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## CARDIFF COUNCIL REPLACEMENT LOCAL DEVELOPMENT PLAN EXAMINATION

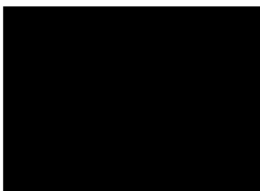
### RESPONSE TO MATTERS AND ISSUES – MATTER 2: STRATEGY

Please find enclosed, on behalf of, and under instruction from the landowner and promoting party, Mr Andrew Evans, a submission to the Examination of the Replacement Local Development Plan (RLDP) in relation to the site : Land at Goitre Farm, St Mellons (Site ID: CS54).

This submission comments on matters and issues raised by, and set out in, the Inspectors' Matters and Issues Agenda to cover Hearing Session 2: Strategy: *"Issue – Will the brownfield-first approach, only carrying over greenfield allocations, deliver?"*

We look forward to attending the Hearing Session in respect of the matter above in due course. In the meantime, we hope and trust that all is in order with the submission. Please do not hesitate to contact us in the event that further information is considered necessary and/or beneficial.

Yours sincerely,



**Geraint John**  
Director  
Geraint John Planning Ltd.

## PREFACE

This submission relates to the matters and issues raised by, and set out in, the Inspectors' Matters and Issues Agenda to cover Hearing Session 2: Strategy: *Issue – Will the brownfield-first approach, only carrying over greenfield allocations, deliver?*

Each of the relevant issues raised in relation to the above matters are considered in detail below.

### This Submission

It should be noted that these submissions do not respond to every question raised within the Inspector's Agenda, as not all of these questions necessitate a response by us, and/or earlier submissions made on behalf of the Landowners (Representor ID. 99) are considered sufficient to address the matters raised. Accordingly, these representations only provide responses to questions where it is considered necessary and relevant to do so.

For clarity, please note that we have not responded to the following questions/issues (principally at they relate to issues and sites which we have not made previous representations on):

- Questions 2.3-2.6;
- Question 2.8; and
- Question 3.5 – 3.7.

Notwithstanding this, all of the issues raised by the Inspectors have a bearing on the underlying supply of housing land, and contribute to our view and opinion that inadequate provision has been made in and by the Plan, and that further site allocations ought to be made.

The Representor objects to the proposed allocation of three sites that are identified as housing-led regeneration sites under Policy H2 'Housing-Led Regeneration Areas' in the Replacement LDP, and these are as follows:

- H2.3 – Cardiff Gate Business Park (West);
- H2.4 – Roath Dock (North Side); and
- H2.5 – Porth Teigr and Alexandra Head.

## QUESTIONS

*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?"*

As set out in paragraph 7.12 of the Deposit Plan, *"Masterplans will be developed for these areas in accordance with the master planning principles set out in Policy SP3 Ensuring a Masterplanning approach which will ensure the provision of necessary infrastructure and delivery of sustainable neighbourhoods."* Accordingly, given that no masterplans have yet to be developed for proposed allocations in the RLDP, it is unclear as to whether the figures attributed to each site and assumed windfalls are informed and underpinned by technical requirements and constraints. As such, this raises concern as to whether the attributed figures are achievable, and informed by comprehensive technical studies.

Moreover, residual land from the Strategic Sites within the LDP is to be allocated / carried forward under Policy H1A of the RLDP, specifically across Strategic Site D (North of Junction 33 on M4), and Strategic Site F (North East Cardiff). For Strategic Site D, a masterplan was developed as part of the outline planning application for the site (ref. 14/00852/DCO), however, this excluded the land that is to be allocated in the RLDP (SH1.4, SH1.5, and SH1.6). This is

equally the case for Strategic Site F and proposed allocations SH1.2 and SH1.3 where the land was excluded from any outline application within the Strategic Site, and has not benefitted from any other application since the adoption of the current LDP. These parcels of land were only included within the Schematic Frameworks that were prepared for the LDP, which are limited in detail, and were produced in 2016. As such, not only are any plans developed for these sites lack in detail, but also these plans were produced around ten years ago, and are considered to not be up-to-date and in accordance with the latest policy provisions, such as Chapter 6 of PPW relating to green infrastructure.

