



CARDIFF REPLACEMENT LOCAL DEVELOPMENT PLAN (RLDP) 2021-2036

Hearing Session 2 (Housing Strategy)

This Hearing Statement has been prepared and submitted by Boyer on behalf of Participant/ Rep No: 133: Taylor Wimpey (TW). The scope of which responds to the questions raised in respect of Hearing Session 2 (Housing Strategy) in accordance with the updated agenda published on 17th April 2026.

For completeness this Statement should be read in conjunction with all previous representations prepared by Boyer including:

- 250411 Cardiff RLDP Deposit Plan - Brummell Drive Creigiau (Written Reps) V3
- 2310005 Cardiff RLDP Preferred Strategy Brummell Drive (PS Reps)
- 220121 Cardiff LDP Growth Options Representations

Issue - Will the brownfield-first approach, only carrying over greenfield allocations, deliver?

2. Strategic

2.1 Do the figures attributed to the allocations and assumed windfalls take account of plan requirements such as, open space, play areas, allotments, food growing space, SuDs, 3:1 tree replacement, energy efficiency, securing good quality and sustainable design?

Having compared the current adopted LDP and emerging RLDP it's evident that two of the proposed strategic residential allocations are set to be carried forward. Most notably that includes Site Ref SH1.7 (Former Gas Work, Ferry Road) for 500 units and H1.1 (Land at areas 9-12, St Mellons) for 150 units.

According to the Council's online planning register neither of which benefit from planning permission however are expected to achieve the same quantum of development as when they were originally allocated back in 2016. Since then, it's important to recognise the fact that new legislative requirements have since come into force including Sustainable Drainage Systems (SuDS)/ SuDS Approval Body (SAB), Net Benefit for Biodiversity (NBB) and additional green infrastructure provision in line with Chapter 6 of PPW12.



Additional constraints imposed by these new policy requirements will inevitably reduce the amount of developable land available and in turn the overall number of dwellings physically able to be accommodated on site.

TW therefore maintain that the numbers for dwellings associated with proposed allocations ref. SH1.7 (Former Gas Work, Ferry Road) and H1.1 (Land at areas 9-12, St Mellons) need to be revisited to more accurately reflect the quantum of development actually able to be achieved on site.

Where necessary, this shall enable new sites which have been assessed in the context of the recent design, biodiversity and drainage requirements (such as Land at Brummell Drive, Creigiau) to come forward in order to account for the shortfall, thereby ensuring the RLDP is capable of effectively meeting local housing needs over the proposed plan period. The benefits of which shall also demonstrate the emerging plan is underpinned by a robust, proportionate and credible evidence base to accord with the requirements of Tests 2 & 3 of the Development Plan Manual for Wales (DPM) (3rd edition).

2.2 Do the figures attributed to the allocations and assumed windfalls take account of viability, particularly on brownfield sites which may be contaminated and plan requirements such as affordable housing, public transport, infrastructure, education in addition to those above?

LPA to provide the relevant information, however whilst it is assumed some form of viability will have been provided for allocated sites, windfalls by their very nature are ad hoc. In terms of brownfield windfall sites there is no assessment/guarantee that they would be deliverable and are more likely to be subject to contamination. Without such evidence brownfield sites should not be heavily relied upon. TW consider that it would be more appropriate for the allocation of additional greenfield sites, such as Brummell Drive Creigiau, which provide greater certainty with regards to deliverability.

2.3 Should the LDP specify minimum densities? (Policy SP3(1c) & SP4(ix)).

TW consider that any minimum densities will need to be evaluated on a site-by-site basis to respond to their individual constraints. Therefore, in the interests of soundness its important such circumstances are factored into Policies SP3 & SP4 to ensure a suitable level of flexibility is accounted for to avoid being overly restrictive.

2.4 Have the requirements of Policy H8 informed the windfall estimate?

TW acknowledge that Section 6 of Background Technical Paper 1 Housing (Evidence Document No 12) provides some high-level commentary on the potential losses to the Council's existing housing stock. This supposedly includes changes of use from residential to other alternative uses (Policy H8) based on the Council's historic planning records which have been factored into Cardiff's overall housing requirement.



