



Cardiff Council - November 2025

Cardiff Replacement LDP

Statement of suggested main issues for consideration at the examination and a suggested procedure for dealing with them



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Cardiff Replacement Local Development Plan

**Statement of suggested main issues for consideration at the
examination and a suggested procedure for dealing with
them**

November 2025

1. Introduction

1.1 This Report provides a summary of the main issues arising from the comments made and includes an outline of the response to these issues. In doing so it provides a statement of the main issues for consideration at the examination. Sections 2 to 16 of this report provide an overall summary of the consideration of the following issues. Further detail on the individual representations and Council responses is set out in the appendices to the Consultation Report.

- Vision, Objectives and Strategy
- Housing growth and strategy
- Affordable Housing
- Gypsy and Travellers
- Transport
- Economy and Employment
- Biodiversity and Green Infrastructure
- Flood Risk and Managing Water Resources
- Net Zero, Renewable Energy and Climate Change
- Heritage
- Air and Noise Pollution and Contaminated Land
- Design and Placemaking
- Welsh Language; and
- Minerals and Waste
- Consultation Process

2. Vision, Objective and Strategy

2.1 A relatively low number of responses made explicit reference to the RLDP vision, objectives, strategy or 'whole plan' matters. Those issues raised included the need for a more regional approach and concerns around delivering transportation solutions and wider infrastructure in connection with the adopted LDP strategic housing sites taken forward in the RLDP. There was also support for many policies in the Plan.

2.2 Overall, no compelling evidence was submitted to demonstrate that the LDP strategy is inherently unsound. Indeed, the vision, evidence and strategy respond to the clear evidenced need to make provision for new homes and jobs. The strategy is considered to not only provide the appropriate level of growth based on up-to-date evidence but also deliberately sets out a framework to manage this necessary development. The masterplanning approach embodied in the strategy recognises the need to bring forward new infrastructure, deliver sustainable transport solutions and mitigate the impacts of new development in a managed way.

2.3 Strategic Policies, Detailed Policies and supporting information are fully consistent with the overall vision, objectives, and strategy. Collectively, they demonstrate how the overarching strategy can be delivered.

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- 2.4 With regard to references to the city-region dimension, it should be stressed that significant cross-boundary collaborative dialogue has taken place to help inform the Plan and the plan specifically helps deliver the vision of Cardiff being at the heart of a thriving city-region and there was a strong consensus for this approach as evidenced by the fact adjoining authorities have raised no objections to the Plan.
- 2.5 Dialogue will continue with partners from around the city-region, particularly with the requirement to prepare a Strategic Development Plan for the Cardiff Capital Region. However, a new SDP is not likely to be in place until at least 2031 and LDPs will remain part of the Development Plan hierarchy.
- 2.6 Therefore, the need for Cardiff to ensure it has an up to date RLDP in place remains paramount to overcoming the real problems caused by having out of date Development Plans, an insufficient supply of housing land and latent demand for new homes. Appeals have been lost for new homes in the countryside so there is an urgent need to prevent further 'ad hoc' developments by providing a framework to effectively manage the delivery of necessary new homes, jobs, and associated infrastructure.

3. Scale of Housing Growth and Strategy

- 3.1 In order to provide for sustainable growth and effectively meet evidenced housing need, the plan sets out a strategy to deliver 26,400 dwellings over the plan period 2021 to 2036.
- 3.2 The Deposit RLDP proposes to provide for new homes over the plan period by a combination of:
 - Dwellings already built (since 2021);
 - Dwellings under construction;
 - Dwellings with planning consent/ subject to Section 106 Agreement;
 - Adjustments to housing stock over plan period;
 - Windfall allowances for remainder of plan period;
 - Strategic Sites- Policy H1A;
 - Non-Strategic Sites- Policy H1B;
 - Housing Led Regeneration Areas H2; and
 - Flexibility allowance if extra 10% is required.
- 3.3 This equates overall to over 50% of homes being provided from brownfield sites.
- 3.4 Responses received can be grouped into the following categories:

Brownfield vs Greenfield Development

- Support for brownfield-first strategy: Many respondents welcomed the plan's emphasis on brownfield regeneration and the decision not to

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allocate new greenfield sites.