Accordingly, these proposed allocations under Policy H1A are not supported by any masterplan for their allocation, and raise concerns and doubt as to their deliverability in consideration of requirements such as green infrastructure, placemaking, sustainability, and other factors.

This is also the case for the three housing-led regeneration areas, given that these sites are considered to be constrained in terms of proposed development irrespective of the requirements identified in Q 2.1. The concerns relating to these HLRA's are summarised below, with further detail and content provided in our response to Question 3 'Allocations' within the agenda.

We have significant concerns regarding the deliverability of the HLRAs in the absence of any produced masterplan, as it is unclear as to whether their constraints have been considered in estimating their housing contribution over the Plan period. All sites are considered to be unsustainable for housing, and this is supported by the Council's assessments of the sites site within the Integrated Sustainability Appraisal (ISA) undertaken of the sites in 'Background Technical Paper 10 Candidate Site Assessment'. Moreover, no technical supporting assessment work has been submitted to evidence their suitability, including matters such as connectivity, drainage, flood risk, amenity impacts, green infrastructure, biodiversity and other technical considerations.

For reasons set out in detail in our response to Question 3 in these representations, it is considered that these sites are not suitable, available, acceptable, and deliverable as proposed housing-led regeneration areas, and should not be relied upon accordingly to make a contribution to the housing supply.

***"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?"***

Having reviewed the report 'Cardiff LDP Viability Testing' dated 30<sup>th</sup> May 2024 prepared by Avison Young, it appears that this adopts a 'high-level assumption' approach in order to inform the level of affordable housing that sites are capable of delivering.

It is not clear whether each brownfield site individually has been fully assessed, and as such, understood in terms of the viability issues that each might encounter during regeneration. The Report only looks to apply a lesser affordable housing target in order to account for any delivery issues. The conclusion states at Para 9.2.1 that *"We would suggest a level of 30% on greenfield, and 20% on brownfield may be an appropriate figure that would enable the release of sufficient value to cover infrastructure delivery, whilst maintaining a contingency to protect against cost and price variability."*

Accordingly, it is unclear as to whether the sites have been rigorously tested for viability in consideration of any on-site physical constraints – such as contamination / remediation and planning obligations. Demonstrating deliverability and viability is a key test of any proposed allocated site, as set out in the Development Plans Manual (2020), and links directly to the test of soundness (i.e. 'Will the plan deliver?'). As such, due to the absence of any viability being publicly available, it is unclear as to whether the sites are viable, and by association, deliverable in the Plan period.

***“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?”***

It is considered that the size of the larger allocations results in only a select few of housebuilder PLCs having the resources and ability to deliver such sites, and this is evident through the delivery of the strategic sites within the adopted LDP. The majority of the sites are being developed by PLCs such as Persimmon Homes, Redrow, and Taylor Wimpey, and in most cases, the sites are only being developed by one or two housebuilders. Accordingly, it is considered that the approach to allocate higher numbers of housing across a small number of sites constrains the ability for smaller housebuilders to make a valuable contribution to the housing supply. The Plan therefore relies on a few and select housebuilders to deliver the housing supply, which is not considered to represent a flexible approach in providing a variety sources of delivery.

As set out within these representations, we have significant concerns with the delivery of a number of brownfield sites within the Plan period of the RLDP, notably H2.3 ‘Cardiff Gate Business Park (West)’, H2.4 ‘Roath Dock (North Side)’, and H2.5 ‘Porth Teigr and Alexandra Head’. Our concerns appear to be shared by the Inspectors, who have identified a range of suitability, availability, and deliverability issues.