That said, TW continue to have concerns regarding the overall feasibility of the proposed windfall allowance as a whole and by extension of which any underlying assumptions. When considered cumulatively the Council's windfall allowance (including small sites (653 homes), large sites (3,898 homes) & changes of use (1,096 homes)), along with the respective housing-led regeneration areas, are projected to facilitate a total of 9,397 new dwellings.

The Council's proposed Housing Trajectory (Appendix 7 of the Deposit Plan) does not provide any breakdown in terms of the anticipated delivery rates associated with the housing-led regenerations areas. This in itself highlights a shortcoming in that there does not appear to be any evidence to demonstrate which sufficient certainty that these housing-led regeneration areas are able to be delivered over the plan period.

TW recognises that Paragraph 5.3 of the Background Technical Paper 1 suggests that the proposed windfall allowance has been informed by historic delivery rates over the past 10-years. However, TW understand these figures has been over inflated due to the failure of large strategic site allocations to deliver the requisite number of dwellings over the adopted LDP period. This has subsequently accelerated the rate windfall sites have been required to come forward in order to account for the overall level of unmet need and increased demand.

Table 18 of the DPM specifies that although due regard must be attributed to analysis of past delivery rates, periods of abnormally high or low completions should be considered inappropriate/anomalies when extrapolating future rates of windfall sites. Moreover, given the challenges associated with demonstrating the deliverability of windfalls sites, as due to the nature the majority of which will be unknown when the emerging RLDP is formally examined. It is imperative that the LPA undertakes an Urban Capacity Study to demonstrate the proposed windfall allowance is actually achievable, alongside the additional Housing-led Regenerations Areas.

2.5 Has the requirement in Policy H9 to demonstrate no overriding need to retain the existing use on unallocated sites informed the windfall estimate?

LPA to provide information.

2.6 Only two non-strategic sites are allocated and these are still large, 90 and 150 units. The Housing Led Regeneration Areas have allocations from 200 to 2,310 units. HBF and others argue allocating only large sites discriminates against SME builders. Further redeveloping brownfield sites presents challenges that may be beyond the resources of smaller firms.

LPA to provide information.

2.7 Does the size of the allocations and the challenge of redeveloping complicated brownfield sites limit the number of developers able to contribute to meeting the housing targets? Should



consideration be given to allocating a range of smaller sites to provide flexibility in sources of delivery?

TW consider that it is imperative that the RLDP recognises that not all previously developed land is suitable for development. This position is clearly set out within PPW12 which emphasises the risks associated with over relying on such sites to come forward particularly given the need to deal with existing or previous uses which often requires extensive remediation works.

These factors have significant effects on the overall deliverability and viability of a scheme to come forward and in turn this often influences the type and number of developers able to be involved with such projects.

Allocating a range of smaller brownfield sites would not necessarily provide greater flexibility in sources of delivery, as the same constraints, viability and remediation issues are usually evident on all brownfield sites irrespective of their size.

In order to avoid such matters, the Council needs to identify other greenfield allocations to incorporate a more diverse portfolio of sites including those which are comparatively smaller and not subject to significant infrastructure works commonly associated with larger strategic allocations. Brummell Drive satisfies such criteria and would help maintain a more consistent supply of housing throughout the plan period, thereby contributing to the overall soundness of the emerging RLDP.

2.8 The core recreational catchment of the Severn Estuary Special Area of Conservation (SAC), Special Protection Area (SPA) and Ramsar sites and Cardiff Beech Wood SAC are 12.6km and 6km respectively. Policy BG7 resists development which would result in an increase in visitor pressure. LDP paragraph 7.395 indicates the best approach to mitigating recreation impacts at a strategic level, likely through contributions to Strategic Access Management and Monitoring (SAMM) or Suitable Alternative Greenspace (SANG). NRW point out a number of allocations are within the core recreation areas, SH1.2, SH1.4, SH1.5, H1.1, H2.2 & H2.3 and it is likely many windfalls will be too.

- i) When will a SAMM or SANG strategy be developed?
- ii) What is the impact of the need to produce a SAMM or SANG strategy on the delivery of the proposed allocations within the core recreation areas in terms of density, timing and financial viability?
- iii) Has this been factored into the estimates of windfalls?

CCC to confirm timescales for SAMM and/or SANG Strategy to be produced.

