

Cyfrol Un / Volume One
Sylwedyddion / Representatives 1 - 50

Rhif Sylwedydd / Representor Number:	1
Rhif Sylw / Representation Number(s):	1.01,1.02, 1.03
Enw Sylwedydd / Representor	Stephen Lingwood

From: [REDACTED]
To: [Local Development Plan / Cynllun Datblygu Lleol](#)
Subject: Local Development Plan consultation
Date: 26 March 2025 12:32:26

EXTERNAL: This email originated from outside Cardiff Council, take care when clicking links.

ALLANOL: Daw'r e-bost hwn o'r tu allan i Gyngor Caerdydd, cymerwch ofal wrth glicio ar ddolenni.

Dear Sir/Madam,

I wish to raise the following points in relation to the Local Development Plan.

I think the priority should be to build a beautiful liveable city where everyone has a view of green (trees/bushes) from their windows. Buildings are beautiful, distinctly Welsh, distinctly Cardiff, built to last, and not need demolishing in 40 years' time, resilient for extreme weather caused by climate change, connected to green energy, and not gas, affordable, and with connected public transport. Where possible historic Cardiff buildings should be preserved.

I must say that I am reasonably computer literate but I found your virtual consultation and websites to be utterly baffling and not reasonable to expect the average citizen to be able to digest what is proposed and what the questions are. I found it entirely confusing and impenetrable.

Please acknowledge receipt of this email.

Yours sincerely,

Stephen Lingwood,
[REDACTED]

Rhif Sylwedydd / Representor Number:


2

Rhif Sylw / Representation Number(s):

2.01

Enw Sylwedydd / Representor Name:

Tamsin Graves

From: 
To: [Local Development Plan / Cynllun Datblygu Lleol](#)
Cc: [Gilbert, Simon](#)
Subject: Adborth i'r Cynllun Datblygu Lleol newydd
Date: 25 March 2025 17:29:17

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ALLANOL: Daw'r e-bost hwn o'r tu allan i Gyngor Caerdydd, cymerwch ofal wrth glicio ar ddolenni.

Annwyl Cyngor Caerdydd

Hoffwn roi adborth ar gynnwys Adroddiad Ionawr 2025 ar y Cynllun Datblygu Lleol newydd.

Rwyf wedi gweld Caerdydd yn newid yn ddirfawr ers fy mhientyndod yma yn y 1960au.

Mae'r prif newid wedi bod yn y tirlun naturiol a hanesyddol.

Mae'r Cynllun diweddaraf fel petai yn parhau i flaenoriaethu cyllid, cynllunio a datblygu ar gyfer lliaws o adeiladau dilun, digymeriad, sy'n edrych fel petai rhannau cynyddol o Gaerdydd eisiau edrych fel Manhattan.

Teimlaf bod yn Cynllun yn anwybyddu angen dinasyddion Caerdydd ar gyfer mwy - o ran maint a nifer - o ardaloedd gwyrdd naturiol.

'Dyn ni hefyd angen gweld sicrwydd bod adeiladau hanesyddol yn cael eu gwarchod mewn cyd-destun gweledol addas.

Nid wyf yn cael yr argraff bod y cynllun yn diogelu mannau gwyrdd na'r etifeddiaeth hanesyddol rhag agosatrwydd adeiladau anghydnaws sydd a'u huchder yn taflu cysgodion dros yr ardaloedd hyn.

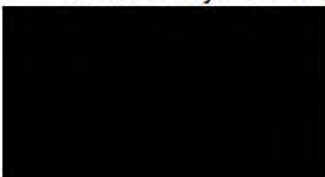
Byddai'n dda os byddai'r Cynllun yn parchu dyhead dinasyddion am bensaerniaeth atyniadol a golygfeydd sy'n bleser i'r llygaid o ran mwy o wyrddni a llai o dyrau concrit mor uchel.

Hoffwn weld y Cynllun yn ystyried prydferthwch y tirlun dinesig, ac yn son am fuddsoddi mewn boddhad gweladwy ac emosiynol y gymuned leol trwy hafannau naturiol, a thrwy adeiladau sy'n hardd.

A fyddwch gystal a chydabod derbyn fy sylwadau os gwelwch yn dda?

Yn gywir

Tamsin Llwyd Graves (Mrs)



Dear Cardiff Council

I would like to provide feedback on the content of the January 2025 Report on the replacement Local Development Plan.

I've seen Cardiff change drastically since my childhood here in the 1960s.

The main change has been to the natural and historic landscape.

The latest Plan seems to continue to prioritise funding, planning and development for a multitude of unsightly, characterless buildings, making an increasing number of areas of Cardiff look as though they want to resemble Manhattan. I feel that the Scheme ignores the need of the citizens of Cardiff for more – in terms of size and number - of natural green areas.

'We also need to see assurance that historic buildings are protected in suitable visual context.

I don't get the impression that the scheme protects green spaces nor the historical heritage from the proximity of incompatible buildings whose height casts shadows over these areas.

It would be good if the Plan respected citizens' desire for attractive architecture and pleasant views in terms of more greenery and fewer tall concrete towers

.

I would like to see the Plan take into account the aesthetic appeal of the urban landscape, and talk about investment

in the visual and emotional satisfaction of the local community with natural havens, and buildings that are beautiful.

Will you please acknowledge receipt of my comments?

Rhif Sylwedydd / Representor Number:

3

Rhif Sylw / Representation Number(s):

3.01 – 3.08

Enw Sylwedydd / Representor Name:

Helena Fox

From: [REDACTED]
To: [Local Development Plan / Cynllun Datblygu Lleol](#)
Subject: RLDP : consultation response
Date: 25 March 2025 11:05:14
Attachments: [H Fox Deposit RLDP comments March 2025.docx](#)

*** Warning: This email contains a Microsoft Office (Word, Excel, PowerPoint) or Adobe PDF attachment. Although this email has been scanned for threats, please think before opening attachments from unrecognised senders.

Rhybudd: Mae'r e-bost hwn yn cynnwys atodiad Microsoft Office (Word, Excel, PowerPoint) neu PDF Adobe. Er bod yr e-bost hwn wedi'i sganio ar gyfer unrhyw fygythiadau, meddyliwch cyn agor atodiadau gan anfonwyr nad ydych yn eu hadnabod. ***

Please find attached my response to the RLDP consultation.

Many thanks,

Helena Fox

THE CARDIFF REPLACEMENT LOCAL DEVELOPMENT DEPOSIT PLAN

1. I support the Deposit Plan, a realistic response to the National Plan for Wales (Future Wales), Cardiff Council's One Planet Strategy, declared in 2019 and the City-wide Nature Emergency declared by the Council in 2021. I am pleased there is clearly no need for new green field sites.
2. That more than 1,500 homes at the Plas Dwr Strategic Site will not be completed by 2036 delays the completion of community centres and other public facilities that a new community needs.
3. With more than 8,000 people on Cardiff Council's housing waiting list the proposal in the Preferred Strategy "to deliver 5,000 to 6,000 affordable homes" is disappointing and is contrary to Future Wales' policies that at least 50% of the 66,000 houses in the South-East Wales region "need to be home affordable."
4. I am pleased that Policy SP17 Managing Spatial Growth through Settlement Boundaries impose a strict control on development of the countryside.
5. I support the rejection of Candidate Sites 23 (Plas Dwr Uchaf), 61 (Goetre Fawr) and 80 (Cwm Farm) which were proposed for housing on the basis that:
 - the sites are outside settlement boundaries proposed in SP17;
 - they are clearly not needed for further housing need;
 - current demand for housing on allocated strategic sites is low;
 - each of the sites has clear environmental and natural advantages and their development would be against the Council's One Planet Strategy and Nature Emergency
6. It is excellent that the Deposit Plan proposes no new greenfield development over and above the Strategic Sites in the current LDP, and also that para 6.131 states that Cardiff's countryside is a "valuable and finite resource which is under pressure from all kinds of development due to its proximity to the urban area.....Cardiff's countryside is particularly vulnerable to the cumulative impact of new developments that may harm its character and appearance."
7. I am pleased that the Deposit Plan allocates considerable amounts of land in NW Cardiff as "countryside to be enhanced and protected: - especially in Radyr and Morganstown which has a very low level of public open space.
8. I had significant concerns about transport in the current LDP. Policies T1 to T6 rely on huge assumptions, unrealistic in NW Cardiff. The Council's Transport White Paper is now five years out of date with vague cost estimates. The Cardiff Cross Rail tram-train line - a game-changer for NW Cardiff - may not be complete or even started by 2035 – this is very disappointing.
9. I am pleased with improvements to the Valley Lines through electrification and increased passenger capacity.
10. Active travel plans continue to fail to take account of the hills and lack of pavements in NW Cardiff which deter less active people. We need fully integrated public transport to reduce car use.

Helena Fox, March 25 2025

From: [REDACTED]
To: [Local Development Plan / Cynllun Datblygu Lleol](#)
Subject: Response to consultation on the Deposit RDLF
Date: 23 March 2025 18:00:34

EXTERNAL: This email originated from outside Cardiff Council, take care when clicking links.

ALLANOL: Daw'r e-bost hwn o'r tu allan i Gyngor Caerdydd, cymerwch ofal wrth glicio ar ddolenni.

Dear Sir

1. Thank you for notifying me of the new consultation phase for the Deposit RDLF. We note the change in the wording of policy C2 with the emphasis which is given to paragraph (iii) to the value of community facilities which support the opportunities for pupils of schools in the area. We support this proposed change and think it is an important acknowledgement of the value which many sports clubs play in supporting the work of schools and is consistent with the wording in C4 which acknowledges the value of schools facilities for the community.
2. However as currently drafted paragraph (iii) would only protect sites where they were not surplus to the needs of the community **and also** playing a part in supporting the educational, cultural or sporting opportunities available to pupils of schools in the area. We wonder if the intention is for the reference to "*support for the educational, cultural or sporting opportunities available to pupils of schools in the area*" to pick out and articulate an important example of a particular way that a facility may meet the needs of the community. We therefore suggest the amendment shown below. Without that change the concern is that only sites where part of the community value was "*support for the educational, cultural or sporting opportunities available to pupils*" would be protected, but sites whose community value lay in other ways would not.
3. I note that the introductory wording lists examples of different sorts of non-commercial community facilities which tie in to some extent with the sorts of activity identified in paragraph (iii) e.g. facilities such as "*libraries*" (cited in introductory wording) is picked up by "educational" and "cultural" opportunities (wording in paragraph

(iii)). We wonder if there would be greater clarity to the value acknowledged in facilities offering *sporting* opportunities to pupils in schools if there was also reference to outdoor sports facilities in the introductory wording (see suggested wording inserted below).

4. Paragraph (i) opens the way to development where “*an alternative facility of at least equal quality and scale to meet community needs is available or will be provided*”. The condition importantly makes express reference to the need for the alternative facility to be in the vicinity. We are conscious that there are occasions where developments have taken place with the promise of alternative facilities but where the delay in providing the alternative facility has been so substantial that it has itself amounted to a significant loss at community level. We wonder whether this issue of timing could be acknowledged by adding wording in paragraph (i) to make reference to reasonable timescales in the way shown below.

C2: PROTECTION OF COMMUNITY FACILITIES Proposals that result in the loss or change of use of buildings and premises currently or last used for community facilities, including ‘corner shops’, public houses and/or non-commercial community facilities, including libraries, community centres, **outdoor sports facilities**, health and religious facilities will only be supported where:

- i. An alternative facility of at least equal quality and scale to meet community needs is available or will be provided within the vicinity **and within a reasonable timescale** or;
- ii. The use is no longer viable and all attempts to let or sell the business have proved unsuccessful; or
- iii. It can be demonstrated either that the existing provision is surplus to the needs of the community **for example through playing a part** in supporting the educational, cultural or sporting opportunities available to pupils of schools in the area;
- iv. The community facility can be fully retained, enhanced, or reinstated as part of any redevelopment of the building or land.

5. I would also flag a minor editing point that paragraphs (i) and (ii) end with a semicolon and then “or” but paragraph (iii) ends with a full stop. I assume that the intention is that each of the 4 paragraphs are intended to be alternatives and that paragraph (iii) should end with a semi-colon as

shown.

6. The paragraphs setting out the circumstances when development of Open Space may be permitted in Policy OS1 are not easy to follow because of the way “*and*” and “*or*” joiners at the end of the paragraphs are alternated in what is shown as a single list.

POLICY OS1: PROTECTION OF OPEN SPACE

Development will not be permitted on areas of open space unless:

- I. It would not cause or exacerbate a deficiency of open space in accordance with the most recent open space study; and
- II. The open space has no functional or amenity value; and
- III. The open space is of no quality or
- IV. The developers make satisfactory compensatory provision; and, in all cases;
- V. The development has no adverse impact upon green infrastructure/ecology and/ or areas of historic conservation importance.

7. We wonder if readability would be improved if it were presented in this way.

POLICY OS1: PROTECTION OF OPEN SPACE

Development will not be permitted on areas of open space unless:

- I. It would not cause or exacerbate a deficiency of open space in accordance with the most recent open space study; and
- II. The open space has no functional or amenity value; and
- III. Either -
 - (a) the open space is of no quality; or
 - (b) the developers make satisfactory compensatory provision;and, in all cases
- IV. The development has no adverse impact upon green infrastructure/ecology and/ or areas of historic conservation importance.

8. Thank you for considering these points.

Yours sincerely

Michael Lubienski
Chair - Whitchurch Tennis Club

Rhif Sylwedydd / Representor Number:

5

Rhif Sylw / Representation Number(s):

5.01 – 5.02

Enw Sylwedydd / Representor Name:

John Isaacson

From: [REDACTED]
To: [Local Development Plan / Cynllun Datblygu Lleol](#)
Cc: [Gilbert, Simon](#)
Subject: RLDP consultation
Date: 23 March 2025 14:18:42

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ALLANOL: Daw'r e-bost hwn o'r tu allan i Gyngor Caerdydd, cymerwch ofal wrth glicio ar ddolenni.

Dear Sir/Madam,

I wish to raise the following point in relation to the RLDP.

There is a huge disparity in the available green spaces across Cardiff. I am fortunate to have some beautiful parks near me, since moving to Rhiwbina in 2017. However, prior to that, I lived in Adamsdown for 20 years, and recall that the only green space when walking between my house in Pearl Place and the city centre was cemetery park. This I believe is totally unacceptable for all the people who live in that part of Cardiff.

Please acknowledge receipt of my email.

Yours faithfully,

John Isaacson



Rhif Sylwedydd / Representor Number:

6

Rhif Sylw / Representation Number(s):

6.01 – 6.03

Enw Sylwedydd / Representor Name:

Kelvin Hughes

From: [REDACTED]
To: [Local Development Plan / Cynllun Datblygu Lleol](#)
Cc: [Gilbert, Simon](#)
Subject: RLDP - Comments/concerns
Date: 21 March 2025 16:58:29

*** EXTERNAL: This email originated from outside Cardiff Council, take care when clicking links. ALLANOL: Daw'r e-bost hwn o'r tu allan i Gyngor Caerdydd, cymerwch ofal wrth glicio ar ddolenni. *** .

Dear Sir/Madam,

I wish to raise the following points in relation to the RLDP.

1. Cumulative loss of green spaces & Biodiversity depletion

This is a huge concern for me and many other residents. This not only has a significant negative impact on the well-being of people but also obviously on wildlife.

As a resident of Whitchurch for over 40 years, the massive cumulative loss of such cherished spaces in my area for example has been very detrimental to residents and wildlife alike. (For example, the loss of 23 acres of the Northern Meadows and thousands of trees for the New Velindre Cancer Centre development).

In my experience attempts at 'mitigation' for such a devastating loss have been woefully inadequate to date.

In the words of the Senedd, we are in a 'Climate Emergency', so hopefully the next LDP will include serious provision for not further contributing to this 'emergency'

2. Transport infrastructure

Cardiff's road, rail and public transport infrastructure is 'not fit for purpose'.

The City-wide transport network cannot cope with the volume of traffic now, let alone if another approx. 25000 houses are built in and around our City.

(It remains to be seen if the much heralded and long-awaited Metro network actually alleviates any of the current impending 'gridlock' once eventually it is fully operational).

3. Sustainable' Developments

Taking huge current and expanding housing developments such as Plasdwr as an example, I wonder how truly sustainable this housing sprawl is?

In devising the replacement LDP, I sincerely hope that the Planning Department examines closely whether the new householders on this development do for example practice 'sustainable travel' such as walking, cycling or the use of public transport, as opposed to driving everywhere. Otherwise the Council is kidding itself and residents in claiming they are building a sustainable and 'Greener' future for our City.

4. 'Legoland-like' City Skyline

Many of the recently built 'skyscrapers' in our city are generally ugly in appearance and often bear little resemblance to what was originally agreed by Planning.

Surely, it is incumbent on Planning to rigidly enforce and ensure that developers do not deviate from what was agreed and also to build structures that are more 'beautiful' in appearance as well as protecting what is left of our city's heritage.

I'd be very grateful if you would please acknowledge safe receipt of this email and I sincerely hope that the points raised will be given due consideration by the relevant people assessing and finalising the LDP.

Thanking you in advance.

Yours faithfully,

Kelvin T Hughes (Dr)



Rhif Sylwedydd / Representor Number:

7

Rhif Sylw / Representation Number(s):

7.01 – 7.11

Rhif Sylw / Representor Name:

Chris Poole

From:
To:
Cc:
Subject:
Date:

Response to the RLDP Deposit Plan
20 March 2025 17:39:08

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ALLANOL: Daw'r e-bost hwn o'r tu allan i Gyngor Caerdydd, cymerwch ofal wrth glicio ar ddolenni.

Dear LDP Team,

I should very much like the following observations to be considered in the consultation process.

Inconsistencies and Contradictions in the Cardiff Replacement LDP

After a careful review of the Cardiff Replacement LDP Deposit Plan, I've identified several potential inconsistencies or contradictions worth noting:

1. Growth Targets vs. Environmental Protection

There's an inherent tension between the ambitious growth targets (26,400 new homes and 32,300 new jobs) and the equally strong commitments to environmental protection, carbon neutrality, and green infrastructure. Specifically:

- The plan aims to be carbon neutral by 2030 (Policy SP20) while simultaneously promoting significant development that will increase carbon emissions through construction and increased population.
- While claiming 50% of development will be on brownfield sites, this still means 50% will be on greenfield sites, potentially contradicting the strong environmental protection language elsewhere in the document.

2. Housing Allocations vs. Affordable Housing Needs

- The document identifies an "average annual overall additional net affordable housing need of 1,098 per annum" (paragraph 6.99), which would equate to approximately 16,470 affordable homes over the 15-year plan period.
- However, the plan only expects to deliver "between 5,000 and 6,000 new affordable homes" (paragraph 6.33), which falls significantly short of the identified need.

3. Gypsy and Traveller Accommodation

- The GTAA (Gypsy and Traveller Accommodation Assessment) identifies a need for 117 permanent pitches (paragraph 7.66).
- The plan only allocates a temporary site at Pengam Green for about 80 pitches (paragraph 7.71-7.72).
- The document acknowledges this doesn't satisfy the overall level of need but doesn't provide a clear strategy for addressing the shortfall of 37 pitches.

4. Welsh Language Commitments

- While the plan describes Cardiff as an "Area of Linguistic Importance" (Policy WL1) and includes policies to promote Welsh language growth, it provides limited concrete mechanisms to ensure this happens in practice.
- Paragraph 7.124 notes that Cardiff needs to increase Welsh speaker numbers by 1,200 annually, but doesn't clearly articulate how development policies will achieve this ambitious target.

5. Transport Objectives and Implementation

- The plan aims for 75% of all journeys to be made by sustainable transport modes by 2030 (Policy SP18), but many of the proposed developments (particularly the strategic housing sites) are in peripheral locations that may reinforce car dependency.
- The implementation of transport infrastructure improvements seems to lag behind housing development, potentially creating more transport problems before solutions are in place.

6. Decarbonization vs. Economic Growth

- Policy RE2 requires new major developments to achieve "carbon net zero regulated emissions," but this is immediately qualified with exceptions where it "cannot be achieved for financial reasons" (paragraph 7.468-7.472).
- This creates a potential loophole where economic considerations could override climate commitments.

7. Flood Risk Policy Contradictions

- The document states development will not be permitted in flood risk areas (Policy W3), yet some of the strategic sites and regeneration areas (particularly those near Cardiff Bay) are in locations with known flood risk concerns.
- The Gypsy and Traveller site at Pengam Green was previously rejected due to flood risk, but is now deemed acceptable due to "significant change in circumstances" (paragraph 7.69), suggesting inconsistent application of flood risk policy.

8. Biodiversity Net Gain vs. Development Scale

- Policy BG4 requires all developments to deliver "Net Benefits for Biodiversity," but it's unclear how this will be practically achieved with the scale of development proposed, particularly on the strategic sites that will remove substantial areas of greenfield land.

Gaps in Outcome Measures

Despite the outcome measurement framework, there are some areas where tangible measures are less clear:

- Limited quantifiable health and wellbeing metrics
- Few specific community cohesion measures
- Not many direct quality of life indicators
- Limited measures for design quality and placemaking success

Notable Gaps in Inequality Measurement

The plan lacks:

Income Inequality Metrics: No specific measures of income distribution or poverty reduction

Educational Attainment Gaps: No targets for reducing disparities in educational outcomes

Health Inequality Targets: Despite acknowledging health gaps, no specific targets for reduction

Gender Inequality Measures: Limited references to gender-sensitive design but no measurement framework

Ethnicity-Based Inequality Metrics: Despite acknowledging Cardiff's diverse population (paragraph 3.14), no specific measures for ethnic disparities

Notable Gaps Regarding Planning Enforcement

The LDP lacks detail on:

Enforcement Procedures - No explanation of how the council will identify breaches of planning permission

Enforcement Powers - No reference to enforcement notices, stop notices, breach of condition notices, or other statutory enforcement powers

Enforcement Priorities - No indication of which types of planning breaches would be prioritized

Resources for Enforcement - No discussion of staff or resources dedicated to ensuring compliance

Public Reporting - No information on how the public can report suspected breaches

The Cardiff Replacement LDP Deposit Plan contains minimal direct reference to planning enforcement. While enforcement is implied through the discussion of planning conditions, obligations, and monitoring, the document does not provide a clear framework for how planning permissions will be enforced in practice.

This represents a potential gap in the plan, as effective enforcement is crucial for ensuring that developments actually deliver the outcomes and benefits intended by the planning policies. Without robust enforcement mechanisms, there's a risk that aspects of developments that aren't commercially advantageous (such as affordable housing, environmental mitigations, or community facilities) might not be delivered as approved.

Thank you for taking the time to consider the above points.

Yours sincerely,

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Chris Poole

Rhif Sylwedydd / Representor Number:

8

Rhif Sylw / Representation Number(s):

8.01 – 8.10

Enw Sylwedydd / Representor Name:

Radyr and Morganstown Local
Development Plan Group

COMMENTS ON THE CARDIFF REPLACEMENT LOCAL DEVELOPMENT DEPOSIT PLAN

Radyr & Morganstown Local Development Group

1. Radyr & Morganstown Local Development Group (RMLDG) broadly supports the Deposit Plan (DP) whose Strategy is a realistic response to the National Plan for Wales (Future Wales), Cardiff Council's One Planet Strategy, declared in 2019 and the City-wide nature emergency declared by the Council in 2021.
2. There are three areas, however, where we have concerns – population growth projections, house build out rates and transport infrastructure.
3. The Deposit Plan proposes to increase the population by 39,742 by 2036 by the construction of 24,000 new homes on a mixture of 50:50 greenfield and brownfield sites. These houses will be occupied by 23,103 households. The 2021 Census shows that in the decade 2011 to 2021, the number of households grew in Cardiff by an average of 500 per annum. The Deposit Plan projects the number of households to grow at an average of 1,500 per annum. This is three times the actual growth experienced between 2011 and 2021, yet there is no clear rationale as to why this is likely to be the case.
4. This strategy is of necessity based upon Cardiff Council's own view of the growth of the City given the absence of any household or population projections for Wales and individual districts since 2018 from Welsh Government. We submit that Welsh Government is failing in its planning duties by not updating population and household projections from the existing 2018 baseline, especially in the light of the results of the 2021 Census and the fact that these Census results showed that the projections for 2021 were almost 2% higher than the actual. Nevertheless, this does not preclude Cardiff Council from the need to set out the rationale to justify their population growth projections that are more than double the Welsh Government 2018 Principal Forecast, and household projections that are three times the actual growth experienced by Cardiff over the last decade 2011-2021.
5. The Strategy of the Deposit Plan (DP) is in broad compliance with the National Strategy for Wales; Future Wales, which requires 66,000 houses to be built in the SE Wales region between 2019 and 2039. However, we have examined the proposals in the RLDPs being proposed by surrounding Local Authorities (RCT, Vale of Glamorgan, Newport, Bridgend,

Caerphilly and Monmouthshire)¹ and these suggest a total of 40,725 homes in addition to the 24,000 being proposed by Cardiff. So, 64,725 already allocated up to a variety of end dates between 2033 and 2037, excluding Torfaen, Blaenau Gwent and Merthyr Tydfil. Moreover, Cardiff represents less than 25% of the total population of SE Wales, yet it is proposing to build 40% of the Future Wales requirement for the SE Wales region. Growth in Cardiff will, therefore, inevitably come at the expense of other areas within SE Wales. We ask the question whether this is acceptable in the regional context? Indeed, the Welsh Government in their comments on the Preferred Strategy (5 October 2023) indicated that there was insufficient evidence to show that Cardiff had taken into account the strategies of neighbouring areas in the SE Region. We would argue that this is still the case.

6. It has to be said, however, that the credibility of Future Wales as a national and regional planning strategy is in doubt given the changes that have taken place since it was produced, especially the lack of any population projections. For example, the latest mid-year population estimate showed the city had a population of 369,202. In fact, the 2021 Census figure states that the population Cardiff in April 2021 was 362,400.
7. We strongly support the strategy in terms of the clear lack of need for any new green field sites. As the Plan shows, of the 26,400 new homes proposed 6,618 have already been built or are under construction by April 2024, and 12,070 are already in the current residential land bank.
8. We do, however, have concerns about the build-out rate proposed within the Plan. The Deposit Plan assumes a build-out rate of 1,600 dwellings per annum. Yet over the last 10 years, an average of only 1,047 dwellings per annum have been built. Things have improved slightly over the last 5 years, with an average of 1,240 dwellings per annum. Whilst it may be argued that a higher proportion of smaller dwellings such as flats may make this target a little easier to achieve, it is still a significant 30% increase over the last 5-year average and a massive 55% increase over the last 10-year average.
9. We also note the Council's current estimate that more than 1,500 homes planned for the Plas Dwr Strategic Site will not be completed by 2036. This means that only around 70% of the “garden city” will be built 20 years after it commenced. We are worried about the implications of this for the delivery of important infrastructure such as shops, schools, medical facilities etc. There are also significant implications for placemaking and a sense of community. What steps will be taken to review the “trigger points” to ensure that important infrastructure is provided, despite this delay in house building? Only when this infrastructure is fully delivered will the “garden city” vision be delivered.