- Concerns about brownfield viability: Several comments noted that brownfield sites are often harder to deliver due to remediation costs and infrastructure constraints.
- Call for small site allocations: Small and Medium-sized enterprise (SME) builders highlighted the lack of small (<50 units) brownfield sites, which limits market diversity and deliverability.
- Housing-led regeneration areas: Support for areas but concerns about over-reliance on previously allocated sites without reassessment.
- Flexibility and targets: Respondents highlighted the need to increase flexibility allowances due to the challenges of brownfield delivery and underperformance of existing sites.

Growth Options

- Criticism of low growth targets: Respondents highlighted that the proposed housing requirement lacks ambition and does not reflect Cardiff's role as a capital city.
- Support for higher growth scenarios: Option C (High growth) was preferred by some respondents to address historical under-delivery and future demand.
- Regional balance concerns: Some respondents felt Cardiff's growth strategy could negatively impact surrounding areas in SE Wales.

Delivery Rates

- Housing delivery trajectory: Respondents raised concerns that the projected annual delivery rate (1,600 homes/year) is unrealistic based on past performance.
- Plasdwr delays: Respondents referenced the slow delivery at Plasdwr and its impact on infrastructure and housing supply.
- Monitoring and trigger points: Respondents requested clearer mechanisms to ensure infrastructure is delivered in line with housing completions.

Land Allocation

- Over-reliance on committed sites: Respondents highlighted that 70% of the housing supply is already committed, limiting flexibility and responsiveness.
- Need for reassessment of previously allocated sites: Respondents called for a fresh review of previously allocated sites to confirm their viability and deliverability.
- Call for greater range of sites: Respondents highlighted the need to include smaller, more agile sites to balance the strategic allocations.
- Support for new allocations: Some respondents proposed additional sites (e.g. Brummell Drive) to diversify the land portfolio.

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Strategic Site Viability

- Viability concerns: Respondents noted that strategic sites are seen as slow to deliver due to infrastructure dependencies and planning complexities.
- 3.5 In response to comments about the level of growth this it is considered that the overall level of growth contained in the Deposit RLDP represents a sound and reasonable figure and is considered to best reflect an analysis of all relevant factors. Importantly, it is based on the most up-to-date information, takes account of all relevant National planning policy guidance as set out in Planning Policy Wales, it accords with Future Wales: The National Plan 2040 which identifies the city as a National Growth Area, accords with the Council's vision and RLDP objectives and effectively respond to the clear evidenced need to provide for a considerable number of new homes.
- 3.6 The Plan makes provision to deliver the official projections and is considered to strike the right balance having regard to the full range of factors;
- Deliver necessary homes in a managed and controlled manner protecting key elements of Cardiff's environment;
 - Meet deliverability and capacity factors - the RLDP contains proposals and mechanisms which justify how deliverability and capacity matters can be adequately addressed; and
 - Respond in an evidence-based manner to the divergence of views expressed during the consultation on strategic options.
- 3.7 The Plan contains a wide range and choice of sites which can be available at any one time as each site will have a finite annual delivery rate based on site specific factors/constraints and marketing factors relating to supply and demand. The approach allows the phased development of sites over a period of time. Trajectories of provision for each Strategic site will be further updated through ongoing liaison with developers reflecting the number of available outlets at any one time together with the mix of private and affordable providers. However, work undertaken to date demonstrates the need for a balanced provision across all Strategic Sites during the remaining plan period to ensure a sufficient range and choice of offer at any one time which in turn directly supports the delivery of the annual build rate, which is required to meet the evidenced need.
- 3.8 Overall, no compelling evidence was submitted to demonstrate that the RLDP strategy is inherently unsound. Indeed, the level of growth responds to the clear evidenced need to make provision for new homes. The level of growth is considered to not only provide the appropriate level of growth based on up-to-date evidence but also deliberately sets out a framework to manage this necessary development. The masterplanning approach embodied in the plan recognises the need to bring forward new infrastructure, deliver sustainable

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transport solutions and mitigate the impacts of new development in a managed way.

- 3.9 Comments raised regarding the need for a regional approach are addressed in paragraphs 2.4 to 2.5, above.

