to the effects of climate change	++	Promotes sustainable modes of transport and helps to prevent/improve climate change
5. Protect and enhance historic and cultural heritage, including the Welsh Language	-?	May affect the historic and cultural heritage, e.g. where rail facilities/infrastructure runs near or through a heritage site
6. Help deliver the growth of a sustainable and diversified economy	++	Allows people to get to work by rail – especially important for people who do not own a car
7. Improve health and well-being	+	Supports walking and cycling; reduces air pollution and accidents related to car use
8. Use soils and natural resources efficiently and safeguard their quality	+/-	Helps to reduce the need for parking areas, though may affect greenfield land
9. Protect and enhance the landscape	-?	May affect the landscape, e.g. where a new rail corridor crosses a greenfield area
10. Minimise resource use and waste, increase re-use and recycling	+	Helps to reduce the need for parking areas and energy use

11. Maintain and enhance water quality and resources, and manage flooding	-?	Large scale rail infrastructure may increase the risk of flooding
<b>ISA comments and suggestions:</b> None		

#### **T4: MANAGING TRANSPORT IMPACTS**

New development will be expected to demonstrate how the need to travel is reduced and essential travel needs can be met by the use of transport modes other than the private car. Transport assessments and travel plans will be required for all major planning applications.

Development will be located where:

- i. It can be served by alternative modes of transport other than the car, such public transport, walking and cycling;
- ii. The traffic generated can be accommodated by existing or known improvements to highways and where it will not create or add to problems of safety, congestion or damage to the environment;
- iii. In the case of residential development, existing or new essential local facilities are within convenient walking distance, and should be within a 400m walking distance of public transport services;
- iv. It makes the best use of existing transport networks and has regard to future transport investment proposals, to enhance the viability of public transport services and future ones identified in the Cardiff Transport Strategy and White Paper.
- v. It will improve accessibility to existing and new jobs and services by non-car modes of transport; and
- vi. Development that generates a large number of passenger movements shall be located in Cardiff City Centre, main urban areas or at locations that provide convenient access on foot, by cycle and by public transport.

The design of development should:

- vii. Help to create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicle, avoid unnecessary street clutter, and respond to local character and design standards;
- viii. Allow for the efficient delivery of goods, and access by service and emergency vehicles;
- ix. Charging of plug-in, shared vehicle services and other ultra-low emission vehicles is enabled in safe, accessible and convenient locations within the development; and
- x. Not create unacceptable harm to the safe and efficient operation of pedestrian and cycle routes, public rights of way, bridle routes, public transport and the highway.

Development that does not support the Well-being of Future generations Act, Llwybr Newydd: the Wales transport strategy and Welsh government Air Quality and Net Zero Strategies will not be permitted.

ISA Objective	Impact	Comments
1. Help deliver equality of opportunity and access for all	++	The policy aims to provide new development that minimises the increase in vehicle movements, and allows access for new residents/workers via walking, cycling and public transport.
2. Maintain and improve air quality	0	
3. Protect and enhance biodiversity, flora and fauna	0	
4. Reduce emissions of greenhouse gases and adapt to the effects of climate change	0	The policy aims to not increase (rather than decrease which would be difficult to do) the transport impacts associated with new development.
5. Protect and enhance historic and cultural heritage, including the Welsh Language	0	
6. Help deliver the growth of a sustainable and diversified economy	+	The policy helps to make employment opportunities more accessible, and supports the role of Cardiff as a key economic driver of South East Wales city region

7. Improve health and well-being	0	The policy aims to not increase (rather than decrease which would be difficult to do) the transport impacts associated with new development.	
8. Use soils and natural resources efficiently and safeguard their quality	0		
9. Protect and enhance the landscape	0		
10. Minimise resource use and waste, increase re-use and recycling	0		
11. Maintain and enhance water quality and resources, and manage flooding	0		
<b>ISA comments and suggestions round 1:</b>			
<ul style="list-style-type: none"> <li>Some rewording needed at 4) and 5)</li> <li>The (original) policy seems to conflate two issues: 1. Where new development should be located to minimise car movements, and 2. Design of new development to minimise car movements. Reword to clarify this distinction?</li> <li>8) is tricky in that it could apply to some of the strategic sites (which generate a large number of passenger movements but obviously are not in the city centre)</li> <li>The last sentence seems to duplicate previous transport policies – is it needed?</li> <li>Is it worth specifying anywhere that provision of new local services may be needed where access to existing services by walking/cycling/PT (e.g. in large new developments) is not possible?</li> </ul>			
<b>Changes made in response to the ISA:</b>			
<ul style="list-style-type: none"> <li>Comments/Suggestions agreed, including restructuring – see revised policy</li> <li>No change re. provision of new local services where access to existing services etc. is not possible</li> </ul>			
<b>ISA comments and suggestions round 2:</b>			
Minor proposed wording changes, accepted by planning team			

<b>T5: TRANSPORT INTERCHANGES</b>		
To facilitate the transfer between transport modes and help to minimise travel demand and reduce car dependency, the following developments will be supported where they are proposed in accordance with wider policies and relevant standards and guidance:		
<ol style="list-style-type: none"> <li>i. New rail stations which adhere to policy T3;</li> <li>ii. Measures to support interchange between local bus services, including facilities to accommodate bus layover and driver facilities;</li> <li>iii. Strategically located park-and-ride facilities, supported by attractive, frequent and reliable bus or rapid transit services;</li> <li>iv. High-quality passenger facilities including but not limited to seating, information, toilet facilities and secure cycle parking;</li> <li>v. Facilities for park and share;</li> <li>vi. Facilities for coach parking, taxis and passenger drop off;</li> <li>vii. Facilities for overnight lorry parking and freight transfer which could be via multimodal hubs (the transfer of long haul freight to lower impact and more sustainable modes such as small vans or e-cargo bikes);</li> <li>viii. Facilities for interchange with water-based transport and opening up the River Taff as a transport corridor, and;</li> <li>ix. Strategically located taxi/loading/parking locations with Electric Vehicle charging.</li> </ol>		
ISA Objective	Impact	Comments
1. Help deliver equality of opportunity and access for all	+?	The policy aims to provide transport interchange facilities that help to reduce vehicle movements by allowing movement from cars/HGV to public transport, walking and cycling. This can improve access to community facilities.

2. Maintain and improve air quality	+-	This policy is likely to reduce air pollution in areas where car/lorry movements are reduced, but increase air pollution near the interchange locations.
3. Protect and enhance biodiversity, flora and fauna	-?	Many interchange locations will be on greenfield land or biodiverse previously developed land, and development of these sites would have negative impacts with impacts on biodiversity.
4. Reduce emissions of greenhouse gases and adapt to the effects of climate change	++	The policy will help to reduce vehicle movements and therefore greenhouse gas emissions.
5. Protect and enhance historic and cultural heritage, including the Welsh Language	-?	Interchange locations could be on historic or cultural sites
6. Help deliver the growth of a sustainable and diversified economy	+	The policy will help to support Cardiff's economy by helping to reduce congestion, and ensure that transport movements are made in the most efficient manner.
7. Improve health and well-being	0	No significant impacts.
8. Use soils and natural resources efficiently and safeguard their quality	+	The policy aims to replace car and lorry journeys with journeys by public transport which are more efficient both in terms of space (parking, road space).
9. Protect and enhance the landscape	-?	Interchange sites are likely to have negative landscape impacts, particularly if they are located on greenfield sites.
10. Minimise resource use and waste, increase re-use and recycling	+	The policy aims to replace car and lorry journeys with journeys by public transport which are more efficient in terms of resource use.
11. Maintain and enhance water quality and resources, and manage flooding	-?	Large paved areas (e.g. Park & Ride) can increase flooding.
<b>ISA comments and suggestions:</b> Include criteria (or refer to other policies that include criteria) on design, biodiversity net gain, flooding?		
<b>Changes made in response to the ISA:</b> Relevant cross links included in explanatory text.		