¹ *Bridgend RLDP has been adopted*

10. With regard to “reserve sites”, we believe that there is no need for any greenfield sites to be included in a reserve list, as Plas Dwr will still be more than 1,500 houses short of completion by the end of the Plan in 2036. If further land is needed, completion of Plas Dwr should be the priority.
11. Given that there are more than 8,000 people on Cardiff Council’s housing waiting list the proposals in the Preferred Strategy “to deliver 5,000 to 6,000 affordable homes depending on the makeup of the sites” is disappointing and is contrary to Future Wales’ policies that at least 50% of the 66,000 houses in the South-East Wales region “need to be home affordable.” However, we accept this may be realistic given the low availability of finance for building such homes.
12. We particularly support Policy SP17 Managing Spatial Growth through Settlement Boundaries. This policy will make it clear to all where development will and will not be permitted and will impose a strict control on development of the countryside.
13. In terms of candidate sites, we support the rejection of sites 23 (Plas Dwr Uchaf), 61 (Goetre Fawr) and 80 (Cwm Farm) which were proposed for housing on the basis that:
 - the sites are outside settlement boundaries proposed in SP17;
 - they are clearly not needed for further housing need;
 - current demand for housing on allocated strategic sites is low;
 - each of the sites has clear environmental and natural advantages (including a SSSI and many SINC)s and their development would be against the Council’s One Planet Strategy and Nature Emergency ;
 - Cwm Farm is located within the “Green Wedge”.

Countryside

14. We are delighted to see that, notwithstanding the above comments, the DP proposes no new greenfield development over and above the Strategic Sites in the current LDP and also that para 6.131 states that Cardiff’s countryside is a “valuable and finite resource which is under pressure from all kinds of development due to its proximity to the urban area....Cardiff’s countryside is particularly vulnerable to the cumulative impact of new developments that may harm its character and appearance.”
15. In this regard it is particularly encouraging to see that the DP allocates considerable amounts of land in NW Cardiff as “countryside to be enhanced and protected.” This is to be especially welcomed in Radyr and Morganstown which has a very low level of public open space. We

would like further clarification of how these areas will be “enhanced” and the specific “protections” they will be afforded.

Transport

16. In our view, the policies relating to Transport in the Deposit Plan are weak - paragraphs 7.401 to 7.435. The detailed policies T1 to T6 are based on some heroic assumptions which do not seem realistic in NW Cardiff. We fully understand that these policies are based upon the Council’s Transport White Paper (TWP) but this is now five years out of date and only contains vague cost estimates. It is difficult for even an optimist to see that much of the proposed Cardiff Cross Rail tram-train line will be complete - or even started - by 2035 (The White Paper states that it will be complete by 2030). In the White paper’s own words the “new communities in the west of the city.....are currently poorly served by public transport” yet the DP does nothing to improve this situation.
17. Improvements to the Core Valley Lines, which policy T3 particularly relies on, from Radyr from 2025 will help a little and the increase in daily seats from approximately 15,000 to 32,000 is to be welcomed but many of these will be occupied by passengers from north of Cardiff.
18. The proposals to improve the level of active travel are welcome yet ignore the hilly topography and lack of pavements in North West Cardiff which deters less-active members of the population. The key has to be full integration of active travel, bus and car into fixed rail in the suburbs with integrated ticketing. The improvement of bus services in the North West Corridor is important and the provision of bus lanes in Llantrisant Road is welcome but the DP contains no detailed policies to indicate how bus times will be improved through current bottlenecks of Llandaff and Cathedral Road.
19. Our detailed comments on the Candidate Sites will be sent separately.

Conclusions

20. We fully support the strategy of the DP centred on no new greenfield development over and above the Strategic Sites in the current LDP and the proposed policy to manage spatial growth through settlement boundaries. We are also pleased to see the designation of large areas of NW Cardiff as “areas of countryside to be enhanced and protected”.
21. We also strongly support the rejection of sites 23 (Plas Dwr Uchaf), 61 (Goetre Fawr) and 80 (Cwm Farm) on the basis that the sites are outside settlement boundaries; they are clearly not needed for further housing; current demand for housing on allocated strategic sites is low; and each of the sites has clear environmental and natural advantages that should be protected.

22. However, we have concerns about the population growth projections, the proposed build-out rates and the policies concerning transport in NW Cardiff.

Radyr & Morganstown Local Development Group

April 2025

Rhif Sylwedydd / Representor Number:	9
Rhif Sylw / Representation Number(s):	9.01
Enw Sylwedydd / Representor Name:	CAMRA

From: [REDACTED]
To: [Local Development Plan / Cynllun Datblygu Lleol](#)
Subject: Cardiff LDP Consultation
Date: 07 March 2025 09:47:44
Attachments: [20250307_094251.pdf](#)

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ALLANOL: Daw'r e-bost hwn o'r tu allan i Gyngor Caerdydd, cymerwch ofal wrth glicio ar ddolenni.

Dear Sirs

I am the pubs protection officer for the Campaign for Real Ale Cardiff Branch (the Campaign). I attach a model planning policy for the protection of public houses and other community facilities which I request on behalf of the Campaign be adopted as part of the planning policies in the new LDP.

Kind Regards

J A LAMB

Model Planning Policy

A robust model planning policy developed by CAMRA which we encourage Local Planning Authorities to adopt.

Model Planning Policy

Any proposal which would result in the loss of a community facility will not be permitted unless:

- an alternative community facility which meets similar local needs to at least the same extent is already available; and
- it can be shown that the proposal does not constitute the loss of a service of particular value to the local community nor detrimentally affect the character and vitality of the area; and
- in the case of commercial community facilities, it has been demonstrated that it is no longer economically viable and cannot be made so.

"Community facility" in this context has the same meaning as in paragraph 92 of the National Planning Policy Framework.

Reasoned Justifications

Regarding alternative community facilities, the Council will require evidence not only that an alternative facility or facilities can be found within easy walking distance but that there is at least one such facility which offers services and an environment comparable to that of the facility subject to the proposal.

This policy applies equally to community facilities which are currently open or have been closed within the past five years.

Regarding local needs, the Council will require evidence that there has been public consultation to ascertain the value of the facility to the local community.

If the facility is registered as an Asset of Community Value then the Council will regard this as a material consideration in the determination of any planning application affecting the facility. The Council will also expect to see evidence of discussion with the local community of the potential for a community enterprise.

Development proposals involving a community facility should not have a detrimental effect on the design, character, significance and setting of buildings or areas of acknowledged heritage value.

On viability, the Council will require evidence demonstrating that:

- the existing or recent business is not financially viable, as evidenced by trading accounts for the last three years in which the business was operating as a full-time business;
- a range of measures were tried during this time to increase trade and diversify use;
- the potential for the property to extend the range of facilities offered at the site has been fully explored;
- for public houses, the CAMRA Public House Viability Test, or a similar objective evaluation method, has been employed to assess the viability of the business and the outcomes show that the public house is no longer economically viable.



Model Planning Policy

Also on viability, the Council will require evidence that all reasonable measures have been taken to market the facility to other potential operators. The facility must have been marketed for at least 24 months either as the current type of facility or as an alternative community facility, at a price agreed with the Council following an independent professional assessment of the property's value as a community facility (paid for by the developer). In turn there must have been no interest in purchasing either the freehold or leasehold as a community facility. The business must have been offered for sale locally, and in the region, in appropriate publications and through relevant specialised agents.

In the case of public houses, any proposal that includes significant diminution of floorspace or cellage or the loss of upper floors or ancillary uses such as function rooms and staff accommodation or the loss of any other features within the curtilage of the public house must demonstrate that the loss will not compromise the operation or viability of the pub.

This policy applies to lawful public houses and sites previously in lawful pub use, whether currently in use as a pub or vacant. The Council will have regard to the Campaign for Real Ale (CAMRA) definition of a public house when applying this policy.



Rhif Sylwedydd / Representor Number:

10

Rhif Sylw / Representation Number(s):

10.01 – 10.07

Enw Sylwedydd / Representor Name:

Glamorgan Gwent
Archaeology / Heneb

From: [REDACTED]
To: [Local Development Plan / Cynllun Datblygu Lleol](#)
Subject: RLDP Deposit Plan Consultation
Date: 06 March 2025 11:41:48
Attachments: [image883267.png](#)
[image449359.png](#)
[image150610.png](#)
[Cardiff RLDP Deposit Plan 2025 Heneb GGA Response.pdf](#)
[Cardiff Council Candidate Sites Register Heneb Responses 2025.pdf](#)
[Cardiff RLDP Candidate Sites 2023 GGAT response.pdf](#)

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ALLANOL: Daw'r e-bost hwn o'r tu allan i Gyngor Caerdydd, cymerwch ofal wrth glicio ar ddolenni.

Good morning

Thank you for consulting us regarding this stage of the RLDP.

Our response is attached, and our responses to the candidate site submissions (these are set out as RAG in that Red advises pre-determination mitigation; Amber advises mitigation by condition; Green identifies no mitigation necessary).

Please do let me know if we can provide any further information at this stage.

Kind regards



Heneb

Judith Doyle BA(Hons), MBA, FSA, MCIfA | Glamorgan-Gwent

Pennaeth Rhanbarthol Dros Dro | Interim Regional Head





Archaeoleg Morgannwg-Gwent

Heneb

Glamorgan-Gwent Archaeology

Our ref: RLDP/CAR/JBHD

Local Development Plan,
Room 250,
County Hall,
Atlantic Wharf,
Cardiff,
CF10 4UW.

6th March 2025

Dear Sir

**Re: Cardiff Replacement Local Development Plan 2021-2036
Deposit Plan Consultation.**

Thank you for consulting us on the deposit plan and supporting documentation including candidate sites.

Glamorgan Gwent Archaeological Trust were archaeological advisors to Cardiff Council; as of 1st April 2024, GGAT merged with the three other Welsh Archaeological Trusts to form Heneb: The Trust for Welsh Archaeology. Our remit as advisors remains unchanged, and as agreed in the Memorandum of Understanding with your Authority includes the historic environment, heritage management and buried archaeology. Within the new structure, we remain Glamorgan Gwent Archaeology, and your Authority still comes within our remit.

A change to the primary legislation regarding archaeology and the historic environment occurred on 4th November 2024 when the Historic Environment (Wales) Act 2023 came into force. This has consolidated the existing range of primary legislation, and the supporting cascade of Policy, Guidance, Advice and Best Practice advice will be updated as a result. We note from the Plan document that the legislation referred to includes those replaced by the Historic Environment (Wales) Act 2023. The correct legislation and supporting Policy and Advice cascade should be included in the Plan.

As we have noted in previous responses, archaeology and the historic environment is an important part of the Cardiff council's area and includes statutorily designated historic assets formed by both areas and structures, as well as non-designated historic assets. The plan notes the historic assets which are statutorily protected (the 30 Scheduled Monuments; 866 Listed Buildings, and 18 Registered Parks and Gardens. However, it must be noted that these are a small proportion of the sites recorded in the Historic Environment Record. There are currently 1428 Core records (sites, features, findspots, etc) and an additional 343 Event records (archaeological interventions, for example, excavations, evaluations, watching briefs, building and structural recording). These are all considered non-designated historic assets.

Cadeirydd / Chair: Dr Carol Bell

PSG / CEO: Richard Nicholls

Cwmni Cyfyngedig (1198990) ynghyd ag Elusen Gofrestredig (504616) yw'r Ymddiriedolaeth

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Registered address: Corner House, 6 Carmarthen Street, Llandeilo, Carmarthenshire, SA19 6AE

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Archaeoleg Morgannwg-Gwent

Heneb

Glamorgan-Gwent Archaeology

The range of the archaeological remains dates from prehistoric through to modern military and civic, all of which contribute to the distinctive heritage and current form of the area. These should not be seen as any constraint to development, planning land use change or non-planning land use change, but viewed with the Well-being of Future Generations (Wales) Act 2015, contribute substantially to the well-being goals relating to culture and community, and by understanding and enhancement to the remaining goals.

Noting the aim in developments to use brownfield sites, it should be considered that these are often historic early industrial sites and comprise deeply stratified and complex remains of industrial archaeology, which will need early stage mitigation. Where expansion of mineral and aggregate extraction is planned, this may impact the historic environment and early stage consultation is strongly advised.

In the Vision, the positivity of protecting and enhancing the historic environment and the historic assets is noted, and this can also contribute to other goals, as noted above, and other aspects of the Plan such as health and wellbeing, social cohesion, open spaces, placemaking and the economy.

The Sustainability Appraisal considers the historic environment and heritage, which are noted as objectives to preserve and enhance, and are key issues to be taken into consideration relating to understanding and mitigation in the development process. The importance of the Historic Environment Record is explained, and The themes dealing more specifically with the historic environment and landscapes, notes, as we have previously stated, that all forms of planned activity will have an impact on the historic environment, including large scale infrastructure works of all types. The support of a range of Policies within the Plan, primarily HE1, and SP13 SP14 and reduces adverse impact on the historic environment and therefore should ensure compliance with Welsh Government Legislation and Policy.

The Habitats Regulations Assessment notes that there must be a balance in developments where the impact on the historic environment must be justified. Any impact is wider than that on statutorily protected remains. refers to the protected areas of the natural environment. The Historic Environment Record shows there are features and sites relating to the historic environment which are within the areas of importance to the natural environment, and these should be considered not in isolation from each other. Upland sites include evidence of prehistoric burial and ritual landscapes; wooded valleys include land and water management sites relating to the industrial growth of south Wales. The threats to the natural environment are those faced by the historic environment.

We have commented previously on the Candidate Sites submitted to recommend mitigation that may be necessary for some sites, due to the likely impact on the archaeological deposits from proposed development. As noted in the Energy and LAEP documents, it also should be taken into consideration that climate change, and the effects of climate change such as flooding, desiccation, leading to erosion and the impacts of other severe weather events have an impact on the historic environment. This includes fragile finite remains which are anaerobically preserved, and evidence

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Archaeoleg Morgannwg-Gwent

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Glamorgan-Gwent Archaeology

of prehistoric and early historic activity which is contained in peats, and in pollen and seed remains.

The impact of balancing tourism and education regarding archaeology and the historic environment is considered in the Sustainability document and in Policy SP10 and contributes to the economy as well as understanding of the historic environment and culture. From an impact viewpoint, where increased visitor numbers may have an adverse impact on remains, is an issue being considered globally at the moment and can be mitigated where visits are limited by time, areas of access, and visitor tax. Clearly this also has impacts economically and on wellbeing, where outdoor walking and social prescribing, engaging with heritage and historic sites is being promoted.

If you have any questions or require further advice on this matter, please do not hesitate to contact us.

Yours faithfully

Judith Doyle

Judith Doyle BA (Hons) MBA FSA MCIfA
Interim Regional Head

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Cardiff Council Candidate Sites Register Heneb Responses 2025

Site Number	Grid reference	Address	Size in hectares	Proposed Use	RAG	Archaeological Impact	Heneb GGA Reference
85	317050 180880	Allied Bakeries, Maes y Coed Road, Heath	2.7	Employment/Redevelopment		No known archaeological or historic environment features recorded in the HER. No mitigation proposed.	CAR0843
86	309990 179905	Land adjacent to Dwrllyn Cottage, Capel Llanilltern	Not given	Residential		No known archaeological or historic environment features recorded in the HER. No mitigation proposed.	CAR0844

Cardiff RLDP Candidate Sites 2023 GGAT response

Site Number	Grid reference	Address	Size in hectares	Proposed Use	RAG	Archaeological Impact	GGAT Reference
10	319300 175540	Bute East Dock, Butetown	9.52	Mixed Use Development		The Historic Environment Record identifies the site as meadows in the mid 19 th century, developed as the Glamorgan Canal route (north to south) with the Cardiff stretch built 1793-1794. The Dock was constructed between 1855-59, and was originally extended further south, with two sea locks and a basin as access. No objection to inclusion, some development may require historic environment mitigation, it is likely that this could be addressed by condition.	CAR0744
52	321175 182850	Cardiff Gate Business Park, Pontprennau and Old St Mellons	6.4	Mixed use development including employment, residential, commercial, and retail uses		The Historic Environment Record identifies the site as including the site of Pontprennau Farm, with associated features noted on historic mapping. For previous proposals for development in this area, we have recommended mitigation by Condition, for mitigation to be agreed by a written scheme of historic environment mitigation, and our understanding of the archaeological resource has not changed. Therefore, mitigation could again be addressed by condition.	CAR0745
69	321970 196965	Eastern Bay Link, Splott	80	Active Travel Route		Formerly Pengam Moors and East Moors, a tidal marsh (part of the Gwent Levels	CAR0746

						system) that retains evidence of inundation and drying, buried land surfaces, and water management and archaeological deposits in the alluvium. Deep disturbance may encounter remains, which may impact on these. Changes to the area after reclamation may have changed the depths at which these occur below ground level, however, desk-based archaeological assessment ahead of proposals would inform any further mitigation.	
29	317180 179175	Flaxland Woods, Gabalfa	0.25	Community Greenspace		Historic Mapping sequences show the area to have been part of the route of the Roath Branch of the Taff Vale Railway, dating from the later 19 th century, with closures between 1931 and 1963. It is unlikely that significant archaeological deposits would be encountered during any development.	CAR0747
61	311830 180460	Goitre Fawr, Plasdŵr	57	Residential-led mixed use development forming an extension to the existing Plasdŵr allocation.		Results of archaeological excavation work on an adjacent site showed remains of prehistoric, Roman and Medieval features. Information in the Historic Environment Record shows evidence of other activity from these and other periods. Archaeological desk-based assessment, including geophysical survey, ahead of proposals would inform any further mitigation.	CAR0748
65	319805 176290	Image House East Tyndall Street 1	0.33	Residential		The Historic Environment Record identifies tramways and former buildings associated with a timber yard, historic mapping shows later 19 th and early 20 th century activity. Remains of these may have been damaged;	CAR0749

						no objection to inclusion, may require historic environment mitigation, it is likely that this could be addressed by condition.	
68	319805 176290	Image House East Tyndall Street 2	0.33	Affordable Housing		The Historic Environment Record identifies tramways and former buildings associated with a timber yard, historic mapping shows later 19th and early 20th century activity. Remains of these may have been damaged; no objection to inclusion, may require historic environment mitigation, it is likely that this could be addressed by condition.	CAR0750
38	314220 179330	Land Accessed from De Braose Close, Danescourt	2.88	Residential development		There are no recorded archaeological sites or features within the Historic Environment Record, or on historic mapping. We do not recommend any historic environment mitigation.	CAR0751
21	309610 179850	Land Adjacent Llantrisant Road (A4119), Capel Llanilltern. (Spicer, Jenkins and Pink Land)	31	Residential		Historic Environment mitigation is in process for this site following the undertaking of an archaeological desk-based assessment, a programme of field evaluation trenching has commenced but is not yet completed. This must be completed. The results will inform any further mitigation requirements.	CAR0752
53	322830 182610	Land Adjacent to Began House	0.1	Residential		There are no recorded archaeological sites or features within the Historic Environment Record, or on historic mapping. We do not recommend any historic environment mitigation.	CAR0753
49	323165 182365	Land adjacent to Cefn Eurwg, Druidstone Road	0.08	Include within the settlement boundary		Archaeological evaluation was undertaken in this site in 2012, no significant archaeological features were encountered	CAR0754

						and no further mitigation was recommended.	
24	312550 176730	Land Archer Road, North Ely	4.7	Redesignate within the settlement boundary. Mixed use of residential, community and enhanced recreational facilities		There are no recorded archaeological sites or features within the Historic Environment Record, or on historic mapping. Shown as fields associated with Llanfaes. We do not recommend any historic environment mitigation.	CAR0755
55	322820 182300	Land at Bridge Road, Old St Mellons	8.28	Residential		Archaeological evaluation was undertaken in two areas adjacent to this site in 2013 and 2014, and nearby in 2012, no significant archaeological features were encountered and no further mitigation was recommended. We have previously recommended archaeological evaluation prior to determination in this area. Given the negative results of the other evaluations, there is potential for similar results in this area, however this is not certain.	CAR0756
3	318520 175620	Land at Callaghan Square	3.36	Residential, business, hotel, retail, food and drink, leisure and public realm and transport infrastructure		The route of the Glamorgan Canal passes through the site, constructed 1792-8, historic mapping shows mills, smithies, streets and house as well as other structures. Remains of the canal and walls have been encountered on part of the site during archaeological mitigation for development. For previous proposals for development in this area, we have recommended mitigation by Condition, for mitigation to be agreed by a written scheme of historic environment mitigation, and our	CAR0757

						understanding of the archaeological resource has not changed. Therefore, mitigation could again be addressed by condition.	
34	319590 183530	Land at Church Farm	14.16	Residential		Archaeological desk based assessment was undertaken in this site in 2012, no significant archaeological features were identified and the potential was assessed as low. No further mitigation was recommended.	CAR0758
1	318545 175950	Land at Customhouse Street	0.009	Residential/ commercial/hotel/ retail		Information in the Historic Environment Record indicates buildings on the site from the later Medieval period onwards. For previous proposals for development in this area, we have recommended mitigation by Condition, for mitigation to be agreed by a written scheme of historic environment mitigation, and our understanding of the archaeological resource has not changed. Therefore, mitigation could again be addressed by condition.	CAR0759
80	312000 181670	Land at Cwm Farm Morganstown	29.22	Residential		The Historic Environment Record shows few sites noted, but this may be due to lack of research. Artefacts of prehistoric date are noted in the vicinity and evidence of post-Medieval activity. Given the extent of the area, archaeological desk-based assessment, including geophysical survey, ahead of proposals would inform any further mitigation.	CAR0760
47	323380 182600	Land at Druidstone Road Old St Mellons	0.972	Residential		Archaeological evaluation was undertaken nearby, no significant archaeological features were encountered and no further	CAR0761

						mitigation was recommended. The course of a Roman road is to the south, mitigation could be by condition.	
11	315140 176700	Land at Ely Mill and Victoria Park	0.25	New station, platforms and access thereto		The site of the Ely Paper Mills is immediately adjoining to the south and west; the area has been redeveloped and archaeological mitigation undertaken. Railway lines as shown on historic mapping; it is unlikely that significant archaeological remains would exist.	CAR0762
54	324000 182270	Land at Goitre Farm, St Mellons	13	Residential and Care Home		Archaeological Geophysical Survey was undertaken on this site in 2014, which showed areas of disturbance, and features likely to relate to previous boundaries. No further mitigation was proposed; our understanding has not changed.	CAR0763
17	307850 180150	Land at Henstaff Court	41	Residential		The Historic Environment Record notes the Court and Gardens; these are noted on the Tithe of 1839, and the First Series of 1833, with buildings, woods, lakes, and formal areas. Given the extent of the area, archaeological desk-based assessment, including geophysical survey, ahead of proposals would inform any further mitigation.	CAR0764
14	309550 179145	Land at Llanfair, Junction 33	9	Housing, Retail, Industrial		The Historic Environment Record notes the area as the site of a monastery, Llanfair, and artefacts of Roman and Medieval date are noted from the immediate area. Archaeological desk-based assessment, including geophysical survey, ahead of proposals would inform any further mitigation.	CAR0765

81	308630 180100	Llwynioli Farm	3.4	Mixed Use		The Historic Environment Record notes sequences of buildings at the farm site, these are noted on the Tithe of 1839, and the First Series of 1833, and have changed over time. Remains of these may exist; no objection to inclusion, may require historic environment mitigation, it is likely that this could be addressed by condition.	CAR0766
5	319800 174825	Land at Pierhead Street (Porth Teigr)	0.9	Safeguarding corridor for future possible extension of Bayline.		The Historic Environment Record notes the area as the site of reclaimed land, with late 19 th and 20 th century engine house, tanks, buildings and railway lines. Whilst the site has been partly remediated, some development, particularly with deeper foundations, may require mitigation, by condition.	CAR0767
66	321630 176870	Land at Rover Way, Pengam Green	21	Business (use class B1), General Industrial (use class B2) & Storage & Distribution (use class B8)		The Historic Environment Record notes the area as the site of reclaimed land as depicted on historic mapping. Development, particularly with deeper foundations, may encounter buried archaeological deposits. Early 20 th century airship associations, later the site of RAF Pengam Moors, with. Archaeological desk-based assessment, potentially including geophysical survey, ahead of proposals would inform any further mitigation.	CAR0768
13	309830 180030	Land at the Old Forge Capel Llanilltarn	1.2	Housing		The Historic Environment Record notes the Old Forge as a Listed Building Grade II, of early to mid 19 th century date. Noted on the Tithe of 1839, and the First Series of 1833, features associated may also exist, no objection to inclusion, will require historic	CAR0769

						environment mitigation, it is likely that this could be addressed by condition.	
48	323910 182620	Land at Tyla Farm, Tyla Lane	5.33	Housing		The Historic Environment Record notes a potential site of a building/earthwork at the southern part of the area, no objection to inclusion, will require historic environment mitigation, it is likely that this could be addressed by condition.	CAR0770
43	311920 183010	Land at Tynewydd, Main Road, Gwaelod y Garth	0.36	Residential/amend settlement boundary		Information in the Historic Environment Record indicates features associated with Pentyrch Ironworks may extend within the area, and a short lived mission chapel is noted. For previous proposals for development in this area, we have recommended mitigation by Condition, for mitigation to be agreed by a written scheme of historic environment mitigation, and our understanding of the archaeological resource has not changed. Therefore, mitigation could again be addressed by condition.	CAR0771
83	324390 179900	Land at Wentloog Avenue	14.6	B1, B2 and B8		Significant Restraint: The area is within the Registered Landscape of the Gwent Levels (Cadw reference HLW (Gt) 2) within the character area HLCA019 Trowbridge, of Medieval origin, having <i>Regular field pattern of rectangular fields, green lanes, minor agricultural settlement, drainage includes major reens and very fine surface ridging</i> . There is a high likelihood of buried remains including waterlogged organic deposits; buried land surfaces, and palaeobotanical information. If included,	CAR0772

						archaeological desk-based assessment, potentially including geophysical survey, ahead of proposals would inform any further mitigation. Cadw must be consulted as the area is within the statutorily protected Registered Landscape	
16	311940 177900	Land east of Croft y Genau Road and south of Pentrebane Road	6.1	Playing Fields		Restraint: Information in the Historic Environment Record indicates a ploughed down burial mound, and finds of multi-period date within and immediately adjacent to the area. Burial mounds usually exist in groups forming a cemetery. If included, archaeological desk-based assessment, including geophysical survey, ahead of proposals would inform any further mitigation.	CAR0773
22	309000 180480	Land East of Heol Pant-Y-Gored, Creigiau	5.3	Residential		Information in the Historic Environment Record shows the route of the former Taff Vale Railway Llantrisant No1 Branch railway line running through the area, no other features are noted. Archaeological features were identified by geophysical survey on land to the south, and mitigated by record during evaluation. Archaeological desk-based assessment, including geophysical survey, ahead of proposals would inform any further mitigation.	CAR0774
56	322830 182130	Land North of Bridge Road, Old St Mellons, Cardiff	1.17	Residential		Archaeological evaluation was undertaken in this site in 2014, following archaeological desk based assessment which identified a moderate/high potential for archaeological deposits. No significant archaeological	CAR0775

						features were encountered and no further mitigation was recommended.	
50	323600 182920	Land north of Druidstone Road	1.6	Residential		Archaeological evaluation was undertaken nearby, no significant archaeological features were encountered and no further mitigation was recommended. The course of a Roman road is to the south, mitigation could be by condition.	CAR0776
7	318830 175450	Land north of Loudon Square	0.25	New station, platforms and potentially ancillary active uses (Classes A1/A3) fronting onto Lloyd George Avenue		The Historic Environment Record notes the area as the site 19 th and 20 th century saw mills, warehouses, and railway lines. The site has been partly remediated, some development, particularly with deeper foundations, may require mitigation.	CAR0777
51	323050 182420	Land north-west of Druidstone Road	5	Residential		Information in the Historic Environment Record indicates archaeological features identified on aerial photographs. The area was archaeologically evaluated in 2015; with some features being identified. No objection to inclusion, historic environment mitigation could be addressed by condition.	CAR0778
20	308720 180870	Land off Brummell Drive, Creigiau	10.5	Residential		Information in the Historic Environment Record indicates no noted features, however, there are finds and sites of prehistoric date adjacent, and the area is bordered by a number of disused railways, and a Registered Park and Garden (Craig y Parc, PGW(Gm)6(CDF)). The impact on the setting of the Park would need to be assessed; and archaeological desk-based assessment, including geophysical survey,	CAR0779

						ahead of proposals would inform any further mitigation.	
70	324370 182000	Land off Clos Medwy, Old St Mellons	0.55	Residential		Information in the Historic Environment Record indicates no noted features, however, the impact on the setting of the Listed Faendre Hall c30m north, and associated listed structures would need to be assessed.	CAR0780
84	313830 182890	Land off Forest Road, Tongwynlais	7	Include in Settlement Boundaries		Information in the Historic Environment Record indicates no noted features, northern area largely quarried.	CAR0781
6	318280 175770	Land south of Cardiff Central Station (Car Park)	1	Proposed mixed use redevelopment of the Cardiff Central Station Car Park to include B1 (office), A1 (retail), A3 (food & drink), sui generis (Active Travel, Bike Parking and a new Tram/Train halt to connect to Cardiff Bay).		Information in the Historic Environment Record indicates former marshland associated with the former course of the River Taff until the mid 19 th century. Historic mapping sequences show railway lines, a station and GWR parcels depot prior to clearance and redevelopment. It is our opinion that it is unlikely archaeological deposits would be encountered during development.	CAR0782
30	316780 178670	Land south of Mynachdy Road, Gabalfa	1.83	New station, platforms, bridge access, access to adjacent retail park and c.65 affordable homes.		Information in the Historic Environment Record indicates no recorded archaeological features; open ground until the mid to late 19 th century, historic mapping sequences show railway lines and sidings. It is our opinion that it is unlikely archaeological deposits would be encountered during development.	CAR0783
73	325130 181000	Land south of St Mellons Business	80.2	Employment (Business Park),		Significant Restraint: The area is within the Registered Landscape of the Gwent Levels	CAR0784