Given the above, we would submit that consideration ought to be given to allocating a range of smaller sites in order to improve and ensure flexibility in supply and delivery.

Over and above this, one mechanism that other Local Authorities across Wales have implemented is an Affordable Housing Exception Site Policy. This approach would allow for 100% affordable housing schemes to come forward outside albeit adjoining settlement boundaries. National planning policy sets out considerable support for the delivery of affordable housing in Wales, and that the planning system should accommodate such development where possible. Specifically, PPW12 sets out the following in para 4.2.35.– *“The provision of affordable housing exception sites must be considered to help meet identified requirements and ensure the viability of the local community.”*

Equally, other Local Authorities have also adopted an Affordable-led housing development policy, which allows for sites to come forward that deliver a minimum of 51% affordable housing. This approach was previously adopted in Swansea’s LDP (under Policy H5 – Local Needs Housing Exception Sites), and has proved to be successful in delivering affordable housing. It is considered that the inclusion of a policy of this nature adds greater flexibility to the Plan to deliver housing, in particularly affordable housing, which will help to meet identified needs over the Plan period.

Indeed, the RLDP recognises that such sites would make a valuable contribution to the delivery of affordable housing in Cardiff, where it is outlined on page 18 that *“The Replacement LDP will need to ensure a range and choice of homes are incorporated within new developments and identify affordable housing-led sites.”*

The Plan has not proposed any affordable housing-led sites to the contrary of the context set out within ‘The Cardiff Context and Key Issues’ chapter of the RLDP. The allocation of such sites would address the Inspector’s question in allocating a number smaller sites to increase flexibility of affordable housing delivery within the Plan. It is therefore considered that affordable-led sites are identified which would make a valuable contribution to meeting the identified need for affordable housing over the Plan period.

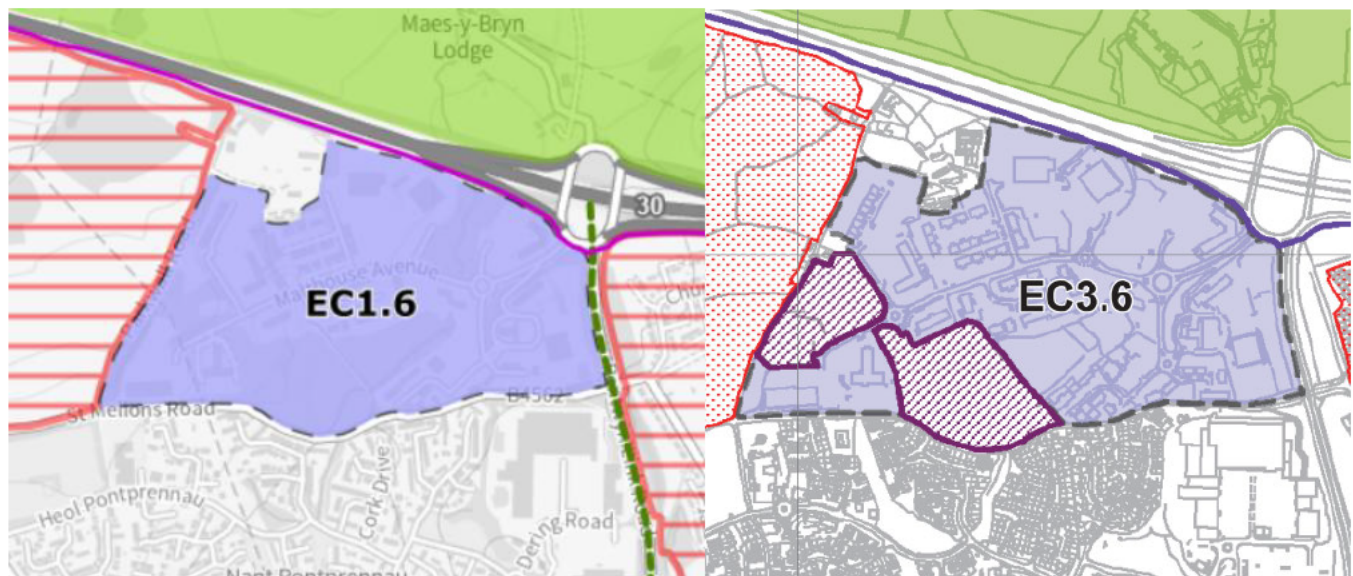
As a result, it is considered that further flexibility would allow for sustainable and deliverable sites to come forward to support housing delivery and to meet the housing targets. Greater sources of delivery would ensure that the housing supply is robust, and that there are different mechanisms in place to allow housing to come forward and yield over the Plan period.