#### T6: CARDIFF CITY REGION 'METRO' NETWORK

The Council will seek to facilitate the development of a future regional 'Metro' network of integrated public transport routes and services within Cardiff and connecting the city with the wider southeast Wales region, including the development and/or enhancement of the following on-highway and off-highway infrastructure components:

- i. Existing and new heavy rail routes
- ii. New light rail routes
- iii. Tram
- iv. Tram/train on segregated rails and/or running on street
- v. Conventional buses, or guided buses using busways completely segregated from the main highway along their entire length or for short sections, in combination with the use of the public highway/bus priority measures on the public highway.
- vi. Conventional buses using dedicated bus lanes and assisted by other bus priority measures, in combination with the use of other carriageway space on the public highway;
- vii. Conventional buses using carriageway space on the public highway used by general traffic. Where the alignment of a future route that is likely to form part of a 'Metro' network falls within any part of a development site, the Council will, through the development management process, seek either to secure the provision of the necessary infrastructure as part of the development, or otherwise, safeguard the land and space required to accommodate the route and potential mode options in the future. This

<p>will include requiring a development to be designed in a way that does not prejudice the future development of the 'Metro' route and would enable it to be incorporated within the development at a later date.</p> <p>viii. Active travel routes to stations and stops on the network with a cohesive wayfinding strategy and branding.</p>
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The metro will introduce digital measures to support 'Mobility as a Service' (MAAS) initiatives and the upgrading of traffic signals and digital infrastructure. The council will support developments that respond to or incorporate these changes in the future.

ISA Objective	Impact	Comments
1. Help deliver equality of opportunity and access for all	++	The policy aims to provide an integrated transport system to facilitate access to services. This will improve access to jobs, homes and facilities/services.
2. Maintain and improve air quality	+	This policy is likely to reduce air pollution by supporting a shift from car to public transport.
3. Protect and enhance biodiversity, flora and fauna	-	Some Metro developments are likely to be on greenfield land or biodiverse previously developed land. Development of these site would have negative impacts with impacts on biodiversity.
4. Reduce emissions of greenhouse gases and adapt to the effects of climate change	++	The policy will help to reduce private vehicle movements and therefore greenhouse gas emissions.
5. Protect and enhance historic and cultural heritage, including the Welsh Language	-?	Metro locations could be on historic or cultural sites
6. Help deliver the growth of a sustainable and diversified economy	++	The policy will help to support Cardiff's economy by providing public transport to areas that are currently deficient; helping to reduce congestion; and ensuring that transport movements are made in the most efficient manner.
7. Improve health and well-being	+	The Metro system would encourage walking to/from public transport; and make walking and cycling journeys safer and more pleasant by reducing the number of cars on the roads.
8. Use soils and natural resources efficiently and safeguard their quality	+/-	The policy aims to replace car journeys with journeys by public transport which are more efficient both in terms of space (parking, road space). However Metro locations are likely to be on greenfield land, with a negative impact on soils.
9. Protect and enhance the landscape	-	Metro developments are likely to have negative landscape impacts, particularly if they are located on greenfield sites.
10. Minimise resource use and waste, increase re-use and recycling	+	The policy aims to replace car and lorry journeys with journeys by public transport which are more efficient in terms of resource use.
11. Maintain and enhance water quality and resources, and manage flooding	-?	Metro developments can increase flooding.

**ISA comments and suggestions:** None

#### **T7: ELECTRIC VEHICLE CHARGING**

Electric vehicle charging should be installed in strategic locations and can form part of wider measures to meet the demand for charging points across the city. Electric vehicle charging points will not be supported where

they impede the movement of other modes or are deemed to have a negative impact on accessibility of, or upon the needs of, vulnerable users.

ISA Objective	Impact	Comments
1. Help deliver equality of opportunity and access for all	0	No significant impact.
2. Maintain and improve air quality	+	Electric vehicles help to reduce air pollution. The policy would help to support the roll-out of electric vehicles.
3. Protect and enhance biodiversity, flora and fauna	0	No significant impact
4. Reduce emissions of greenhouse gases and adapt to the effects of climate change	+	See 2.
5. Protect and enhance historic and cultural heritage, including the Welsh Language	0	No significant impact
6. Help deliver the growth of a sustainable and diversified economy	0	No significant impact
7. Improve health and well-being	+?	Some indirect health benefits from reduced air pollution and climate change impacts.
8. Use soils and natural resources efficiently and safeguard their quality	0	
9. Protect and enhance the landscape	0	Although electric vehicle charging point have a visual impact, this is minor.
10. Minimise resource use and waste, increase re-use and recycling	+	Helps to move transport energy use from fossil fuels to renewables.
11. Maintain and enhance water quality and resources, and manage flooding	0	No significant impact

#### ISA comments and suggestions:

- Rename the policy “Electric vehicle charging”?
- What are “wider demand measures” in the first sentence? Reword?
- Should 2) say “at least 10 spaces, 1 charging point or at least one charging point for every 10 spaces, should be provided”. Also why should there be no charging points if the communal car park is <10 spaces? And 10% seems low.
- Is there a difference between an “active charging point” and a “charging point”?

#### Changes made in response to the ISA:

- Policy renamed “Electric Vehicle Charging”
- Amendments made to first sentence.
- The detailed requirements will now be set out in the Managing Transportation SPG which will ensure a more flexible approach and allow for changes in requirements as Electric Vehicle take-up increases within the city.

n.b. Former Policy T8 has been integrated into Policy SP19.