		Park : Hendre Lakes		transport hub and ancillary uses		(Cadw reference HLW (Gt) 2) within the character area HLCA019 Trowbridge, of Medieval origin, having Regular <i>field pattern of rectangular fields, green lanes, minor agricultural settlement, drainage includes major reens and very fine surface ridging</i> . It is within the Archaeologically Sensitive Area of the Gwent Levels. There is a high likelihood of buried remains including waterlogged organic deposits; buried land surfaces, and palaeobotanical information. If included, archaeological desk-based assessment, potentially including geophysical survey, ahead of proposals would inform any further mitigation. Cadw must be consulted as the area is within the statutorily protected Registered Landscape.	
33	319000 183600	Land to South of the M4 motorway, West of Rudry Road, Lisvane	4.955	Residential		Previous recommendation that if included, archaeological desk-based assessment, potentially including geophysical survey, ahead of proposals would inform any further mitigation. Our understanding has not changed, and our recommendation remains the same.	CAR0785
62	316170 183930	Land to the East and West of Thornhill Road and to the North and South of Capel Gwilym Road	164	Residential led mixed use development		Includes a number of Statutorily protected sites, and entries in the Historic Environment Record; Aerial photographs have identified potential further archaeological sites. Previous recommendation for a part of the site that if included, archaeological desk-based assessment, potentially including geophysical survey, ahead of proposals	CAR0786

						would inform any further mitigation. Our understanding has not changed, and our recommendation remains the same for all the site.	
57	320230 182560	Land to the north of Ty-Draw Road	15.33	Residential		Previous recommendation that if included, archaeological field evaluation should be undertaken, and geophysical survey would provide further elucidation, ahead of determination. Our understanding has not changed, and our recommendation remains the same.	CAR0787
58	323230 182540	Land to the rear of Charters, North of Druidstone Road	0.68	Residential and proposed amendment to settlement boundary of Druidstone Road		Archaeological evaluation was undertaken nearby, no significant archaeological features were encountered and no further mitigation was recommended. Previous recommendation in LDP indicated no mitigation, our understanding has not changed.	CAR0788
59	323180 182520	Land to the rear of Mainbrace, Druidstone Road	0.9	Residential and proposed amendment to settlement boundary of Druidstone Road		Archaeological evaluation was undertaken nearby, no significant archaeological features were encountered and no further mitigation was recommended. Previous recommendation in LDP indicated no mitigation, our understanding has not changed.	CAR0789
18	308140 180720	Land to the South of Creigiau	38.8	Residential		For previous proposals for development in this area, we recommended archaeological assessment, which has been undertaken. Resulting recommendations for geophysical survey to inform field evaluation have been made but not undertaken yet. Our understanding of the archaeological	CAR0790

						resource has not changed. Therefore, our recommendation remains the same.	
19	308400 180280	Land to the South of Llantrisant Road (Part of Site D)	13	Residential		The Historic Environment Record notes sequences of buildings at the Llwynioli farm site, adjoining, these are noted on the Tithe of 1839, and the First Series of 1833, and have changed over time. Remains of these may exist; no objection to inclusion, may require historic environment mitigation, it is likely that this could be addressed by condition.	CAR0791
35	318240 183920	Land to the West of Graig Road and North of the M4	13.2	Residential		Adjoins the Registered Cefn Onn Park to the west, PGW(Gm)20(CDF), information in the Historic Environment Record indicates no noted features, however, there are undated sites adjacent. The impact on the setting of the Park would need to be assessed.	CAR0792
39	314830 179530	Llandaff Station Car Park	0.45	Transit orientated development through the reconfiguration of the car park to deliver transport integration measures and potential redevelopment for employment / residential uses.		The Historic Environment Record notes the railway station buildings on historic mapping sequences, since then the buildings were demolished and the area has been landscaped. It is our opinion that it is unlikely archaeological deposits would be encountered during development.	CAR0793
77	314180 180840	Northern Meadows	9.3	Community Greenspace		Adjoins the Registered Park of Coryton House to the north, PGW (GM) 67(CDF), and Whitchurch Hospital Registered Park PGW(Gm)66(CDF) to the east, information	CAR0794

						in the Historic Environment Record indicates no other noted features, however, the impact of the proposed change on the setting of the Park would need to be assessed.	
23	311000 179300	Plasdŵr Uchaf	144	Residential-led mixed use development forming an extension to the existing Plasdŵr allocation.		Information in the Historic Environment Record indicates some known archaeological features, and some potential features identified on aerial photographs. Archaeological desk-based assessment, including geophysical survey, ahead of proposals would inform any further mitigation.	CAR0795
9	320300 174300	Port of Cardiff	289.29	Port, port-related uses and mixed-use development		Information in the Historic Environment Record indicates a number known archaeological features, primarily associated with the formation and use of the docks, including wrecks and other features. Formerly tidal estuary, disturbance may also encounter buried palaeoenvironmental deposits. Archaeological desk-based assessment, ahead of proposals would inform any further mitigation.	CAR0796
4	319530 174150	Porth Teigr and Alexandra Head	27	Retail & Food & Drink, Business, Hotel, Residential, Assembly and Leisure, Car Parking and transport infrastructure.		Information in the Historic Environment Record indicates a number known archaeological features, primarily associated with the formation and use of the docks, including wrecks and other features. Formerly tidal estuary, disturbance may also encounter buried palaeoenvironmental deposits. Archaeological desk-based assessment,	CAR0797

						ahead of proposals would inform any further mitigation.	
8	319870 174850	Queensgate	3.67	Port, port-related uses and mixed-use development		The Historic Environment Record notes the area as the site of reclaimed land, with late 19 th and 20 th century engine house, tanks, buildings and railway lines. Whilst the site has been partly remediated, some development, particularly with deeper foundations, may require mitigation.	CAR0798
60	313540 180400	Radyr Station Car Park	0.93	Transit orientated development through the reconfiguration of the car park to deliver transport integration measures and potential redevelopment for employment / residential uses.		The Historic Environment Record notes buildings on historic mapping sequences, since then the buildings were demolished and the area has been landscaped. It is our opinion that it is unlikely archaeological deposits would be encountered during development.	CAR0799
15	308860 180520	Robin Hill, Creigiau	0.4	Residential		Information in the Historic Environment Record indicates no noted features.	CAR0800
37	315020 178070	Rookwood Hospital	3.4	Residential		Information in the Historic Environment Record records Rookwood House, a mid 19 th century house as changed but surviving, with formal gardens and a summer house re-erected from Cardiff Castle. Used as a First World War convalescent home. Archaeological desk-based assessment ahead of proposals would inform any further mitigation.	CAR0801

44	311870 182450	Taffs Well Quarry	4.6	Extension to the quarry		Information in the Historic Environment Record records a number of sites related to early minerals extraction in the area, and evidence of prehistoric activity in the wider area. Archaeological desk-based assessment ahead of proposals would inform any further mitigation.	CAR0802
82	323200 182456	The Manor, Druidstone Road	0.44	Residential		Archaeological evaluation was undertaken nearby, no significant archaeological features were encountered and no further mitigation was recommended. Previous recommendation in LDP indicated no mitigation, our understanding has not changed.	CAR0803
45	311260 182300	Ton Mawr Quarry	12	Extension to the quarry		Information in the Historic Environment Record records a number of sites related to early minerals extraction in the area, and evidence of prehistoric activity in the wider area. Archaeological desk-based assessment ahead of proposals would inform any further mitigation.	CAR0804
76	314800 180460	Velindre Cancer Centre	3.98	Residential and ancillary mixed uses		Adjoins and includes part of the Registered Park of Whitchurch Hospital, PGW(Gm)66(CDF), and associated Listed Structures. Information in the Historic Environment Record indicates no other noted features, however, the impact of the proposed change on the setting of the Park would need to be assessed.	CAR0805
79	314140 181000	Velindre Station	1	Proposed new metro station adjacent to the forthcoming		Is within the Essential setting to and adjoins the Registered Park of Coryton House to the north, PGW (GM) 67(CDF), and Whitchurch Hospital Registered Park PGW(Gm)66(CDF)	CAR0806

				new Velindre Cancer Centre site.		to the east. Information in the Historic Environment Record indicates no other noted features, however, the impact of the proposed change on the setting of the Park would need to be assessed.	
74	324300 179700	Wentloog Levels – Rhymney and Peterstone SSSI	5700	Biodiversity and active travel		Significant Restraint: The area is within the Registered Landscape of the Gwent Levels (Cadw reference HLW (Gt) 2) and includes all or part of four Character Areas HLCA018 Rumney; HLCA019 Trowbridge, HLCA017 Peterstone, and HLCA020 Marshfield. It is within the Archaeologically Sensitive Area of the Gwent Levels, and includes Scheduled Monuments and Listed Buildings. There is a high likelihood of buried remains including waterlogged organic deposits; buried land surfaces, and palaeobotanical information. If included, archaeological desk-based assessment, potentially including geophysical survey, ahead of proposals would inform any further mitigation.	CAR0807
78	314550 180600	Whitchurch Hospital	22.2	Mixed use development of hospital, residential, leisure, employment, community and retail facilities with playing fields.		Restraint: Information in the Historic Environment Record shows the site to be the Whitchurch Hospital Registered Park PGW(Gm)66(CDF), and the associated Listed Buildings. This includes the open aspects of the gardens are planned and designed. The impact of the proposed change on the setting of the Park would need to be assessed. Due to the extent, Cadw should be consulted.	CAR0808

75	315390 180420	Whitchurch Tennis Club	0.67	Sporting facility / community facility / open space		Information in the Historic Environment Record shows the site as adjoining the area noted as the original Medieval settlement at Whitchurch, comprising a church, and motte, with Roman and prehistoric remains also recorded in the immediate area. Although altered, any changes may encounter archaeological deposits. Archaeological desk-based assessment, and potentially further investigative mitigation work, prior to determination of any application.	CAR0809
32	316880 174850	Wholesale Fruit Market, Bessemer Road	4.8	Residential		Previous response to LDP inclusion noted the site is on reclaimed land and deeper foundations may encounter archaeological deposits. Whilst the site has been partly remediated, some development, particularly with deeper foundations, may require mitigation.	CAR0810

Rhif Sylwedydd / Representor Number:

11

Rhif Sylw / Representation Number(s):

11.01

Enw Sylwedydd / Representor Name:

Jonathan Davies

(Spring Consultancy)

From: [REDACTED]
To: [Local Development Plan / Cynllun Datblygu Lleol](#)
Subject: Deposit Plan Consultation Response - RE2: Net Zero Development
Date: 06 March 2025 09:17:34
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
Importance: High

EXTERNAL: This email originated from outside Cardiff Council, take care when clicking links.
ALLANOL: Daw'r e-bost hwn o'r tu allan i Gyngor Caerdydd, cymerwch ofal wrth glicio ar ddolenni.

Dear Policy Development Team,

Why does RE2: Net Zero Development contain no specific targets or standards for buildings to achieve? [LETI](#), [RIBA](#) and the [UK GBC](#) – culminating in the [UK Net Zero Carbon Building Standard](#) – apply specific metrics and targets to embodied and operational carbon. Without clear metrics or standards to guide development, policies can be easily misinterpreted/ misapplied and potential carbon reductions lost.

Scientifically robust targets would ensure the appropriate delivery of Cardiff's Net Zero commitments while clarifying to designers, developers and development control officers what they need to achieve.

Multiple LAs in England have already adopted such policies (B&NES, Central Lincolnshire, Cornwall and the Lake District at our last count) and many more are proposing similar positions. Within the Welsh context, Spring are actively assisting both the Vale of Glamorgan and Monmouthshire County Councils in developing Net Zero policy for their forthcoming rLDPs.

We would welcome the opportunity to discuss how this can be applied, tested and evidenced for the rLDP with Cardiff's policymakers.

Best,

Jonathan Davies BDesArch (Hons 1 + Medal), MArch
Associate Director Sustainability
AECB CarbonLite Building Standard Certifier & PHPP Modeller
Certified Passivhaus/ Passive House Designer

Rhif Sylwedydd / Representor Number:

12

Rhif Sylw / Representation Number(s):

12.01 – 12.03

Enw Sylwedydd / Representor Name:

Angela Gray

From: [REDACTED]
To: [Local Development Plan / Cynllun Datblygu Lleol](#)
Subject: Consultation Response to draft RLDP
Date: 12 April 2025 16:29:13

EXTERNAL: This email originated from outside Cardiff Council, take care when clicking links.

ALLANOL: Daw'r e-bost hwn o'r tu allan i Gyngor Caerdydd, cymerwch ofal wrth glicio ar ddolenni.

Dear Sir/Madam

I write to broadly support the Council's draft Deposit Plan, in particular the Strategic Policies SP16 and 17 which protect areas outside the current Settlement Boundary from future development.

I would however like to see more information on the current status of the Masterplan for Strategic Site C Plasdwr since the completion of this development contributes a large percentage of the growth strategy in the LDP and there is very little (if any) reference to the monitoring of any deliverables beyond the bare numbers of projected completions.

Yours faithfully

Angela Gray

Rhif Sylwedydd / Representor Number:	13
Rhif Sylw / Representation Number(s):	13.01
Enw SylwedyddRhif Sylw / Representor Name:	Tom Vaughan

From: [REDACTED]
To: [Local Development Plan / Cynllun Datblygu Lleol](#)
Subject: Cardiff Local Development Plan - Priority for Active Travel
Date: 01 April 2025 22:55:19

Dear Sir/Madam,

I wish to raise the following points in relation to the Replacement LDP.

All LDPs must comply with Planning Policy Wales Edition 12.

Sections 3 and 4 of PPW12 stress the need for new developments to minimise car use. Clause 4.1.11 states Development proposals must seek to maximise accessibility by walking, cycling and public transport, by prioritising the provision of appropriate on-site infrastructure and, where necessary, mitigating transport impacts through the provision of off-site measures, such as the development of active travel routes, bus priority infrastructure and financial support for public transport services. Importantly, sustainable transport infrastructure and services should be prioritised and put in place from the outset, before people have moved in and travel patterns have been established.

The Cardiff LDP does not currently require this infrastructure to be in place before people move in, so they tend to get used to relying on cars, rather than using sustainable transport modes.

I would ask that the Council considers how these important issues should be addressed in the plan.

Please acknowledge receipt of this email.

Yours faithfully

Tom Vaughan



Rhif Sylwedydd / Representor Number:

14

Rhif Sylw / Representation Number(s):

14.01

Enw Sylwedydd / Representor Name:

Steve Convery

From: [REDACTED]
To: [Local Development Plan / Cynllun Datblygu Lleol](#)
Subject: Cardiff Replacement Local Development Plan 2021-2036 Deposit Plan
Date: 01 April 2025 22:42:16

Good evening.

I am writing to register my increasing concern regarding the uncontrolled development in northwest cardiff - specifically in the Radyr and Morganstown area.

As a resident, and having endured the construction in the area for approaching 7 years (plas Dwr), I can confirm that the existing development is totally at odds with the available current infrastructure, and hence quality of life has been significantly adversely impacted as a result.

The remaining green spaces (farmland and wooded areas) in the area are all that remain of a former countryside environment. These remaining amenities are crucial for the well-being of current residents and the remaining wildlife which has managed to withstand the onslaught of development.

The current development- despite assurances to the contrary - have not considered amenities including transport provision and drainage (foul and surface water), with the resultant issues for the residents and ecology in the area. There is therefore no confidence that future development will make conditions any better.

The existing development, I believe, has not met the local and national requirements for such a scale of development to date, and as such I have no confidence that ongoing issues will be sufficiently addressed, let alone a further expansion of development in this area.

I am writing having watched the reality of the plans as they have unfolded, and suggest that the proposals for yet more development are simply unacceptable.

I urge you to consider these realities going forward.

Regards

Steve Convery

Sent from my iPhone

Rhif Sylwedydd / Representor Number:


15

Rhif Sylw / Representation Number(s):

15.01

Enw Sylwedydd / Representor Name:

David Silver

From: 
To: [Local Development Plan / Cynllun Datblygu Lleol](#)
Subject: Deposit Plan
Date: 01 April 2025 20:56:08

EXTERNAL: This email originated from outside Cardiff Council, take care when clicking links.

ALLANOL: Daw'r e-bost hwn o'r tu allan i Gyngor Caerdydd, cymerwch ofal wrth glicio ar ddolenni.

Overall I support the deposit plan which I believe is realistic. I strongly agree that no new greenfield sites are necessary in the plan or on the reserve list. Plasdwr will not be completed by 2036 and if housing is needed, completion of this site should be the priority.

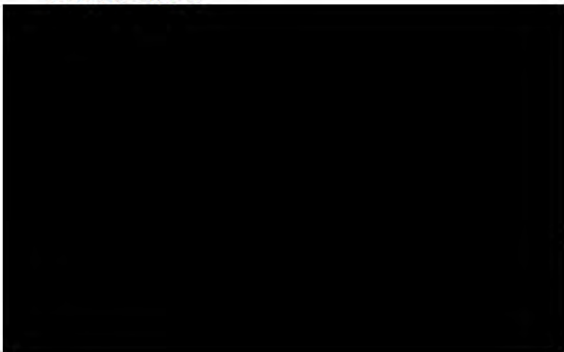
I agree that site 61 Goetre Fawr should not be included in the plan. It is a greenfield site which is much used in the community. It is also not needed as the Plasdwr site will not be completed before the end of the plan in 2036 and it is not needed to support the growth strategy of the plan.

I agree that site 80, Cwm Farm should not be included in the plan as it is part of the green wedge.

I agree that site 60, Radyr Station Car Park should not be included in the plan. There are currently not enough parking spaces in the current car park and the roads surrounding the station are full of parked cars during the week. Removal of the car park would move more cars into an area where there is no space for them. It would not fit in with an integrated transport system to link the metro to the bus system. The aim of this site appears to be purely to raise funds by the Welsh Government and not by any need in the plan. It would be very detrimental to the whole community and remove any prospect of a desperately needed integrated transport system for the area.

I agree that site 23, Plasdwr Uchaf should not be included in the plan. It is in protected countryside outside the settlement boundary and is not needed to meet the growth strategy of the plan.

David Silver



Rhif Sylwedydd / Representor Number:

16

Rhif Sylw / Representation Number(s):

16.01 – 16.03

Enw Sylwedydd / Representor Name:

Cwmpass

From: [REDACTED]
To: [Local Development Plan / Cynllun Datblygu Lleol](#)
Cc: [Williams, Helen E \(Planning\)](#)
Subject: RE: Cynllun Datblygu Lleol Newydd Caerdydd / Cardiff Replacement Local Development Plan
Date: 01 April 2025 10:17:43
Attachments: [image001.png](#)
[Cardiff RLDP Deposit Plan Consultation - Cwmpas Response - April 2025.docx](#)
Importance: High

***** Warning: This email contains a Microsoft Office (Word, Excel, PowerPoint) or Adobe PDF attachment. Although this email has been scanned for threats, please think before opening attachments from unrecognised senders.**

Rhybudd: Mae'r e-bost hwn yn cynnwys atodiad Microsoft Office (Word, Excel, PowerPoint) neu PDF Adobe. Er bod yr e-bost hwn wedi'i sganio ar gyfer unrhyw fygythiadau, meddylwch cyn agor atodiadau gan anfonwyr nad ydych yn eu hadnabod. ***

EXTERNAL: This email originated from outside Cardiff Council, take care when clicking links.
ALLANOL: Daw'r e-bost hwn o'r tu allan i Gyngor Caerdydd, cymerwch ofal wrth glicio ar ddolenni.

Further to the email inviting comments as part of the public consultation on the Deposit Plan of the Cardiff Replacement Local Development Plan, on behalf of Cwmpas, please find attached our consultation response.

I trust that this is satisfactory and I should be grateful if you could acknowledge receipt of the response.

Finally, if you have any queries, or require any additional information in regard to our response, please do not hesitate to contact me.

Many thanks

Jonathan

Jonathan Hughes

Ymgynghorydd Tai Cymunedol (Datblygu) | Community Led Housing Advisor (Development) | Cwmpas



Comments of Cwmpas (Consultee)

Cardiff Replacement Local Development Plan (RLDP) 2021-2036

Deposit Plan Consultation

Our comments and observations are made in the context of the overall document issued for consultation and are noted thus:

By way of background, Cwmpas, previously known as the Wales Co-Operative Centre, is a development agency focused on building a fairer, greener economy and a more equal society, where people and planet come first. Established in 1982, Cwmpas have made it their mission to change the way our economy and society works. Cwmpas is a not for profit organisation which supports Wales' economic growth, helps communities to become stronger and more inclusive and in turn supports people in Wales to improve their lives and livelihoods by delivering a range of projects which help social businesses to grow; help people to learn digital skills, help people set up their own co-operatives in care and housing and help people to invest in their community.

Having reviewed the Deposit Plan consultation document, Cwmpas sees a clear synergy between the key objectives and vision statements within the Deposit Plan of the emerging Cardiff Replacement Local Development Plan and community led affordable housing programmes and projects. Community-led housing is housing development where the community plays an integral role in identifying local needs and bringing a proposal forward with a view to delivering social and economic benefits to a local area. Such projects must meet long term housing needs and will provide affordable housing for local people. This can include all types of affordable housing meeting defined within the Welsh planning policy context. Furthermore, there is a direct statement of support for community led housing projects within the Welsh Government 'Programme for Government 2021 – 2026'.

In reviewing the Deposit Plan, Cwmpas believes that community led affordable housing has direct relevance and contribution to the following policies within the Deposit Plan and for which it is believed that a direct and overt reference to community led housing could provide a positive contribution in furthering the diverse means by which affordable housing can be delivered in Cardiff:

- SP12: Delivering sustainable neighbourhoods, social cohesion and affordable housing
- SP7: Supporting placemaking plans
- Objective 1: To provide a variety of quality low carbon homes to address the housing crisis and future housing needs - Provide a range and choice of new homes of different tenure, type and location in response to specific housing needs, including responding to the needs of older people;
- Objective 6: To create healthier environments, reduce inequalities and improve wellbeing
- Objective 9: To use the placemaking approach to create sustainable places
- Housing Policies: H1A: Strategic Housing Sites, H1B: Non-Strategic Housing Sites, H2: Housing Led Regeneration Areas, H3: Affordable Housing

Furthermore, it is considered that the direct reference to community led affordable housing in the Deposit Plan document would address and remove some of the potential barriers and challenges faced in the delivery of such forms of housing in terms of the availability of sites, enhancing evidence bases of housing need through genuine community level assessment and survey to supplement wider LHMA's and, standards within community led housing schemes around design, density, energy and sustainable transport most closely reflect placemaking principles. In addition, explicit reference to community led housing will bridge the knowledge gap around models and management of such housing when compared to other more traditional forms of private and social housing development and thereby recognise the important role and contribution community led affordable housing makes in addressing pressing and urgent housing needs.

Recognition of community led affordable housing within the Deposit Plan would reflect the changes made in February 2024 and introduced into PPW (Edition 12) and within that the recognition of the role of community led housing including:

Paragraph 4.2.14 PPW now stating:

'As part of considering housing delivery options, planning authorities should understand the contribution that all sectors of the housing market and house-builders could make to meeting their housing requirement. When allocating sites, planning authorities need to consider providing a range of sustainable and deliverable sites to allow all sectors and types of house-builder, including nationals, regionals, registered social landlords (RSLs), Small and Medium-sized Enterprises (SMEs), community-led housing organisations and the custom and self-build sector, the opportunity to contribute to delivering the proposed housing requirement.'

Similarly, Paragraph 4.2.15 PPW states:

'To assist in broadening the housing delivery options and enable the provision of housing by RSLs, SMEs, community-led housing organisations and the custom and self-build sector, planning authorities should set a locally determined target for the delivery of housing on small sites. To facilitate this, planning authorities should maintain a register of suitable sites which fall below the threshold for allocation in their development plan. Planning authorities should also work with developers to encourage the sub-division of large sites where this could help to speed up the delivery of homes.'

Finally, and most significant to our consultation response, Paragraph 4.2.27 of PPW now states:

'Affordable housing includes social rented housing owned by local authorities and RSLs and intermediate housing where prices or rents are above those of social rent but below market housing prices or rents. Affordable housing may also include that owned by community-led housing organisations where this meets the Welsh Government's definition set out in paragraph 4.2.26 above. All other types of housing are referred to as 'market housing,' that is private housing for sale or rent where the price is set in the open market and occupation is not subject to control by the local authority. It is recognised that some schemes may provide for staircasing to full ownership and where this is the case there must be secure arrangements in place to ensure the recycling of capital receipts to provide replacement affordable housing.'

