



Local Development Plan 2021 > 2036

Cardiff Council - May 2026

Cardiff Replacement LDP Examination

Statement of Common
Ground between Cardiff
Council and Natural
Resources Wales



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This document is available in Welsh



Examination of Cardiff Replacement Local Development Plan

Statement of Common Ground

Between Cardiff Council and Natural Resources Wales

Introduction

1.1 This Statement of Common Ground has been prepared jointly by Cardiff Council (the Council) and Natural Resources Wales (NRW) (Representor Number 118) in relation to Cardiff Replacement Local Development Plan (RLDP) Habitat Regulations Assessment (HRA).

Matters agreed

1.2 The Council commissioned AECOM to prepare a HRA (January 2025) to support the Deposit RLDP. NRW commented on this in paragraphs 109 to 132 of consultation response CAS-274882-J6C3 (15 April 2025) (see Appendix A) as part of their formal representation on the Deposit RLDP (Representation 118.41).

1.3 The purpose of this statement is to record how those matters were addressed and confirm areas of agreement between the Council and NRW ahead of the RLDP Examination Hearing Sessions.

1.4 In response to NRWs comments, the Council commissioned AECOM to undertake further assessment of the potential impacts of the Deposit RLDP on the Severn Estuary European Marine Site (EMS). This resulted in an updated HRA (February 2026). NRW commented on the updated HRA in their consultation response CAS-301454-T5H7 (16 March 2026) (see Appendix B), welcoming the revisions made but identifying a small number of additional matters requiring further consideration. AECOM subsequently completed additional assessment work and produced a final HRA (April 2026) [CD06-Cardiff-Deposit-Plan-HRA-April-2026-en.pdf](#). NRW confirmed by email (16 April 2026) (see Appendix C) that the final HRA satisfactorily addressed the matters raised in their previous correspondence.

1.5 The final HRA has been submitted to the Examination Inspectors.

1.6 This Statement of Common Ground has been prepared to confirm the above matters and is agreed by both the Council and NRW.

7th May 2026

Cardiff Council

Stuart Williams

Natural Resources Wales

A handwritten signature in black ink, appearing to read 'Stuart Williams', written in a cursive style.

Appendix A: Natural Resources Wales’s consultation response CAS-274882-J6C3 (15 April 2025) on Habitat Regulations Assessment (January 2025)

Habitat Regulations Assessment

109. Under the Conservation of Habitats and Species Regulations 2017, you must undertake a HRA of the RLDP to determine whether the policies and proposals in the Plan are likely to have significant effects on any European site. If so, the HRA must then take a closer look at those potential effects through the Appropriate Assessment (AA), determining whether the Plan will adversely affect the integrity of European sites.
110. The HRA concludes that with the changes made in response to its recommendations, it is considered that the Cardiff RLDP contains a sufficient policy framework that no adverse effect would arise on Habitats either alone or in combination with other plans or projects.

Severn Estuary European Marine Site

111. We have identified the following issues that could make a material difference to the outcome of the decision-making process for this project. We consider these matters may be resolved through further assessment, further evidence, or amendments:

Marine and Coastal Physical Processes

112. Paragraph 3.20 refers to the loss of 38 hectares (ha) of intertidal sand and mudflats because of coastal squeeze, referencing our most recent condition assessment for the Severn Estuary SAC. We advise the Severn Estuary SAC Indicative Condition Assessment states there is a predicted loss of 641 ha of intertidal sand and mudflat across the whole SAC in the first Shoreline Management Plan (SMP) epoch (2005 – 2025), and an additional 38 ha of Atlantic salt meadow, again across the whole site over the same period.
113. We advise the HRA is updated following a review of our more recent [Guidance on the Assessment of Coastal Squeeze](#), in particular, Annex 1 Table 3. This document provides a more detailed breakdown of potential coastal squeeze losses for the Welsh shore of the Severn Estuary by policy unit. Policy units CAR1, CAR2, CAR3, and WEN1 are all relevant to the Cardiff frontage. The total predicted intertidal loss (intertidal sand and mud and Atlantic salt meadow) for these units is 30.14 ha for 2005-2025, and a further 55.5 ha for 2025-2055.
114. For paragraph 4.31 we advise the HRA should refer to Welsh specific evidence on the potential effects of coastal squeeze, including our [Guidance on the Assessment of Coastal Squeeze](#) and our Evidence Report 798 [Understanding the likely scale of deterioration of Marine Protected Area features due to coastal squeeze: Volume 1- Methodology: Understanding the likely scale of deterioration of Marine Protected Area features due to coastal squeeze: Volume 2- Results and Discussion](#).
115. For paragraph 5.19 we advise this should refer to our Indicative Condition Assessment for the Severn Estuary SAC, which identifies coastal squeeze as a reason for the conclusion of unfavourable condition. We agree with the conclusion reached that Likely Significant Effects (LSE) cannot be ruled out and coastal squeeze should be considered further in the AA.