## OPEN SPACE

OS1: PROTECTION OF OPEN SPACE			
<p>Development will not be permitted on areas of open space unless:</p> <ul style="list-style-type: none"> <li>i. It would not cause or exacerbate a deficiency of open space in accordance with the most recent open space study; and</li> <li>ii. The open space has no functional or amenity value; and</li> <li>iii. The open space is of no quality or</li> <li>iv. The developers make satisfactory compensatory provision; and, in all cases;</li> <li>v. The development has no adverse impact upon green infrastructure/ecology and/or areas of historic conservation importance.</li> </ul>			
ISA Objective	Impact	Comments	
1. Help deliver equality of opportunity and access for all	+-	This policy is likely to restrict the development of some new homes. However it would help to ensure that new and existing residents have access to green space.	
2. Maintain and improve air quality	0	This is a protective policy – it indirectly protects air quality by protecting green space, but does not necessarily enhance air quality.	
3. Protect and enhance biodiversity, flora and fauna	-?	The policy indirectly protects biodiversity in Cardiff. However it could allow trade-off between 'quality' which includes (but is not limited to) biodiversity versus 'compensatory provision' which focuses more on functional/amenity value.	
4. Reduce emissions of greenhouse gases and adapt to the effects of climate change	0	The supporting text to the policy notes that any compensatory provision should be reasonably related to the original site. This will help to minimise the need to travel to open space.	
5. Protect and enhance historic and cultural heritage, including the Welsh Language	0	The policy protects but does not enhance areas of historic conservation importance	
6. Help deliver the growth of a sustainable and diversified economy	-?	This policy is likely to restrict the development of some new employment sites.	
7. Improve health and well-being	0	The is a protective policy – it protects but does not necessarily enhance the benefits of open spaces, e.g. water infiltration, attractive landscape.	
8. Use soils and natural resources efficiently and safeguard their quality	0		
9. Protect and enhance the landscape	0		
10. Minimise resource use and waste, increase re-use and recycling	0		
11. Maintain and enhance water quality and resources, and manage flooding	0		
ISA comments and suggestions:			
<ul style="list-style-type: none"> <li>• Would it make more sense to move v. to first place? It feels like an uncomfortable add-on at the end of the policy.</li> <li>• In areas where there is already a lot of open space, could compensatory provision for the loss of open space be provided in areas where there isn't much existing open space?</li> </ul>			
Changes made in response to the ISA:			
<ul style="list-style-type: none"> <li>• The policy primarily relates to the protection of open space and is ordered so criteria (i) to (iii) are considered together before considering criteria (iv) and (v). This ordering reflects the existing adopted LDP policy and the ordering works well when considering development proposals.</li> <li>• This approach would fail the Planning Obligation tests where compensatory provision must be directly related to the development and used to mitigate impacts in the vicinity of the development.</li> </ul>			

OS2: PROVISION FOR OPEN SPACE, OUTDOOR RECREATION, CHILDREN'S PLAY AND SPORT		
<p>Provision for open space, outdoor recreation, sport and opportunities for children's play will be sought in conjunction with all new residential developments. This policy is aimed at securing the provision or improvement of open space and other appropriate outdoor recreation, sport and play in conjunction with all new residential developments over 5 units and on site provision of functional open space in conjunction with all new residential developments over 20 units. The appropriate amount of multi-functional green space is based on a minimum of 2.43 hectares of functional open space per 1,000 projected population. All other open space provision, including natural and semi-natural green space will be in addition to the provision of multi-functional green space.</p>		
ISA Objective	Impact	Comments
1. Help deliver equality of opportunity and access for all	+	The policy would help to ensure that new residents have access to adequate amounts of open space. This will particularly benefit children.
2. Maintain and improve air quality	0	No significant impact
3. Protect and enhance biodiversity, flora and fauna	+/-	Provision of new open space could also provide for some new biodiversity and reduce pressure on sites such as the Cardiff Beech Woods SAC. However the new open space could be located on areas of existing biodiversity importance. The policy explains that green space (as distinct from open space) also needs to be separately/ additionally provided by development.
4. Reduce emissions of greenhouse gases and adapt to the effects of climate change	0	Providing on-site or nearby open space helps to minimise the need to drive to areas of open space. However this benefit is not likely to be significant.
5. Protect and enhance historic and cultural heritage, including the Welsh Language	0	No significant impact
6. Help deliver the growth of a sustainable and diversified economy	0	No significant impact
7. Improve health and well-being	+/?	The policy supports walking, cycling and outdoor recreation, which help to improve health and well-being. The policy is unclear about whether open space provided as part of new developments will be publicly accessible or whether access can be limited to just residents of the new development. If the new open space is accessible to anyone, then it can help to reduce existing deficiencies in local space.
8. Use soils and natural resources efficiently and safeguard their quality	0	No significant impact
9. Protect and enhance the landscape	0	Open space typically comprises mown grass, with no significant positive or negative impact on the landscape
10. Minimise resource use and waste, increase re-use and recycling	0	No significant impact
11. Maintain and enhance water quality and resources, and manage flooding	0	No significant impact. Potential for the policy to link open space to flood alleviation measures.
ISA comments and suggestions:		
<ul style="list-style-type: none"> <li>Does the new open space have to be accessible to anyone, or can its use be limited to people living in the new development (or gated communities)? The former is better sustainability-wise.</li> <li>Can the provision of open space be linked to the provision of sustainable urban drainage systems?</li> </ul>		
Changes made in response to the ISA:		
<ul style="list-style-type: none"> <li>Confirm that in order to be defined as open space it must be accessible to everyone.</li> </ul>		

- Sustainable urban drainage systems can be linked to provision of open space but can only be defined as open space in certain circumstances where it can be demonstrated that the space will be dry for the majority of the time and where it is accessible for the use of residents.

## PLAY

P1: PLAY AND INFORMAL RECREATION		
Development proposals for schemes that are likely to be used by children and young people should:		
ISA Objective	Impact	Comments
1. Help deliver equality of opportunity and access for all	+	Provision of areas for formal and informal play, that are accessible to children and young people helps to improve access to community facilities and helps to improve access to informal education and learning. The policy refers to provision “for all ages, genders and abilities”. It is very much in line with the excellent Welsh Plan Policy.
2. Maintain and improve air quality	0	No significant impact
3. Protect and enhance biodiversity, flora and fauna	0	
4. Reduce emissions of greenhouse gases and adapt to the effects of climate change	0	
5. Protect and enhance historic and cultural heritage, including the Welsh Language	0	
6. Help deliver the growth of a sustainable and diversified economy	0	
7. Improve health and well-being	+	Outdoor active play areas help to promote physical activity and wellbeing. They provide an early appreciation of the natural environment. Access to these areas by walking and cycling also supports good mental and physical health. The policy only applies to play areas related to new proposals; it would be ++ if it also related to enhancement of existing play areas.
8. Use soils and natural resources efficiently and safeguard their quality	0	No significant impact
9. Protect and enhance the landscape	0	
10. Minimise resource use and waste, increase re-use and recycling	0	
11. Maintain and enhance water quality and resources, and manage flooding	0	
ISA comments and suggestions:		

- I struggle to understand iv.: “incorporate incidental play space to make the space more playable”. What is ‘incidental play space’? Does iv. mean something like “where possible, make other areas – those that are not formally designated as play space - more playable”?
- Specify that the routes to the play areas should be by walking and cycling?
- Should there also be support for retrofitting existing play areas to make them more accessible, and more in line with the objectives of point ii?

**Changes made in response to the ISA:**

- Criterion iv. amended. reference to “more playable” amended as this term is not easily understood.
- Criterion iii. changed to specify that routes to the play areas should be by walking and active travel. This allows for other modes of the active travel in addition to cycling such as scooting, etc.
- The objectives in criterion ii. reflect the principles for successful play area design set out in the adopted Open Space Technical Guidance Note. These are taken into account in the design of new and upgraded playgrounds.
- Criterion ii. also amended to reference “genders and abilities”.