TW understand the process of preparing these types of reports/ strategies is often time intensive due to the different components involved and therefore will undoubtedly result in delays to the



proposed delivery of any allocations which fall within catchment of core recreation areas. As highlighted within NRW's response this includes:

- SH1.2 - Land south of the M4 Motorway, West of Rudry Road, Lisvane (Part of adopted LDP Strategic Site F)
- SH1.4 - Land south of Llantrisant Road (Part of adopted LDP Strategic Site D)
- SH1.5, - Land at Llantrisant Road (A4119) (Part of adopted LDP Strategic Site D)
- H1.1 - Land at areas 9-12, St Mellons
- H2.2 - Whitchurch Hospital/Velindre Site
- H2.3 - Cardiff Gate Business Park (West)

From a procedural perspective it is also important to recognise that Policy BG7 clearly states that development proposals which would result in an increase in visitor pressure on features of the Severn Estuary SAC, SPA, Ramsar site and Cardiff Beech Woods SAC, & land linked to the Severn Estuary Marine Site (EMS), will not be supported unless it can be demonstrated that the integrity of such sites is able to be maintained following the HRA staged process.

Having reviewed the evidence base which underpins the RLDP we are unaware of any information which demonstrates beyond doubt that these proposed allocations are able to come forward with sufficient mitigation in place.

This position is further reinforced within NRW's latest guidance (Version 5.1 published 09/02/2026) which explains that for the purposes of the Conservation of Habitats and Species Regulations 2017 (as amended), the Planning Authority is the "*competent authority responsible for undertaking the Habitats Regulations Assessment (HRA) to consider the implications of a plan or project on an SAC. As such, it is a matter for the Planning Authority to determine whether a plan or project is likely to have a significant effect on an SAC having considered this advice*".

To our knowledge, there is currently no clear evidence to demonstrate that the land required to facilitate the proposed SAMM and/or SANG Strategy is within the Council's ownership or control, is situated in a location capable of effectively intercepting nutrients within the relevant SAC catchment zones, and can be secured, managed and maintained for the lifetime of the developments it is intended to mitigate. In the absence of which there remains significant uncertainty as to whether the proposed SAMM and/or SANG Strategy would be capable of effectively mitigating the additional nutrient loading arising from future development. This, in turn, brings into question the deliverability of these sites over the emerging plan period and whether it can be concluded, beyond reasonable doubt, that the integrity of the relevant SACs would not be adversely affected.

The cumulative impact of which can often lead to significant delays in housing delivery, especially earlier on during the plan period, and on occasions the associated financial costs can prevent development from coming forward all together. Furthermore, it is reasonable to assume that some of these sites may well require the overall density of development to be reduced once the level of mitigation needed to achieve nutrient neutrality is better understood.

On that basis it is imperative that the Council allocates other sites including small to medium greenfield plots to help account for any unforeseen slippage and thus maintain a more consistent



supply of housing over entire plan period. In the interests of soundness priority should be given to those that are geographically located outside of the SAC catchment areas and thus are not reliant on strategic mitigation measures to be in place before development is able to be consented and ultimately commence on site.

For instance, given its location the site known as 'Land off Brummell Drive' represents a logical extension to the existing settlement of Creigiau. Not only does it remain outside of any of the relevant SAC catchment areas, but the site is also naturally well-contained by existing vegetation and benefits from excellent connections to a range of existing public transport networks along with active travel routes. These characteristics fully accord with PPW12 and would facilitate the delivery of much need affordable and full market housing in a highly sustainable location without relying on significant infrastructure improvements. The latter is particularly important to provide sufficient certainty that residential dwellings can be delivered in a timely matter in order to ensure the RLDP is capable of responding to local need, and thereby soundly prepared as per Table 27 of the DPM.

3. Site Allocations

H2.3 – Cardiff Gate Business Park (West)

3.1 - The northern parcel is bounded on 3 sides by commercial uses. Prospective residents would need to drive through an employment area and the site appears divorced from any facilities or services. Part of the northern parcel is used as a car park.

- i) Is the northern parcel suitable for residential use and does the allocation comply with LDP Policies SP4(iv & xii) and PC1?

The northern parcel of proposed allocation H2.3 (Cardiff Gate Business Park (West)) sits firmly within an established Enterprise Zone (EC.3 – Cardiff Gate Business Park). This raises concerns on whether the allocation is situated in a sustainable location given the existing business/commercial uses and associated activities present in the immediate surrounding area.