116. For paragraphs 6.80 and 6.81, we advise SMP Policy Unit WEN 1 is also relevant to Cardiff's frontage and should be included.
117. Paragraph 6.84 states: 'Therefore, there will be no adverse effects of the Cardiff LP on the Severn Estuary SAC / SPA / Ramsar regarding coastal squeeze. The required statutory tests would have been undertaken and met at the planning level of the relevant SMP, as this is a legal requirement for all SMPs before they are adopted.'
118. We advise the first sentence is amended to say: 'there will be no additional adverse effects arising from the Cardiff LP due to coastal squeeze that haven't already been assessed through the SMP HRA.'

Marine Fish

119. Throughout the document, inclusions of the Ramsar site focus solely on the bird component and not the fish assemblage or the individual migratory fish species features. This should be rectified with the fish components given appropriate consideration within the HRA. However we are of the opinion that with appropriate assessment of marine fish, this should not change the overall conclusions of the HRA. We have identified the following sections of the HRA that should be updated.
120. The summary in 3.1 and 3.2 would benefit from the inclusion of text highlighting fish are also included within the Ramsar site, and particularly the importance for both migratory fish and the whole fish assemblage within the Severn Estuary.
121. Where migratory fish or the fish assemblage of the SAC/Ramsar are screened out at Test of Likely Significant Effect stage or screened into the AA within the HRA, we advise justification is provided.
122. Paragraph 5.12 states: '*It is unlikely that alterations in water flow will be impacting SPA / Ramsar species directly.*' While this may be the case for other species, alterations in flow have the potential to impact upon migratory fish or the fish assemblage designated under the Severn Estuary Ramsar site. The HRA should be updated to include this within the Test of Likely Significant Effect.
123. The corresponding AA on water quantity, level and flow is set out in paragraphs 6.57 – 6.63. Paragraphs 6.57 and 6.58 confirm the impacts of water quantity, level, and flow have been screened into the AA for the SAC, Ramsar and SPA sites. However, we presume fish features of the SAC and Ramsar sites have not been considered within the assessment. There is no reference of them in the explanatory paragraphs, unlike the other features.
124. Notwithstanding the above, we do not consider the conclusions of the AA should not change when fish features are included.

Marine Ornithology

125. We agree with the impact pathways identified for the Severn Estuary SPA and those taken further into AA (recreational pressure, functionally linked land, and coastal squeeze).

126. We also agree with the following conclusions of the AA for marine ornithology:

- Recreational boating - An increase in recreational boating is unlikely to cause a significant disturbance to wintering waders and wildfowl;
- Functionally linked land - '6.4.5 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 regarding its qualifying bird species. To demonstrate this, a survey will be required to determine the habitats and current site use to verify if the land parcel is indeed suitable for supporting a significant population of designated bird species.'
- Coastal Squeeze - There will be no adverse effect on the Severn Estuary SPA.

Marine Water Quality

127. We agree with the conclusions of the HRA that the Cardiff RLDP contains a sufficient policy framework that no adverse effect from water quality would arise on designated sites either alone or in-combination with other plans or projects.

Freshwater Fish

128. The upper catchment of the Nant Glandulas and its tributaries is already experiencing multiple pressures from existing development projects and abstraction points, including several silt pollution events reported in recent years from housing development sites near the watercourse. These incidents have impacted the health of the watercourse. Further development in this area has the potential to increase incidents occurring. This watercourse should be considered and assessed as a supporting habitat for some of the fish features of the Severn Estuary European Marine Site.

Cardiff Beech Woods Special Area of Conservation

129. We support and agree with the conclusions of the HRA in reference to Cardiff Beech Woods SAC.

130. The HRA (6.38) states, 'Since mitigation is likely to be most effective if coordinated in an SAMM, Cardiff should also work towards developing a mitigation strategy funded by a tariff on net new residential development and have an outline of such a mitigation strategy available by the time of Local Plan Examination.'