## NET ZERO, RENEWABLE ENERGY AND CLIMATE CHANGE

RE1: RENEWABLE AND LOW CARBON ENERGY DEVELOPMENT		
Renewable energy development is required to support the transition to a low carbon future. Development proposals associated with the generation, or storage and provision of renewable and low carbon energy will be supported where:		
<ul style="list-style-type: none"> <li>i. The scale and nature of the development, its construction and infrastructure connections do not cause unacceptable impacts on:           <ul style="list-style-type: none"> <li>a. the landscape or seascape character of the area.</li> <li>b. designated sites for nature conservation, or protected habitats and species</li> <li>c. the historic environment, or protected built heritage assets</li> <li>d. the amenity of nearby communities</li> </ul> </li> <li>ii. Key, landscape, heritage, cultural and biodiversity features are retained and maintained as part of development and decommissioning proposals.</li> <li>iii. Existing infrastructure or operations, including marine and those related to aviation are maintained.</li> <li>iv. Proposals detail the operation lifespan of the development and include appropriate provisions relating to the decommissioning and removal of infrastructure and apparatus at the end of service, together with proposals for effective land restoration.</li> <li>v. Due consideration has been given to the materials flow generated, such as those required for anaerobic digestion, by the development to ensure the sustainable use and management of resources</li> <li>vi. Proposals are consistent with other policies within the development plan.</li> </ul>		
ISA Objective	Impact	Comments
1. Help deliver equality of opportunity and access for all	0	No significant impact
2. Maintain and improve air quality	+	To the extent that renewables replace fossil fuels, they will help to reduce the associated air pollution
3. Protect and enhance biodiversity, flora and fauna	-?	Although the policy aims to prevent unacceptable impacts on designated site and maintain biodiversity features, cumulatively the development of renewables is likely to have some negative impacts, e.g. bird strike by wind turbines
4. Reduce emissions of greenhouse gases and adapt to the effects of climate change	++	Although renewables use energy and materials in their production, over their lifetime they will replace fossil fuel energy requirements and associated greenhouse gas emissions.
5. Protect and enhance historic and cultural heritage, including the Welsh Language	-?	Although the policy aims to prevent unacceptable impacts on the historic environment and maintain heritage/cultural features, cumulatively the development of renewables is likely to have some negative impacts
6. Help deliver the growth of a sustainable and diversified economy	+	Renewables will provide energy to support a sustainable economy
7. Improve health and well-being	+	Improved air quality and (indirectly and in a minor way) reduced climate change helps to support health
8. Use soils and natural resources efficiently and safeguard their quality	?	Depending on their type and location, renewables may be able to co-exist with other forms of development. They are reversible via decommissioning.
9. Protect and enhance the landscape	-?	Likely negative visual impacts from wind farms, solar farms, anaerobic digestors etc.
10. Minimise resource use and waste, increase re-use and recycling	++	Helps to reduce Cardiff's ecological footprint, and prevent use of finite resources
11. Maintain and enhance water quality and resources, and manage flooding	+	Indirectly helps to control climate change and associated flooding etc.

**ISA comments and suggestions:**

- Please consider making the titles of RE1-RE4 more consistent (e.g. & versus and, : versus -). Also the titles of RE1 and RE2 are confusingly similar.
- First sentence “will be supported”
- What is “long term”? For instance would the 25 or 40 year lifespan of an offshore wind farm or solar farm be considered “short term” (and so acceptable on visual or bird strike grounds) because the development will be decommissioned in time?
- vi. should be policies not polices

**Changes made in response to the ISA:**

- Wording changed as suggested (also RE3 & RE4 deleted)
- “long term” removed

**RE2: NET ZERO DEVELOPMENT**

All new build development, on major and strategic sites will be expected to achieve carbon net zero regulated emissions through measures such as maximising energy efficiency, utilising sustainable heating and cooling systems and incorporating onsite renewable energy generation.

All Major development proposals must submit an energy statement, appropriate for the scale and nature of the development proposal and prepared by competent experts, that:

- Follows the stepped approach set out by the energy hierarchy in the design, construction and operation of development
- Examines the full range of measures, technologies and opportunities available to achieve Net Zero Development
- Demonstrates it aligns with the Local Area Energy Plan and making buildings low carbon

Following detailed assessment where Net Zero cannot be achieved for financial reasons proposals should demonstrate how the development is designed and constructed to accommodate adaptations in the future to achieve net zero. Where Net zero cannot be achieved for other than financial reasons a financial contribution will be sought to support local carbon reduction projects.

ISA Objective	Impact	Comments
1. Help deliver equality of opportunity and access for all	0	
2. Maintain and improve air quality	+?	Net zero development will not by itself reduce greenhouse gas emissions and associated air pollution, but it will indirectly facilitate improvements to existing housing and employment site stock (e.g. by reducing prices), so improving air quality
3. Protect and enhance biodiversity, flora and fauna	0	
4. Reduce emissions of greenhouse gases and adapt to the effects of climate change	+	Net zero development will not by itself reduce greenhouse gas emissions, rather not increase them. However it will indirectly facilitate improvements to existing housing and employment site stock (e.g. by reducing prices), so reducing greenhouse gas emissions.
5. Protect and enhance historic and cultural heritage, including the Welsh Language	?	The impact will depend on how renewables and sustainable heating/cooling systems will be permitted for heritage assets.
6. Help deliver the growth of a sustainable and diversified economy	+	Net zero development will itself involve new employment (e.g. in renewables). It will also reduce running costs for businesses in the future.
7. Improve health and well-being	+?	Net zero development will, over time, help to reduce fuel poverty, thus improving health.

8. Use soils and natural resources efficiently and safeguard their quality	0	No significant impact
9. Protect and enhance the landscape	-?	Net zero development can include onshore windfarms, solar panels on roofs, and air source heat pumps. Depending on one's point of view, these can be perceived as having a negative impact on the landscape
10. Minimise resource use and waste, increase re-use and recycling	+/-	Increases resource use for e.g. solar panels in the short term. Reduces the use of fossil fuels in the longer term.
11. Maintain and enhance water quality and resources, and manage flooding	0	No significant impact

**ISA comments and suggestions on original version:**

This has the potential to be a lovely strong policy, but at the moment I have all kinds of questions about it. I haven't appraised the policy yet because of this.

- Aren't "major and strategic sites" = new build development? Does the distinction need to be made?
- What is the definition of "net zero" for this policy? Is it something like "requires no external input of energy in operation, through a combination of high energy efficiency and on-site renewable energy"? Does that need to be stated in the explanatory text?
- The policy seems to conflate 1. Energy efficiency of new development and 2. Provision of on-site renewable energy. It's unclear to me whether the policy is requiring 1. Net zero development in all cases, 2. "Maximum renewable energy" development (which could be more or less than net zero) in all cases, 3. Net zero development unless it can be shown that this is not feasible, or 4. something else. I think it would be better to have the policy distinguish between energy efficiency and provision of on-site renewables.

Two possible approaches (but by all means not all) could be:

- "All new-build development proposals are required to be 'net zero' (i.e. to require no external input of energy through a combination of high energy efficiency and on-site renewable energy). Additionally, all major and strategic sites are required to maximise the potential for renewable energy (which may go beyond 'net zero')"
- "All major and strategic sites are required to be 'net zero' (i.e. to require no external input of energy through a combination of high energy efficiency and on-site renewable energy). All other new-build development proposals are required to reach insulation level X and maximise the potential for renewable energy (which may go beyond providing for the energy needed on site)"

I think that both of these are clearer than the draft policy, but the first one is stronger...