4. Affordable Housing

- 4.1 The affordable housing policy contained in the Deposit RLDP aims to assist the Council in meeting evidenced housing need by seeking an appropriate housing contribution from new residential developments in the city. The policy sets out a target of 20% affordable housing on brownfield sites and 30% affordable housing on greenfield sites in all residential developments which contain 10 or more dwellings or exceed 0.3 hectares in gross site area.
- 4.2 Responses received can be grouped into the following categories:

Affordability Targets

- Under-delivery concerns: Many respondents, including the House Builders Federation and Cardiff Civic Society, argue that the proposed delivery of 5,000–6,000 affordable homes is significantly below the identified need.
- Policy H3 Affordable Housing: Respondents called for more flexibility in Policy H3 to accommodate different tenure mixes, including Discount Market Rent (DMR) and Build-to-Rent models.
- Viability and thresholds: Respondents highlighted the need to revisit viability assessments and consider lower thresholds to ensure deliverability across Cardiff.
- Community-led housing: Respondents supported the allocation of sites specifically for community-led affordable housing initiatives.
- Welsh Government: Stated that sites should be allocated where at least 50% of homes are affordable to meet Future Wales targets.

Housing Mix

- Tenure diversity: Respondents highlighted the need to deliver a range of tenures, including social rent, shared ownership, and market housing.
- Family housing: Respondents called for more family-sized units, especially in areas like Grangetown.
- Older people: Respondents highlighted the need to recognise Cardiff's aging population and the need for housing that supports independent living.
- Student and co-living: Respondents raised concerns about over-concentration and affordability in student housing developments.

- 4.3 In response to the comments relating to under delivery it is considered that the

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target for the delivery of affordable homes is appropriate taking into account the landbank of existing sites with planning permission, the Council's Housing Partnership Programme and findings of the Avison Young Viability study which established the viability targets for further housing development.

- 4.4 In response to comments seeking a wider definition of affordable housing it is important to note that the definition contained within the Deposit RLDP accords with Welsh Government guidance and states that affordable housing encompasses both social rented and intermediate housing where there are secure mechanisms in place to ensure that it is accessible to those who cannot afford market housing, both on first occupation and for subsequent occupiers. Given the need for the Plan to accord with national guidance it would be inappropriate to include a wider definition in the Plan.
- 4.5 With regard to the issue of targets set out in Policy, it should be stressed that the targets are derived from the findings of the viability study undertaken by Avison Young which assessed the viability of a range of housing scenarios for different development types with varying levels of affordable housing. In order to demonstrate viability and take account of the higher costs associated with the development of brownfield sites the study recommended a two-tiered affordable housing target and confirms that affordable housing is viable at 30% on greenfield sites and 20% on brownfield sites whilst making provision for other 'policy costs' including community infrastructure.
- 4.6 In response to the other issues it is important to note that further clarification on the implementation of the policies will be provided in Supplementary Planning Guidance. This will seek to address the comments seeking further clarification on a range of issues.

5. Gypsy and Travellers

- 5.1 The Deposit RLDP sets out a criteria-based policy for assessing proposals for new Gypsy and Traveller sites and in response to need evidenced in the Gypsy and Traveller Accommodation Assessment (GTAA) allocates a site for 80 pitches at Pengam Green. It was identified previously as part of an independent study which assessed potential sites within the city to accommodate this need and follows criteria set out in national guidance relating to availability, suitability, and achievability.
- 5.2 Several responses were received and can be grouped into the following categories:

Site Provision

- Some respondents supported the proposed site at Pengam Green, which is intended to meet the full need of 117 pitches by 2036.
- Welsh Government emphasized the need for a robust site selection process, including flood risk assessments and alignment with national

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guidance (Circular 005/2018).

- Some respondents proposed allocating all 117 pitches at Pengam Green to consolidate provision.

Location Concerns

- Some respondents objected to the Pengam Green location due to its proximity to industrial areas and existing social pressures and suggested an alternative sites in North Cardiff to avoid overburdening communities in the south and east.
- Respondents highlighted concerns about the visual and environmental impact of large-scale Traveller sites in urban areas.

Community Impact

- Respondents commented that is important to integrate Traveller children into local schools and the new site should support social inclusion and avoid isolating the Gypsy and Traveller community.

Infrastructure Needs

- Respondents highlighted the need for adequate infrastructure, including transport links, drainage, and community facilities.

Policy Clarity

- Respondents highlighted the need for clearer language in the RLDP regarding site phasing, delivery timelines, and management and monitoring responsibilities.

5.3 In response to the comment relating to the site selection process it is important to note the independent study followed criteria set out in national guidance and all the sites considered were subject to thorough investigation and analysis.

5.4 There are strong reasons to support the proposed size of the site although it is acknowledged the site would be of a large scale in a Wales context and above recommended site size in national guidance. It is important to note the guidance also states that local authorities may consider it necessary to be flexible by allowing more pitches on a site when taking into account local circumstances and the current level of need. Furthermore, the Council's experience in operating the Shirenewton site of 59 pitches has demonstrated that large sites can be very effectively managed providing both benefits for the Gypsy and Traveller community and enabling the effective delivery of supporting services. The site allows for a logical phased development where pitches can be provided in a managed and orderly manner whilst integrating the provision of supporting facilities.