It is now clearly the case that PPW supports community-led housing as a form of affordable housing and that, in the view of Cwmpas, this is material to the considerations of Local Development Plan preparation and from which the Cardiff Deposit Plan would benefit.

With Planning Policy Wales ("PPW") being the principal national planning policy document which sets out the land use policies of the Welsh Government against which development proposals should be assessed, the latest version published in February 2024 seeks to ensure that the planning system contributes towards sustainable development and improves the social, economic, environmental, and cultural well-being of Wales. Placemaking lies at the heart of PPW with local planning policy required to seek to deliver development that adheres to these principles. In a bid to ensure placemaking is prioritised, and to aid in implementing the Well-being of Future Generations Act, policy topics within PPW have been grouped under four themes, namely 'Strategic and Spatial Choices,' 'Active and Social Places,' 'Productive and Enterprising Places,' and 'Distinctive and Natural Places.' Community led affordable housing development makes positive and significant contributions to each of these themes.

Additionally, PPW promotes action at all levels of the planning process which is conducive to maximising its contribution to the well-being of Wales and its communities. In this regard it seeks to achieve WG's well-being goals with PPW stating emphatically that 'legislation secures a presumption in favour of sustainable development.' Moreover, PPW covers the Key Planning Principles of WG in seeking to achieve 'the right development in the right place.' Development proposals must seek to deliver development that addresses these outcomes. Another Key Planning Principle of WG is facilitating accessible and healthy environments, stating that 'Our land use choices and the places we create should be accessible for all and support healthy lives. High quality places are barrier-free and inclusive to all members of society. They ensure everyone can live, work, travel and play in a way that supports good physical and mental health.' Similarly, creating, and sustaining communities is a further Key Planning Principle, stating: 'The planning system must work in an integrated way to maximise its contribution to well-being. It can achieve this by creating well-designed places and cohesive rural and urban communities which can be sustained by ensuring the appropriate balance of uses and density, making places where people want to be and interact with others. Our communities need the right mix of good quality/well designed homes, jobs, services, infrastructure, and facilities so that people feel content with their everyday lives.'

In summary, wellbeing goals of the Well-being of Future Generations Act (WFGA) are clearly adhered to in community led affordable housing. PPW 12 brings the objectives of the Act into clearer focus in a planning context, and within which community led affordable housing delivery is specifically recognised. Hence, by introducing community led affordable housing into the Deposit RLDP, there exists compliance with PPW which thereby demonstrates adherence to the WFGA.

Going forward, however, Cwmpas, would consider that detailed planning policy development within the Deposit RLDP should make an overt and explicit community led affordable housing development reference and with specific community led housing policies in addition to those subsumed within more generic and general housing policies.

Firstly, Deposit RLDP policies on community led housing development could include a definition which might read:

A development instigated and taken forward by a not-for-profit organisation set up and run primarily for the purpose of meeting the housing needs of its members and the wider local community, rather than being a primarily commercial enterprise. The organisation is created, managed, and democratically controlled by its members. It may take any one of various legal forms including community land trusts, housing co-operatives, co-housing, mutual housing, tenant-controlled housing. Membership of the organisation is open to all beneficiaries and prospective beneficiaries of that organisation. The organisation should own, manage, or steward the homes in a manner consistent with its purpose with benefits of the development to the specified community should being clearly defined and consideration given to how these benefits can be protected over time, or in perpetuity. Community led housing schemes share three common principles: a requirement that meaningful community engagement and consent occurs throughout the process; the local community group or organisation own, manages or stewards the homes; and a requirement that the benefits to the local area and/or specified community are clearly defined and legally protected in perpetuity.

Secondly, it is evident that supporting the delivery of self-build or custom housebuilding and community-led housing can contribute to greater housing choice and potentially provide lower cost and affordable options for households than regular market housing. The importance of PPW Edition 12 is key to the evolution of specific community led housing policies within the RLDP preparation process at Deposit Plan stage. This could be addressed in policy drafting to include:

- Site specific allocations for community led affordable housing;
- Provision for community led housing as part of wider new development say 5 -10% of the dwellings on larger strategic growth or regeneration sites;
- Community led housing exceptions sites as in repurposing or more efficient and effective re-use of redundant community buildings and land, or, reuse of underused or vacant employment or industrial land, or, reserved open space provided the proposal is demonstrably supported by the local community and no deficiency of open space will arise as a consequence.

However, it is considered a positive feature that the consultation document is underpinned throughout by the principles of placemaking, good quality design and the role of local community distinctiveness and character and within that the essence of the Well Being of Future Generations Act and post-pandemic recovery as if anything the pandemic has seen the role of 'home' and 'place' become more important than ever. Cwmpas believes that these elements are essential to fostering community cohesion, resilience, safety, and connection, and creating places and environments where the health and well-being of individuals, residents, business, and communities can thrive, flourish, and reach their full potential based on community led affordable housing delivery at its heart. As such, community led housing will be fundamental both to the qualitative nature of new affordable housing in the Cardiff and to the quantitative targets of delivering upon the new affordable homes targets for the emerging RLDP. Moreover, as well as further indirect impacts and outcomes on all seven of the WBFG Act goals, there is a direct correlation of community led housing with those goals concerned with Healthier Wales, More Equal Wales, Wales of Cohesive Communities, and Globally Responsive Wales.

In summary, it is considered that the direct reference to community led housing in the Deposit Plan document would represent a very positive addition and that it would address and remove

some of the potential barriers and challenges faced in the delivery of such forms of housing by drafting specific community led housing policies at the RLDP Deposit Plan stage.

Rhif Sylwedydd / Representor Number:

17

Rhif Sylw / Representation Number(s):

17.01 – 17.13

Enw Sylwedydd / Representor Name:

Julie Morgan Senedd Member

Julie Morgan

Aelod o'r Senedd dros
Ogledd Caerdydd

Member of the Senedd for
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4 April 2025

Re: Response to LDP consultation on the Deposit Plan

I am submitting these comments on Cardiff Council's LDP – Deposit Plan – in my capacity as the Member of the Senedd for Cardiff North.

I welcome the publication of the Deposit Plan and its ambition for the future of Cardiff. I am pleased to see that responses to previous consultations on the replacement LDP have been given serious consideration and alternatives proposed as a result. As the Chair of the Gypsy and Traveller Cross Party Group in the Senedd, I am particularly pleased to see that further consideration has been given to the provision of sites for Gypsies and Travellers since the last consultation. I will be making further comment on this later on in my submission.

I note that the preferred strategy is to provide for 26,400 new homes in Cardiff during the plan period and that there is the potential for 5000-6000 of those homes to be affordable. The current housing crisis we are currently experiencing in Cardiff needs to be tackled head-on. I understand that there are currently close to 8000 people on Cardiff Council's housing waiting list so I am concerned that the provision for social housing is not enough to meet the need of the population.

I welcome the ambition that the majority of new-build housing will be on brownfield sites across the city and that there is a commitment that no greenfield sites, other than those already earmarked for development, will be used. It will always be my preferred option that housing be built on brownfield sites, but I do recognise that in some circumstances greenfield sites will need to be utilised. In those cases, I would urge that all considerable mitigations are put in place to minimise the impact to our environment and I hope that this will be the case for the new greenfield housing developments.

Considerable areas of Cardiff North are earmarked as strategic housing sites (SH1.1, SH1.2, SH1.3) which equate to 650 dwellings. There are also two housing-led regeneration areas (H2.2 and H2.3) that fall in my constituency. These developments need to be sustainable, integrated and cohesive with the communities around them, and I welcome the commitment in the Deposit Plan for this. The people of Cardiff are fiercely community-minded, and ensuring that future developments tie in with existing communities is something that I support. This means that local services, schools, shops, healthcare settings and recreational spaces should also be integrated so there is not a feeling of exclusion or difference between areas.

The creation of new 32,300 new jobs in Cardiff is also welcome. However, we have to be mindful to ensure that these jobs are the right jobs for our city. The plans to regenerate land at Forest Farm on Longwood Drive for a Life Science Park are very exciting and tie in with the overall view of north Cardiff being a 'health hub', with the University Hospital of Wales and the existing and new Velindre Cancer Centre being in close proximity. I also welcome the provision of employment land in the wider housing-led developments in the north-east of Cardiff, which will supply a good range of employment opportunities.

I strongly welcome the commitment to secure new infrastructure, which includes new schools, health and social care facilities, community spaces, open space, sustainable drainage systems, public art, and waste management facilities. Without these things underpinning new and existing developments, they will not function as they should.

Transport infrastructure is a large part of this and I am pleased to see the amount of emphasis that has been put into this, especially the Cardiff Transport White Paper which sets a target of 75% being made by sustainable transport by 2030. We must do all we can do to save our environment which means getting people out of their cars and using public transport or using active travel. The current transport infrastructure in Cardiff at the moment doesn't completely allow for this, although I commend the work that has been done so far. I would support the inclusion of more routes and facilities for people walking and cycling, bus corridors and bus priority measures, improved rail network and seamless integration between all modes of transport. In regards to new railway stations, I would like to propose stations at Gabalfa and Velindre. These stations are already on Transport for Wales's list, but there is currently no timescale for when they will be delivered.

It is also important that we have a transport system in Cardiff that everyone can navigate, no matter your physical ability. I would like to see all proposals made in co-production with disabled people, disability charities and others to ensure that the system in place works for everyone and doesn't create unnecessary danger.

More generally on creating a disability-friendly city, we need to have accessible housing and there should be a requirement to incorporate these into housing developments. Public spaces should be inclusive, designed for everyone including those with mobility or sensory needs. The new jobs that are being created in Cardiff should be accessible for disabled people, with businesses actively encouraged to hire and support disabled employees. City-wide consultations, such as the LDP, should be easily accessible in accessible formats, such as each read, braille and BSL, so that disabled people are not excluded from contributing their voice to these important matters.

I welcome the Deposit Plan's recognition that Cardiff is a child-friendly city, designated by UNICEF. It is therefore important that the future of Cardiff is designed with children in mind and therefore nothing should be done that negatively impacts their future.

Climate change is very real and we are already experiencing dramatic changes in our weather. We are experiencing more storms and heavy rain which is leading to significant flood risk in many areas. As mentioned in previous LDP consultation responses, areas of Whitchurch and Llandaff North in my constituency flooded in 2020 and regularly receive flood alerts during periods of intense heavy rain. All developments must be designed and built in a way that does not increase the likelihood of flooding in those areas, nor increases the chance of flooding in other areas. I am pleased to see the focus on the Sustainable Urban Drainage Schemes and that assessing flood risk implications of development proposals will be carried out. I also welcome the commitment that trees should be retained and protected, as well as the expectation that developments will maintain and enhance the 'integrity, extent, diversity, quality and connectivity of green infrastructure assets' and ensure the resilience of ecosystems.

I welcome the commitment that all new build developments will be expected to be NetZero. This should include all housing, whether that be social, affordable or private housing. New properties should not be built with gas boilers but instead with environmentally friendly systems such as heat pumps.

I remain concerned that the position within the LDP is that the land north of the M4 is to remain as a Green Wedge. While I am pleased that there is the protection of Green Wedge status on this land, it does mean that some development can take place. It also means that this protection is only in place during the lifespan of this Local Development Plan which runs until 2036. I have campaigned to protect this land since being elected as a representative of Cardiff North in 1997 and firmly believe that the land should be afforded Green Belt status. My view on this will not change and I would look to the Council to change its position.

Moving onto the provision for Gypsies and Travellers in Cardiff in my role as the Chair of the Cross Party Group on Gypsies and Travellers. The plan is to create a temporary site of 80

pitches at Pengam Green for a minimum of 10 years so that residents living on the existing Rover Way site can live there while the old site is renovated. However, I am concerned that by your own admission that this temporary site is above the recommended site size in national guidance. When speaking to organisations that represent the Gypsy and Traveller community, they are clear that a site of this size will simply not work and will create tensions within the community.

Candidate sites

My comments on the candidate sites remain the same as my last consultation submission.

I **do not** support any of the candidate sights that are north of the M4.

Flaxland Woods – I agree that this area should be kept as community greenspace.

Land south of Mynachdy Road, Gabalfa – I support the proposal for this to be a new train station with affordable housing

Llandaf station car park – Llandaf station is a busy station, used by commuters and families. There is a need for the car park to be retained to support the use of the station. I am not convinced that this site should be redeveloped for employment or residential use as proposed.

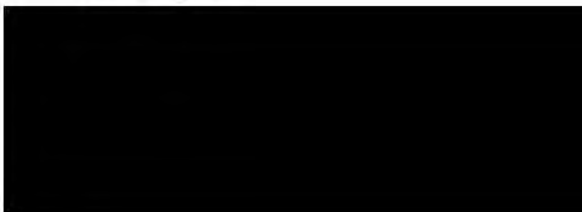
Whitchurch Tennis Club – I strongly support the proposal for this site to be retained for sporting and community facilities

Conclusion

I welcome the opportunity to give feedback on the Deposit Plan and its commitments to create an integrated, sustainable and flourishing capital city of Wales of the future. We owe it to our future generations to build a city where children can thrive, people are adequately housed, it is easy and simple to get around and is ecologically sensitive to climate change.

I hope that you will take these points into consideration.

Kind regards,



Julie Morgan MS
Member of the Senedd for Cardiff North

Rhif Sylwedydd / Representor Number:

18

Rhif Sylw / Representation Number(s):

18.01 – 18.09

Enw Sylwedydd / Representor Name:

National Grid Electricity
Transmission

Our Ref: 105181-024
04 April 2025

Cardiff City Council
LDP@cardiff.gov.uk
via email only

Fisher German LLP
The Estates Office
Norman Court
Ashby de la Zouch
LE65 2UZ

t. 01530 412821
fishergerman.co.uk

Dear Sir /Madam,
Cardiff Replacement Local Development Plan 2021 – 2036
Representations on behalf of National Grid Electricity Transmission

National Grid Electricity Transmission has appointed Fisher German LLP to review and respond to local planning authority Development Plan Document consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.

About National Grid Electricity Transmission (NGET)

National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. NGET manage not only today's highly complex network but also to enable the electricity system of tomorrow. Their work involves building and maintaining the electricity transmission network – safely, reliably and efficiently. NGET connect sources of electricity generation to the network and transport it onwards to the distribution system so it can reach homes and businesses.

National Grid Electricity Distribution (NGED) are the electricity distribution division of National Grid, and are separate from National Grid Electricity Transmission's core regulated businesses. Please also consult with NGED separately from NGET.

National Grid no longer owns or operates the high-pressure gas transmission system across the UK. This is the responsibility of National Gas Transmission, which is a separate entity and must be consulted independently.

National Grid Ventures (NGV) develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States. NGV is separate from National Grid's core regulated businesses. Please also consult with NGV separately from NGET.

National Energy System Operator (NESO) has taken over the electricity and gas network planning responsibility from National Grid Electricity System Operator Limited (NGESO) as of 1st October 2024. Please also consult with NESO separately from NGET.

Proposed development sites crossed or in close proximity to NGET assets

Following a review of the above Development Plan Document, we have identified that one or more proposed development sites are crossed or in close proximity to NGET assets. Details of the sites affecting NGET assets are provided below.

Development Plan Document Site	Asset Description
Policy EC2	WG ROUTE: 275Kv Overhead Transmission Line route: TREMORFA - USKMOUTH – WHITSON & ABERTHAW - TREMORFA

Land south of St Mellons Business Park	XM ROUTE: 275Kv Overhead Transmission Line route: CARDIFF EAST - USKMOUTH – WHITSON & ABERTHAW - TREMORFA
Policy EC3.3 Existing Employment Land	WG ROUTE: 275Kv Overhead Transmission Line route: TREMORFA - USKMOUTH – WHITSON & ABERTHAW - TREMORFA TREMORFA 275KV Substation TREMORFA 33KV Substation
Policy EC3.6 Existing Employment Land	VP ROUTE: 275Kv Overhead Transmission Line route: ABERTHAW - CARDIFF EAST – PYLE & CARDIFF EAST - USKMOUTH - WHITSON
Policy EC3.9 Existing Employment Land	XM ROUTE: 275Kv Overhead Transmission Line route: ABERTHAW - CARDIFF EAST – PYLE & ABERTHAW - TREMORFA
Policy EC3.23 Existing Employment Land	VP ROUTE: 275Kv Overhead Transmission Line route: ABERTHAW - CARDIFF EAST – PYLE & CARDIFF EAST - USKMOUTH - WHITSON
Policy EC3.25 Existing Employment Land	VP ROUTE: 275Kv Overhead Transmission Line route: ABERTHAW - CARDIFF EAST – PYLE & CARDIFF EAST - USKMOUTH - WHITSON
Policy SP1 Housing Commitment over 100 dwellings	VP ROUTE: 275Kv Overhead Transmission Line route: ABERTHAW - CARDIFF EAST – PYLE & CARDIFF EAST - USKMOUTH - WHITSON
Policy H2 Housing Led Regeneration Area	VP ROUTE: 275Kv Overhead Transmission Line route: ABERTHAW - CARDIFF EAST – PYLE & CARDIFF EAST - USKMOUTH - WHITSON

A plan showing details of the site locations and details of NGET assets is attached to this letter. Please note that this plan is illustrative only. NGET also provides information in relation to its assets at the website below.

<https://www.nationalgrid.com/electricity-transmission/network-and-infrastructure/network-route-maps>

NGET advocates the high standards of design and sustainable development forms promoted through national planning policy and understands that contemporary planning and urban design agenda require a creative approach to new development around high voltage overhead lines and other NGET assets.

Without appropriate acknowledgement of the NGET assets present within the site, these policies should not be considered effective as they cannot be delivered as proposed; unencumbered by the constraints posed by the presence of NGET infrastructure.

We propose modifications to the above site allocations and/or policies to include wording to the following effect. We propose that these modifications are applied to each of the aforementioned site allocations affected by NGET assets.

Development proposals will include a strategy for responding to the National Grid Overhead Cable Route present within the site which demonstrates how the National Grid Design Guide and Principles have been applied at the masterplanning stage and how the impact of the assets has been reduced through good design.

New Infrastructure

Currently there are no known new infrastructure interactions within the area, however demand for electricity is expected to rise as the way NGET power our homes, businesses and transport changes. As

the nation moves towards net zero, the fossil fuels that once powered the economy will be replaced with sources of low-carbon electricity, such as offshore wind farms.

The UK Government has committed to reach net zero emissions by 2050. This means achieving a balance between the greenhouse gases put into the atmosphere and those taken out. Decarbonising the energy system is vital to this aim.

NGET's infrastructure projects in England and Wales will support the country's energy transition and make sure the grid is ready to connect to more and more sources of low carbon electricity generated in Britain.

The way NGET generate electricity in the UK is changing rapidly, and NGET are transitioning to cheaper, cleaner and more secure forms of renewable energy such as new offshore windfarms. NGET need to make changes to the network of overhead lines, pylons, cables and other infrastructure that transports electricity around the country, so that everyone has access to clean electricity from these new renewable sources. These changes include a need to increase the capability of the electricity transmission system between the North and the Midlands, and between the Midlands and the South. It is also needed to facilitate the connection of proposed new offshore wind, and subsea connections between England and Scotland, and between the UK and other countries across the North Sea.

Accordingly, we request that the Council is cognisant of the above.

Further Advice

NGET is happy to provide advice and guidance to the Council concerning their networks. If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us.

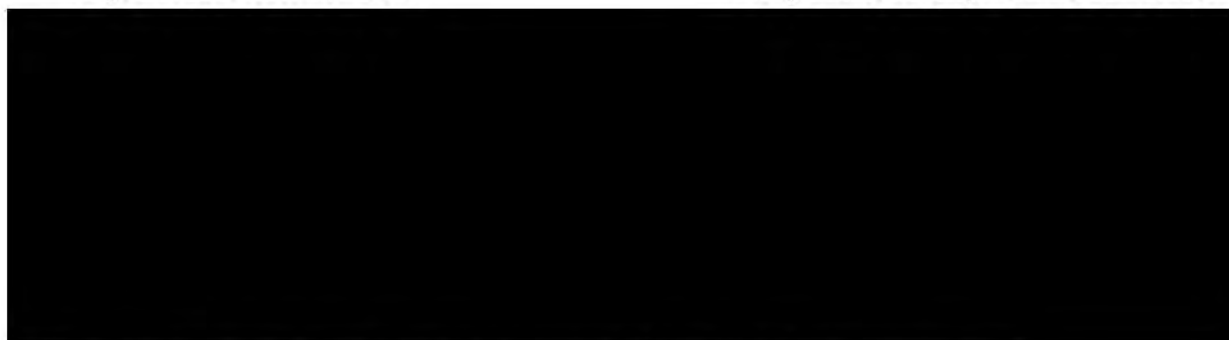
If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us.

To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, NGET wishes to be involved in the preparation, alteration and review of plans and strategies which may affect their assets. Please remember to consult NGET on any Development Plan Document (DPD) or site-specific proposals that could affect our assets.

We would be grateful if you could add our details shown below to your consultation database, if not already included:

Angela Brooks MRTPI, Partner

Tiffany Bates, Development Liaison Officer



If you require any further information in respect of this letter, then please contact us.

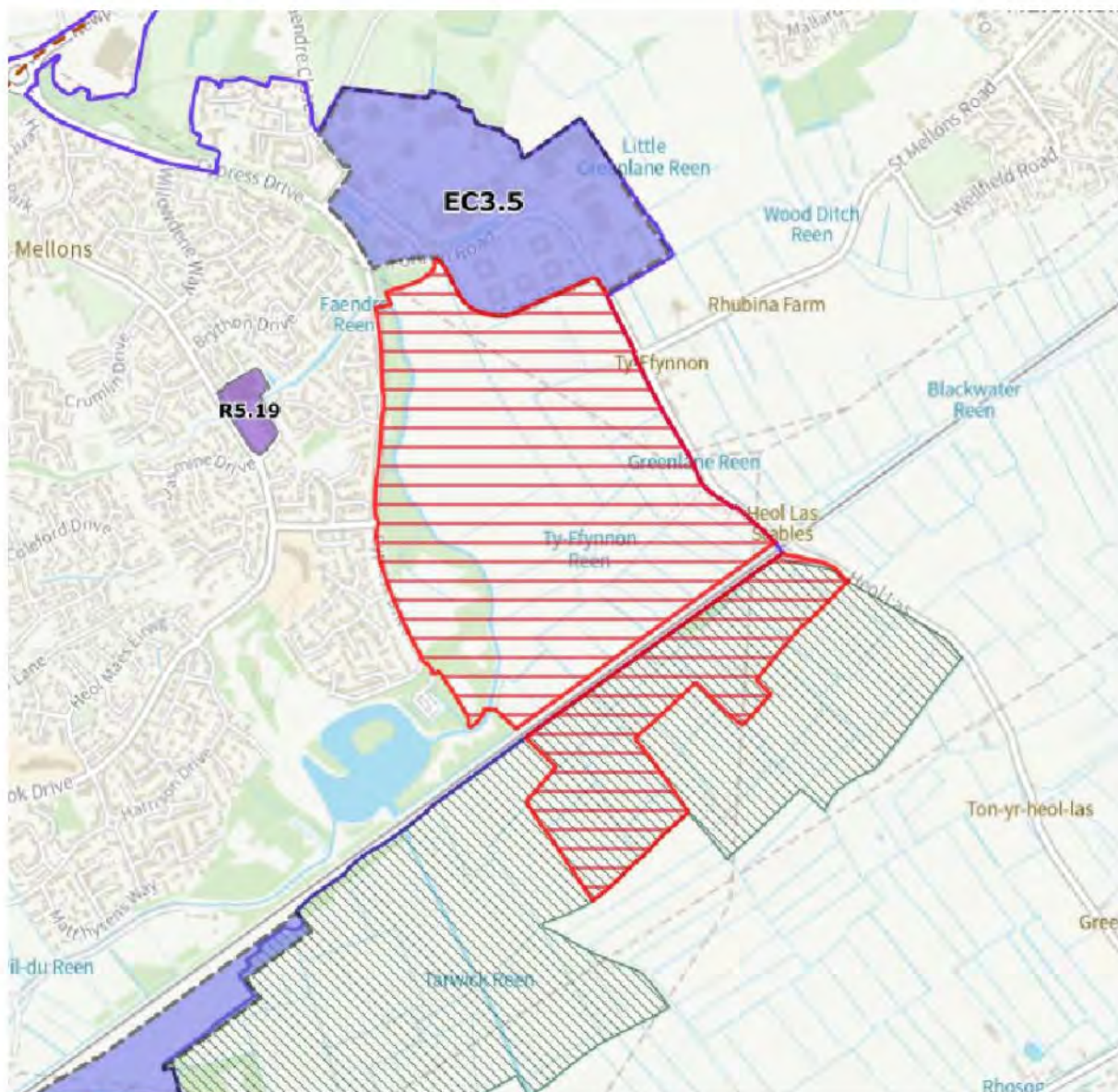
Yours faithfully,



Angela Brooks MRTPI
Partner
For and on behalf of Fisher German LLP

National Grid Assets Interacting with Allocations

Development Plan Document Site	Asset Description
Policy EC2 Land south of St Mellons Business Park	WG ROUTE: 275Kv Overhead Transmission Line route: TREMORFA - USKMOUTH – WHITSON & ABERTHAW - TREMORFA XM ROUTE: 275Kv Overhead Transmission Line route: CARDIFF EAST - USKMOUTH – WHITSON & ABERTHAW - TREMORFA