- Should the name of this policy be "Net zero development" which brings together the points above?

**Changes made in response to the ISA (and other factors):**

- Comprehensive rewrite of the policy

**ISA comments and suggestions round 2:**

This policy could also apply to major rebuild/ refurbishment

**Changes made in response to the ISA:**

No changes.

## FLOOD RISK AND MANAGING WATER RESOURCES

W1: WATER SENSITIVE DESIGN		
<p>Development should apply water sensitive urban design solutions (the process of integrating water cycle management with the built environment through planning and urban design). To include the management of:</p> <ol style="list-style-type: none"> <li>I. Water demand and supply;</li> <li>II. Waste water and pollution;</li> <li>III. Rainfall and runoff;</li> <li>IV. Watercourses and water resource</li> <li>V. Flooding; and</li> <li>VI. Water pathways.</li> </ol> <p>The above will employ nature-based solutions (and thus the improvement of green infrastructure) as a fundamental solution to these challenges, including ecological enhancement</p>		
ISA Objective	Impact	Comments
1. Help deliver equality of opportunity and access for all	0	
2. Maintain and improve air quality	0	
3. Protect and enhance biodiversity, flora and fauna	+	The policy promotes nature-based solutions to water management, which is likely to improve biodiversity.
4. Reduce emissions of greenhouse gases and adapt to the effects of climate change	+	The policy helps to adapt to climate change by integrating planning for flooding into development planning. It may also help to reduce the energy requirements of moving water, and moving and treating wastewater.
5. Protect and enhance historic and cultural heritage, including the Welsh Language	0	
6. Help deliver the growth of a sustainable and diversified economy	+?	The policy can help to reduce flooding and provide more efficient management of water. This may help to ensure that Cardiff continues to function as a key economic driver of South East Wales city region.
7. Improve health and well-being	+/0	Improved water quality, reduced wastewater and pollution, and reduced flooding are all likely to improve health and well-being, although the impact may be limited.
8. Use soils and natural resources efficiently and safeguard their quality	+	The policy promotes multi-functional, nature-based solutions to water management, which is an efficient use of land.
9. Protect and enhance the landscape	+	Where nature-based solutions to water management are used instead of more engineering solutions, this is likely to enhance the landscape.
10. Minimise resource use and waste, increase re-use and recycling	+	Considering the water cycle as a whole, and waste/flood water as a resource rather than a problem needing an engineering solution, helps to reduce the ecological footprint and promote 'water recycling'.
11. Maintain and enhance water quality and resources, and manage flooding	++	This is the purpose of this policy.
<b>ISA comments and suggestions:</b> None		

<b>W2: PROTECTION OF WATER RESOURCES</b>		
Development will not be permitted that would cause unacceptable harm to the quality or quantity of underground, surface or coastal waters.		
ISA Objective	Impact	Comments
1. Help deliver equality of opportunity and access for all	0	This is a protective policy which aims to prevent harm (and thus negative impacts) but does not encourage enhancement (which is done in policy W01).
2. Maintain and improve air quality	0	
3. Protect and enhance biodiversity, flora and fauna	0	
4. Reduce emissions of greenhouse gases and adapt to the effects of climate change	0	
5. Protect and enhance historic and cultural heritage, including the Welsh Language	0	
6. Help deliver the growth of a sustainable and diversified economy	0	
7. Improve health and well-being	0	
8. Use soils and natural resources efficiently and safeguard their quality	0	
9. Protect and enhance the landscape	0	
10. Minimise resource use and waste, increase re-use and recycling	0	
11. Maintain and enhance water quality and resources, and manage flooding	0	
<b>ISA comments and suggestions:</b> None		

<b>W3: FLOOD RISK</b>		
Development will not be permitted:		
I.	Within tidal or fluvial flood plains unless it can be demonstrated that the site is justified in line with national guidance and an appropriate detailed technical assessment has been undertaken to ensure that the development is designed to alleviate the threat and consequences of flooding over its lifetime;	
II.	Where it would increase the risk of flooding from fluvial and/or tidal flooding or from additional run-off from the development in any location;	
III.	Where it would hinder future maintenance or improvement schemes of flood defences and watercourses;	
IV.	Where it would cause adverse effects on the integrity of tidal or fluvial defences;	
Proposals involving bedrooms on ground or lower floors in areas liable to flooding are unlikely to be acceptable, unless satisfactory mitigation measures can be demonstrated in accordance with TAN 15.		
Where appropriate the developer should demonstrate that they have considered the need to incorporate environmentally sympathetic flood risk mitigation measures such as Sustainable Urban Drainage Systems (SuDS), especially capitalising on nature based solutions.		
ISA Objective	Impact	Comments
1. Help deliver equality of opportunity and access for all	0	
2. Maintain and improve air quality	0	
3. Protect and enhance biodiversity, flora and fauna	?	The impacts of this policy on biodiversity will depend on the location and type of development, and mitigation measures put in place. They could be positive where SuDS and other nature-based solutions are used which

		improve biodiversity. They could be negative if flood prevention measures set up barriers to animal migration or themselves have significant biodiversity impacts.
4. Reduce emissions of greenhouse gases and adapt to the effects of climate change	?	The policy aims to deal with flooding, which is expected to worsen as a result of climate change. The policy says nothing about climate change – suggest a change in wording to include this.
5. Protect and enhance historic and cultural heritage, including the Welsh Language	0	No significant impact
6. Help deliver the growth of a sustainable and diversified economy	0	The policy aims to protect existing and new developments from flooding. This will support (but not improve) the city's economic growth, and protect (but not improve) people's health and well-being.
7. Improve health and well-being	0	
8. Use soils and natural resources efficiently and safeguard their quality	0	No significant impact
9. Protect and enhance the landscape	+?	The impact of the policy will depend on the location and type/design of any flood alleviation/protection works. SuDS should help to improve the landscape.
10. Minimise resource use and waste, increase re-use and recycling	0	
11. Maintain and enhance water quality and resources, and manage flooding	++	This is the point of this policy

**ISA comments and suggestions:**

- I. The concept of “justified in line with” is not one with which I am familiar. Is it Wales-specific? Otherwise should it be rephrased as e.g. “consistent with”?
- II. I was under the impression that zones C1 and C2 (mentioned in the supporting text) had been superseded by Zones 2 and 3?

Does the policy or supporting text need to mention likely future changes in flood likelihood as a result of climate change?

Please note that the proposed extension to the Rover Way Gypsy and Traveller site would be inconsistent with V. Indeed, I suspect that the current G&T site is inconsistent with V. Is this so bad that a different site should be sought for current residents of the site?

**Changes made in response to the ISA:**

- i. Welsh guidance relating to flood risk set out in TAN15 sets out a range of justification tests which is the reason to the reference to justified in the policy and this phrasing is included in the wording of the adopted LDP policy relating to flood risk.
- ii. Explanatory text updated to reflect the new flood zones set out in the Flood Map for Planning and [revised TAN15](#).