5.5 In response to the other issues raised by consultees it is considered that the Statement of suggested main issues for consideration at the examination and a suggested procedure for dealing with them November 2025

Plan meets the tests of soundness without the need for changes relating to these matters. Therefore, the proposed changes are not considered necessary to ensure that the RLDP is sound.

6. Transport

6.1 The Deposit RLDP sets out a range of policies on delivering sustainable transportation solutions and active travel. These policies provide a suite of complementary policies to put in place a change in approach to bring about 75% of all trips on Cardiff's transport network to be made by sustainable transport modes by 2030.

6.2 Responses received can be grouped into the following categories:

Public Transport

- Station protection: Respondents called for the safeguarding of sites for new stations (e.g. Crwys Road, Cardiff Parkway, Ely Mill, Roath Park).
- Bus connectivity: Respondents raised concerns about poor bus links in NW and Eastern Cardiff and suggested ways to improve interchanges and extend services.
- Metro integration: Respondents supported the South Wales Metro but requested clearer timelines and station locations.
- Infrastructure lag: Respondents expressed worries that transport infrastructure is not being delivered in parallel with housing developments.
- Event congestion: Respondents raised concerns about traffic bottlenecks during major events

Active Travel

- Cycle lane design: Respondents criticised current cycle lane layouts, especially where they replace bus lanes.
- Topography challenges: Respondents noted that NW Cardiff's hilly terrain and lack of pavements deter active travel.
- Integration needs: Respondents called for better integration of walking, cycling, and public transport.
- Safety and accessibility: Respondents highlighted the need to separate walking and cycling routes for safety reasons.

Infrastructure Delivery

- Infrastructure delivery: Respondents supported the delivery of infrastructure before or alongside development.
- S106 and SPG: Respondents requested clearer Planning Obligations and Supplementary Planning Guidance to ensure timely infrastructure.
- Viability concerns: Respondents raised issues about cumulative policy burdens affecting infrastructure provision.

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Modal Shift Targets

- Respondents expressed doubts about achieving the 75% sustainable transport target by 2030.
- Behavioural Change: Respondents highlighted the need for more incentives and infrastructure to shift travel habits.
- Monitoring: Respondents requested clearer metrics and enforcement mechanisms to track progress.

EV Charging

- Provision Gaps: Respondents questioned how EV charging will be delivered for terraced and townhouses.
- Policy Clarity: Respondents called for specific targets and clearer implementation plans.

Strategic Connectivity

- Regional Integration: Respondents raised concerns about development near Cardiff's boundaries impacting infrastructure without coordination.
- Cross-boundary Planning: Respondents supported early cooperation with neighbouring authorities ahead of the Strategic Development Plan.

6.3 In response to comments doubts about achieving the 75% target this target is derived from detailed modelling and transport assessment work carried out by the Council when preparing the RLDP. This work showed that a 75% target will be necessary to avoid unmanageable levels of congestion of the highway network and to keep the network functioning and meet the Council's target in reducing carbon emissions.

6.4 In response to comments raised in relation to infrastructure delivery the RLDP Master Planning policies will further enable the Council to secure essential infrastructure in new developments and to make this provision integral to their design and delivery. It will also enable the Council to control the implementation of transport infrastructure in large developments. Thus, whilst the final public transport provisions for a major site may not be in place on day one of development, mechanisms will be available to secure sustainable travel options (e.g., by way of additional bus services) for the occupiers of earlier phases.

6.5 In response to the other issues it is considered sufficient evidence for the reasons behind the policies is set out in the Transport Background Technical Paper. In addition, further clarification will be provided in Supplementary Planning Guidance, and it is considered that the Plan meets the tests of soundness without the need for changes relating to these matters.

6.6 Comments raised regarding the need for a regional approach are addressed

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in paragraphs 2.4 to 2.5, above.