- ☒ Land south of St Mellons Business Park EC2



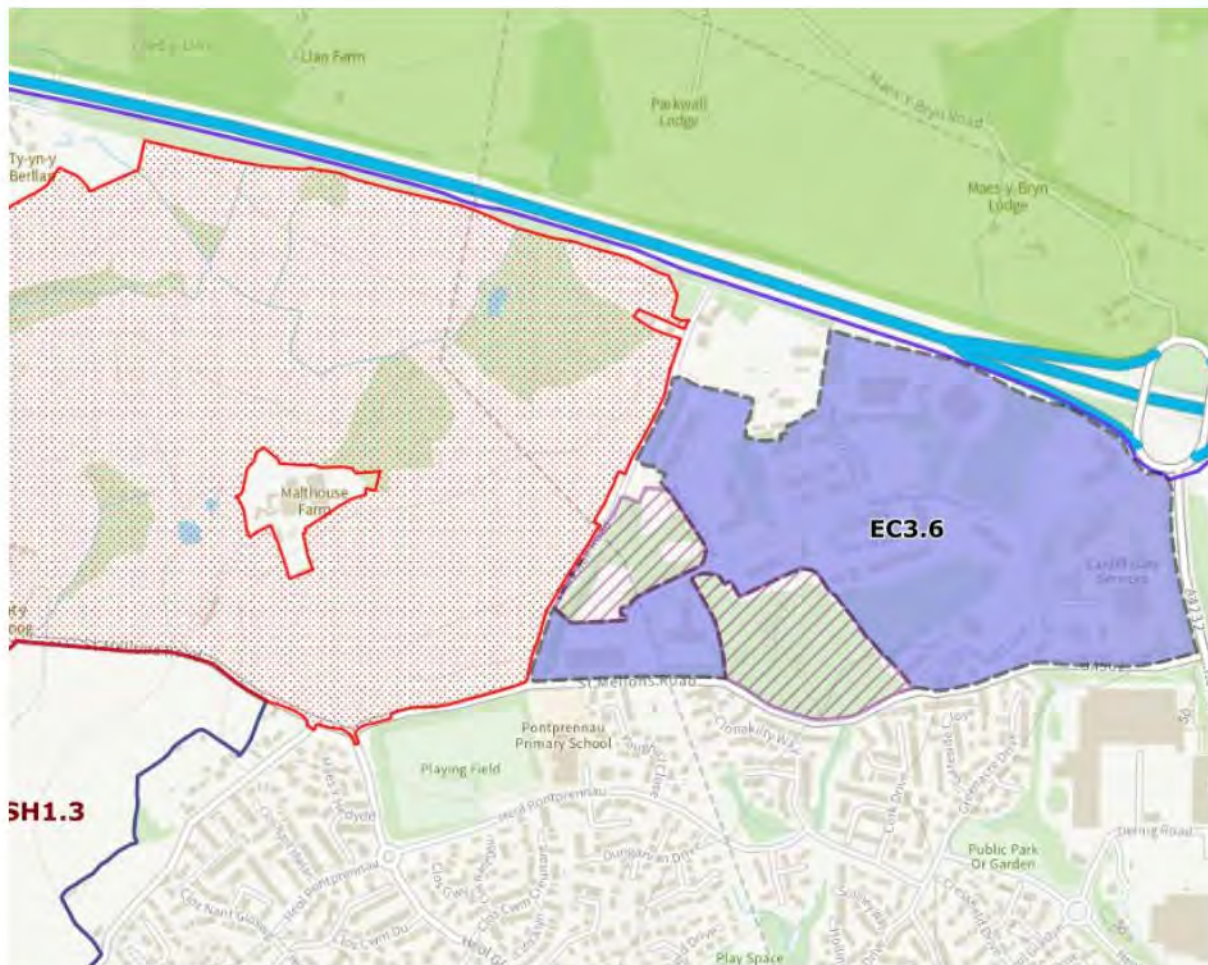
Asset illustrated as dotted line on above plan

Development Plan Document Site	Asset Description
Policy EC3.3 Existing Employment Land	WG ROUTE: 275Kv Overhead Transmission Line route: TREMORFA - USKMOUTH – WHITSON & ABERTHAW - TREMORFA TREMORFA 275KV Substation TREMORFA 33KV Substation



Asset illustrated as dotted line on above plan

Development Plan Document Site	Asset Description
Policy EC3.6 Existing Employment Land	VP ROUTE: 275Kv Overhead Transmission Line route: ABERTHAW - CARDIFF EAST – PYLE & CARDIFF EAST - USKMOUTH - WHITSON
Policy SP1 Housing Commitment over 100 dwellings	VP ROUTE: 275Kv Overhead Transmission Line route: ABERTHAW - CARDIFF EAST – PYLE & CARDIFF EAST - USKMOUTH - WHITSON
Policy H2 Housing Led Regeneration Area	VP ROUTE: 275Kv Overhead Transmission Line route: ABERTHAW - CARDIFF EAST – PYLE & CARDIFF EAST - USKMOUTH - WHITSON



☒ Housing Commitment over 100 dwellings SP1

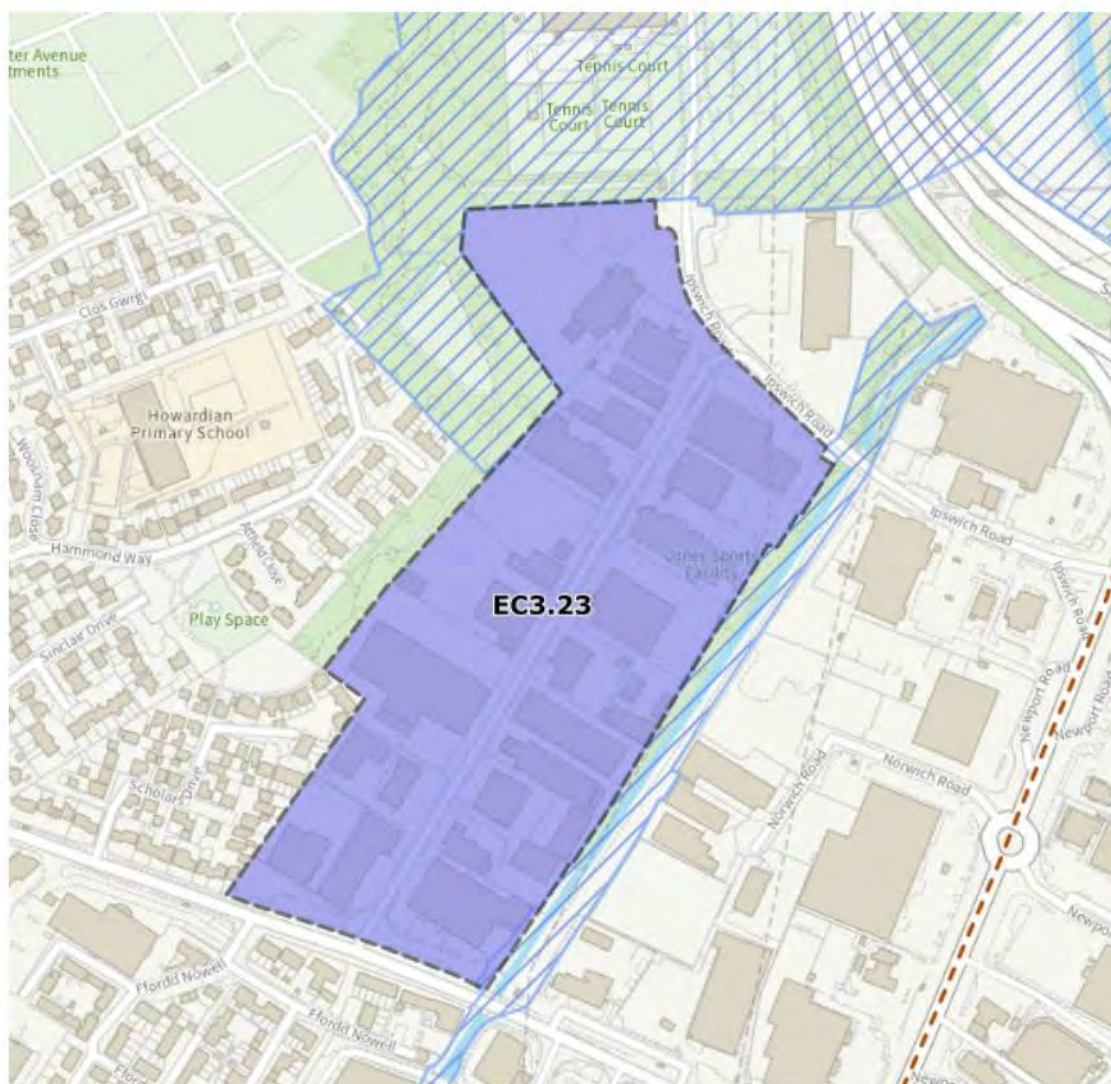


☒ Housing Led Regeneration Area H2



Asset illustrated as dotted line on above plan

Development Plan Document Site	Asset Description
Policy EC3.23 Existing Employment Land	VP ROUTE: 275Kv Overhead Transmission Line route: ABERTHAW - CARDIFF EAST – PYLE & CARDIFF EAST - USKMOUTH - WHITSON



Asset illustrated as dotted line on above plan

Development Plan Document Site	Asset Description
Policy EC3.9 Existing Employment Land	XM ROUTE: 275Kv Overhead Transmission Line route: ABERTHAW - CARDIFF EAST – PYLE & ABERTHAW - TREMORFA



Asset illustrated as dotted line on above plan

Further Guidance

NGET is able to provide advice and guidance to the Council concerning their networks and encourages high quality and well-planned development in the vicinity of its assets.

Developers of sites crossed or in close proximity to NGET assets should be aware that it is NGET policy to retain existing overhead lines in-situ, though it recognises that there may be exceptional circumstances that would justify the request where, for example, the proposal is of regional or national importance.

NGET's 'Design guidelines for development near pylons and high voltage overhead power lines' promote the successful development of sites crossed by existing overhead lines and the creation of well-designed places. The guidelines demonstrate that a creative design approach can minimise the impact of overhead lines whilst promoting a quality environment. The guidelines can be downloaded here: <https://www.nationalgrid.com/electricity-transmission/document/145326/download>

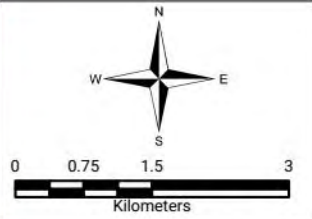
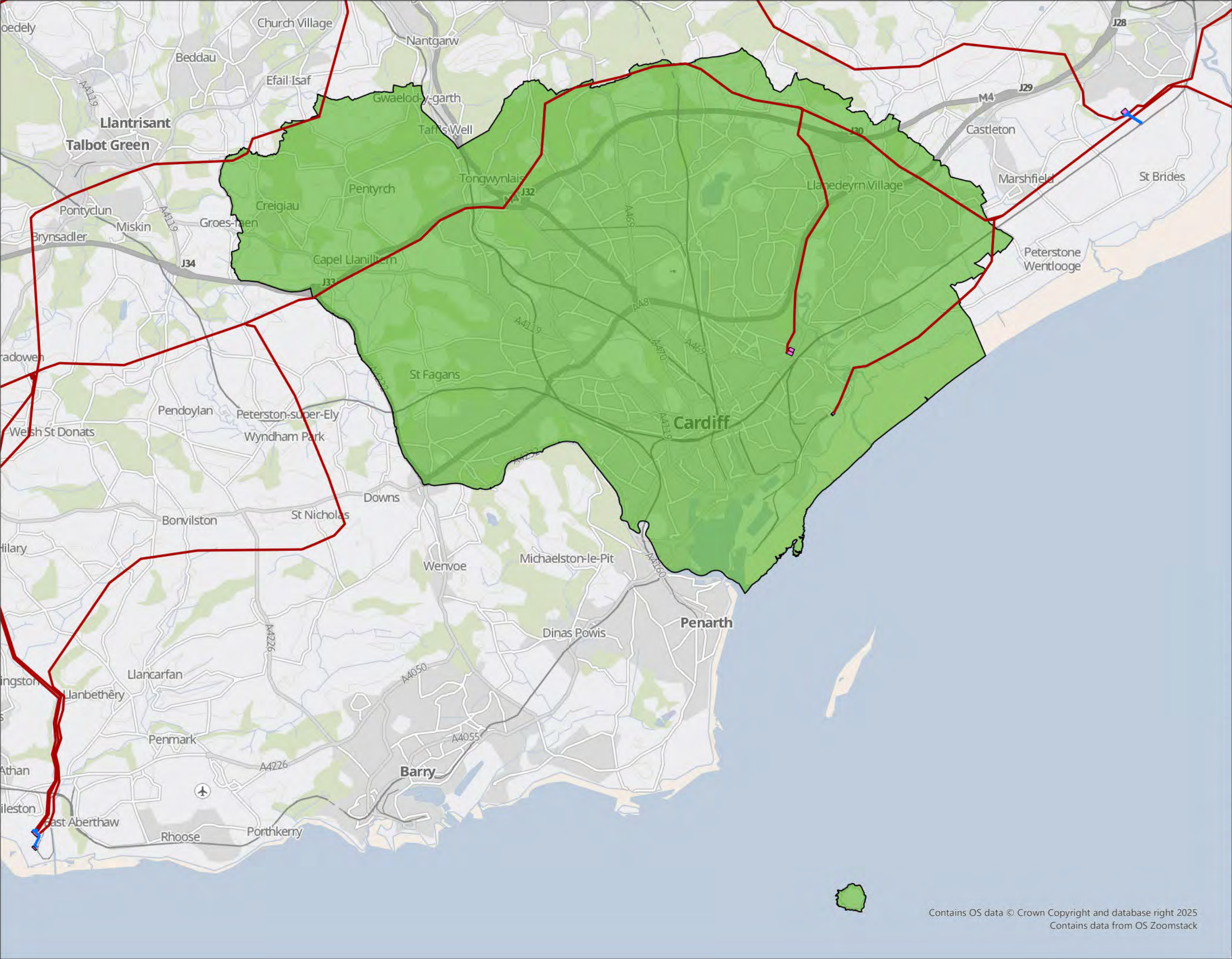
The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site.

NGET's statutory safety clearances are detailed in their Technical Guidance Note 'Third-party guidance for working near National Grid Electricity Transmission equipment', which can be downloaded here: <https://www.nationalgrid.com/electricity-transmission/document/149291/download>

How to contact NGET

If you require any further information in relation to the above and/or if you would like to check if NGET's transmission networks may be affected by a proposed development, please visit the website: <https://lsbud.co.uk/>

For local planning policy queries, please contact: ngplanning@fishergerman.co.uk



- LEGEND:
- Cable
 - OHL
 - Substation
 - LPA Area

REVISION: A
CLIENT: **nationalgrid**
SCHEME:
PLANNING INTERACTION
TITLE:
LPA ASSET INTERACTION
FP: 105181-024
SCALE: 1:83,000 @ A3
DATE: 05/03/2025

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Rhif Sylwedydd / Representor Number:

19

Rhif Sylw / Representation Number(s):

19.01 – 19.03

Enw Sylwedydd / Representor Name:

Watkin Jones Group

LDP Team
Strategic Planning
Cardiff Council
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County Hall
Altantic Wharf
Cardiff
CF10 4UW

Date: 3 April 2025

Our ref: 68246/01/AC/OW/33638625v1

To Whom It May Concern

Cardiff Council Deposit Plan Consultation Response on behalf of Watkin Jones Group

We write on behalf of our client, the Watkin Jones Group ('WJG') to provide representations to Cardiff Council's ('the Council's') Replacement Local Development Plan (RLDP) Deposit Plan Consultation (February – April 2025).

The purpose of these representations is to provide the Council with WJG's assessment of the Deposit Plan. The letter focuses on three policies proposed to be introduced in the RLDP:

- Policy H3: Affordable Housing;
- Policy H6: Student Accommodation; and,
- Policy H7: Co-Living Accommodation.

Watkin Jones Group

With a focus on delivering for its customers since 1791, WJG is the UK's leading developer and manager of residential for rent homes. By spearheading this sector, WJG is creating the future of living for a diverse and growing group of people who want flexibility, convenience, and a strong sense of community alongside the best location and value. Its purpose-built build to rent apartments (BTR, multifamily), co-living and student homes are designed and built sustainably, and welcome people from all backgrounds to enjoy a great way of life, generating a positive impact for wider communities. Beyond residential for rent, its successful and well-established house building division has an increasing focus on the delivery of affordable and BTR single family homes (i.e. houses for rent).

With increasing pressure on many areas to speedily deliver new housing, WJG has an excellent track record of creating homes expediently without compromising on quality. Over 95% of its projects are on site within six months of the grant of planning permission and its in-house construction capacity means that it can rapidly boost housing supply. Over the last 25 years WJG has delivered over 60,000 homes and has a significant pipeline. In Cardiff, WJG delivered the award-winning, mixed-use Bridge Street

Exchange in 2018 comprising of 477 student homes, retail and an alcohol treatment centre. WJG is also delivering 718 rental homes (BTR) at Central Quay. WJG has delivered three co-living schemes to date – Zinc Works in Bristol, the Gorge in Exeter, and Ark in Wembley – and has several co-living developments in the pipeline (e.g. Y400 on Custom House Street in Cardiff).

Today, WJG successfully works across every part of the UK focussing on centrally located, previously **developed sites**. WJG's end-to-end delivery model means that it acquires, designs, and builds places, and typically remain within communities as on-site building managers. Fresh is its multi award-winning operator-arm, who are currently managing approaching 20,000 rental homes across the UK and Ireland, including The Gorge co-living in Exeter. Fresh achieves 95% customer satisfaction, and cares for its residents with a range of wellbeing and community building activities.

WJG's experience in delivering and managing residential for rent homes provides them with strong insight into what works well and is realistic operationally, and what residents look for in these schemes. WJG therefore has a valuable insight regarding the emerging LDP policies and in how they can be further refined.

Policy H3: Affordable Housing

Summary of policy

Policy H3 states that the Council will require 20% affordable housing on brownfield sites and 30% affordable housing on greenfield sites in all residential proposals that meet certain criteria. The threshold is set at 5 units, or 0.1Ha.

We note that the policy is unchanged from the current Local Development Plan. We assume, therefore, that the Council considers the Policy to have been effective, and viable at this level of provision.

The policy itself does not definitively set out the split of tenures affordable housing contributions will be sought for, but paragraph 7.23 states that the overall % target was considered viable based on a tenure mix of 80% social rent and 20% low-cost home ownership. This is based on a Viability Assessment which forms part of the evidence base; paragraph 9.1.1 of the Assessment notes the appraisals rely on a *“multitude of high-level assumptions.”* **And, the Assessment only includes appraisals on two tenure mixes:** 80% social rent / 20 % low-cost home ownership, and 100% social rent. WJG question the robustness of this study and also its applicability to BTR.

As there is no indication that this policy would be applied differently for different types of living accommodation (e.g. BTR), it appears this is a blanket policy for all types.

Supporting text to the policy, para 7.24, states that a “policy compliant affordable housing contribution must be provided”.

Review of policy

WJG supports policy that secures the appropriate provision of affordable housing of the correct type on viable sites. However as drafted, the policy is not sufficiently detailed to achieve this aim, nor is it sufficiently flexible enough to appropriately enable development. It also does not consider the dynamics of BTR where affordable housing is provided on site as discount market rent (DMR), owned and

operated alongside the remainder of the development (with no registered provider involvement), and let at rents no higher than 80% of market rent.

The following points are of particular concern and to which WJG objects as they are not considered to be sound:

- 1 The Policy makes no allowance for different types of living accommodation, and how they might, or might not, be able to deliver affordable housing. Standard build to sell residential is very different to BTR both operationally and in its financial dynamics, which is also different to co-living. A *one size fits all* policy will not enable the plan to effectively deliver its aims and targets. To ensure that Policy H3 is effective and Cardiff delivers the homes (and affordable homes) it needs and secures important investment, it is essential that affordable housing from BTR schemes, if provided on site, is in the form of DMR as detailed earlier. BTR responds to changing occupier trends with more people now renting and delivers high quality homes quickly, as it is typically owned by institutional **investors (e.g. WJ's Central Quay scheme is funded by Legal and General)** who are not dependant on individual unit sales to enable delivery. Given the priority the Council is placing on regenerating the city centre for higher density forms of residential development, as the Council is likely to see the increased delivery of BTR single family homes over the Plan period, and to benefit housing delivery across Cardiff as a whole, it is essential that these changes are made to Policy H3 to ensure that the investment in, and delivery of, BTR is maximised.
- 2 There appears to be no justification for the suggested 80/20 split between social rent and low-cost ownership (we note also that this is not necessarily committed to by the Policy). It represents a significant change from the suggested affordable housing tenure split included in paragraph 5.10 of the adopted LDP (40% social rent, 40% intermediate rent, and 20% low-cost home ownership). The Viability Assessment (Dec 2024) in support of the draft Plan has not considered a sufficient range of tenure mix, nor has it considered affordable housing as DMR which would typically be delivered within BTR schemes. As such, the appraisal fails to consider a suitable range of housing types, or affordable housing delivery scenarios, to test the deliverability and viability of the Policy.
- 3 Critically, the policy appears to make no allowance for viability. Para 7.24 does not acknowledge that scheme viability may be a factor. The Viability Assessment (Dec 2024) demonstrates that no brownfield development in Plasnewydd; Splott; Gabalfa; Cathays; Grangetown; Ely; Butetown or Grangetown (i.e. half of the **city's** wards) could deliver policy compliant affordable housing based on the tested scenario schemes. The draft Plan may, effectively, place a moratorium on residential development in these locations if it makes no allowance for viability, and may similarly stop or constrain residential development where it is not viable to deliver a policy compliant amount of affordable housing. This raises further questions as to whether the Plan as drafted could deliver on its delivery targets. **It's essential that a viability clause is added to the policy to ensure that the policy is sound.** An alternative approach would be to reduce the affordable housing requirement sought by this policy to a level which would be viable across all of the city (although it is anticipated such a percentage requirement would be low or zero).

Suggested changes to policy:

To ensure that Policy H3 includes the appropriate mechanisms to secure provision for affordable housing, without hindering the delivery overall, WJG suggests the following changes are made:

- 1 The Viability Assessment should be revisited. This should:
 - a Assess the viability of different tenure mixes and define a mix which is both viable and aligns **with the city's needs**;
 - b Assess the viability of different types of housing (BTR and co-living) that might deliver affordable housing in a different way (such as DMR and Payment in Lieu) and define policy approaches for those housing types which are viable; and,
 - c Have consideration for setting a lower viability threshold, that is deliverable across the City and that would provide greater certainty for investors.
- 2 Reflecting the outcome of the revised Viability Assessment, Policy H3 should set out a more flexible approach to affordable housing requirements, having regard for the different type of housing that can be delivered, including BTR and co-living accommodation, that might be better suited to a DMR model or a payment in lieu. This should, at the very least, lead to modification of para 7.23; and,
- 3 Paragraph 7.24 should be updated to make an allowance for viability in the delivery of housing:
"The cost of affordable housing provision must be factored into any development from an early stage. The Council will work with developers to secure the most appropriate affordable housing contribution suitable for individual sites, having regard for development viability at that time."

Policy H6: Student Accommodation

Summary of policy

Cardiff has a growing student population which is driven by the success of its educational institutions and **is needed to support the city's continued growth**. WJG welcome a policy that positively identifies the contribution PBSA makes to the diverse housing mix.

Whilst WJG supports the introduction of Policy H6 and largely agrees with its drafting, there are areas which would benefit from refining and reconsideration – for the policy to be fit for purpose and sound, and to be effective in delivering the PBSA which the city needs.

Review of Policy

Location of student accommodation

Part i – ii. of Policy H6 states that PBSA will only be permitted when it is located in the Central and Bay Business Area or when it is located in close proximity to existing university and college campuses.

WJG considers that the suggested boundary is too restrictive. The boundary of the Cardiff Bay Business Area runs quite tightly around the city centre and Cardiff Bay. This could therefore result in suitable and accessible sites on the fringes of the city centre, or between the city centre and Bay, being discounted and considered contrary to Policy.

The Policy should be updated to state that sites that are well connected to the Cardiff Bay Business Area and/or campuses by means of active travel will be considered.

Communal kitchen and dining areas

The provision of communal kitchen and dining areas to cater for all students within a PBSA development is very rare. Whilst cluster flats will provide a living, dining and kitchen area for its occupiers, residents of studios do not typically have access to any form of communal kitchen and dining area. WJG can find no justification for this approach and is it counter to the way the market operates, which will dissuade investment if the current wording is maintained.

To ensure that Policy H6 is effective in delivering PBSA and based on sound justification, the requirement to provide communal kitchen and dining areas must be removed from the policy. Other forms of communal facility and service are provided within PBSA developments (e.g. lounges, gym, study spaces), and this (more generic) approach to the provision of communal facilities is supported.

Supplementary Planning Guidance

The supporting text to Policy H6 states that Cardiff Council will prepare a SPG to support this policy. Paragraph 7.43 states this will include detail not currently included in the Policy, such as space standards for room sizes. As noted, WJG supports the introduction of this policy in principle and agrees that student accommodation will make an important contribution to diversifying **Cardiff's housing** mix. However, WJG is concerned that introducing such standards through an SPG could run counter to the **Council's aim** of supporting the appropriate delivery of student accommodation. WJG also highlights that it is only aware of one authority (Glasgow) who set room size standards for PBSA, given that room sizes across PBSA do not vary greatly.

Policy is the principal decision-making tool. An SPG can be a material consideration, but its content should enable the delivery the policy and the Plan's objectives. Any detail brought though a subsequent SPG must not prevent delivery against this policy.

Suggested changes to policy

To ensure that Policy H6 is effective in facilitating the delivery PBSA, WJG suggests the following changes are made:

- 1 Parts i – ii **are combined to one criterion and updated to: "Located in areas that are** accessible by non-car modes to Cardiff city centre and to **university and college campuses."**
- 2 Part iv should be updated as follows "They include communal facilities and services that are sufficient to meet residents requirements and offer convenient access to communal ~~kitchen, dining area as well as communal amenity~~ spaces to ensure a social and inclusive environment can be **delivered"**
- 3 Paragraph 7.44 any reference to minimum space standards for private and communal areas should be removed.

Policy H7: Co-Living Accommodation

Summary of policy

Co-living has an important **role in diversifying Cardiff's housing mix**, helping to rebalance supply with demand for smaller units. Co-living is a form of accommodation well suited to a varied demographic, but particularly young professionals and recent graduates. It can therefore be a tool for cities to increase graduate retention (**avoid the 'brain drain'**) and attract new young professionals (**'brain gain'**), thereby **supporting the city's** economic growth. Co-living provides high quality managed accommodation for smaller households that prioritise city-centre living but are interested in access to high-quality amenity facilities, community living alongside likeminded individuals, and the events and support that this type of living offers.

As a wider benefit, co-living comprises an alternative accommodation for graduates and young professionals and could help release HMOs back to the market as family housing. The proliferation of HMOs in areas of Cardiff, namely Cathays and Roath, has resulted in challenges for families and young people originally from these areas from being able to access the housing market. This is demonstrated **by the introduction of Policy SP12 (namely part vii) which includes** *"establishing strict controls for the sub-division of existing homes, including flat conversions and HMOs."*

Review of Policy

WJG supports the introduction of Policy H7 and considers that it can enable the Council to both provide high quality communal accommodation for young professionals and recent graduates which will support its growth ambitions, whilst also reduce demand for existing and new HMOs, which will benefit residents of Cardiff more generally, and potentially increase family housing stock. That said, WJG consider amendments are required, to ensure the Policy is effective and delivers the co-living which Cardiff needs. These are listed below:

Supplementary Planning Guidance

The supporting text to Policy H7 states that Cardiff Council will prepare a Supplementary Planning Guidance (SPG) to this policy. **WJG's** understanding is that this will include detail such as space standards for units and amenity space. WJG is concerned that introducing an SPG, where the requirements are too rigid, could run **counter the Council's aim to support the growth of the co-living** sector. WJG is interested in engaging with the Council as they develop the SPG as it can offer advice in respect of their experience in delivering and operating co-living schemes, and on the feedback they have received from residents. WJG also suggests that any room or communal space sizes introduced by the Council should mimic those detailed within the **Greater London Authority's** Large Scale Purpose Built Shared Living London Plan Guidance (2024), as this guidance was prepared following extensive consultation with co-living residents and operators to ensure that it responds to their needs.

As noted above in respect of PBSA, policy is the principal decision-making tool. An SPG can be a material consideration, but its content should enable the delivery of policy and the Plan's objectives. Any detail brought through a subsequent SPG must not prevent delivery against this policy and the overarching positive approach to the delivery of co-living in Cardiff adopted by Policy H7.