The Flood Map for Planning will be updated every six months to take into account latest modelling including changes because of climate change and this will ensure planning decisions are informed by the latest flood risk information. We also make a link between flood risk and climate change in policy SP19 Securing Climate Resilience, De-Carbonisation and Renewable Energy in New Developments.

Works are currently taking place to improve the coastal defences along Rover Way. This £35 million pound scheme has been funded by the Council and Welsh Government and has been designed to protect this land and the adjoining residential development at Pengam Green from flooding – see [press release](#). However, the proposed extension cannot come forward until the existing Rover Way has been realigned to allow development of the site.

## AIR, NOISE, LIGHT POLLUTION AND CONTAMINATED LAND

PC1: AIR, NOISE, LIGHT POLLUTION AND LAND CONTAMINATION		
Development will not be permitted where it would cause or result in unacceptable harm to health, local amenity, the character and quality of the countryside, green infrastructure or nature conservation assets, landscape or built heritage importance because of air, noise, light pollution or the presence of unacceptable levels of land contamination.		
ISA Objective	Impact	Comments
1. Help deliver equality of opportunity and access for all	0	No significant impact
2. Maintain and improve air quality	0	The policy aims to protect (rather than improve) air quality, biodiversity etc.
3. Protect and enhance biodiversity, flora and fauna	0	
4. Reduce emissions of greenhouse gases and adapt to the effects of climate change	0	
5. Protect and enhance historic and cultural heritage, including the Welsh Language	0	No significant impact
6. Help deliver the growth of a sustainable and diversified economy	0	No significant impact
7. Improve health and well-being	0	The policy aims to protect (rather than improve) health. It will also indirectly protect soil quality.
8. Use soils and natural resources efficiently and safeguard their quality	0	
9. Protect and enhance the landscape	0	No significant impact
10. Minimise resource use and waste, increase re-use and recycling	0	
11. Maintain and enhance water quality and resources, and manage flooding	0	The policy will indirectly protect (rather than improve) water quality and resources.
ISA comments and suggestions: None		

## MINERALS AND WASTE

MW1: MINERAL LIMESTONE RESERVES AND RESOURCES		
Mineral reserves with planning permission will be safeguarded from development that would prevent their extraction at: <ul style="list-style-type: none"> <li>i. Creigiau Quarry;</li> <li>ii. Taffs Well Quarry;</li> <li>iii. Ton Mawr Quarry; and</li> <li>iv. Blaengwynlais Quarry.</li> </ul> A Preferred Area of known resource suitable for the future working of Limestone has been identified as an extension to Ton Mawr Quarry.		
ISA Objective	Impact	Comments
1. Help deliver equality of opportunity and access for all	0	
2. Maintain and improve air quality	-	Quarries generate dust as well as vehicle movements
3. Protect and enhance biodiversity, flora and fauna	--	Ton Mawr and Taffs Well Quarries are adjacent an SAC and SSSI, and Ton Mawr Quarry includes a Site of Nature Conservation Importance.
4. Reduce emissions of greenhouse gases and adapt to the effects of climate change	+/-	The quarries provide minerals locally, but involve vehicle movements that generate greenhouse gases.
5. Protect and enhance historic and cultural heritage, including the Welsh Language	0	No significant impacts
6. Help deliver the growth of a sustainable and diversified economy	++	The quarries support local development
7. Improve health and well-being	0	No significant impact
8. Use soils and natural resources efficiently and safeguard their quality	+/-	Safeguards mineral resources; uses mostly Grade 3 agricultural land
9. Protect and enhance the landscape	-	Creigiau Quarry is in a Special Landscape Area and all sites are greenfield land that would get changed
10. Minimise resource use and waste, increase re-use and recycling	--	Provides virgin materials
11. Maintain and enhance water quality and resources, and manage flooding	-?	Depending on site management, could affect water quality of nearby streams
<b>ISA comments and suggestions:</b> Taffs Well Quarry is (slightly) more sustainable than Ton Mawr Quarry – TM is in a SINC but TW isn't. See site assessment, also map below (TM on left, TW on right). Consider promoting TW instead if it can provide limestone?		
<b>Changes made in response to the ISA:</b>		
The Regional Technical Statement for the North Wales and South Wales Regional Aggregate Working Parties – Second Review (RTS2 – September 2020) sets out individual LPA apportionments and allocations for		

crushed rock. For Cardiff this identifies a minimum allocation of 7,475 million tonnes to meet the required provision.

Given this both these areas are required to meet this minimum allocation. The area at Ton Mawr is allocated as a preferred area for minerals in the current adopted LDP and it is proposed to carry this area forward into the Replacement LDP to meet the need set out in RTS2. Mitigation measures will be identified to minimise any harm to the SINC designation.

The area at Taffs Well Quarry was granted permission in September 2023 and is now a commitment rather than a proposed allocation.

#### **MW2: PREFERRED ORDER OF MINERAL RESOURCE RELEASE**

The extension or deepening of existing mineral workings will be favoured in preference to the release of new sites and, with the exception of the lateral extension to Ton Mawr Quarry referred to in Policy M1, deepening will be preferred to lateral extension. Applications to extend or deepen mineral workings will be permitted where it can be demonstrated that:

- i. There are environmental improvements at the site which can be justified by the addition of new reserves, or traded off by the giving up of existing reserves, or;
- ii. The addition of new reserves preserves the productive capacity of Cardiff to meet its sub regional apportionment commitments; or
- iii. There are operational benefits in permitting further reserves that will lead to more efficient exploitation of the resource;
- iv. It should also be demonstrated that such an approach will not cause unacceptable harm to the environment, including consideration of impacts relating to access, noise, air quality, landscape and visual effects, ecology, soil resources, hydrology and hydrogeology, blast vibration and cultural heritage.

ISA Objective	Impact	Comments
1. Help deliver equality of opportunity and access for all	0	No significant impacts
2. Maintain and improve air quality	0	
3. Protect and enhance biodiversity, flora and fauna	+/-	Policy may bring forward some environmental improvements. However, even with prevention of 'unacceptable harm', extension/deepening of mineral workings is still likely to have negative biodiversity impacts.
4. Reduce emissions of greenhouse gases and adapt to the effects of climate change	0	
5. Protect and enhance historic and cultural heritage, including the Welsh Language	0	No significant impacts
6. Help deliver the growth of a sustainable and diversified economy	0	
7. Improve health and well-being	0	
8. Use soils and natural resources efficiently and safeguard their quality	++	The policy aims to make efficient use of land
9. Protect and enhance the landscape	0	The policy aims to protect (not improve) the landscape
10. Minimise resource use and waste, increase re-use and recycling	0	
11. Maintain and enhance water quality and resources, and manage flooding	0	No significant impacts
<b>ISA comments and suggestions:</b> None		