### 3. Allocations

#### Policy 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.*

The location of housing in the Cardiff Gate Business Park is considered to be in conflict with the surrounding uses, which are predominantly employment, and this is further compounded by land’s status as an allocation for employment use in the adopted LDP (EC1.6 – Cardiff Gate Business Park). Extracts of the adopted and emerging Proposals Map are provided below for comparison / context:



Extract of Adopted LDP Proposals Map

Extract of Replacement LDP Proposals Map

The Employment Land and Premises Study (2022) does not recommend releasing any land within the Cardiff Gate employment allocation, but rather recognises its role in providing high-quality, and motorway-accessible employment provision in an important location in Cardiff. Accordingly, there is no justification within the report for the loss or release of any employment land within the strategic allocation.

Accordingly, the proposed release of employment land is considered to be at odds with the 2022 study, and is not based on any factual evidence or recommendations. As such, there is a lack of robust evidence to support the land’s allocation for an alternative use, and moreover, is not consistent with national planning policy (PPW 12 – para 5.4.4) which sets out that employment land should be protected where possible – and its loss justified accordingly.

In respect of the RLDP Background Technical Paper 2 ‘Economic’, whilst it outlines a proposed boundary change to the existing allocation to account for the two proposed parcels of housing-led regeneration, it does specify that these areas are subject to a residential-led (outline planning application (ref. 22/00726/MJR). However, this application was subsequently withdrawn in October 2024. The application only sought approval for residential use (120no. homes) on the southern parcel, and therefore, it is uncertain as to whether the estimated figure of 200no. homes within the RLDP can be delivered at the site. Therefore, the deliverability of the site for a housing-led scheme is seriously questioned.

In terms of the acceptability of the site as a housing-led regeneration, in respect to the northern site This is particularly the case for the southern parcel, which would be detached and divorced from the housing commitment, and would not be integrated into the wider development or have any natural connection. This is compounded by the existing employment uses located to the west of the parcel, which would act as a physical barrier between the residential development of this parcel and the adjacent housing commitment.

Indeed, the Inspector appears to share our concerns regarding the location of this proposed allocation, given its sitting within the employment park, and that it is bounded by commercial uses on its boundaries.

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

In terms of the northern parcel's compliance with Policy SP4 (iv & xii) in the RLDP, as set out within these representations, the Council's 'Background Technical Paper 10 Candidate Site Assessment' identifies the site to not be in a sustainable location – as demonstrated in the Council's ISA Assessment of the site in the table below:

ISA criteria		Proposed use	WIMD	Primary school	Second. school	Health centre	GP	Allotments	Hub	PRoW	Housing	Air quality mgm	SPA/Ramsar	SAC	SSSI	LNR	SINC	Bus stop	Train station	Local centre	District centre	Historic landsc	Historic park&G	Ancient monum	Conserv area	Archaed sens	Employment	Prev devel land	Agric land qual	Spec landsc area	Water body	Flooding
52	Cardiff Gate Busin. Park	M	1	Green	Red	Red	Green	Red	Red	Red	White	Green	Green	Green	Green	Green	Yellow	Green	Red	Red	Red	Green	Green	Green	Green	Green	Green	Red	Yellow	Green	Red	Green

Extract of H2.2 ISA Assessment

In light of the above, it can be concluded that the site is not within acceptable walking distance of key local uses – such as a local or district centre, as well as a health centre, hub, and train station. It is therefore considered that the development of the northern parcel fails to comply with Policy SP4 (iv).

