

CARDIFF REPLACEMENT LOCAL DEVELOPMENT PLAN EXAMINATION**HEARING SESSION 2****10TH June 2026**

This Statement has been prepared on behalf of Associated British Ports (ABP) to provide further comments in respect of some of the Matters for discussion at Hearing Session 2: Housing Strategy.

It is not intended to repeat the comments already made by ABP in its Deposit Plan Consultation Response (DPCR) (dated April 2025).

Subsequently, a Statement of Common Ground (SoCG) has been agreed between Cardiff Council and ABP (dated 17th April 2026) that sets out those matters upon which agreement has been reached. It is noted that the plan included within the SoCG at Appendix 1 re-numbers allocation H2.5 to H2.4. For the purposes of this Statement, the references used in the Hearing Agenda are used.

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

Q2.2. 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?

In respect of allocations H2.4 and H2.5 as set out in the Deposit Plan, ABP considers that the figures did not take account of land availability within its ownership.

H2.4 – Roath Dock (North Side)

Q3.2. 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 the land be found to replace the estimated 316 units that would be lost?

The SoCG sets out the agreed deletion of allocation H2.4 at Roath Dock (North Side).

Q3.3 Notwithstanding the above, is Roath Dock (North Side) suitable for residential development given the proximity of the Port?

- 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?**
- 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).**

The ABP position is clearly set out in the DPCR and the SoCG. This site is within the operational jurisdiction of the Port and forms an important part of ABP's Estate. The previously proposed H2.4 allocation area included an operational marine aggregate wharf that must be safeguarded in accordance with national policy, and that stated elsewhere in the Deposit Plan.

Any residential development within this allocation would compromise the effective operations at the Port and the operating conditions of long established businesses thereby undermining the Plan's stated policies (SP9 and MW6) of supporting the Port.

In the context of the deletion of this allocation, the references to noise and air quality parameters are moot.

H2.5 – Port Teigr and Alexandra Head

Q3.4 ABP own 7ha. Of the site and has no intention to dispose of it for redevelopment. Furthermore, ABP argue that the developable area is around 11ha not 27ha.

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

Appendix 1 of the SoCG includes a Plan that reflects the discussions between ABP and CC on the proposed boundary changes to the allocation.

In respect of a specific area (i.e. 11ha.), the intention of ABP as set out in the DPCR was not to specify what that quantum should be, but rather to assist CC in identifying what areas are unavailable and/or considered to be unsuitable for development. The case set out in that submission and in the SoCG stands: that any allocation in close proximity to operational areas is inappropriate and has the potential to compromise ABP's operations and the safeguarding of the Port.

As such, ABP raises concerns around the appropriateness of this allocation and by extension the Test of Soundness, Test 2 'Is the plan appropriate?'. Furthermore, the key matters identified within the DPCR question whether this allocation will be effective and viable in its delivery against Test 3 'Will the plan deliver?'.

ii. 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?

ABP considers that the residual allocation of H2.5 has the potential to directly compromise Policies SP4 xii and PC1, and therefore impact on residential amenity and the quality of life of residents. The DPCR sets out ABP's position in respect of the proximity of the proposed development to its operations in respect of noise, air quality, and lighting and also its concerns about the application of the Agent of Change principle, which is clearly embedded within Planning Policy Wales (Edition 12).

iii. 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).

ABP was not party to any engagement or consultation by Cardiff Council prior to the publication of the Deposit Plan in respect of its existing or future operations in relation to the allocation. Since then, ABP has not been party to any technical assessment or consideration in respect of the potential impacts of the proposed mixed-use development within the currently proposed boundary.

It continues to be ABP's case that the allocation (even as amended) will have the potential to impact on the LDP's stated aim of supporting the Port. ABP's position on the appropriateness of the allocation remains as above and as set out in the DPCR.