131. We fully support and welcome this. We are happy to work with your Authority on this strategy (also see *BG7: Severn Estuary and Cardiff Beech Woods Recreational Pressure* below).

132. At various points in the HRA there is reference to the potential impacts arising from neighbouring authorities both in relation to the Severn Estuary and the Cardiff Beech Woods. We suggest your authority liaise and collaborate with neighbouring authorities to ensure a consistent approach to addressing potential impacts.

Appendix B: Natural Resources Wales's consultation response CAS-301454-T5H7 (16 March 2026) on Habitat Regulations Assessment (February 2026)

Summary

Under the Conservation of Habitats and Species Regulations 2017, the planning authority must undertake a HRA of the Replacement Local Development Plan (RLDP) to determine whether the policies and proposals in the Plan are likely to have significant effects on any European site. If so, the HRA must then take a closer look at those potential effects through the Appropriate Assessment (AA), determining whether the Plan will adversely affect the integrity of European sites.

The updated HRA concludes that with the changes made in response to its recommendations, it is considered that the Cardiff RLDP contains a sufficient policy framework that no adverse effect would arise on Habitats either alone or in combination with other plans or projects.

Severn Estuary European Marine Site

We have identified the following matters for consideration.

Qualifying Features

1. There are additional sub-features of the Severn Estuary Special Area of Conservation (SAC) which should be considered for completeness. Notably:
 - Migratory fish (salmon, eel, sea trout and allis shad);
 - Assemblage of fish species (>100 species);
 - Internationally important populations of migratory bird species;
 - Internationally important populations of wintering bird species;
 - Assemblage of nationally important populations of waterfowl;
2. All are listed as a 'notable species sub-feature of estuary feature' for the SAC (see EMS Reg 33 Table 1, page 17. [The Severn Estuary / Mór Hafren](#)).
3. We recommend including sub features of the SAC Estuary feature in the qualifying features section of Chapter 3 of the HRA. However, we do not envisage this having an impact on the HRA conclusion.
4. The bird assemblage sub-feature of the SAC is addressed via the existing assessment of Severn Estuary Special Protection Area (SPA) and Ramsar features.

Marine Fish

5. We welcome the additional consideration and explanations included for marine fish in the Water Quality, and Water Quantity, Level, and Flow, sections of the Test of Likely Significant Effect (TLSE) and AA. However, there does not appear to be consideration for fish with regard to recreational pressures. Referring to paragraph 121. of our previous advice, we advise justification/explanation is provided where fish features are screened in or out in the TLSE and AA.
6. We welcome the inclusion of paragraph 5.12, outlining that changes in the volume of freshwater input to the estuary have the potential for direct impacts to migratory SAC fish species, as well as the Ramsar fish assemblage. We highlight fish can also be impacted through entrainment if fish screens are not used appropriately for water abstractions. This also applies to paragraph 6.62.
7. There appears to be a minor contradiction between paragraph 5.12 and the first sentence of paragraph 5.13. "In contrast, it is unlikely that alterations in water flow will be impacting SPA / Ramsar species directly." We suggest this sentence is amended to remove the contradiction, for example, "It is unlikely that alterations in water flow will **directly impact bird species of the SPA / Ramsar**. However, changes in the supply of freshwater to the estuary may have marked indirect effects on qualifying birds..."

Physical Processes

8. We welcome the inclusion of our guidance and evidence report in paragraph 4.32. However, there is a typographical error in this sentence "... (a proportional loss of approximately 95)." This should be 9%, not 95.

Appendix C: Natural Resources Wales's email (16 April 2026) on Habitat Regulations Assessment (April 2026)

Deposit Plan - Cardiff Replacement LDP 2021-2036 (Deposit Plan updated HRA) V2 - NRW Response NRW:01177005



South East Planning
To ● Riley, James (Basingstoke)
Cc ● Stuart Williams

Hi James,

Thank you for consulting us on the revised Cardiff Deposit Local Plan Habitats Regulation Assessment by AECOM (April 2026).

We are satisfied the changes made address the comments in our letter reference CAS-301454-T5H7 (16 March 2026).

Kind regards,
Sarah