7. Economy and Employment

- 7.1 The Deposit RLDP makes provision for a range and choice of new employment sites for different types of employment and different geographical locations to effectively deliver the level of growth set out in the plan together with putting in place a framework to protect the role of existing employment land. This responds to Cardiff's role as the main economic driver in South East Wales.
- 7.2 Several responses were received, and these are set out below:
- Site EC3.7 (Cardiff Business Park and Land North of Maes y Coed Road) should be removed from employment designation due to its current use and planning context.
 - Support for Life Science Park at Forest Farm as part of housing-led regeneration.
 - Concerns about EC2 (Cardiff Parkway): Respondents raised concerns due to traffic, pollution, and lack of community benefit and suggested a collaborative placemaking strategy should be prepared and implemented.
 - Active Travel gaps: Respondents noted that many employment areas lack walking/cycling infrastructure and new developments should include secure cycle storage and staff facilities.
 - Respondents called for flexibility in repurposing office spaces to adapt to changing needs—e.g., converting to creative workspaces, community hubs, or affordable housing with ground-floor commercial uses.
- 7.3 In response to those seeking amendments to the boundaries of the protected employment areas defined under Policy EC3 these have been defined on the basis that these areas display strong potential to continue playing an important economic role, whether this is to provide local employment on smaller sites within key neighbourhoods or whether the sites are more strategic in size, position and function. Given this the areas shown on the Proposals Map are considered appropriate and the Plan meets the tests of soundness without the need for changes relating to these matters.
- 7.4 In response to comments seeking amendments to either the policies or supporting text it is considered that the Plan meets the tests of soundness without the need for changes relating to these matters. Therefore, the proposed changes are not considered necessary to ensure that the RLDP is sound.
- 7.5 In response to comments regarding Cardiff Parkway this development now has planning permission, and these issues will be considered in the detailed master planning and implementation of the site.
- 7.6 In response to the other issues it is considered sufficient evidence for the reasons behind the policies is set out in the Economic Background Technical

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Paper and the Plan meets the tests of soundness without the need for changes relating to these matters.

8. Biodiversity and Green Infrastructure

- 8.1 The Deposit RLDP sets out a range of policies relating to the protection and enhancement of biodiversity and green infrastructure. Natural assets are key to Cardiff's character, value, distinctiveness, and sense of place and include the undeveloped countryside and coast, river valleys, biodiversity interests and trees.
- 8.2 Several responses were received and can be grouped into the following categories:

Habitat Protection

- Respondents highlighted the need to protect SSSIs and SINCs, including undesignated sites that meet the relevant criteria.
- Respondents also requested that parks as wildlife sites with legal protection are protected.
- Respondents raised concerns about rewilded brownfield sites being overlooked despite their biodiversity value and the need to safeguard habitats within the city.
- Respondents suggested the policy language should be revised to ensure mitigation and compensation are robust and enforceable.
- Respondents proposed the creation of protected nature corridors linking parks, rivers, and countryside.

Tree Preservation

- Respondents were critical of tree removal practices, especially in urban areas and recommended preservation orders on street and garden trees. Also, they noted that Retail parks should be required to maintain trees planted under planning conditions.

Biodiversity Net Gain

- Respondents raised concerns about the practicality of achieving net benefits for biodiversity given the scale of development and requested clearer implementation mechanisms and monitoring of biodiversity outcomes.

Green Infrastructure Delivery

- Respondents requested clarification on the use of Green Infrastructure Statements vs Assessments and supported the requirement for GIS tools in planning applications.
- Respondents suggested the inclusion of buffer zones around

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woodlands and integration of biodiversity into masterplans.

Policy Alignment with National Guidance

- Respondents referenced the need for policies to be consistent with Planning Policy Wales (PPW) and requested they align with national standards, terminology and current national biodiversity strategies.
- 8.3 In response to comments seeking amendments to either the policies or supporting text it is considered that the Plan meets the tests of soundness without the need for changes relating to these matters. Therefore, the proposed changes are not considered necessary to ensure that the RLDP is sound.
- 8.4 In response to the other issues it is important to note that further clarification on the implementation of the policies will be provided in Supplementary Planning Guidance. This will seek to address the comments seeking further clarification on a range of issues.

9. Flood Risk and Managing Water Resources

- 9.1 The Deposit RLDP includes a policy relating to flood risk which aims to avert development where it would be at risk from river, ordinary watercourse, coastal, surface water flooding or where it would increase the risk of flooding or additional run off from development elsewhere. The Policy reflects advice in Welsh Government Planning guidance TAN15 Flood Risk and helps deliver RLDP objectives relating to flood risk.
- 9.2 Several responses were received and can be grouped into the following categories:

Flood Risk and Mitigation

- Respondents stated that the RLDP should include robust, detailed, and timetabled flood mitigation plans, especially for vulnerable communities in the Southern Arc.