Services

The supporting text to Policy H7 sets out services that co-living accommodation can include (paragraph 7.48). Whilst WJG accepts that it might be appropriate to include certain standards and requirements within Policy, it notes that:

- Cleaning is typically limited to amenity spaces, receptions, shared kitchen and dining areas, and circulation space. Whilst cleaning of private co-living units is offered by some co-living operators, it is not offered by others and the approach varies.
- Bed linen services are not typically provided by co-living operators
- Whilst gyms are often provided within larger co-living schemes, their provision is largely dependent on the size of the scheme, whether the provision of a gym results in the best use of amenity space or whether an alternative communal facility would be preferable, and whether there are existing gyms in the local area (e.g. if a commercial gym was located next to the co-living scheme, with membership available to residents, it is unlikely that an on-site gym would be provided).

Given the above WJG suggest that para 7.48 be updated to remove reference to specific services, and instead require applications to demonstrate that a good array of communal facilities are provided and which would be appropriate within that location. Failure to do so might lead to requirements being placed on schemes that would not be supported by operators or the market and may therefore deter investment in and the delivery of co-living.

Amenity

The supporting text to Policy H7 also sets out recommendations for how amenity and communal **cooking spaces should be set out (paragraph 7.49)**. It states “*communal cooking and dining spaces are to be inclusively designed for the number of occupants they serve per floor and will provide a variety of generous spaces to maximise the potential for social interactions, communal cooking and comfortable living.*” WJG agrees that communal cooking and dining spaces can provide a variety of generous spaces to maximise the potential for social interaction – this is critical to the design of co-living schemes that facilitate communal living and they have been very popular within the co-living schemes delivered by WJG to date.

However, WJG objects to policy or guidance in any way implying that communal and dining spaces should be provided on every floor within a building. Whilst this approach may be suitable for schemes with large floorplates, the provision of communal and dining spaces in taller buildings with small floorplates, (i.e. towers), would not create the types of spaces that align with the ethos of communal co-living (i.e. lots of smaller communal kitchens would be provided which would not maximise the potential for social interaction sought by the Council). **WJG’s experience in delivering and operating co-living schemes** means they have an understanding of what creates a successful scheme, and how spaces should be designed to maximise interaction. Further detail is provided as follows:

- 1 The design of communal and dining spaces must be of an appropriate size to successfully encourage interaction and create a sense of community. Small communal and dining spaces that would only be used by several residents can create underused spaces that could, in contrast to the co-living

community ethos, result in residents only mixing with their immediate neighbours or indeed cooking on their own, given that residents may use the space at different times.

- 2 Further to the fact that it could result in residents only mixing with immediate neighbours, given where co-living schemes are usually provided (i.e., in city centres) and that they are occupied by a range of residents (namely young professionals and recent graduates), **it's likely that small kitchens** on every floor would not be well used on a daily basis particularly given that there are some basic cooking facilities in each room. Eating and dining times would vary between residents, depending on work requirements or lifestyle choices like shift times, or residents choosing to eat at cafes and restaurants in the city. **It's essential that the communal spaces have a critical mass so that they** function as intended. From **WJG's experience**, a smaller quantum of larger communal kitchens deliver the most successful schemes, as they maximise the potential for residents to come together and socialise.

WJG supports an approach whereby the applicant is required to demonstrate that the scheme has an appropriate range of communal facilities and that communal kitchens (which may be on different floors) can be accessed within a reasonable period of time.

Suggested changes to policy

To ensure that Policy H7 is effective in facilitating the delivery of co-living accommodation, WJG suggests the following changes are made:

- 1 The supporting text should be updated to include clarity on the space standards that may be introduced through the SPG. Space standards (both for rooms and amenity spaces (internal and external) should replicate the approach detailed within the **Greater London Authority's Large Scale Purpose Built Shared Living London Plan Guidance (2024)** for the reasons stated earlier.
- 2 Paragraph 7.48 should be updated to ***"Developments will be classified as co-living when they include at least 10 units and where an element of typical domestic provision is communal. A good array of communal facilities, relevant to the buildings location and design, should also be provided"*** ~~Typical services can include room cleaning, bed linen, on site gym and concierge service, none of these are typical domestic provision. Anything smaller will typically be considered as an HMO~~
- 3 **Paragraph 7.49 should be updated to** "Communal cooking and dining spaces are to be inclusively designed for occupants they serve ~~per floor~~ and will provide a variety of suitable spaces to maximise the potential for social interactions, communal cooking and comfortable living. Developments may provide access to on-site managed facilities, relevant to the buildings location and design ~~such as a cleaning service, the provision of bed linen and a concierge.~~ To encourage a communal lifestyle, spaces such as lounges, gyms, cinemas, games rooms, libraries, and communal work/ study spaces should be considered. Linking internal and external amenity spaces is encouraged."

Conclusion

We trust the above responses on behalf of WJG are clear. In the main, WJG is supportive of the three policies considered in this response, however, consider that elements need refining to ensure the RLDP successfully supports development in these sectors. In respect of the three policy areas specifically

referenced, having regard to the 'Tests of Soundness' in the Development Plans Manual (2020), WJG are of the opinion that the Plan will fail to deliver (Test 3), as the policy will not be effective

Should you wish to discuss anything further, please do not hesitate to contact me.

Yours faithfully



Rhiannon Harrop-Griffiths

Senior Planner

BA (Hons) MSc Assoc RTPI

- Watkin Jones Group

Respondent: Rhiannon Harrop-Griffiths Lichfields

On-behalf of: Watkin Jones Group

Submission Date: 03/04/25
14:43

H3: AFFORDABLE HOUSING

H3: AFFORDABLE HOUSING

1. Which part(s) of the Plan (or supporting documents) are you commenting on?

LDP policy or site allocation number(s)

Policy H3

LDP paragraph or section number(s)

All

LDP Proposals Map reference(s)

N/A

If your representation relates to a supporting document (e.g. the Sustainability Appraisal), insert the name(s) and reference(s) here

Viability Assessment

2. Before you set out your comments in detail, it would be helpful to know whether you think the Plan is sound and meets the procedural requirements.

* I think the LDP is unsound and should be changed

3. Would you like the LDP to include a new policy, site allocation or paragraph?

* New policy

* New paragraph or supporting text

5. Please set out your comments below.

Policy H3: Affordable Housing

Summary of policy

- Policy H3 states that the Council will require 20% affordable housing on brownfield sites and 30% affordable housing on greenfield sites in all residential proposals that meet certain criteria. The threshold is set at 5 units, or 0.1Ha.
 - We note that the policy is unchanged from the current Local Development Plan. We assume, therefore, that the Council considers the Policy to have been effective, and viable at this level of provision.
-

- The policy itself does not definitively set out the split of tenures affordable housing contributions will be sought for, but paragraph 7.23 states that the overall % target was considered viable based on a tenure mix of 80% social rent and 20% low-cost home ownership. This is based on a Viability Assessment which forms part of the evidence base; paragraph 9.1.1 of the Assessment notes the appraisals rely on a “*multitude of high-level assumptions*.” And, the Assessment only includes appraisals on two tenure mixes: 80% social rent / 20 % low-cost home ownership, and 100% social rent. WJG question the robustness of this study and also its applicability to BTR.
- As there is no indication that this policy would be applied differently for different types of living accommodation (e.g. BTR), it appears this is a blanket policy for all types.
- Supporting text to the policy, para 7.24, states that a “*policy compliant affordable housing contribution must be provided*”.

Review of policy

- WJG supports policy that secures the appropriate provision of affordable housing of the correct type on viable sites. However as drafted, the policy is not sufficiently detailed to achieve this aim, nor is it sufficiently flexible enough to appropriately enable development. It also does not consider the dynamics of BTR where affordable housing is provided on site as discount market rent (DMR), owned and operated alongside the remainder of the development (with no registered provider involvement), and let at rents no higher than 80% of market rent.
- The following points are of particular concern and to which WJG objects as they are not considered to be sound:
 - The Policy makes no allowance for different types of living accommodation, and how they might, or might not, be able to deliver affordable housing. Standard build to sell residential is very different to BTR both operationally and in its financial dynamics, which is also different to co-living. A *one size fits all* policy will not enable the plan to effectively deliver its aims and targets. To ensure that Policy H3 is effective and Cardiff delivers the homes (and affordable homes) it needs and secures important investment, it is essential that affordable housing from BTR schemes, if provided on site, is in the form of DMR as detailed earlier. BTR responds to changing occupier trends with more people now renting and delivers high quality homes quickly, as it is typically owned by institutional investors (e.g. WJ's Central Quay scheme is funded by Legal and General) who are not dependant on individual unit sales to enable delivery. Given the priority the Council is placing on regenerating the city centre for higher density forms of residential development, as the Council is likely to see the increased delivery of BTR single family homes over the Plan period, and to benefit housing delivery across Cardiff as a whole, it is essential that these changes are made to Policy H3 to ensure that the investment in, and delivery of, BTR is maximised.
 - There appears to be no justification for the suggested 80/20 split between social rent and low-cost ownership (we note also that this is not necessarily committed to by the Policy). It represents a significant change from the suggested affordable housing tenure split included in paragraph 5.10 of the adopted LDP (40% social rent, 40% intermediate rent, and 20% low-cost home ownership). The Viability Assessment (Dec 2024) in support of the draft Plan has not considered a sufficient range of tenure mix, nor has it considered affordable housing as DMR which would

typically be delivered within BTR schemes. As such, the appraisal fails to consider a suitable range of housing types, or affordable housing delivery scenarios, to test the deliverability and viability of the Policy.

- Critically, the policy appears to make no allowance for viability. Para 7.24 does not acknowledge that scheme viability may be a factor. The Viability Assessment (Dec 2024) demonstrates that no brownfield development in Plasnewydd; Splott; Gabalfa; Cathays; Grangetown; Ely; Butetown or Grangetown (i.e. half of the city's wards) could deliver policy compliant affordable housing based on the tested scenario schemes. The draft Plan may, effectively, place a moratorium on residential development in these locations if it makes no allowance for viability, and may similarly stop or constrain residential development where it is not viable to deliver a policy compliant amount of affordable housing. This raises further questions as to whether the Plan as drafted could deliver on its delivery targets. It's essential that a viability clause is added to the policy to ensure that the policy is sound. An alternative approach would be to reduce the affordable housing requirement sought by this policy to a level which would be viable across all of the city (although it is anticipated such a percentage requirement would be low or zero).

Suggested changes to policy:

- To ensure that Policy H3 includes the appropriate mechanisms to secure provision for affordable housing, without hindering the delivery overall, WJG suggests the following changes are made:
 - The Viability Assessment should be revisited. This should:
 - Assess the viability of different tenure mixes and define a mix which is both viable and aligns with the city's needs;
 - Assess the viability of different types of housing (BTR and co-living) that might deliver affordable housing in a different way (such as DMR and Payment in Lieu) and define policy approaches for those housing types which are viable
 - Have consideration for setting a lower viability threshold, that is deliverable across the City and that would provide greater certainty for investors.
 - Reflecting the outcome of the revised Viability Assessment, Policy H3 should set out a more flexible approach to affordable housing requirements, having regard for the different type of housing that can be delivered, including BTR and co-living accommodation, that might be better suited to a DMR model or a payment in lieu. This should, at the very least, lead to modification of para 7.23; and,
 - Paragraph 7.24 should be updated to make an allowance for viability in the delivery of housing: *"The cost of affordable housing provision must be factored into any development from an early stage. The Council will work with developers to secure the most appropriate affordable housing contribution suitable for individual sites, having regard for development viability at that time."*

Having regard to the 'Tests of Soundness' in the Development Plans Manual (2020), WJG are of the opinion that the Plan will fail to deliver (Test 3), as the policy will not be effective.

Please upload any additional material to support your representation. [Cardiff LDP Reps - Lichfields on behalf of WJG\(33638625.2\).pdf](#)

6. If you are objecting to the LDP, do you want to speak at a hearing session of the public examination?

* I want to speak at a public hearing.

7. If you want to participate in a hearing, indicate below what you want to speak about (e.g. 'Housing site at Pen y Graig' or 'The overall housing target').

Policy H3

8. If you wish to speak, it would be helpful if you could indicate in which language you would like to be heard.

* I wish to be heard in English

H6: STUDENT ACCOMMODATION

H6: STUDENT ACCOMMODATION

1. Which part(s) of the Plan (or supporting documents) are you commenting on?

LDP policy or site allocation number(s)

Policy H6

LDP paragraph or section number(s)

All

LDP Proposals Map reference(s)

N/A

If your representation relates to a supporting document (e.g. the Sustainability Appraisal), insert the name(s) and reference(s) here

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* I think the LDP is unsound and should be changed

3. Would you like the LDP to include a new policy, site allocation or paragraph?

* New policy

* New paragraph or supporting text

5. Please set out your comments below.

Policy H6: Student Accommodation

Summary of policy

- Cardiff has a growing student population which is driven by the success of its educational institutions and is needed to support the city's continued growth. WJG welcome a policy that positively identifies the contribution PBSA makes to the diverse housing mix.
- Whilst WJG supports the introduction of Policy H6 and largely agrees with its drafting, there are areas which would benefit from refining and reconsideration – for the policy to be fit for purpose and sound, and to be effective in delivering the PBSA which the city needs.

Review of Policy

Location of student accommodation

- Part i – ii. of Policy H6 states that PBSA will only be permitted when it is located in the Central and Bay Business Area or when it is located in close proximity to existing university and college campuses.
- WJG considers that the suggested boundary is too restrictive. The boundary of the Cardiff Bay Business Area runs quite tightly around the city centre and Cardiff Bay. This could therefore result in suitable and accessible sites on the fringes of the city centre, or between the city centre and Bay, being discounted and considered contrary to Policy.
- The Policy should be updated to state that sites that are well connected to the Cardiff Bay Business Area and/or campuses by means of active travel will be considered.

Communal kitchen and dining areas

- The provision of communal kitchen and dining areas to cater for all students within a PBSA development is very rare. Whilst cluster flats will provide a living, dining and kitchen area for its occupiers, residents of studios do not typically have access to any form of communal kitchen and dining area. WJG can find no justification for this approach and is it counter to the way the market operates, which will dissuade investment if the current wording is maintained.
- To ensure that Policy H6 is effective in delivering PBSA and based on sound justification, the requirement to provide communal kitchen and dining areas must be removed from the policy. Other forms of communal facility and service are provided within PBSA developments (e.g. lounges, gym, study spaces), and this (more generic) approach to the provision of communal facilities is supported.

Supplementary Planning Guidance

- The supporting text to Policy H6 states that Cardiff Council will prepare a SPG to support this policy. Paragraph 7.43 states this will include detail not currently included in the Policy, such as space standards for room sizes. As noted, WJG supports the introduction of this policy in principle and agrees that student accommodation will make an important contribution to diversifying Cardiff's housing mix. However, WJG is concerned that introducing such standards through an SPG could run counter to the Council's aim of supporting the appropriate delivery of student accommodation. WJG also highlights that it is only aware of one authority (Glasgow) who set room size standards for PBSA, given that room sizes across PBSA do not vary greatly.
 - Policy is the principal decision-making tool. An SPG can be a material consideration, but its content should enable the delivery the policy and the Plan's objectives. Any detail brought though a subsequent SPG must not prevent delivery against this policy.
-

Suggested changes to policy

- To ensure that Policy H6 is effective in facilitating the delivery PBSA, WJG suggests the following changes are made:
 - Parts i – ii are combined to one criterion and updated to: “Located in areas that are accessible by non-car modes to Cardiff city centre and to university and college campuses.”
 - Part iv should be updated as follows “They include communal facilities and services that are sufficient to meet residents requirements and offer convenient access to communal spaces to ensure a social and inclusive environment can be delivered”
 - Paragraph 7.44 any reference to minimum space standards for private and communal areas should be removed.

Having regard to the ‘Tests of Soundness’ in the Development Plans Manual (2020), WJG are of the opinion that the Plan will fail to deliver (Test 3), as the policy will not be effective.

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7. If you want to participate in a hearing, indicate below what you want to speak about (e.g. 'Housing site at Pen y Graig' or 'The overall housing target').

Policy H6

8. If you wish to speak, it would be helpful if you could indicate in which language you would like to be heard.

* I wish to be heard in English

H7: CO-LIVING ACCOMMODATION

H7: CO-LIVING ACCOMMODATION

1. Which part(s) of the Plan (or supporting documents) are you commenting on?

LDP policy or site allocation number(s)

Policy H7

LDP paragraph or section number(s)

All

LDP Proposals Map reference(s)

N/A

If your representation relates to a supporting document (e.g. the Sustainability Appraisal), insert the name(s) and reference(s) here

N/A

2. Before you set out your comments in detail, it would be helpful to know whether you think the Plan is sound and meets the procedural requirements.

* I think the LDP is unsound and should be changed

3. Would you like the LDP to include a new policy, site allocation or paragraph?

* New policy

* New paragraph or supporting text

5. Please set out your comments below.

Policy H7: Co-Living Accommodation

Summary of policy

- Co-living has an important role in diversifying Cardiff's housing mix, helping to rebalance supply with demand for smaller units. Co-living is a form of accommodation well suited to a varied demographic, but particularly young professionals and recent graduates. It can therefore be a tool for cities to increase graduate retention (avoid the 'brain drain') and attract new young professionals ('brain gain'), thereby supporting the city's economic growth. Co-living provides high quality managed accommodation for smaller households that prioritise city-centre living but are interested in access to high-quality amenity facilities, community living alongside likeminded individuals, and the events and support that this type of living offers.
- As a wider benefit, co-living comprises an alternative accommodation for graduates and young professionals and could help release HMOs back to the market as family housing. The proliferation of HMOs in areas of Cardiff, namely Cathays and Roath, has resulted in challenges for families and young people originally from these areas from being able to access the housing market. This is demonstrated by the introduction of Policy SP12 (namely part vii) which includes "*establishing strict controls for the sub-division of existing homes, including flat conversions and HMOs.*".

Review of Policy

- WJG supports the introduction of Policy H7 and considers that it can enable the Council to both provide high quality communal accommodation for young professionals and recent graduates which will support its growth ambitions, whilst also reduce demand for existing and new HMOs, which will benefit residents of Cardiff more generally, and potentially increase family housing stock. That said, WJG consider amendments are required, to ensure the Policy is effective and delivers the co-living which Cardiff needs. These are listed below:

Supplementary Planning Guidance

- The supporting text to Policy H7 states that Cardiff Council will prepare a Supplementary Planning Guidance (SPG) to this policy. WJG's understanding is that this will include detail such as space standards for units and amenity space. WJG is concerned that introducing an SPG, where the requirements are too rigid, could run counter the Council's aim to support the growth of the co-living sector. WJG is interested in engaging with the Council as they develop the SPG as it can offer advice in respect of their experience in

delivering and operating co-living schemes, and on the feedback they have received from residents. WJG also suggests that any room or communal space sizes introduced by the Council should mimic those detailed within the Greater London Authority's Large Scale Purpose Built Shared Living London Plan Guidance (2024), as this guidance was prepared following extensive consultation with co-living residents and operators to ensure that it responds to their needs.

- As noted above in respect of PBSA, policy is the principal decision-making tool. An SPG can be a material consideration, but its content should enable the delivery of policy and the Plan's objectives. Any detail brought through a subsequent SPG must not prevent delivery against this policy and the overarching positive approach to the delivery of co-living in Cardiff adopted by Policy H7.

Services

- The supporting text to Policy H7 sets out services that co-living accommodation can include (paragraph 7.48). Whilst WJG accepts that it might be appropriate to include certain standards and requirements within Policy, it notes that:
- Cleaning is typically limited to amenity spaces, receptions, shared kitchen and dining areas, and circulation space. Whilst cleaning of private co-living units is offered by some co-living operators, it is not offered by others and the approach varies.
- Bed linen services are not typically provided by co-living operators
- Whilst gyms are often provided within larger co-living schemes, their provision is largely dependent on the size of the scheme, whether the provision of a gym results in the best use of amenity space or whether an alternative communal facility would be preferable, and whether there are existing gyms in the local area (e.g. if a commercial gym was located next to the co-living scheme, with membership available to residents, it is unlikely that an on-site gym would be provided).
 - Given the above WJG suggest that para 7.48 be updated to remove reference to specific services, and instead require applications to demonstrate that a good array of communal facilities are provided and which would be appropriate within that location. Failure to do so might lead to requirements being placed on schemes that would not be supported by operators or the market and may therefore deter investment in and the delivery of co-living.

Amenity

- The supporting text to Policy H7 also sets out recommendations for how amenity and communal cooking spaces should be set out (paragraph 7.49). It states "*communal cooking and dining spaces are to be inclusively designed for the number of occupants they serve per floor and will provide a variety of generous spaces to maximise the potential for social interactions, communal cooking and comfortable living.*" WJG agrees that communal cooking and dining spaces can provide a variety of generous spaces to maximise the potential for social interaction – this is critical to the design of co-living schemes that facilitate communal living and they have been very popular within the co-living schemes delivered by WJG to date.
 - However, WJG objects to policy or guidance in any way implying that communal and dining spaces should be provided on every floor within a building. Whilst this approach may be suitable for schemes with large floorplates, the provision of communal and dining spaces in taller buildings with small floorplates, (i.e. towers), would not create the types of spaces that align with the ethos of communal co-living (i.e. lots of smaller communal kitchens would be provided which would not maximise the potential for social interaction
-

sought by the Council). WJG's experience in delivering and operating co-living schemes means they have an understanding of what creates a successful scheme, and how spaces should be designed to maximise interaction. Further detail is provided as follows:

- The design of communal and dining spaces must be of an appropriate size to successfully encourage interaction and create a sense of community. Small communal and dining spaces that would only be used by several residents can create underused spaces that could, in contrast to the co-living community ethos, result in residents only mixing with their immediate neighbours or indeed cooking on their own, given that residents may use the space at different times.
- Further to the fact that it could result in residents only mixing with immediate neighbours, given where co-living schemes are usually provided (i.e., in city centres) and that they are occupied by a range of residents (namely young professionals and recent graduates), it's likely that small kitchens on every floor would not be well used on a daily basis particularly given that there are some basic cooking facilities in each room. Eating and dining times would vary between residents, depending on work requirements or lifestyle choices like shift times, or residents choosing to eat at cafes and restaurants in the city. It's essential that the communal spaces have a critical mass so that they function as intended. From WJG's experience, a smaller quantum of larger communal kitchens deliver the most successful schemes, as they maximise the potential for residents to come together and socialise.

WJG supports an approach whereby the applicant is required to demonstrate that the scheme has an appropriate range of communal facilities and that communal kitchens (which may be on different floors) can be accessed within a reasonable period of time.

Suggested changes to policy

- To ensure that Policy H7 is effective in facilitating the delivery of co-living accommodation, WJG suggests the following changes are made:
 - The supporting text should be updated to include clarity on the space standards that may be introduced through the SPG. Space standards (both for rooms and amenity spaces (internal and external) should replicate the approach detailed within the Greater London Authority's Large Scale Purpose Built Shared Living London Plan Guidance (2024) for the reasons stated earlier.
 - Paragraph 7.48 should be updated to *"Developments will be classified as co-living when they include at least 10 units and where an element of typical domestic provision is communal. A good array of communal facilities, relevant to the buildings location and design, should also be provided. Anything smaller will typically be considered as an HMO"*
 - Paragraph 7.49 should be updated to *"Communal cooking and dining spaces are to be inclusively designed for occupants they serve and will provide a variety of suitable spaces to maximise the potential for social interactions, communal cooking and comfortable living. Developments may provide access to on-site managed facilities, relevant to the buildings location and design. To encourage a communal lifestyle, spaces such as lounges, gyms, cinemas, games rooms, libraries, and communal work/ study spaces should be considered. Linking internal and external amenity spaces is encouraged."*

Having regard to the 'Tests of Soundness' in the Development Plans Manual (2020), WJG are of the opinion that the Plan will fail to deliver (Test 3), as the policy will not be effective.

Please upload any additional material to support your representation. [Cardiff LDP Reps - Lichfields on behalf of WJG\(33638625.2\).pdf](#)

6. If you are objecting to the LDP, do you want to speak at a hearing session of the public examination?

* I want to speak at a public hearing.

7. If you want to participate in a hearing, indicate below what you want to speak about (e.g. 'Housing site at Pen y Graig' or 'The overall housing target').

Policy H7

8. If you wish to speak, it would be helpful if you could indicate in which language you would like to be heard.

* I wish to be heard in English

Rhif Sylwedydd / Representor Number:

20

Rhif Sylw/ Representation Number(s):

20.01

Enw Sylwedydd / Representor

David and Sue Salway

From: [REDACTED]
To: [Local Development Plan / Cynllun Datblygu Lleol](#)
Subject: RLDP
Date: 03 April 2025 12:25:54

EXTERNAL: This email originated from outside Cardiff Council, take care when clicking links.

ALLANOL: Daw'r e-bost hwn o'r tu allan i Gyngor Caerdydd, cymerwch ofal wrth glicio ar ddolenni.

Good morning

I would like to make the following comments on the RLDP.

There is too much emphasis on commercial development that does not take into account the aesthetics, and the need to keep green spaces.

This city has been overshadowed by high rise blocks which are constructed with very little consideration to quality of materials.

The approach to the general station is a concrete wasteland, no greenery or any attempt to make the area feel pleasant and enjoyable.

It seems that the city is at the behest of commercial developers.

Yours faithfully

David and Sue Salway

[REDACTED]

Rhif Sylwedydd / Representor Number:

21

Rhif Sylw / Representation Number(s):

21.01 – 21.02

Enw Sylwedydd / Representor Name:

Frederick Ager

Cardiff Council Replacement Local Development Plan 2021-2036

Deposit Plan Representations Form

We would like your views on the Cardiff Replacement Local Development Plan (RLDP) and also on documents which support the RLDP.

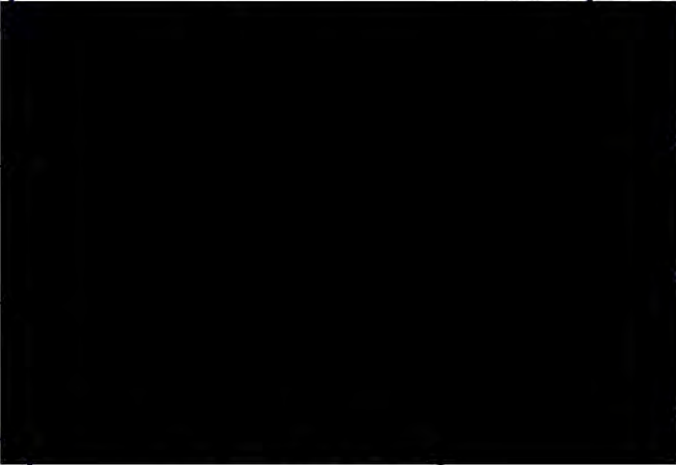
This form should be used for all representations (i.e. comments or objections). If you are submitting a paper copy, attach additional sheets as necessary.

This form has two parts: Part A (Personal details) and Part B (Your representation). Please note that Part B will be made publicly available and will be forwarded to the Planning Inspectorate.