<b>MW3: QUARRY CLOSURES AND EXTENSION LIMITS</b>		
Measures to prevent further mineral working and, where appropriate, to secure restoration and landscaping works at the earliest opportunity, will be sought at the following sites:		
i. Cefn Garw Quarry, Tongwynlais;		
ii. Highland Park Brickworks, Ely; and		
iii. West End Brickworks, Ely.		
ISA Objective	Impact	Comments
1. Help deliver equality of opportunity and access for all	0	No significant impacts
2. Maintain and improve air quality	0	
3. Protect and enhance biodiversity, flora and fauna	+	Restoration of quarries is likely to improve their biodiversity
4. Reduce emissions of greenhouse gases and adapt to the effects of climate change	0	
5. Protect and enhance historic and cultural heritage, including the Welsh Language	0	No significant impacts
6. Help deliver the growth of a sustainable and diversified economy	0	
7. Improve health and well-being	0	
8. Use soils and natural resources efficiently and safeguard their quality	+?	Restoration of quarries will allow them to be used for other purposes, e.g. recreation/agriculture
9. Protect and enhance the landscape	+	Restoration of quarries will enhance the landscape
10. Minimise resource use and waste, increase re-use and recycling	0	No significant impacts
11. Maintain and enhance water quality and resources, and manage flooding	+?	Restoration of quarries may involve the formation of lakes
<b>ISA comments and suggestions:</b> None		

<b>MW4: MINERALS BUFFER ZONES</b>		
Within the minerals buffer zones no mineral working, housing or other sensitive development will be permitted.		
ISA Objective	Impact	Comments
1. Help deliver equality of opportunity and access for all	0	
2. Maintain and improve air quality	0	
3. Protect and enhance biodiversity, flora and fauna	0	All the buffer zones are in the Green Wedge / Special Landscape Area to the north of the M4. The policy is unlikely to prevent any significant sustainable (e.g. accessible to services, not in sensitive landscape/biodiversity areas etc.) development from taking place. The policy protects but does not improve people's health from the impacts of minerals development.
4. Reduce emissions of greenhouse gases and adapt to the effects of climate change	0	
5. Protect and enhance historic and cultural heritage, including the Welsh Language	0	
6. Help deliver the growth of a sustainable and diversified economy	0	
7. Improve health and well-being	0	

8. Use soils and natural resources efficiently and safeguard their quality	0	
9. Protect and enhance the landscape	0	
10. Minimise resource use and waste, increase re-use and recycling	0	
11. Maintain and enhance water quality and resources, and manage flooding	0	

**ISA comments and suggestions:** None

#### **MW5: RESTORATION AND AFTER-USE OF MINERAL WORKINGS**

Proposals for mineral working or for related plant and buildings will be permitted only where firm proposals are included for the reinstatement of the site to a condition fit for an appropriate after-use supported, where relevant, by adequate after-care proposals. Appropriate reinstatement and after-care proposals will similarly be required when existing controls are reviewed. In drawing up restoration proposals, mineral operators will be encouraged to:

- i. Undertake progressive restoration;
- ii. Make beneficial use of mineral waste generated by mineral operations;
- iii. Consider whether restoration can contribute to nature conservation objectives set out in the Natural Recovery Action Plan/Biodiversity and Resilience of Ecosystems Duty actions;
- iv. New uses of former mineral workings other than those appropriate to a rural area will not be permitted without special justification. Proposals to carry out safety works at derelict or dormant sites will be favoured.

ISA Objective	Impact	Comments
1. Help deliver equality of opportunity and access for all	0	
2. Maintain and improve air quality	0	
3. Protect and enhance biodiversity, flora and fauna	0	
4. Reduce emissions of greenhouse gases and adapt to the effects of climate change	0	
5. Protect and enhance historic and cultural heritage, including the Welsh Language	0	
6. Help deliver the growth of a sustainable and diversified economy	0	
7. Improve health and well-being	0	
8. Use soils and natural resources efficiently and safeguard their quality	0	
9. Protect and enhance the landscape	0	
10. Minimise resource use and waste, increase re-use and recycling	0	
11. Maintain and enhance water quality and resources, and manage flooding	0	

The policy aims to minimise negative long-term impacts (not improve them) on biodiversity, landscape, soil quality etc.

**ISA comments and suggestions:**

Should the last sentence be a new point (v.) rather than a continuation of point iv. which seems to be about quite a different issue?

**Changes made in response to the ISA:**

Additional point (v) added.

<b>MW6: SAND WHarf PROTECTION AREAS</b>		
The sand wharves shown on the Proposals Map will be protected against development which would prejudice their ability to land marine dredged sand and gravel. Proposals for the provision and improvement of landing and distribution facilities for marine dredged aggregates within the sand wharves shown on the Proposals Map will be favoured where there will be no unacceptable harm to the environment.		
ISA Objective	Impact	Comments
1. Help deliver equality of opportunity and access for all	0	The main aim of the policy is to protect the existing sand wharves, with the possibility of improving their operation. Although 'provision and improvement of landing and distribution facilities' within the wharves could cause some additional air pollution/dust, impact on water quality etc., these negative impacts are likely to be relatively minimal. Any reduction in vehicle transport as a result of bringing in sand by ship (onto improved wharves) is also likely to be minimal.
2. Maintain and improve air quality	0	
3. Protect and enhance biodiversity, flora and fauna	0	
4. Reduce emissions of greenhouse gases and adapt to the effects of climate change	0	
5. Protect and enhance historic and cultural heritage, including the Welsh Language	0	
6. Help deliver the growth of a sustainable and diversified economy	+?	The policy supports the enhancement as well as protection of the sand wharves. This could enhance Cardiff's economy by providing needed materials.
7. Improve health and well-being	0	
8. Use soils and natural resources efficiently and safeguard their quality	0	
9. Protect and enhance the landscape	0	
10. Minimise resource use and waste, increase re-use and recycling	0	
11. Maintain and enhance water quality and resources, and manage flooding	0	
<b>ISA comments and suggestions:</b> None		

<b>MW7: SAFEGUARDING OF SAND AND GRAVEL, LIMESTONE RESOURCES AND HIGH SPECIFICATION AGGREGATES</b>		
Development will not be permitted within the Sand and Gravel, Limestone and sandstone High Specification Aggregates (HSA) Safeguarding Areas shown on the Proposals Map that would permanently sterilise these mineral resources unless:		
ISA Objective	Impact	Comments
i. The applicant can demonstrate to the satisfaction of the Local Planning Authority that the mineral concerned is no longer of any resource value or potential resource value; or		
ii. The mineral can be extracted satisfactorily prior to the incompatible development taking place; or		
iii. The incompatible development is of a temporary nature and can be completed and the site restored to a condition that does not either sterilise the resource or inhibit extraction within the timescale that the mineral is likely to be needed; or		
iv. There is an overriding need for the incompatible development which overrides the need for the resource, including a requirement for prior extraction if practicable.		
ISA Objective	Impact	Comments
1. Help deliver equality of opportunity and access for all	0	No significant impact
2. Maintain and improve air quality	0	