Water Quality

- Respondents called for measurable targets and a binding timetable to reduce pollutants entering rivers and groundwater.
- The House Builders Federation (HBF) questioned the inclusion of water quality improvement requirements, stating they are not mandated by national policy.

SuDS (Sustainable Drainage Systems)

- HBF noted that SuDS are already covered by separate legislation and

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should not be duplicated in RLDP policies.

Infrastructure Planning

- Respondents raised concerns about overlapping policy requirements and lack of clarity on how infrastructure delivery aligns with SuDS and drainage strategies already required under Planning Policy Wales (PPW)

Alignment with TAN15 or National Guidance

- Respondents questioned whether the RLDP policies align with TAN15 and Planning Policy Wales (PPW), especially regarding water quality and drainage.
- Respondents highlighted the need to avoid duplicating statutory requirements and ensure consistency with national guidance.

9.3 In response to comments seeking amendments to either the policies or supporting text it is considered that the Plan meets the tests of soundness without the need for changes relating to these matters. Therefore, the proposed changes are not considered necessary to ensure that the RLDP is sound.

9.4 In response to the other issues it is important to note that further clarification on the implementation of the policies will be provided in Supplementary Planning Guidance. This will seek to address the comments seeking further clarification on a range of issues.

10. Net Zero, Renewable Energy and Climate Change

10.1 The Deposit RLDP promotes development that mitigates the causes of climate change, and which is able to adapt to its likely effects. Policies require development proposals to follow the energy hierarchy and prevent development that places an additional de-carbonisation burden on the city. Policies also seek to protect and increase carbon sinks and increase energy efficiency and the supply of renewable energy.

10.2 Several responses were received and can be grouped into the following categories:

Carbon Neutrality Targets

- Respondents called for a stronger commitment to carbon neutrality and urged the RLDP to clearly specify enforceable timetables and scrutiny processes for achieving a carbon neutral city by 2030.
- Whole lifecycle approach: Respondents called for the expansion of the scope of net zero policies to include indirect emissions and embodied

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carbon, not just operational energy use.

Whole Life Carbon Assessments

- Respondents stated that Policy RE2 should require whole life carbon assessments for all developments.
- Respondents called for “energy statement” to be replaced with “energy and emissions statement” requiring developers to demonstrate how buildings can be adapted to meet net zero in future if not currently viable.

Energy Efficiency and Renewable Infrastructure

- Respondents supported the fabric-first approach and developers advocated for prioritising sustainable construction techniques and local supply chains.

Viability Concerns

- Developers asked for clarity on how carbon offset payments would be calculated and used.
- Flexibility needed: Respondents raised concerns about the feasibility of applying net zero standards to all developments, especially smaller sites.

Policy Alignment with National Guidance

- Some respondents noted inaccuracies in how Planning Policy Wales (PPW) was cited in the RLDP.
- The HBF argued that the threshold of 100 units for applying higher sustainability standards is too low and should only apply to larger strategic allocations.

10.3 In response to comments it is considered that the Plan meets the tests of soundness without the need for changes relating to these matters. In addition, further clarification on the implementation of the policies will be provided in Supplementary Planning Guidance. Therefore, the proposed changes are not considered necessary to ensure that the RLDP is sound.

11. Heritage

11.1 The Deposit RLDP aims to protect, manage and enhance Cardiff’s distinctive heritage assets including the character and setting of its Scheduled Ancient Monuments, Listed Buildings, Historic Parks and Gardens, Conservation Areas, Locally Listed Buildings, and other features of local interest that positively contribute to the distinctiveness of the city.

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- 11.2 Several responses were received and can be grouped into the following categories:

Protection of Historic Buildings

- Respondents supported preserving Cardiff's historic buildings and called for robust policies to protect heritage assets from inappropriate development.

Conservation Areas

- Respondents requested community involvement in managing conservation areas and supported Policy HE1 which strengthens protection for listed buildings and conservation zones.

Cultural Heritage

- Respondents acknowledged the importance of cultural heritage in shaping Cardiff's identity.

- 11.3 In response to comments it is considered that the Plan meets the tests of soundness without the need for changes relating to these matters. In addition, further clarification on the implementation of the policies will be provided in Supplementary Planning Guidance. Therefore, the proposed changes are not considered necessary to ensure that the RLDP is sound.

12. Air, Noise Pollution and Contaminated Land

- 12.1 The Deposit RLDP seeks to prevent unacceptable harm resulting from air, noise, light pollution, and unacceptable levels of land contamination.