The area is characterised by a mix of office and commercial uses, and whilst not posing the amenity issues associated with traditional heavy industry or manufacturing, residential development in this location would appear divorced from the supporting services and facilities needed to satisfy the requirements of PPW12.

The parcel's compliance with policies SP4 (iv and xii) and PC1, are questioned. Any future development would depend on the provision of robust evidence that the site is no longer suitable for employment use. This allocation is in direct conflict with the Welsh Government's objectives set out within PPW12 & Future Wales: The National Plan 2040 in terms of the need to ensure existing employment land is suitably protected. The latter is crucial in attracting future investment to the region and shall act as a catalyst to enable housing to be delivered elsewhere, in more sustainable locations better connected to local services/ facilities, such as Brummell Drive, Creigiau.



As for placemaking, the inclusion of residential development would be incongruous to the existing character of the area and will likely result in an unsustainable pattern of development given the level of separation from local amenities required to support future residential occupants.

TW suggest that the withdrawal of application 22/00726/MJR indicates that proposed residential development at this location does not comply with the aforementioned policies.

- ii) Would the southern parcel be accessed off St Mellons Road, or Malthouse Avenue? If the latter, does having to drive through an employment area comply with the principles of good placemaking?

The aforementioned planning application on the Site (Ref: 22/00726/MJR) indicates that access to the Southern parcel would be provided off Malthouse Road. Upon further review TW consider that any access from St Mellons Road would not be appropriate given the convoluted route vehicles would need to travel to access the site. Therefore, future residents would have to access through the business park, which TW consider contradicts the principles of good placemaking.

H2.4 – Roath Dock (North Side)

3.2 - ABP own the site and has no intention to develop the site for housing. As housing cannot be delivered on this site should the allocation be deleted? If so should land be found to replace the estimated 316 units that would be lost?

TW consider that if the landowner, Associated British Ports (ABP), have no intention to develop the site for housing, then the allocation should be removed and additional, more appropriate sites should be found in order to replace the estimated 316 units that would be lost.

Given that ABP have no intention of releasing that land for residential development, the inclusion of this site with the Local Plan is considered to be contrary to the test set out within the DPM. On that basis the site is not considered to be freely available and thus fails to meet the requirements set out within Test 3 to demonstrate deliverability over the proposed plan period.

TW therefore consider that further allocations, such as Brummell Drive, Creigiau, must be identified to account for the deficit allowing the emerging RLDP to meet housing need up to 2036. Brummell Drive represents a suitable, deliverable and viable allocation for residential development within the emerging plan which lies immediately adjacent to an existing settlement. Creigiau is located in north-west Cardiff and benefits from a range of local services including a primary school, convenience store, post office, GP surgery and sports facilities. These characteristics emphasise the fact the settlement is well served by existing infrastructure and therefore constitutes one of the most sustainable locations for future housing.



Q3.3 - Notwithstanding the above, is Roath Dock (North side) suitable for residential development given the proximity of the port? (Policy MW6).

- i) Would developing this site for residential use comply with LDP Policies SP4(iv & xii) and PC1? Will the noise limits set out in paragraph 7.521 be achieved? Has any regard been given to air quality?

Having reviewed the Council's evidence base, TW suggest that the available documents do not demonstrate that residential development at this location can comply with RLDP policies SP4(iv & xii) and PC1. The same applies to the noise limits set out in paragraph 7.521 and concerns regarding air quality, which are not considered to be achievable.

Due to the site's location, adjacent to the existing industrial premises, TW suggest that achieving suitable separation distances will be difficult. In turn this shall reduce the site's net developable area and subsequent quantum of residential development.

Collectively, this adds additional complexity to delivering the level of mitigation required to safeguard residential amenity of future occupants along with associated costs. PPW12 embeds the "Agent of Change" principle, requiring developers of new, sensitive schemes (like residential) near existing noise/air quality generating development, such as the port, to mitigate impacts and implement these measures to ensure future development is acceptable in that respect.

There are significant questions raised regarding the necessary mitigation measures and any negative impact they will have on the overall deliverability and viability of any future scheme. As it stands the lack of evidence undermines the site's position as continued allocation which is not considered to accord with the requirements of Test 3.

- ii) What regard has been given to the operating conditions of existing businesses and the port? Would residential use undermine the LDP's aim of supporting the port and safeguarding wharves? (Policies SP9 & MW6).