In terms of SP4 (xii), given the northern's parcel separation from any adjoining residential area, it would not naturally connect positively to surrounding communities, and instead be divorced – prohibiting any integration with residential uses. Whilst the parcel of land is located on the boundary of a Housing Commitment in the emerging Plan, the site still sits within the boundary of the business park. By way of its location, it has a stronger inherent relationship with the employment uses within the park as compared to the housing commitment. Accordingly, the development of the parcel would fail to meet the criterion of this Policy, and therefore, its suitability as an allocation is undermined. This is a view shared by the Inspector where they outline that *"The northern parcel is bounded on 3 sides by commercial uses."* We would therefore suggest that the northern parcel is not in compliance with the key criteria relevant to the site under Policy SP4.

With regards to Policy PC1, as set out in these representations, it is unclear as to whether detailed assessment work has been undertaken to evidence the site's acceptability as an allocation, including air, noise, and contamination assessments. The site is located approximately 350m from the motorway, and therefore, it is likely that both noise and air quality mitigation will be needed, including potentially the consideration of buffers within the site – which may impact the quantum of housing delivered. Equally, the contamination of the site would need to be determined, particularly as to whether remediation is required, and if so, how this affects the viability of the site.

**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?**

In response to question ii, in respect of the southern parcel, any access to the site from St Mellons Road is not considered to be acceptable, given this currently comprises a country road (currently national speed limit) and which has no crossing points or pedestrian connectivity. Significant existing green infrastructure would also need to be removed to facilitate a highway connection in this location – which would not be considered acceptable in biodiversity and arboricultural respects. Accordingly, it is assumed that access to the site would be from Malthouse Avenue, and as outlined by the Inspector, would require travel through the existing business park.

Overall, we consider the site to be unsuitable and undeliverable for housing. The incompatibility of residential development adjacent to, and accessed via employment land, and the detached and divorced location of the site are, we note, apparent concerns shared by the Inspectors. It is therefore considered that the site should not be identified as a housing-led regeneration site in the RLDP, given that it is not considered to be deliverable, and therefore, would undermine the 'soundness' of the Plan as a whole.

## H2.4 – Roath Dock (North Side)

Firstly, it is considered that this site is significantly constrained in respect of flood risk, given that the majority of the site lies within Flood Zone 2. Over and above this, areas of Flood Zone 3 are present within the southern portion that abuts the dock. This constraint is considered to be insurmountable, given that residential use is classed as 'more vulnerable' under TAN 15, where residential proposals are not considered to be acceptable. Accordingly, this is a fundamental policy constraint of the site, and no supporting assessment work has been provided to evidence the contrary, and in turn, confirm that the site is deliverable as a housing-led regeneration area.

***"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?"***

Given that the landowner of the site (ABP) has no intention to develop or dispose the site for housing, as confirmed by the Inspector, this raises fundamental deliverability concerns with the proposed allocation of the site, and its proposed contribution of 316no. units to the RLDP housing supply. In line with the Inspector's question, the site should be removed as a housing-led regeneration site within the RLDP, and a replacement site / sites ought to be identified to offset any loss. Failure to do so undermines the robustness and soundness of the housing supply that underpins the RLDP, and as such, this would result in a shortage of housing delivered over the Plan period relative to the identified need.

Evidently the site is not available for housing, and moreover, for the reasons set out below, is not considered to be suitable in any event as a housing-led regeneration site.