- 12.2 Several responses were received and can be grouped into the following categories:

Air Quality

- Respondents raised concerns about increased air pollution due to housing development along the M4, which may lead to higher car usage as these areas lack public transport.

Noise Pollution

- Respondents raised concerns about increased noise levels from traffic due to housing developments near major roads.

Land Contamination

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- Respondents stated the RLDP should clearly outline how contaminated legacy sites will be assessed for risks to human health and nature and requested the preparation of detailed remediation strategies to identify and prevent future contamination.

Land Stability

- Respondents raised concerns over the omission of land instability criteria in Policy PC1 and recommended remediation where necessary.

12.3 In response to comments it is considered that the Plan meets the tests of soundness without the need for changes relating to these matters. Therefore, the proposed changes are not considered necessary to ensure that the RLDP is sound.

13. Design and Placemaking

13.1 The Deposit RLDP requires new development to be of the highest architectural quality, promote sustainable design and make a positive contribution to the creation of distinctive and healthy communities, places, and spaces. In order to ensure this a master planning approach is required to both existing and future strategic sites or development including more than 100 homes, or any project involving more than one phase of development.

13.2 Several responses were received and can be grouped into the following categories:

Design Quality

- Respondents emphasised the need to build a beautiful, resilient, and distinctly Welsh city, with high-quality architecture and climate-responsive design.
- Respondents criticised poor design in high-rise developments, especially in Cardiff Bay, and called for more local, small-scale builders.
- Respondents supported inclusive design and suggested inclusion of reference to hidden disabilities and neurodivergence in the policy language.

Placemaking Principles

- Respondents advocated stronger use of S106 agreements and early community involvement in placemaking.
- Respondents suggested that mental and physical wellbeing, biodiversity, and height limits be included in the placemaking guidance.
- Respondents supported master planning, especially for strategic sites.
- Respondents supported the 15-minute neighbourhood model, with emphasis on active travel, cycle infrastructure, and low car

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dependency.

Accessibility

- Respondents encouraged planners to experience the city through diverse perspectives, including children, elderly, and disabled people.

Tall Buildings

- Respondents raised concerns about aesthetic quality and longevity of new tall buildings and called for height restrictions near historic areas, and promotion of human-scale development with natural materials and greenery.

Lifetime Homes

- Respondents supported inclusive design, lifetime homes and neighbourhoods that adapt to changing needs.
- Respondents requested that both conversions and new builds meet lifetime standards.
- Respondents called for the delivery of lifetime homes to be monitored across tenures and locations.

13.3 In response to comments it is considered that the Plan meets the tests of soundness without the need for changes relating to these matters. In addition, further clarification on the implementation of the policies will be provided in a range of future Supplementary Planning Guidance. Therefore, the proposed changes are not considered necessary to ensure that the RLDP is sound.

14. Welsh Language

14.1 The Deposit RLDP defines Cardiff as an area of Linguistic Importance for the Welsh Language and seeks to secure and enhance opportunities to grow the Welsh Language in new developments. Development proposals will be expected to identify positive measures that enhance the interests of the Welsh Language and opportunities to speak the language on a daily basis and identify any mitigation measures where adverse effects are identified.

14.2 Several responses were received and can be grouped into the following categories:

Education Provision

- Respondents widely supported Welsh-medium education as a driver of language growth.
- Respondents stated that the 50% Welsh-medium school provision target was insufficient and called for 100% provision in new developments.

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- Respondents called for new Welsh-medium schools in underserved areas like Grangetown and South Cardiff, citing educational inequality and long travel distances.
- Respondents highlighted the need to align with the Welsh in Education Strategic Plan (WESP) and UNICEF's Child Friendly Cities initiative.
- Respondents highlighted the need to support Welsh-medium childcare to normalise bilingualism from early

Planning Policy Alignment

- Respondents supported Cardiff's designation as an area of linguistic significance, with emphasis on growing and retaining Welsh speakers through housing, work, and community facilities.
- Respondents raised concerns about vague language in policies, especially the phrase "where relevant", which may weaken implementation.
- Respondents supported the requirement for developers to identify positive measures to support the Welsh language but called for stronger enforcement.
- Respondents criticised SP15's mitigation approach, arguing it implies acceptance of harm rather than prevention.

Cultural Visibility

- Respondents supported the use of Welsh names in development proposals to reinforce cultural identity and encourage everyday language and recommended that they are rooted in local history and dialect.