Policy SP9 of the RLDP states that "*the operation of the port and ancillary uses should take precedence*". TW therefore consider that allocating land for residential use in this location would have a detrimental impact on both the current and future operations of the port and its associated facilities. This could result in a reduction to the operating hours of the industrial premises as well as the activities able to be undertaken on the surrounding area in order to account for additional provision to protect the amenity of nearby residences. It is therefore reasonable to assume that this, overtime, will have a negative impact on the functionality of the port and its longer-term vitality and viability.

Paragraph 7.5.62 of the RLDP states that "*it is necessary to ensure that existing wharves are protected, and that appropriate landing and distribution facilities are provided to ensure this important source of construction materials remains available*". Given this area is a key



employment generator that supports both Cardiff and the wider Capital Region, it is not considered an effective method of plan-making. TW therefore suggest that Cardiff, as a National Growth Area, is required to provide suitable employment provision in order to generate economic growth. The removal of this employment land for residential development is therefore contrary to the regional growth aspirations of Future Wales 2040 and the Cardiff Capital Region Strategic Development Plan. Furthermore, TW maintain that this is not consistent with other adopted plans across the region.

TW therefore consider that further allocations, such as Brummell Drive, Creigiau, must be identified to account for the deficit allowing the emerging RLDP to meet the housing need over the plan period.

H2.5 – Porth Teigr and Alexandra Head

3.4 - ABP own 7ha of the site and has no intention to dispose of it for redevelopment. Furthermore, ABP argue the developable area is around 11ha not 27ha (Figure 8 ABP's deposit representation).

i) Should the boundary of the allocation be changed to reflect this?

Yes, TW agree that the boundary of the allocation needs to be amended to reflect the actual Net Developable Area (NDA) of the Site. Under the promoters own admission, the NDA of the site is 11.2 ha which is a significant reduction compared to the current position. In the interests of soundness, TW maintain that over half of the site should be removed from the allocation to more accurately reflects the sites overall capacity and ensure the supporting evidence reflects this accordingly.

ii) What would be the revised estimate of units if ABP's land is taken out of the allocation/not released for housing?

According to ABP, they own 7ha of land included within the allocation for which they have no intension of developing for residential use, leaving a total of 20ha of land remaining.

The Draft Regeneration Strategy (2025-2030), although not formally adopted, sets out the desired placemaking requirements for future development within Cardiff. It states that *“future development should focus on creating compact, well-connected neighbourhoods with medium to high housing densities (approximately 50–100 dwellings per hectare)”*.

At the highest density, the revised estimate quantum of development would equate to 2,000 units. In turn this would lead to a reduction of 310 units in comparison to the current proposed allocation. As for the lowest density, this equate to 1,000 units thereby resulting in a shortfall of circa 1,310 units.

Alternatively, the original allocation accounted for approximately 85.5dph (2,310 no. dwellings/27ha). Once ABP's land is omitted the revised estimated quantum of development would equate to a total 1,710 units resulting in a reduction of 600 units.



Net Developable Area	Dwellings Per Hectare	Estimated Quantum of Development	Shortfall Compared to Original Allocation
20ha	100 dph	2,000 dwellings	-310 dwellings
20ha	85.5 dph	1,710 dwellings	-600 dwellings
20ha	50 dph	1,000 dwellings	-1,310 dwellings

Table 1. Assessment of Estimated Development Based on Different Dwellings per Hectare Scenarios for 20 Hectares

As shown in the table above, irrespective of which methodology is used, the position is clear that once ABPs land is omitted from the allocation there will be a shortfall of between 310, 600 or 1,310 dwellings. By virtue of which TW maintain that the proposed allocation needs to be updated accordingly to reflect the actual NDA available and thus ensure the supporting evidence base is proportionate to the site's physical capacity.

- iii) What would be the revised estimate of units be if ABP is correct regarding the developable area being 11ha compared to 27ha?

As mentioned above based on an average of 85.5dph for the site, TW maintain that if ABP are correct in that the developable area of the site is only 11ha. Then the revised estimate of units would be circa 940 units, thereby resulting in a deficit of 1,369 units when compared to the original allocation.

For consistency the table below also sets out the revised estimated quantum of development based on the highest and lowest dph suggestions set out within the Council's Draft Regeneration Strategy.