***"3.3 Notwithstanding the above, is Roath Dock (North side) suitable for residential development given the proximity of the port? (Policy MW6)."***

As set out above, in the absence of any masterplan for the site, or any publicised technical assessment work, it is unclear as to whether mitigation is required to protect the amenity of the future residents from the operation of the port, and if mitigation is required, whether this has been built into any masterplan. The location of the site relative to the port is likely to raise amenity concerns relating to noise, air quality, and light pollution, to the detriment of residents within the site. The relevant mitigation that would be needed to make any residential use acceptable in planning terms would need to be assessed as part of any viability work

It is therefore very likely that the proposed residential use of the site would be in conflict with the operation of the port, and therefore, the site should not be allocated accordingly in the RLDP.

- 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?"***

In addition to our concerns relating to the principle of the site for residential use, as well as the likely amenity impacts that would be brought about on future residents, it is also considered that the site is not in a sustainable location for housing. The Council's assessment of the site undertaken and set out in 'Background Technical Paper 10 Candidate Site Assessment', confirms this position, as illustrated below:

ISA criteria		Proposed use	WIMD	Primary school	Second. school	Health centre	GP	Allotments	Hub	ProW	Housing	Air quality mgm	SRA/amsar	SAC	SSSI	LNIR	SINC	Bus stop	Train station	Local centre	District centre	Historic landsc	Historic park&G	Arc/ent monum	Conserv area	Arc/aeol sens	Employment	Preveland	Agric land qual	Spec landsc area	Water body	Flooding	
8	Roath Dock North	M	1	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green

Extract of H2.4 ISA Assessment

As outlined in the above table, the site is not located within walking distance to key services and facilities, and would therefore not be in compliance with Policy SP4 (iv). It is therefore assumed that residents would have to rely on the use of private vehicles in order to access their everyday needs.

In terms of criterion xii of Policy SP4, as evidenced in these representations, the development of the site is not considered to be compatible with the surrounding uses and constraints, which would likely bring about unacceptable amenity impacts on future residents. Accordingly, the site would fail to meet the requirements of this criterion, and overall, would not be acceptable under Policy SP4. This is equally the case for Policy PC1 which seeks to ensure that development would not result in unacceptable harm to local amenity because of air, noise, light pollution and/or unacceptable levels of land contamination – all of which are considered to be constraints associated with the site.

- 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).*

As stated above, it is considered that the residential use of the site would conflict with the operations of the port, and would undermine the RLDP's aim of supporting the port and associated businesses / operations. The deliverability of the site is further questioned as a result.

## 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?*  
*ii. What would be the revised estimate of units if ABP's land is taken out of the allocation/not released for housing?*  
*iii. What would be the revised estimate of units be if ABP is correct regarding the developable area being 11ha compared to 27ha?*  
*iv. If the site cannot deliver 2,310 units, should land be found to replace the units that would be lost?*

As set out by the Inspector, a large part of the site is clearly undeliverable due to the site's ownership position of ABP, as set out in their Deposit Plan representations – where they outline that ABP has no intention to dispose of the land for housing in the Plan period.

There appears to be no evidence or support that the site will come forward within the Plan period, and as a result, this would significantly affect the ability to deliver the estimated number of dwellings set out within Policy H2. Accordingly, as suggested in the Inspector's questions (i-iii), the site boundary of the proposed allocation should be amended, alongside the revised number of homes that can be realistically delivered within the site.

It is expected that the quantum of housing delivered within the site would significantly decrease as a result of the identified landownership, and as suggested in question iv, alternative land within Cardiff should be identified to offset the loss of housing at the site. ABP's representations suggest that only 11ha of the allocated 27ha is deliverable (i.e. less than half the site). In any event, the delivery of this site for 1,310no. homes (with a capacity up to 2,310no. homes) is seriously questioned, and a revised site boundary and estimated housing figure should be provided accordingly – along with the supporting assessment work evidencing that the residual land is deliverable for residential use.

Replacement sites should then be identified to make up the loss of housing at this site, to ensure that the overall housing supply remains robust and achievable – which it fails to demonstrate in its current form.