14.3 In response to comments it is considered that the Plan meets the tests of soundness without the need for changes relating to these matters. In addition, further information is provided in the Welsh Language Background Technical Paper and further clarification will be provided in future Supplementary Planning Guidance. Therefore, the proposed changes are not considered necessary to ensure that the RLDP is sound.

15. Minerals and Waste

15.1 The Deposit RLDP sets out a range of policies relating to minerals and waste. In terms of minerals the Deposit RLDP aims to contribute to regional aggregate supplies by promoting and supporting the efficient use of minerals and use of alternatives, protecting existing mineral reserves and safeguarding potential resources from permanent development including sand and gravel resources and limestone resources and maintaining a 10 year land bank of permitted aggregate reserves in line with national guidance. In addition to this the Plan seeks to protect sand wharves within the Cardiff docks from development, sets out criteria for the preferred order of mineral resource release and includes policies relating to quarry closures and extension limits, mineral buffer zones

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and restoration and after-use of mineral workings.

15.2 In terms of waste the Deposit RLDP seeks to manage waste arisings in the city by promoting and supporting additional sustainable waste treatment facilities, encouraging the provision of in-building treatment facilities in existing areas of general industry, supporting the provision and maintenance of sustainable waste management and storage facilities in new developments and supporting waste minimisation and the provision of facilities that use recycled or composted products. Detailed set out a framework for the assessment of planning applications for waste management facilities.

15.3 Several responses were received and can be grouped into the following categories:

Mineral Safeguarding

- Respondents supported the safeguarding known mineral resources and infrastructure, in line with Planning Policy Wales (PPW) and MTAN1 requirements.

Quarry Operations

- Respondents raised concerns about the impact of quarrying on residential areas and biodiversity.
- Respondents requested limits on vehicle movements and operating hours and for community liaison arrangements with quarry operators.
- Respondents raised concerns about pollution and ecological damage from mineral extraction and waste operations and called for stronger environmental protection measures and impact assessments.

Recycling and Waste Infrastructure

- Respondents called for a review recycling centre provision, especially in Northwest Cardiff, to ensure accessibility and capacity.

Policy Alignment with National Guidance

- Respondents requested clearer references to regional aggregates apportionment and strategic co-ordination.

15.4 In response to comments seeking amendments to either the policies or supporting text it is considered that the Plan meets the tests of soundness without the need for changes relating to these matters. Therefore, the proposed changes are not considered necessary to ensure that the RLDP is sound.

15.5 In response to the other issues, sufficient evidence for the reasons behind the

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policies is set out in the Minerals and Waste Background Technical Papers and the Plan meets the tests of soundness without the need for changes relating to these matters.

16. Consultation Process

16.1 The consultation process for the preparation of the RLDP is set out in detail in the Consultation Report. Responses received can be grouped into the following categories:

Accessibility

- Respondents stated that standard PDF formats were inaccessible to many disabled users, and that disabled people had to request accessible formats, violating the anticipatory duty under the Equality Act 2010 meaning that those needing alternative formats effectively had less time to respond.

Equality

- Respondents stated that the plan failed to demonstrate compliance with Article 14 of the Human Rights Act, the Equality Act 2010 and the Well-being of Future Generations (Wales) Act and the consultation process was seen as discriminatory under Sections 15 and 19 of the Equality Act.
- Respondents stated that the lack of published equality impact assessment raised concerns about due regard to equality duties.

Legal Compliance

- Respondents raised concerns the consultation did not align with the Delivery Agreement or Community Involvement Scheme and argued the RLDP failed procedural soundness tests.

Engagement Methods

- Respondents raised concerns the drop-in sessions were inconvenient and poorly attended and stated that the document should be broken down into smaller, topic-based sections for better accessibility.
- Respondents raised criticism of the Council's failure to engage with underrepresented communities and called for an additional round of consultation with improved accessibility.

16.2 In response to the comments it is considered that a comprehensive engagement process has been undertaken on the preparation of the RLDP over the last 4 years as set out in detail in the Consultation Report. This process has been undertaken in full accordance with the Delivery Agreement and Community Involvement Scheme agreed by Welsh Government and in

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accordance with the relevant Regulations and guidance. Given this it is considered the Plan meets the procedural tests of soundness without the need for changes relating to these matters.

- 16.3 In addition an Equality Impact Assessment has been undertaken in accordance with the relevant guidelines and is included as background paper to the Deposit RLDP.