

Jenny Rathbone

Member of the Senedd for Cardiff Central 2011-2026



May 14th 2026

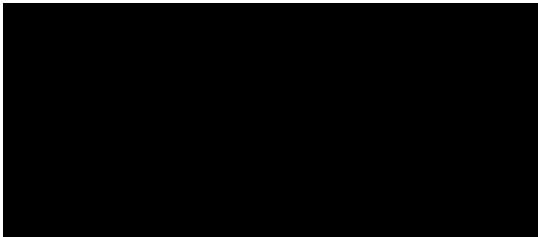
Dear Gareth Hall and Anthony Thickett,

Re **Hearing Session 2** on Land Use at County Hall on Wednesday June 10th

Further to my original submission, I wrote to the then Leader of Cardiff Council Huw Thomas on February 9th, setting out my concerns about recent planning decisions eating into Best and Most Versatile agricultural land concentrated around the development known as Cardiff Parkway. I attach this as Appendix 1.

I have not received a reply to my letter. I hope this can be discussed on June 10th 2026.

Yours sincerely



Enc Letter to Cllr huw Thomas dated February 9th 2026

Jenny Rathbone

Aelod o'r Senedd dros Canol Caerdydd

Member of the Senedd for Cardiff Central

Councillor Huw Thomas

Leader, Cardiff Council

By email

Senedd Cymru

165 Albany Road, Caerdydd, CF24 3NT



Welsh Parliament

165 Albany Road, Cardiff, CF24 3NT



February 9th 2026

Dear Huw,

Re: Protection of BMV in the latest version of the Draft LDP

Having commissioned some specialist research on how Cardiff could feed itself; I am concerned to note that proposals for the area around Cardiff Parkway appear to be in breach of the requirement to protect the Best and Most Versatile (BMV) agricultural land.

Planning Policy Wales (Edition 11), particularly Chapter 6 (Distinctive and Natural Places), places clear importance on the protection of Best and Most Versatile (BMV) agricultural land (Grades 1, 2 and 3a) and requires planning authorities to avoid its loss wherever possible, unless there is an overriding need and no reasonable alternatives.

I would welcome clarification on how the potential loss of BMV agricultural land associated with the Cardiff Parkway proposals has been assessed, including:

- The extent and location of BMV land within and adjacent to the KP2(H) South of St Mellons Business Park strategic allocation;
- How the cumulative impact on BMV land across the Wentloog Levels and surrounding areas has been considered, given the scale of strategic transport and employment proposals in the area;
- Whether reasonable alternative sites, including previously developed or less constrained land within the Cardiff–Newport corridor, were fully considered prior to proposing development on higher quality agricultural land.

I would request disclosure of any soil classification or land quality surveys relied upon to identify BMV land within the Cardiff Parkway area, including any mapping or technical reports used in the assessment.

I would also welcome clarification on how the Technical Advice Note (TAN) 15: Development, Flooding and Coastal Erosion policy considerations have been addressed.



Welsh Labour  **Llafur Cymru**

TAN 15 places a strong emphasis on avoiding development in areas at risk of flooding wherever possible and applying a precautionary approach where such development is considered. I note in particular:

- Paragraphs 1.6 and 1.7, which emphasise the importance of steering development away from areas of flood risk.
- Paragraph 6.2, which identifies Development Advice Map Zones C1 and C2 as areas subject to significant flood risk constraints.
- Paragraphs 6.2–6.6, which require development within these zones to meet the Justification Test, including demonstrating necessity, contribution to economic or regeneration objectives and that flood risk can be acceptably managed without increasing risk elsewhere.

Where land within these zones forms part of the Cardiff Parkway proposals, I would be grateful for clarification on how the requirements of TAN 15 have been applied, including how the Justification Test has been satisfied and how alternative, less constrained sites were considered.

The Cardiff Local Development Plan (LDP 2006–2026), relevant LDP policies include:

- KP2: Strategic Sites, including KP2(H) South of St Mellons Business Park
- KP6: New Infrastructure
- KP8: Sustainable Transport
- KP9: Responding to Evidenced Economic Needs
- EC1: Existing Employment Land
- EN1–EN14, particularly EN14: Flood Risk, which requires development proposals to demonstrate compliance with TAN 15

I would welcome clarification on the following:

1. Which areas within or adjacent to the Cardiff Parkway site are classified as BMV agricultural land; fall within TAN 15 Development Advice Map Zones C1 and/or C2; or are affected by other significant policy constraints.
2. How the TAN 15 Justification Test was applied to these areas, and what evidence was relied upon in reaching the conclusion that development was acceptable.
3. How the potential loss of BMV agricultural land was assessed in policy terms, including consideration of cumulative impacts and alternative sites, and any soil classification evidence used.
4. What technical assessments and site-selection or alternatives appraisals informed the final proposals.



I appreciate the complexity of delivering major strategic infrastructure and recognise the need to balance multiple policy objectives. My interest is in understanding how the relevant planning framework has been applied, particularly in relation to the protection of high-quality agricultural land and flood risk,. I would like to know how much consideration has been made of the volatile climate and state of global uncertainty which may mean the BMV land near Cardiff would have a critical role in securing the capital city's food security.

A written response addressing the points above supported, where possible, by relevant policy references, mapping and technical documentation, would be appreciated.

Yours sincerely,



CC Cllr Dan De'Ath, Cabinet Member for Strategic Planning