**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?**

As set out above, we raise serious concerns to the deliverability of the proposed site, and it is not considered that supporting evidence has been provided to demonstrate that the site can deliver the estimated number of homes over the Plan period. This is compounded by the flood risk position of the site, where parts of the site lie within Flood Zone 3, which prohibits any development for residential use. In the absence of any masterplan, it is unclear as to whether the figures attribute to the site have considered the flood risk position, or any other physical constraints that might be present within the site’s boundaries. A site of this scale should be supported by significant evidence to demonstrate that it is suitable, available, deliverable, and therefore, acceptable as a key housing-led allocation in the Plan.

Accordingly, it is considered that there is no publicised evidence that supports the site as a housing-led allocation in the Plan, and notwithstanding the landownership position of the site, it is not considered that the site is deliverable – at least for the number of homes identified in the housing supply.

Moreover, as set out by the Inspector, the site is identified as a ‘housing commitment over 500 homes’ in the adopted LDP, however, no planning application has been submitted to-date. It is not considered that the site has been supported by substantial evidence to carry it forward in the RLDP, and to identify the site as delivering 1,310no. homes, making up a large proportion of the housing supply proposed under Policy H2. As such, there is no evidence provided that confirms the site will yield its estimated housing supply in full over the Plan period, and this undermines the soundness of Policy H2.

**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?**

The site is predominantly located in the Cardiff Docks area, where there are no existing services and facilities to meet the everyday needs of residents – including education provision. The existing area comprises industrial / employment uses, and is separated from any existing residential area by the Roath Basin. This is recognised in the ISA undertaken for the site in ‘Background Technical Paper 10 Candidate Site Assessment’, with the table detailing the assessment of the site below:

ISA criteria		Proposed use	WIMD	Primary school	Second. school	Health centre	GP	Allotments	Hub	ProW	Housing	Air quality mgm	SPA/Ramsar	SAC	SSSI	LNR	SINC	Bus stop	Train station	Local centre	District centre	Historic landsc	Historic park&G	Ancient monum	Conserv area	Archaeol sens	Employment	Prev devel land	Agric land qual	Spec landsc area	Water body	Flooding	
4	Porth Teigr & Alexandra Head	M	1																														

Extract of H2.5 ISA Assessment

As clearly demonstrated in the above table, the proposed allocation scores poorly in access to key services and facilities, and therefore, is not considered to be an inherently sustainable location. As such, the site fails to meet the requirements of criterion iv of Policy SP4, and should not be allocated for housing on this basis in the RLDP accordingly.

In terms of criterion xii, and equally PC1, it is unclear as to what potential impact may arise from the operations of the port upon the residential amenity of future occupiers of the site – particularly in respect of noise. It is considered that robust noise assessments should be undertaken to evidence that the operational noise would not bring about undue effects on future residents, including both existing operations and any future planned expansions. The same should also apply for air quality, to determine that no effects would be brought about on residents. Without such assessments and the necessary mitigation, it is not considered that the site would meet either criterion xii of SP4 or PC1.

- vi. *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)."*

As outlined above, it is currently unclear as to what impacts might arise from the operation of both the existing businesses and the port on the amenity of future residents. This is a key consideration in the acceptability of the site, as it is likely that detailed mitigation will be required, which will need to be considered within the viability of the site.

## Conclusion

In summary, it is considered that the sites - H2.3 'Cardiff Gate Business Park (West)', H2.4 'Roath Dock(North Side)', and H2.5 'Porth Teigr and Alexandra Head' should not be allocated for residential use in the RLDP (and by association, form part of the housing supply), given that there are serious concerns and questions regarding their suitability, availability, viability, and deliverability. As such, their inclusion within Policy H2 as housing-led regeneration areas brings into question the overall deliverability of the Plan, and whether its housing supply is robust and sound. On this basis, the RLDP would fail to meet the test of 'Soundness', and therefore, contrary to the requirements of the Development Plan Manual.