Your representations must be received on or before 15th April 2025. Please return forms to: LDP@cardiff.gov.uk LDP Team, Room 250 County Hall, Cardiff CF10 4UW

This form is available in Welsh / Mae'r ffurflen hon ar gael yn Gymraeg

PART A: Contact details

Your / your client's details		Agent's details (if relevant)
Name	FREDERICK ARTHUR BRAYBROOK AGER	/
Organisation (where relevant)	/	/
Email address		/
Address		/
Signed		
Date		30 MARCH 2025

PART B: Your representation

Your name / organisation

1. Which part(s) of the Plan (or supporting documents) are you commenting on?

- ☐ LDP policy or site allocation number(s)
- ☒ LDP paragraph or section number(s)
- ☐ LDP Proposals Map reference(s)

If your representation relates to a supporting document (e.g. the Sustainability Appraisal), insert the name(s) and reference(s) here.

--

2. Before you set out your comments in detail, it would be helpful to know whether you think the Plan is sound and meets the procedural requirements.

For more information on soundness and procedural requirements, see the guidance notes.

- ☐ I think the LDP is sound and meets procedural requirements.
- ☒ I think the LDP is unsound and should be changed.
- ☐ I think that the procedural requirements have not been met.

3. Would you like the LDP to include a new policy, site allocation or paragraph?

Tick all that apply.

- ☐ New site allocation
- ☐ New Policy
- ☐ New paragraph or supporting text

4. If you want to add a new site allocation, have you previously submitted the site as a Candidate Site? If so, please give the Candidate Site name and reference (if known).

Site name

Site reference

If you want to suggest a new site, please attach a site plan identifying the boundaries of the site you wish to be included in the Plan and provide details of its proposed use. You should consider whether it is necessary for this comments form to be accompanied by a sustainability appraisal. Where proposed changes to a development plan have significant sustainability effects, you will need to provide the relevant sustainability appraisal information. This information must be consistent with the scope and level of detail of the sustainability appraisal conducted by the Authority. It should also refer to the same baseline information in identifying the likely significant effects of the revised policy or new site.

5. Please set out your comments below.

Include all the information, evidence and supporting information necessary to support / justify your representation. Please indicate which soundness test(s) the LDP meets or does not meet, and why (see guidance notes for more information). This will help the Authority and the Inspector to understand the issues you raise. You will only be able to submit further information to the examination if the Inspector invites you to address matters that he or she may raise. Please note that the Inspector will not have access to comments you may have made in response to previous consultations.

- 1) The roads around Whitchurch - Velindre Rd, Park Rd, St Margaret's Rd, Church Rd, area is currently heavily used, resulting in the local residential roads being inappropriately used as 'rat-runs' by drivers of vans, cars and lorries ignoring the maximum speed limits. This will inevitably get worse if the Whitchurch Hospital/Velindre Hospitals site was the planned approx 400 new housing units built there.
- 2) The current water/sewage system for Cardiff generally, including Handaff North/Whitchurch/Rhwbina area is already inadequate resulting in regular sewage over flow into the local water courses esp. the River Taff. Until this is corrected and capacity is INCREASED IN ANTICIPATION of any increase in housing stock I feel that NO ADDITIONAL house-building should be permitted.

☐ Tick here if you are submitting additional material to support your representation.

6. If you are objecting to the LDP, do you want to speak at a hearing session of the public examination?

At this stage, you can only make comments in writing (these are called 'written representations'). However, everyone that wants to change the Plan can appear before and speak to the Inspector at a 'hearing session' during the public examination. But you should bear in mind that your written comments on this form will be given the same weight by the Inspector as those made verbally at a hearing session. Please also note that the Inspector will determine the most appropriate procedure for accommodating those who want to provide oral evidence.

☒ I do not want to speak at a public hearing and am happy for my written representations to be considered by the Inspector.

☐ I want to speak at a public hearing.

If you want to participate in a hearing, indicate below what you want to speak about (e.g. 'Housing site at Pen y Graig' or 'The overall housing target').

7. If you wish to speak, it would be helpful if you could indicate in which language you would like to be heard.

☐ I wish to be heard in Welsh.

☐ I wish to be heard in English.

Guidance notes

The Cardiff Replacement Local Development Plan (RLDP) will be examined by an independent Inspector appointed by the Welsh Government. It is the Inspector's job to consider whether the Plan meets procedural requirements and whether it is sound.

'Sound' may be considered in this context within its ordinary meaning of 'showing good judgement' and 'able to be trusted'. The questions or 'tests' which the Inspector will consider in deciding whether the Plan is sound are:

1. Does the plan fit? (i.e. is it consistent with other plans?)
2. Is the plan appropriate? (i.e. is it appropriate for the area in the light of the evidence?)
3. Will the plan deliver? (i.e. is it likely to be effective?)

More information on the soundness tests and procedural requirements is provided in the Planning Inspectorate's LDP Examinations Procedural Guidance.

If you are making an objection, you should say why you think the Plan is unsound and how the Plan should be changed to make it sound.

Where you propose a change to the Plan it would be helpful to make clear which test(s) of soundness you believe the Plan fails. If your comment relates to the way in which the Plan has been prepared or consulted on, it is likely that your comments will relate to 'procedural requirements'.

Failing to identify a test will not mean that your comments will not be considered, providing it relates to the Plan or its supporting documents. You should include all your comments on the form, using accompanying documents and supporting evidence where necessary.

If you seek more than one change to the Plan, it is not always necessary to complete separate forms for each part of your representation. It may, however, be helpful to use two separate forms if you wish to speak at a hearing about some objections but not others.

Where a group shares a common view on how it wishes the Plan to be changed, it would be helpful for that group to send a single form with their comments, rather than for a large number of individuals to send in separate forms repeating the same point. In such cases the group should indicate how many people it is representing and how the representation has been authorised. The group's representative (or chief petitioner) should be clearly identified.

Rhif Sylwedydd / Representor Number:

22

Rhif Sylw / Representation Number(s):

22.01 – 22.15

Enw Sylwedydd / Representor Name:

South Wales Police



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Cadw De Cymru Yn Ddiogel

Keeping South Wales Safe

Communities and Partnerships Department

4th. April 2025

Mr Simon Gilbert
Head of Planning
Cardiff City Council Planning Department
Cardiff City Council

Dear Mr Gilbert,

Re: Cardiff Replacement Local Development Plan (LDP) 2021 - 2036

We would like to thank you for consulting with South Wales Police in respect of the Replacement Local Development Plan 2021 to 2036. We welcome working with Cardiff City Council in respect of the Cardiff Replacement Local Development plan to ensure the future needs of the Cardiff met. We would respectfully ask that our comments are taken into consideration and included in the plan.

As the Cardiff Local Development Plan consultation documents states:

‘Local Development Plans are the most important factor when making decisions on planning applications. Once it is adopted, every planning application will be tested against the policies in the Plan.’

Secured by Design (SBD) is the official police security initiative that works to improve the security of buildings and their immediate surroundings to provide safe places to live, work, shop, and visit. It is supported by the following documents:

Planning Policy Wales (PPW) states that crime and prevention and fear of crime are social considerations to which regard must be given by local planning authorities

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in the preparation of development plans. They should be reflected in any supplementary planning guidance and may be material considerations in the determination of planning applications. The aim should be to produce safe environments through good design.

Technical Advice Note (TAN) 12: Design, provides advice for all those involved in the design of development on how good sustainable design can be facilitated through the planning system. TAN 12 reminds practitioners that local authorities (including National Park Authorities) are required to have due regard to crime and disorder prevention in the exercise of their functions under Section 17 of the Crime and Disorder Act 1998. TAN 12 recognises the Secured by Design initiative as a standard that has been shown.

TAN 12, paragraph states that 'Local authorities are advised to consult Designing out Crime Officers on pre-applications and planning applications for those developments where there is potential to eliminate or reduce crime through the adoption of suitable measures at the design stage. This is especially important for major developments such as new housing estates, industrial estates, shopping centres, leisure complexes, schools, and car parks. It is important to consult Designing out Crime Officers at as early stage as possible – by the time a formal application is submitted, the opportunity to take account of advice may already be limited.'

Section 17 of the Crime and Disorder Act requires local authorities to consider crime and disorder implications in all their authorities and functions and do all that they reasonably can do all they can do to reduce these problems.

Crime has a major impact on people's lives in Cardiff City and impacts on the health of the public especially those who have been victims of crime and anti-social behaviour and vulnerable groups such as Women and Girls.





In spring 2023, the Home Secretary announced Violence Against Women and Girls as a national threat and included it within the 9 Strategic Policing Requirement (SPR) alongside terrorism, serious and organised crime, and child sexual abuse.

Secured by Design can assist with ensuring that the built environment in all its forms is designed to reduce the opportunity of Violence Against Women and Girls (VAWG) and contribute to such places feeling safe, to live, work and socialise, for all. The importance of this is outlined within the National Police Chiefs' Council's (NPCC) 'Policing Violence Against Women and Girls – The National Framework for Delivery: 2024 – 2027' under the 'Prevent' element of the strategy; outlining the need for building safer spaces and places. Further information is available at:

<https://www.npcc.police.uk/SysSiteAssets/media/downloads/our-work/vawg/vawg-framework-for-delivery.pdf>

The Terrorism (protection of premises) Bill (Martyn's Law) is currently going through various stages of Parliament and although it has not become law at this stage, it is likely to come into effect by 2025. We believe this will take a two-tiered approach as below:

Standard- will drive good preparedness outcomes. Locations with a maximum **occupancy** of **greater than two hundred people** at any time will be required to undertake low-cost, simple yet effective activities to improve protective security and preparedness. This is achieved by accessing free awareness raising materials and development of a basic preparedness plan considering how best a location can respond to a terrorist event in their location.

Enhanced- focussed on high-capacity locations in recognition of the potential consequences of a successful attack. Locations with an **occupancy of eight**





hundred plus at any time will additionally be required to take forward a risk assessment and subsequently develop and implement a security plan. Enhanced Duty holders will be required to meet a reasonably practicable test.

Premises will fall within scope of Martyn's Law where **"qualifying activities"** take place. **This will include activities such as entertainment, leisure, retail, food and drink, museums and galleries, sports grounds, public areas of local and central Government buildings (e.g., town halls), visitor attractions, temporary events, Places of Worship, health, and education.**

It is proposed that Martyn's Law will apply to eligible locations which are either: **a building (including collections of buildings used for the same purposes, e.g., a campus); or location/event (including a temporary event) that has a defined boundary, allowing capacity to be known.** Eligible locations whose maximum occupancy meets the above specified thresholds will be then drawn into the relevant tier.

In view of the above I would ask that **crime and disorder be one of the vision objectives listed in Cardiff replacement development plan** and for Designing out Crime and Secured by Design to be mentioned and supported in the LDP.

Welsh Government are supportive of Designing out Crime and Secured by Design and representative from Government and Housing Associations sit on the All Wales Designing out Crime group.

Secured By Design Residential Homes guide 2025 states 'Constructing well-designed places, buildings and communities that promote both sustainable communities and health and well-being is an objective that Secured by Design widely supports; however, it is imperative that they must also be safe, secure, and accessible. Mitigating the opportunities for crime is not only about reducing and preventing injury and crime, but it is also about building strong, cohesive, vibrant, and participatory communities.'





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Keeping South Wales Safe

New Homes:

When prioritising the building of affordable homes in Cardiff South Wales Police would ask, that the Cardiff Replacement Local Development Plan stipulates that all affordable homes are all built to Secured by Design gold standard.

Currently in Wales all affordable social housing that is grant funded by Welsh Government to comply with the Development Quality Requirement (DQR) set by the Government must achieve the Secured by Design Gold award.

All developments should be built to Secured by Design standards and specifications. Designing out Crime Officers should be consulted at the concept stage, so the layout and standards are achieved.

This is particularly important when considering the needs of vulnerable groups for example: **The harm caused to victims and society by violence against women and girls (VAWG) in all its forms, including but not limited to, harassment, stalking, rape, sexual assault, murder, honour-based abuse and coercive control is incalculable. While men and boys also suffer from many of these forms of abuse, they disproportionately affect women.**

In spring 2023, the Home Secretary announced Violence Against Women and Girls as a national threat and included it within the 9 Strategic Policing Requirement (SPR) alongside terrorism, serious and organised crime, and child sexual abuse.

Secured by Design can assist with ensuring that the built environment in all its forms is designed to reduce the opportunity of Violence Against Women and Girls (VAWG) and contribute to such places feeling safe, to live, work and socialise, for all. The importance of this is outlined within the National Police Chiefs' Council's (NPCC) 'Policing Violence Against Women and Girls – The National Framework for Delivery: 2024 – 2027' under the 'Prevent' element of

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the strategy; outlining the need for building safer spaces and places. Further information is available at:

<https://www.npcc.police.uk/SysSiteAssets/media/downloads/our-work/vawg/vawg-framework-for-delivery.pdf>

Conversion to flats:

South Wales Police would ask that all flats meet WDQR (Welsh Design Quality Standards) and achieve a Secured by Design silver award.

Houses of multiple occupation:

South Wales Police welcome being involved in writing the new Specific planning guidance in respect of Houses of multiple occupancy with Cardiff City Council. To establish strict controls for the sub-division of existing homes, including flat conversions and HMOs.

All conversions (Where planning permits) and new build houses of multiple occupants to be converted/built to Secured by Design Standard and achieve at least a silver award.

Student accommodation:

Student accommodation should be built in compliance with the Secured by Design Residential Homes guide.

Co – Living Accommodation:

South Wales Police recognise that this type of development will provide an important source of housing, as part of a balanced housing mix. We would ask that the layout and building/s are built to Secured by Design standards as set out in the Residential Guide.





We would also ask that the following are made as conditions:

- A pre – commencement agreement is made at the pre planning stage is made between with South Wales Police and the developer that the development is built to Secured by Design Residential guide.
- Leases should be for a period of 6 months or more and have no allowance for the premises to be “sub-let” or used for any other reason, such as an Air BnB type premises.
- The premises must be controlled by One Management Company who operate a robust Management Plan for the lifetime of the building and to Secured by Design standards.

Where retail units form part of these developments and there is a public domain **The Terrorism (protection of premises) Bill (Martyn’s Law)** legislation Designing out Crime officers and Counter Terrorism Security Advisors should be consulted.

Change of use of residential land or properties:

South Wales Police would ask that any change of use application is flagged to South Wales Police Designing out crime officers to ensure that if this can potentially impact on crime and disorder that they are able to comment.

Change of use or redevelopment to residential use on unallocated sites.

Any redevelopment on unallocated sites should also be built to secured by Design Standards.





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Sites for gypsy and traveller caravans/ sites:

South Wales Police would welcome with Cardiff City Council to achieve Secured by Design residential 'Gold' award gypsy and traveller sites e.g. Pengam Green, Cardiff.

Local heritage List

Secured by Design gives guidance on how crime prevention methods can be added to heritage sites and supports objective 11.

South Wales Police welcome working with Cardiff City Council planning department to ensure that buildings of architectural/ historic within the city are protected as well as meeting Secured by Design standards.

Tall Buildings:

**South Wales Police will work with Cardiff Council to achieve Objective 7
Continue the regeneration of Cardiff Bay as a high density, mixed-use destination.**

In recent years and to fulfil the housing demand in Cardiff City we have seen the use of vacant buildings and new high-rise buildings being built. South Wales Police have worked closely with the planning department to address our concerns over these developments. We would ask that preplanning advice is sought from South Wales Police and pre commencement plans are in place to ensure units are built to Secured by Design Standards. Thus, making these units safe and sustainable.

Community Facilities and Safety

Objective 6 from the Vision and objective document:

Prif Gwnstabl | Chief Constable Jeremy Vaughan

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To create healthier environments, reduce inequalities and improve wellbeing and ensure safer environments which reduce the scope for crime.

South Wales Police would ask that consultation takes place with Designing Out Crime Officers and Counter Terrorism Policing Wales in respect of all community facilities and environments. This early consultation is essential, as the design and layout of communal facilities needs to carefully consider the design and layout to make vulnerable groups feel safe and inclusive and more likely to use the facilities. Good design also reduces instances of antisocial behaviour, Secured by Design New Residential guide 2025 states:

Poorly designed and specified public realm and communal areas, such as playgrounds, roof gardens, communal gardens, community dining rooms, toddler play areas, seating facilities **have the potential to generate crime, the fear of crime and anti-social behaviour**. The design and layout of play spaces will vary depending on the age requirements.

Planning for schools:

To create safe and secure learning environments it is recommended that all schools/extensions should be built to Non-Commercial Secured by Design Standards, with early pre planning consultation and ongoing site visits and support from Design out Crime officers and Counter Terrorism Policing Wales.

Heritage and the Historic Environment:

Designing out Crime officers can give Secured by Design advice on Heritage sites and properties and those of architectural interest.





Health, Wellbeing and Food Sustainability

Objective 9: To use the placemaking approach to create sustainable places, improves the city centre and neighbourhoods, maximises regeneration opportunities, enhances the role of public spaces, ensures that future growth can be effectively managed and delivers developments of high-quality design.

Early consultation with the community and South Wales Police Designing Out Crime Officers should be sought on design and layout of developments and public space.

By creating safe environments this will encourage people including vulnerable groups such as women and girls to feel safe to walk and use.

Designing out Crime officers and Counter Terrorism Security Advisors should be consulted if the space falls under **The Terrorism (protection of premises) Bill (Martyn's Law)** legislation.

Transport

South Wales Police Traffic Management unit work closely with Designing out Crime Officers and Counter Terrorism Policing Wales in respect of the safety of transport links. They should be consulted again at the pre planning stage of any new infrastructure within the Cardiff.

Objective 7. The provision of supporting sustainable transport infrastructure including Crossrail between Central Station, the Bay and Newport Road – including the regeneration around new stations City, Lloyd George Avenue, the Bay, Ocean Way, Splott and Newport Road areas.





Heddlu De Cymru
Pencadlys Heddlu
Heol y Bont-faen
Penybont
CF31 3SU

South Wales Police
Police Headquarters
Cowbridge Road
Bridgend
CF31 3SU

Cadw De Cymru Yn Ddiogel

Keeping South Wales Safe

Prioritising walking and cycling

To ensure that all members of the community particularly vulnerable groups feel safe when using walking and cycling routes, we would ask that Cardiff City Highways have early consultation with South Wales Police. We would also ask that all walking and cycling routes comply with the standards set out in Secured by Design Residential and non-residential guides 2025.

Cycling routes and walking routes should not create vulnerabilities that hostile vehicles could exploit in crowded areas.

In summary South Wales Police Designing out Crime Officers, Traffic Management officers and Counter Terrorism Policing Wales would welcome continuing to work in partnership with Cardiff City Council to deliver the vision and objectives proposed in the Cardiff Replacement Local Development plan 2021 – 2036.

If you have any questions about the content of this letter, please do not hesitate to contact me.

Kind Regards

Julie Odgers
Designing out Crime Officer

Prif Gwnstabl | Chief Constable Jeremy Vaughan

www.south-wales.police.uk

Rydym yn croesawu gohebiaeth yn Gymraeg ac yn Saesneg. Byddwn yn ymateb yn eich iaith o ddewis.
We welcome correspondence in Welsh and English. We will respond in your language of choice.



HEDDLU
DE CYMRU
SOUTH WALES
POLICE

Rhif Sylwedydd / Representor Number:

23

Enw Sylwedydd / Representation Number(s):

23.01 – 23.04

Rhif Sylw / Representor Name:

Jennifer Williams

From: [REDACTED]
To: [Local Development Plan / Cynllun Datblygu Lleol](#)
Subject: council planning for Cardiff's future
Date: 05 April 2025 17:21:55

I wish to suggest ideas for what our capital city should aim for in the future.

The council I believe should plan to make our city a good place for everyone to live in, especially young families, and it should aim to make a city where our young people can live meaningful lives in a safe and pleasant environment.

The Cardiff Civic Centre is for me one of the delights of Cardiff....planned attractive white buildings with green spaces and trees all around, spaces to walk and be near the green of Bute park. But how many of Cardiff residents have an environment near them which resembles in any way such an area? The Civic Centre cannot be duplicated but it can be a model of what is possible for future localities in the city.

The suburb of Rhiwbina is one of the "Wales' best " suburbs with its tree lined streets and green spaces.....but so many of the citizens of the city live in drab streets, bereft of any nature and places to sit and relax in. The scourge of high rise buildings is not the future of a city where it is pleasant to live.

I hope these ideas will influence the council's plans for our capital city.

Sincerely

Jennifer Williams

Rhif Sylwedydd / Representor Number:

24

Rhif Sylw / Representation Number(s):

24.01 – 24.04

Enw Sylwedydd / Representor Name:

Cardiff North Labour Party
Disability Group

Cardiff Council Replacement Local Development Plan 2021-2036

Deposit Plan Representations Form

We would like your views on the Cardiff Replacement Local Development Plan (RLDP) and also on documents which support the RLDP.

This form should be used for all representations (i.e. comments or objections). If you are submitting a paper copy, attach additional sheets as necessary.

This form has two parts: Part A (Personal details) and Part B (Your representation). Please note that Part B will be made publicly available and will be forwarded to the Planning Inspectorate.

Your representations must be received on or before 15th April 2025. Please return forms to: LDP@cardiff.gov.uk LDP Team, Room 250 County Hall, Cardiff CF10 4UW

This form is available in Welsh / Mae'r ffurflen hon ar gael yn Gymraeg

PART A: Contact details

Your / your client's details		Agent's details (if relevant)
Name	TIM COX	
Organisation (where relevant)		
Email address		
Address		
Signed		
Date	29 / 03 / 2025	

PART B: Your representation

Your name / organisation Tim Cox, Labour Party Disability Working Group

1. Which part(s) of the Plan (or supporting documents) are you commenting on?

- | | |
|-------------------------------------|---|
| <input checked="" type="checkbox"/> | LDP policy or site allocation number(s) |
| <input type="checkbox"/> | LDP paragraph or section number(s) |
| <input type="checkbox"/> | LDP Proposals Map reference(s) |

If your representation relates to a supporting document (e.g. the Sustainability Appraisal), insert the name(s) and reference(s) here.

2. Before you set out your comments in detail, it would be helpful to know whether you think the Plan is sound and meets the procedural requirements.

For more information on soundness and procedural requirements, see the guidance notes.

- | | |
|-------------------------------------|---|
| <input checked="" type="checkbox"/> | I think the LDP is sound and meets procedural requirements. |
| <input type="checkbox"/> | I think the LDP is unsound and should be changed. |
| <input type="checkbox"/> | I think that the procedural requirements have not been met. |

3. Would you like the LDP to include a new policy, site allocation or paragraph?

Tick all that apply.

- | | |
|-------------------------------------|----------------------------------|
| <input type="checkbox"/> | New site allocation |
| <input type="checkbox"/> | New Policy |
| <input checked="" type="checkbox"/> | New paragraph or supporting text |

4. If you want to add a new site allocation, have you previously submitted the site as a Candidate Site? If so, please give the Candidate Site name and reference (if known).

Site name

Site reference

If you want to suggest a new site, please attach a site plan identifying the boundaries of the site you wish to be included in the Plan and provide details of its proposed use. You should consider whether it is necessary for this comments form to be accompanied by a sustainability appraisal. Where proposed changes to a development plan have significant sustainability effects, you will need to provide the relevant sustainability appraisal information. This information must be consistent with the scope and level of detail of the sustainability appraisal conducted by the Authority. It should also refer to the same baseline information in identifying the likely significant effects of the revised policy or new site.

5. Please set out your comments below.

Include all the information, evidence and supporting information necessary to support / justify your representation. Please indicate which soundness test(s) the LDP meets or does not meet, and why (see guidance notes for more information). This will help the Authority and the Inspector to understand the issues you raise. You will only be able to submit further information to the examination if the Inspector invites you to address matters that he or she may raise. Please note that the Inspector will not have access to comments you may have made in response to previous consultations.

- Ensure that new housing developments include sufficient fully-accessible homes to give disabled people more housing choices
- Ensure all new public transport and walking routes are fully accessible, with safe crossings and clear signage. Limit the use of shared pathways without clear separation of walkers and cyclists
- Ensure parks, community buildings and shopping areas are designed for everyone, including those with mobility and sensory needs
- Ensure disabled workers are supported, making new job opportunities accessible with businesses encouraged to hire and support disabled people

☐ Tick here if you are submitting additional material to support your representation.

6. If you are objecting to the LDP, do you want to speak at a hearing session of the public examination?

At this stage, you can only make comments in writing (these are called 'written representations'). However, everyone that wants to change the Plan can appear before and speak to the Inspector at a 'hearing session' during the public examination. But you should bear in mind that your written comments on this form will be given the same weight by the Inspector as those made verbally at a hearing session. Please also note that the Inspector will determine the most appropriate procedure for accommodating those who want to provide oral evidence.

☒ I do not want to speak at a public hearing and am happy for my written representations to be considered by the Inspector.

☐ I want to speak at a public hearing.

If you want to participate in a hearing, indicate below what you want to speak about (e.g. Housing site at Pen-y-Graig or 'The overall housing target')

7. If you wish to speak, it would be helpful if you could indicate in which language you would like to be heard.

☐ I wish to be heard in Welsh.

☐ I wish to be heard in English.

Guidance notes

The Cardiff Replacement Local Development Plan (RLDP) will be examined by an independent Inspector appointed by the Welsh Government. It is the Inspector's job to consider whether the Plan meets procedural requirements and whether it is sound.

'Sound' may be considered in this context within its ordinary meaning of 'showing good judgement' and 'able to be trusted'. The questions or 'tests' which the Inspector will consider in deciding whether the Plan is sound are:

1. Does the plan fit? (i.e. is it consistent with other plans?)
2. Is the plan appropriate? (i.e. is it appropriate for the area in the light of the evidence?)
3. Will the plan deliver? (i.e. is it likely to be effective?)

More information on the soundness tests and procedural requirements is provided in the Planning Inspectorate's LDP Examinations Procedural Guidance.

If you are making an objection, you should say why you think the Plan is unsound and how the Plan should be changed to make it sound.

Where you propose a change to the Plan it would be helpful to make clear which test(s) of soundness you believe the Plan fails. If your comment relates to the way in which the Plan has been prepared or consulted on, it is likely that your comments will relate to 'procedural requirements'.

Failing to identify a test will not mean that your comments will not be considered, providing it relates to the Plan or its supporting documents. You should include all your comments on the form, using accompanying documents and supporting evidence where necessary.

If you seek more than one change to the Plan, it is not always necessary to complete separate forms for each part of your representation. It may, however, be helpful to use two separate forms if you wish to speak at a hearing about some objections but not others.

Where a group shares a common view on how it wishes the Plan to be changed, it would be helpful for that group to send a single form with their comments, rather than for a large number of individuals to send in separate forms repeating the same point. In such cases the group should indicate how many people it is representing and how the representation has been authorised. The group's representative (or chief petitioner) should be clearly identified.

Rhif Sylwedydd / Representor Number:

25

Rhif Sylw / Representation Number(s):

25.01 – 25.03

Enw Sylwedydd / Representor Name:

Esyllt George

From: [REDACTED]
To: [Local Development Plan / Cynllun Datblygu Lleol](#)
Subject: Replacement local development plan consultation response
Date: 08 April 2025 11:32:29

EXTERNAL: This email originated from outside Cardiff Council, take care when clicking links.

ALLANOL: Daw'r e-bost hwn o'r tu allan i Gyngor Caerdydd, cymerwch ofal wrth glicio ar ddolenni.