Net Developable Area	Dwellings Per Hectare	Estimated Quantum of Development	Shortfall Compared to Original Allocation
11ha	100 dph	1,100 dwellings	-1,210 dwellings
11ha	85.5 dph	940 dwellings	-1,370 dwellings
11ha	50 dph	550 dwellings	-1,760 dwellings

Table 2. Assessment of Estimated Development Based on Different Dwellings per Hectare Scenarios for 11 Hectares

- iv) If the site cannot deliver 2,310 units, should land be found to replace the units that would be lost?

For the RLDP to be considered sound and effective, the allocation should be amended in one of 2 ways:



- a) Remove the allocation entirely and replace the units lost (2,310) on other, deliverable land. The allocation has been in the local plan for 30 years, with no sign of development coming forward. TW therefore consider that this does not meet the criteria of Test 3 of the DPM in that the allocation cannot be delivered over the plan period.
- b) Amend the allocation to reflect the NDA associated with the reduced site area of 11.2ha which in theory could accommodate up to 940 units based on the current dph provision. Alternatively allocate further sites which are capable of delivering the remaining 1,370 units to ensure the requisite level of growth can be achieved.

From a plan-making perspective other sites (such as Brummel Drive, Creigiau) will also need to be identified to accommodate the residual number of dwellings to provide sufficient certainty that the RLDP is able to meet local need over the emerging plan period.

- v) Land was allocated for residential development here in the 1996 and 2016 plans but did not come forward. What evidence is there it will come forward now?

Having reviewed the RLDP evidence base TW are not aware of any change in circumstances or documentation to demonstrate deliverability and therefore query whether the site should be carried forward as a proposed allocation.

Table 18 'The Components of Housing Supply' within the DPM specifies that "*Allocations rolled forward from a previous plan will require careful justification for inclusion in a revised plan, aligning with PPW. There will need to be a substantial change in circumstances to demonstrate sites can be delivered and justify being included again. Clear evidence will be required that such sites can be delivered. The sites should be subject to the same candidate site process requirements as new sites i.e. they must be demonstrated to be sustainable and deliverable*".

As there has been a distinct lack of progress then TW consider that the site should be deallocated, and that house builder led sites (such as Land off Brummell Drive Creigiau) provide more certainty in deliverability and early development in the trajectory.

- vi) Would developing this site for residential use comply with LDP Policies SP4(iv & xii) and PC1? Will the noise limits set out in paragraph 7.521 be achieved? Has any regard been given to air quality?

Any future planning applications at the site would have to consider neighbouring land uses and whether residential development would be appropriate at this location.



- vii) What regard has been given to the operating conditions of existing businesses and the port? Would residential use undermine the LDP's aim of supporting the port and safeguarding wharves? (Policies SP9 & MW6).

According to the Employment Land and Premises Study which was published in March 2022 and can be found within the Evidence Base documents, Cardiff has a low supply of employment land. TW consider that the removal of this industrial land for residential development would only worsen this position. This is further evidenced by the fact that the landowner, ABP, have stated that they have no intention of releasing this land for residential development.

H2.5 – Hadfield Road

3.5 - The site lies in a commercial area and is bounded on 3 sides by commercial uses.

- i) Would developing this site for residential use comply with LDP Policies SP4(iv & xii) and PC1? Will the noise limits set out in paragraph 7.521 be achieved? Has any regard been given to air quality?

To avoid repetition please refer to answer under Question 3.3(i).

- ii) What regard has been given to the operating conditions of existing businesses?

No evidence can be found in relation to the operating conditions of existing businesses. Again, consideration needs to be given to PPW12 and the "Agent of Change" principle, requiring developers of new, sensitive schemes (like residential) near existing noise/air quality generating development to mitigate impacts and implement as part of ensuring development is acceptable. Considerable additional evidence is required in this regard.

- iii) Why is this site not included in EC3.10, Penarth Road Area (includes Hadfield Road and Bessemer Road) Protected Employment Land and Premises?

The southern part of allocation H2.5 is also included within allocation EC3.10. TW suggest that this is not considered effective plan-making and convolutes the position from a planning perspective by allocating the same parts of the site for different land uses.