3. Protect and enhance biodiversity, flora and fauna	0		
4. Reduce emissions of greenhouse gases and adapt to the effects of climate change	0		
5. Protect and enhance historic and cultural heritage, including the Welsh Language	0		
6. Help deliver the growth of a sustainable and diversified economy	0		
7. Improve health and well-being	0		
8. Use soils and natural resources efficiently and safeguard their quality	++		
9. Protect and enhance the landscape	0	No significant impact	
10. Minimise resource use and waste, increase re-use and recycling	0		
11. Maintain and enhance water quality and resources, and manage flooding	0		
<b>ISA comments and suggestions:</b> The gist of this policy seems v. similar to that of Policy M4. Merge the two policies?			
<b>Changes made in response to the ISA:</b> The purpose of policies M4 and M7 are different and reflect Welsh Government guidance. I have extracted the relevant extracts from Minerals Technical Advice Note (Wales) 1: Aggregates and Planning Policy Wales Edition 12 which explain the difference:			
<b>Buffer Zones (MTAN1)</b> 70. MPPW (paragraph 40) established the principle of Buffer Zones around permitted and allocated mineral extraction sites. Development plans are required to indicate the boundary of the buffer zone. Within the buffer zone, no new sensitive development or mineral extraction should be approved. Sensitive development is any building occupied by people on a regular basis and includes housing areas, hostels, meeting places, schools and hospitals where an acceptable standard of amenity should be expected. Sensitive development could also include specialised high technology industrial development where operational needs require high standards of amenity.			
71. The objective of the buffer zone is to protect land uses that are most sensitive to the impact of mineral operations by establishing a separation distance between potentially conflicting land uses. Research has indicated that people living close to mineral workings consider dust to be the main impact of mineral extraction and any processing operations, followed by traffic, and noise and vibration from blasting.			
<b>Safeguarding Mineral Resources and Infrastructure (PPW12)</b> 5.14.7 It is important that access to mineral resources, including secondary, recycled and marine dredged materials, which society may need, as well as the minerals related infrastructure to deliver this need, is safeguarded in order to prevent sterilisation by other forms of permanent development. Planning authorities should consider the long term and the need for preventative action to avoid the creation of problems in the future. Safeguarding does not indicate an acceptance of mineral working, but that the location and quality of the mineral is known and that the environmental constraints associated with extraction, including the potential for extraction of mineral resources prior to undertaking other forms of development, have been considered.			
5.14.9 Using the National Minerals Resource Maps and the National Aggregates Safeguarding Maps for Wales, areas to be safeguarded should be identified on proposals maps and policies should protect potential mineral resources from other types of permanent development which would either sterilise them or hinder extraction, or which may hinder extraction in the future as technology changes.			

#### MW8: SITES FOR WASTE MANAGEMENT FACILITIES

Proposals for the development of waste management facilities will be permitted where:

- i. There is a demonstrable need assessed against regional requirements; or
- ii. The proposed facility would move the management of waste up the waste hierarchy; and
- iii. There would be no unacceptable harm to the environment, human health, landscape and built heritage;
- iv. It would not cause unacceptable air, noise, light or water pollution or unacceptable levels of dust, vibration or odours;
- v. It would not be located within an area at risk of flooding;
- vi. It would not endanger aviation safety;
- vii. The proposal includes acceptable plans for restoration, aftercare and after-use;
- viii. The proposal includes acceptable proposals for the protection of adjoining and nearby land from gas and leachate migration, or contamination;
- ix. There would be safe means of access to the highway and adequate on-site parking and turning facilities;
- x. The proposal is accompanied by a Waste Planning Assessment containing sufficient information to enable an assessment of the proposal.

Facilities for the handling, treatment and transfer of waste will generally be encouraged towards existing use class B2 general industrial land.

ISA Objective	Impact	Comments
1. Help deliver equality of opportunity and access for all	+	Waste management facilities provide a range of jobs
2. Maintain and improve air quality	-	Cumulatively, this policy is likely to lead to some air pollution, dust, gas emissions etc., plus air pollution from vehicles delivering/moving waste.
3. Protect and enhance biodiversity, flora and fauna	-?	Depending on the location and type of development, this policy could have a cumulative negative impact on biodiversity
4. Reduce emissions of greenhouse gases and adapt to the effects of climate change	+/-	The policy supports the waste hierarchy, which would help to reduce methane etc. emissions and so climate change. However, to the extent that it supports landfill (methane) and development requiring significant transport movements, it could have a negative impact.
5. Protect and enhance historic and cultural heritage, including the Welsh Language	-?	Depending on the location and type of development, this policy could have a negative impact on the historic and cultural heritage.
6. Help deliver the growth of a sustainable and diversified economy	++	The policy aims to provide waste management facilities to support other businesses in Cardiff.
7. Improve health and well-being	+/-	The policy supports the move up the waste hierarchy, which would help to reduce leachate, smell etc. However the vehicle movements, noise etc. from all waste development would have a negative impact.
8. Use soils and natural resources efficiently and safeguard their quality	+/-	The policy supports the move up the waste hierarchy, reducing the need for landfill. However, all waste management facilities require land, and are more likely to contaminate it than clean it up.
9. Protect and enhance the landscape	-	Waste management facilities do not enhance the landscape!
10. Minimise resource use and waste, increase re-use and recycling	+	The policy supports the move up the waste hierarchy, although it does not prevent landfill.
11. Maintain and enhance water quality and resources, and manage flooding	-	Cumulatively, waste management facilities are likely to lead to worsened water quality and possibly an increase in flooding due to their need for hard-standing/parking.

#### ISA comments and suggestions:

- Should the policy say anything about landfill, i.e. will more be needed or is Cardiff trying to prevent new landfill sites?

- Generally can the waste policies be more creative/exigent to support the move up the waste hierarchy?

**Changes made in response to the ISA:**

Welsh Government guidance set out in Technical Advice Note 21: Waste and its associated regional monitoring reports are used to monitor whether each region has enough capacity to manage its waste arisings and anticipate when additional regional capacity will be needed.

Cardiff is part of the South East Wales Region. The latest regional monitoring report available is the 'Waste Planning Monitoring Report: South East Wales' published in April 2016. This concluded that there is no further need for landfill capacity within the South East Wales region and that any proposals for further residual waste treatment should be carefully assessed to ensure that the facility would not result in overprovision. In this respect it is worth noting that only 2% of household waste was sent to landfill in 2022/23, down from 39% in 2012/13.

Criterion ii encourages facilities that seek to move the management of waste up the waste hierarchy.

Also see changes to EC2 re. council support for businesses to use one business's waste and a resource for another business.

**MW9: PROVISION FOR WASTE MANAGEMENT FACILITIES IN DEVELOPMENT**

Where appropriate, provision will be sought in all new development for facilities for the storage, recycling and other management of waste.

ISA Objective	Impact	Comments
1. Help deliver equality of opportunity and access for all	0	
2. Maintain and improve air quality	0	
3. Protect and enhance biodiversity, flora and fauna	0	
4. Reduce emissions of greenhouse gases and adapt to the effects of climate change	0	No significant impact
5. Protect and enhance historic and cultural heritage, including the Welsh Language	0	
6. Help deliver the growth of a sustainable and diversified economy	0	
7. Improve health and well-being	-?	Poorly-managed waste management facilities can smell, attract vermin etc.
8. Use soils and natural resources efficiently and safeguard their quality	0	No significant impact
9. Protect and enhance the landscape	-?	Poorly-managed waste management facilities can be unattractive
10. Minimise resource use and waste, increase re-use and recycling	++	The policy helps to implement effective waste recycling etc. in Cardiff
11. Maintain and enhance water quality and resources, and manage flooding	0	No significant impact
<b>ISA comments and suggestions:</b> None		