TW also highlight that Cardiff is a National Growth Area and that suitable employment provision is required in order to generate economic growth. The removal of this employment land for residential development is therefore contradictory to the regional growth aspirations of Future Wales 2040 and the Cardiff Capital Region Strategic Development Plan. TW maintain that this is not consistent with other adopted plans within the region.



SH1.7 – Former Gas Works, Ferry Road

3.6 - This site was allocated for residential development in the 2016 plan but, with the exception of a temporary permission for 52 units which expires in 2030, has not come forward. What evidence is there it will come forward now?

- i) Given its former use, what evidence is there the allocation of 500 units is deliverable and can provide 20% affordable housing, open space, allotments and meet the other requirements such as education contributions required by the LDP?

According to the Council's Candidate Site Register (Evidence Document No 33) we are not aware of any evidence to demonstrate that Proposed Allocation SH1.7 is capable for being delivered over the proposed plan period.

Firstly, the site's former heavy industrial use is likely to have resulted in significant ground contamination. Comprehensive remediation works will therefore be required to render the land safe for long-term residential occupation. The scale and cost of such remediation will inevitably have a substantial impact on the overall viability of any scheme and, in some cases, prevent development from coming forward altogether if the abnormal costs prove extensive.

Secondly, it is understood that the site is within the Council's ownership and currently used to provide temporary accommodation. Under the Housing (Wales) Act 2014 the Council has a social responsibility to ensure that existing occupants are appropriately rehoused elsewhere within the city before redevelopment can proceed. This introduces an additional layer of complexity from a procedural standpoint, which in turn is likely to create further uncertainty regarding the timeframe for delivery. Similar to the position in the adopted LDP, given the circumstances it is not unreasonable to assume this may well extend beyond the RLDP's proposed period.

Thirdly, there are legitimate questions regarding the extent of the site's NDA once consideration is given to the amount of land needed to achieve policy compliant provision in respect of: i) public open space; ii) allotments; iii) biodiversity net gain; iv) green infrastructure; and v) SuDs/ SAB standards. Given the physical constraints of the site, it is unclear whether these can feasibly be accommodated whilst still achieving 500 dwellings, 20% affordable housing and other supporting infrastructure. TW therefore query whether the resulting form of development would meet Welsh Government expectations in respect of high-quality placemaking and thus conflict with the objectives of PPW12.

- ii) Is the site in Flood Zone 3 and, if so, what are the implications for the principle of allocating this site and delivery?

Whilst it will be for the Council to confirm the sites position in light of NRW's latest Flood Map for Planning, national planning policy and other relevant guidance. It is important to recognise that in accordance with TAN15 all residential premises are identified as a highly vulnerable development for the purposes of assessing flood risk.



H1.1 - Land at areas 9-12 St Mellons

3.7 - This site was allocated for residential development in the 2016 plan but has not come forward. What evidence is there it will come forward now?

i) According to NRW's Flood and Coastal Erosion Risk Map flood risk from the sea is low and flood risk from rivers is under review. What is the current situation?

For the Council to answer.

ii) Part of the site lies in Hendre Road Site of Importance for Nature Conservation. How has the step-wise approach informed the decision to carry over this allocation from the 2016 plan?

According to the Council's Candidate Site Register (Evidence Document No 33) we are not aware of any information to clearly evidence that the LPA's decision has been informed by WG's stepwise approach/ mitigation hierarchy. Furthermore, the DPM specifies that "*Allocations rolled forward from a previous plan will require careful justification for inclusion in a revised plan, aligning with PPW. There will need to be a substantial change in circumstances to demonstrate sites can be delivered and justify being included again*".

Based on the information available TW maintain that there are no substantial changes in circumstances to justify carrying forward the current allocation to the RLPD and therefore query the site's deliverability. By comparison there are equally sustainable sites (such as Land off Brummell Drive Creigiau) which would not have any adverse impact on nearby SINCs or other ecological designations. From a plan-making perspective these are sequentially more preferable and growth should be prioritised on those accordingly to ensure the plan is capable of effectively meeting local need up to 2036.

iii) The allocation lies within the core recreational catchment of the Severn Estuary Special Area of Conservation (SAC), Special Protection Area (SPA) and Ramsar sites. What are the implications for the principle of developing this allocation for housing and, if it is deemed appropriate, its delivery?

Whilst it will be for the Council to confirm whether the principle of residential development is acceptable or not as the case may be. To avoid duplication please refer to our response to Question 2.8 above.