Dear Cardiff Council and Planning and Environment Decisions Wales, I would like share the following short paragraph regarding the RDLP:

I think it would be good to voice concern about nature decline and providing better protection for habitat. Also, protecting heritage in the city. Strong policies are needed to protect both biodiversity and heritage.

Making developers provide affordable housing within the areas they develop is also an issue.

Best Wishes

Esyllt George

Rhif Sylwedydd / Representor Number:

26

Rhif Sylw / Representation Number(s):

26.01

Enw Sylwedydd / Representor Name:

John Bennett

From: [REDACTED]
To: [Local Development Plan / Cynllun Datblygu Lleol](#)
Subject: Save Cardiff
Date: 07 April 2025 18:48:30

I have lived in Cardiff for over 25 years . I came here as a student , settled and have a home and a family , I consider my self to be a Cardiffian and this to be my home .

Over the years I have seen how Cardiff county council have blunder and squandered public money . There is no foresight to any of their plans , just greed and nepotism. They do not listen to the people , they abuse and dismantle public concern and amenities to profit . Their gentrification of Cardiff bay and disregard of public promise .. eg .. the statue of lord Bute . The underhand relationship with housing association with reframing of planning permission .currently the geocide attach in our natural resource , our small track of parks and forestry , including Bute park, and now black weir. .. stealing public land and converting it into a semi public capacity . They blatantly lie and cheat to our face and have no identity or association with Cardiff or Wales .

The road are the worst in the uk, the police are underfunded and arnt able to provide a public center service , the street are dirty and littered . There is no society support for homeless or the ill and un cared for .. community resources , children play area , youth center , swimming pools , library . Playing area are all been stripped away . This council is not to be trusted and need to be held accountable and they need to be jailed for their distraction and defacement or the once international capital if Wales , their was more community and society here when they were closing down the coal mines ..

With respect

John Bennett
Sent from my iPhone

Rhif Sylwedydd / Representor Number:

27

Rhif Sylw / Representation Number(s):

27.01 – 27.09

Enw Sylwedydd / Representor Name:

Paul Rock

Williams, Helen E (Planning)

From: [REDACTED]
Sent: 08 April 2025 15:04
To: Local Development Plan / Cynllun Datblygu Lleol
Subject: LDP Deposit Plan Consultation Response

Follow Up Flag: Follow up
Flag Status: Completed

EXTERNAL: This email originated from outside Cardiff Council, take care when clicking links.

ALLANOL: Daw'r e-bost hwn o'r tu allan i Gyngor Caerdydd, cymerwch ofal wrth glicio ar ddolenni.

Dear Sir,

Whilst there is much in the plan that is an improvement on its predecessor, however I would like to make the following comments and suggestions:

Policy D1: Tall Buildings

The way the criteria are written, it is not clear how many of the criteria for support need to be met in order for a proposal to be supported. This uncertainty allows challenge from potential developers who wish to erect buildings in unsuitable locations which meet only a small number of the criteria. I therefore suggest that the words "Tall buildings will be generally supported where they:" be replaced with "Tall buildings will be generally supported where they meet all of the following criteria:".

There is also no explicit benefit to the community or tourism of tall buildings in the policy. In London, the tallest buildings are required to allow free public access to their top floors which provides both a free tourist attraction and allows the city's residents to benefit from the views from such buildings. I suggest this is made into a planning requirement for buildings over a certain height in Cardiff.

There is also no explicit protection of the views of the city's built heritage. This has already caused the complete loss of views of the Millennium Stadium from westbound trains arriving at Cardiff Central Station - which is the most important arrival route for tourists. The policy needs to provide for protection of views of the city's iconic buildings from streets and other popular locations like railway station platforms. London and other cities require this of new buildings.

Policy BG5

This simply does not provide sufficiently strong protection for hedgerows and other wildlife corridors. The "significant and clearly defined public amenity benefits" cited in the policy can easily be abused by developers. The policy should explicitly ban the "temporary" removal of hedgerows during building projects - as has been seen at PlasDŵr and elsewhere, wildlife populations will not simply recover when their habitat is removed - even if new hedgerow is planted at a later date. (this later date is often extended by delayed works which exacerbates the problem).

I therefore propose that the policy generally requires building to be done within traditional field boundaries and hedgerows not be removed.

5. Strategic Growth and Spatial Options

This section fails to recognise the ecological and human wellbeing benefits of some urban and suburban brownfield sites. In many areas there are well-loved brownfield sites which have naturally "rewilded" over the years and have now become important for biodiversity and the local ecosystem as well as being hugely beneficial for local people's wellbeing in parts of the city where public natural open spaces are scarce. These areas are generally far more biodiverse than an intensively farmed field (with the notable exception of hedgerows - see above).

I propose that the LDP explicitly provides protection for rewilded urban and suburban brownfield sites.

Policy OS2:

The policy does not allow for local populations to have access to natural open spaces (as opposed to sports pitches and playgrounds) which is known to be vital for human wellbeing and childrens' development.

I propose that a specific requirement for local access to significant natural open space and encounter with nature be added to the policy.

I also propose that artificial / all-weather pitches as well as any fenced-off sports facility should not be included in any open-space calculation and that any newly created all-weather pitches or fenced-off sports facilities should be mitigated by a new equivalent amount of natural open space being made available to the public and for biodiversity.

H3 Affordable housing

There is a loophole in this section whereby developers can interpret it as a percentage of units and utilise very small areas of a development for affordable housing by building a very high density of such housing - thus increasing the inequality between housing types.

I propose this loophole is closed by specifying that the percentage of affordable housing should be based on land area rather than number of units.

7.233

There is no recognition of the falling rolls of the city's existing schools and the fact that most of the city's schools are now operating deficit budgets as a result. In this context, the building of additional schools should not be supported.

I propose that no further schools be built until the existing schools in the district are 95% full.

7.464

The implications for this are vague. I propose that play sufficiency guidelines not only apply to new developments but are also applied to the older areas of the city with little or no capacity for new developments.

Policy EC10

There is a lack of balance in this section and it still reads as if the intention is for Cardiff to be the top "Stag and Hen" destination in the UK. It needs to explicitly encourage development that will appeal to children, families and older people and explicitly discourage developments associated with heavy drinking - for instance it could require that all licenced premises in the city centre must serve substantive meals until late.

Whilst the policy seeks to resist the closure of public houses, there is no equivalent recognition of the importance of churches and other faith buildings in supporting and generating our city's vibrant culture. I suggest an equivalent supporting phrase be added.

Policy SP5

Moat seriously, the requirement that "New development will make appropriate provision for, or contribute towards, all essential, enabling and necessary infrastructure required as a consequence of the development [...] in a timely manner" is simply far too weak.

As we have seen from the problems surrounding many of the most recent large developments, it means that large housing estates are being built with no frequent walkable public transport, contiguous active travel or community facilities and sometimes inadequate sewerage! This inevitability means that housing developments become heavily car-dependant which, in turn means that each home has to have parking spaces etc. This is opposed to both Cardiff Council and the Welsh Governments sustainability policies.

For example, if the proposed railway from Fairwater to Craigau had been built prior to the construction of PlasDŵr, the estate would have been able to be built in a less car-centric manner (narrower roads, fewer driveways and garages etc.) so that housing density and amenity space could be greater.

I propose that Outline Planning permission be tightened up so that developers would not be allowed to proceed with house-building on such large developments until all the infrastructure deemed necessary for the development to be truly sustainable is actually in place.

All the best

- Paul Rock, 

Rhif Sylwedydd / Representor Number:

28

Rhif Sylw / Representation Number(s):

28.01

Enw Sylwedydd / Representor Name:

Swifts Local Network

From: [REDACTED]
To: [Local Development Plan / Cynllun Datblygu Lleol](#)
Subject: comments - Replacement Cardiff Local Development Plan (Deposit Plan)
Date: 15 April 2025 10:06:19
Attachments: [Deposit LDP Representations Form English \(1\).docx](#)

EXTERNAL: This email originated from outside Cardiff Council, take care when clicking links.

ALLANOL: Daw'r e-bost hwn o'r tu allan i Gyngor Caerdydd, cymerwch ofal wrth glicio ar ddolenni.

***** Warning: This email contains a Microsoft Office (Word, Excel, PowerPoint) or Adobe PDF attachment. Although this email has been scanned for threats, please think before opening attachments from unrecognised senders.**

Rhybudd: Mae'r e-bost hwn yn cynnwys atodiad Microsoft Office (Word, Excel, PowerPoint) neu PDF Adobe. Er bod yr e-bost hwn wedi'i sganio ar gyfer unrhyw fygythiadau, meddyliwch cyn agor atodiadau gan anfonwyr nad ydych yn eu hadnabod. ***

Dear LDP team,

Please find my completed Representations Form (Deposit Plan) attached.

Unfortunately I was unable to sign manually as I am submitting this from my phone, but I trust you will be able to accept.

Best regards,

Mr Mike Priaulx

[REDACTED]

Cardiff Council

Replacement Local Development Plan 2021–2036

Deposit Plan

Representations Form

We would like your views on the Cardiff Replacement Local Development Plan (RLDP) and also on documents which support the RLDP.

This form should be used for all representations (i.e. comments or objections). If you are submitting a paper copy, attach additional sheets as necessary.

This form has two parts: Part A (Personal details) and Part B (Your representation). Please note that Part B will be made publicly available and will be forwarded to the Planning Inspectorate.

Your representations must be received on or before 15th April 2025. Please return forms to:
LDP@cardiff.gov.uk LDP Team, Room 250 County Hall, Cardiff CF10 4UW

This form is available in Welsh / Mae'r ffurflen hon ar gael yn Gymraeg

PART A: Contact details

Your / your client's details		Agent's details (if relevant)
Name	Mike Priaulx	
Organisation (where relevant)	Swifts Local Network: Swifts & Planning Group	
Email address		
Address		
Signed	Mike Priaulx	
Date	14/04/25	

PART B: Your representation

Your name / organisation

Mike Priaulx, Swifts Local Network: Swifts -

1. Which part(s) of the Plan (or supporting documents) are you commenting on?

LDP policy or site allocation number(s)

LDP paragraph or section number(s)

7.364

LDP Proposals Map reference(s)

If your representation relates to a supporting document (e.g. the Sustainability Appraisal), insert the name(s) and reference(s) here.

2. Before you set out your comments in detail, it would be helpful to know whether you think the Plan is sound and meets the procedural requirements.

For more information on soundness and procedural requirements, see the guidance notes.

I think the LDP is sound and meets procedural requirements.

I think the LDP is unsound and should be changed.

Tick

I think that the procedural requirements have not been met.

3. Would you like the LDP to include a new policy, site allocation or paragraph?

Tick all that apply.

New site allocation

New Policy

New paragraph or supporting text

4. If you want to add a new site allocation, have you previously submitted the site as a Candidate Site? If so, please give the Candidate Site name and reference (if known).

Site name

Site reference

If you want to suggest a new site, please attach a site plan identifying the boundaries of the site you wish to be included in the Plan and provide details of its proposed use. You should consider whether it is necessary for this comments form to be accompanied by a sustainability appraisal. Where proposed changes to a development plan have significant sustainability effects, you will need to provide the relevant sustainability appraisal information. This information must be consistent with the scope and level of detail of the sustainability appraisal conducted by the Authority. It should also refer to the same baseline information in identifying the likely significant effects of the revised policy or new site.

5. Please set out your comments below.

Include all the information, evidence and supporting information necessary to support / justify your representation. Please indicate which soundness test(s) the LDP meets or does not meet, and why (see guidance notes for more information). This will help the Authority and the Inspector to understand the issues you raise. You will only be able to submit further information to the examination if the Inspector invites you to address matters that he or she may raise. Please note that the Inspector will not have access to comments you may have made in response to previous consultations.

The reference in paragraph 7.364 to "swift nest boxes" is welcome but it is not sound as it only refers to swift nest boxes for swifts as a mitigation measure, but swift bricks are a universal nest brick for small bird species suitable for all new developments.

Please add: Swift bricks are a universal nest brick for small bird species and should be installed in new developments including extensions, in accordance with best practice guidance such as BS 42021 or CIEEM. Artificial nest cups for house martins may be proposed instead of swift bricks where recommended by an ecologist.

Also: Swift bricks are significantly more beneficial than external bird boxes as they are a permanent feature of the building, have zero maintenance requirements, are aesthetically integrated with the design of the building, and have better thermal regulation with future climate change in mind.

Also please add: Existing nest sites for building-dependent species such as swifts and house martins should be protected, as these endangered red-listed species which are present but declining in Cardiff return annually to traditional nest sites. Mitigation should be provided if these nest sites cannot be protected.

In more detail for supporting evidence:

Swift bricks are considered a universal nest brick suitable for a wide range of small bird species including swifts, house sparrows and starlings (e.g. see NHBC Foundation: Biodiversity in New Housing Developments (April 2021) Section 8.1 Nest sites for birds, page 42: <https://www.nhbc.co.uk/foundation/biodiversity-in-new-housing-developments>).

Therefore, swift bricks should be included in all developments following best-practice guidance (which is available in BS 42021:2022 and from CIEEM (<https://cieem.net/resource/the-swift-a-bird-you-need-to-help/>)).

The UK Green Building Council (UKGBC) is a membership-led industry network and they have produced a document entitled: "The Nature Recovery & Climate Resilience Playbook" (Version 1.0, November 2022) <https://ukgbc.org/resources/the-nature-recovery-and-climate-resilience-playbook/> This document is designed to empower local authorities and planning officers to enhance climate resilience and better protect nature across their local area, and includes a recommendation (page 77) which reflects guidance throughout this document: "Recommendation: Local planning Authorities should introduce standard planning conditions and policies to deliver low cost/no regret biodiversity enhancement measures in new development as appropriate, such as bee bricks, swift boxes [and bricks] and hedgehog highways."

For reference: in England, NPPF December 2024 Paragraph 187 (d) (page 54) states: "planning policies should... incorporate features which support priority or threatened species such as swifts", NPPG Natural Environment 2019 paragraph 023 refers to the value of swift bricks, and the National Model Design Code Part 2 Guidance Notes (2021) also recommends bird bricks (Integrating Habitats section on page 25, and Creating Habitats section on page 26).

Many local authorities in England are including detailed swift brick requirements in their plans, such as Tower Hamlets Local Plan Regulation 19 stage (paragraph 18.72, page 328 - <https://talk.towerhamlets.gov.uk/local-plan>),

which follows the exemplary swift brick guidance implemented by Brighton & Hove since 2020,

and Wiltshire Local Plan Regulation 19 stage, which requires an enhanced number of 2 swift bricks per dwelling (policy 88: Biodiversity in the built environment, page 246 - "As a minimum, the following are required within new proposals: 1.

integrate integral bird nest bricks (e.g., swift bricks) at a minimum of two per dwelling;" <https://www.wiltshire.gov.uk/article/8048/Current-consultation-Reg-19>),

so such an enhanced level should also be considered.

Tick here if you are submitting additional material to support your representation.

6. If you are objecting to the LDP, do you want to speak at a hearing session of the public examination?

At this stage, you can only make comments in writing (these are called 'written representations'). However, everyone that wants to change the Plan can appear before and speak to the Inspector at a 'hearing session' during the public examination. But you should bear in mind that your written comments on this form will be given the same weight by the Inspector as those made verbally at a hearing session. Please also note that the Inspector will determine the most appropriate procedure for accommodating those who want to provide oral evidence.

I do not want to speak at a public hearing and am happy for my written representations to be considered by the Inspector.

I want to speak at a public hearing.

Tick

If you want to participate in a hearing, indicate below what you want to speak about (e.g. 'Housing site at Pen y Graig' or 'The overall housing target').

To provide further information, if required.

8. If you wish to speak, it would be helpful if you could indicate in which language you would like to be heard.

I wish to be heard in Welsh

I wish to be heard in English.

Tick

Rhif Sylwedydd / Representor Number:	29
Rhif Sylw / Representation Number(s):	29.01 – 29.02
Enw Sylwedydd / Representor Name:	Bogod Group

Comments

Event: Cardiff Replacement Local Development Plan 2021-2036 Deposit Plan

Agent Name: Mr Darren Parker

Agent Organisation: RPS

Agent Position: OD

Agent Email:

Agent Address:

Consultee Organisation: Bogod Group Ltd

Consultee Address:

Consultation point: Foreword

1. Which part(s) of the Plan (or supporting documents) are you commenting on?

LDP policy or site allocation number(s)

H1B: Non-strategic housing sites; SP1: Providing for Sustainable Growth

2. Before you set out your comments in detail, it would be helpful to know whether you think the Plan is sound and meets the procedural requirements.

I think the LDP is unsound and should be changed

3. Would you like the LDP to include a new policy, site allocation or paragraph?

New site allocation

New paragraph or supporting text

4. If you want to add a new site allocation, have you previously submitted the site as a Candidate Site? If so, please give the Candidate Site name and reference (if known).

Site name

Land north west of Druidstone Road

Site reference

CS 51

5. Please set out your comments below.

Please refer to representation enclosed.

6. If you are objecting to the LDP, do you want to speak at a hearing session of the public examination?

I want to speak at a public hearing.

7. If you want to participate in a hearing, indicate below what you want to speak about (e.g. 'Housing site at Pen y Graig' or 'The overall housing target').

Candidate Site 51 - Land north west of Druidstone Road

8. If you wish to speak, it would be helpful if you could indicate in which language you would like to be heard.

I wish to be heard in English

CARDIFF REPLACEMENT LOCAL DEVELOPMENT PLAN – DEPOSIT PLAN CONSULTATION

Land north west of Druidstone Road (Candidate Site 51)

1. RLDP Strategy for Residential Growth

The Strategic Growth option set out in Policy SP1: *Providing for Sustainable Growth* of the Deposit Plan is a brownfield strategy which seeks to meet the majority of housing land required during the plan period to 2036 through a range of brownfield sites within the existing settlement boundary and it considers that no new greenfield releases are necessary.

The landbank of new homes already committed is 19,872 (as at April 2024). The Deposit Plan states that approximately 50% of all new homes being provided on brownfield sites and 50% provided on greenfield sites. It is considered that this split is only achieved as a result of previously allocated green field sites having not been delivered in the time scales anticipated (Annual Monitoring Report, 2023).

2. Flexibility Allowance

The total housing requirement is 26,400. This is a requirement of 24,000 plus 10% for flexibility. The LDP Manual Edition 3 De-risking Plan Checklist states that LPA's should... 'Include an appropriate level of flexibility within the housing and job provision to allow for unforeseen circumstances'.

Background Technical Paper 1: Housing (January 2025) acknowledges that that not all schemes may come to fruition as originally consented and sites may be developed at lower densities, or for alternative purposes - a 'non-delivery allowance' (-20% i.e. -3,018 units) is therefore factored into the Housing Trajectory. It is not clear whether the landbank figure of 19,872 is inclusive of the non-delivery allowance. A need for a 'further allowance' has also been identified as Sustainable Drainage Systems (SuDS) and biodiversity/green infrastructure requirements have reduced the area of developable land available. This appears to have been applied to Strategic Site C, Plasdwr, only. The further allowance has not been quantified and it is unclear why this has not been applied to the other large strategic sites.

Future Wales: The National Plan 2040 (FW) identifies Cardiff (as part of the wider Cardiff, Newport and Valleys region) as a National Growth Area. The Welsh Government supports Cardiff's status as an internationally competitive city and a core city on the UK stage. FW states that Local Development Plans should consider the interdependence of Cardiff and the wider region - Cardiff must generate and support regional growth. It is considered that the proposed brownfield strategy restricts the potential growth of the capital city.

When considering:

- the contribution that Cardiff is expected to make to the FW growth strategy;
- the risk to developable areas of sites within the landbank (resulting from SuDS and biodiversity / green infrastructure requirements); and
- the potential complexities associated with brownfield land e.g. remediation requirements and associated costs which pose a risk to delivery,

the Replacement Local Development Plan should be de-risked. As such, we propose an increase in flexibility allowance to 20% to accommodate a worst-case scenario. The lower risk housing requirement would be 28,800 homes. We are proposing that up to 60 of these homes could be accommodated on the Candidate Site 51. The remainder of this document outlines the reasons this land is well suited for such development.

3. Sustainable Location for Growth

The site is well situated in eastern Cardiff just adjacent to the settlement boundary of St Mellons within proximity to existing bus stops/services, walking and cycling routes and between two mainline stations in Newport and Cardiff.

There is an existing cycle route along Tyr Winch Road to the south of the site. There are available bus services near the site, that sit within the Cardiff bus network and connect to services between Cardiff and Newport. Recent development at St Ederyn's village also provides opportunities for connectivity towards the City centre with the benefit of significant investment in public transport infrastructure at this location.

Cardiff Central and Newport rail stations are situated on the Main Line between Swansea and London and the wider South Wales valleys. The recently consented Cardiff Parkway Development at Land South of St Mellons Business Park will provide the development with a mainline rail station in close proximity of the site. Cardiff Parkway will contribute:

- The creation of c.3,000 jobs
- A transport interchange comprising a 650-space park and ride facility
- Significant new cycling infrastructure between Cardiff and Newport, as well as a rapid bus corridor between Newport and Cardiff, via Cardiff Parkway.

Candidate Site 51 lies within 2 miles of Cardiff Parkway and therefore presents the opportunity to deliver new homes that are well connected to both employment opportunities and significant investment in transport infrastructure. The proximity of Cardiff Parkway, together with the proximity of both the A48 and M4 makes this site a highly sustainable location for growth.

4. Placemaking

The site is located on undeveloped greenfield land between Druidstone Road and Began Road in Old St. Mellons, between the M4 motorway and A48 (Eastern Avenue) and approximately 9.5km north east of Cardiff City Centre. The site is broadly triangular in shape with existing residential development flanking the Site to the east and west meaning the site is not in 'open country' as such. However, the Site is largely screened from Druidstone Road and Began Road by existing trees and hedgerows which will limit views of the Site from existing adjacent dwellings. There is an existing gate into the northwest corner of the site from Began Road.

To the north of the site lies a stream and beyond the hedgerow is open countryside. To the east and south of the site lie existing residential properties along Druidstone Road. To the west of the site lie existing residential properties along Began Road.

The site is well located to form an extension to an existing well-established place. The site would enable St Mellons to grow and develop in a way that uses land efficiently, supports and enhances the existing settlement and is well connected. The development capacity can increase the local population whilst sustaining services, facilities and public transport.

Walking, cycling and public transport can be prioritised to provide a choice of transport modes and avoid dependence on private vehicles. Well designed and safe active travel routes can connect to the wider active travel and public transport network.

Other services and facilities, subject to not harming the existing provision, could be accommodated at site. There are no electrical vehicle charging points within close proximity to the existing site, but some can be included as part of the development.

Development density and the mix of tenures will help to support a diverse community and vibrant extension to the existing community. The site will be wholly aligned to the identity of St Mellons as there is no dilution of the place through coalescence. The settlement is well connected in the East of Cardiff.

The illustrative concept masterplan includes the areas of proposed residential development, accompanied by proposed pedestrian/cycle links, vehicular routes, access points, existing vegetation, play and space and the SuDS basin/swale.

5. Accordance with RLDP Objectives

Table 1 overleaf identifies how residential development of Land north - west of Druidstone Road would contribute to (and accord with) the relevant RLDP Objectives of the Deposit Plan.

Table 1: Accordance with the RLDP Objectives

Objective No.	RLDP Objective	Accordance
1	To provide a variety of quality low carbon homes to address the housing crisis and future housing needs.	<p>Land north west of Druidstone Road would provide for a range of dwelling types, sizes and tenure, offering an accessible and acceptable choice of lifestyles and lead to the creation of an integrated and sustainable residential community with a sensitive relationship to the existing settlement.</p> <p>The delivery of homes at the site would follow a fabric first approach to sustainable construction to minimise energy demand and carbon dioxide emissions in accordance with the RLDP and wider policy context.</p>
4	To respond to the climate emergency so Cardiff becomes more resilient and maximises opportunities for energy efficient solutions in line with the One Planet Cardiff Strategy to become a carbon neutral city by 2030.	<p>The Site is sustainably located adjacent to the existing settlement boundary (refer to section 3) which enables the development of new homes that are not dependent upon the private vehicle to access facilities and services. As part of future travel planning for this site, the development will provide an electric bike for each household. The Site facilitates a new pedestrian and cycle route linking the two access points allowing for efficient accessibility through the key desire lines. Additionally, proposed off-site improvements (see objective 5 below) promote wider active travel opportunities.</p> <p>The site is located entirely in Flood Zone 1 as per NRW's Flood Map for planning. A Conceptual Drainage Strategy has been prepared to inform the Concept Masterplan, demonstrating that surface water can managed to mimic natural drainage processes, reducing pollution, and enhancing the environment. Surface water runoff generated by the development will be conveyed by a gravity sewer system including a central swale feature. The proposed SuDS features will allow peak flow rates to be reduced and provide water treatment through the settlement of silts and suspended sediments.</p> <p>The Proposed Development will be green-infrastructure led and provide meaningful and multifunctional public open spaces which comprises a low carbon approach to design and fosters carbon sequestration. The design of the detailed masterplan will seek to</p>

protect and enhance ecosystem resilience considering diversity, extent, condition, and connectivity of on-site and off-site habitats.

5	To make the city easier to move around with a focus on sustainable and active travel.	<p>The Concept Masterplan shows that a new pedestrian and cycle route will be created through the centre of the Site linking the two access points from Druidstone Road and Began Road. This allows for efficient movement by pedestrians and cyclists following key desire lines. The approach to site access and movement will provide quiet streets which will form part of the movement framework for pedestrians and cyclists. This strategy will be inclusive for all and will include facilities such as dropped kerbs and tactile paving as appropriate.</p> <p>To encourage sustainable and active travel, an area for a bike sharing scheme as well as car club spaces will also be provided for as part of the development proposals.</p> <p>Active travel will be prioritised for users of the site, and to connect with the current and proposed off-site improvements, which will be provided as part of the development, for the benefit of existing and future users. This would include improvements to Druidstone Road and along Tyr Winch Road and the junction with Wern Fawr Lane. A Transport Assessment providing additional detail has been submitted.</p>
6	To create healthier environments, reduce inequalities and improve wellbeing.	<p>Delivery of homes at the site is likely to be beyond the implementation of the Future Homes Standard and will therefore be designed with low-carbon heating, improved insulation, and energy efficiency measures as standard. The site presents the opportunity to deliver 60 good quality homes which are warm, ventilated and well-lit.</p> <p>The Concept Masterplan demonstrates that the site can facilitate adequate and functional green spaces within public realm with a view to creating a sustainable and healthy environment for residents. Play facilities and active travel opportunities are incorporated within the Concept Masterplan.</p>
9	To use the placemaking approach to create sustainable places, improve the city centre and neighbourhoods, maximise regeneration opportunities, enhance the role of public spaces, ensure that future growth can be effectively managed and deliver developments of high-quality design.	<p>While the Site comprises greenfield land which is a departure from the 'brownfield first' priority, it presents an opportunity to direct growth to a sustainable location adjacent to the settlement boundary (refer to section 3 above).</p> <p>A local character assessment has been undertaken which identifies a number of distinctive qualities within the existing local area and potential design cues which will influence the detailed design approach moving forward. The masterplan for the site</p>

would be green infrastructure and landscape led providing meaningful and multifunctional public open spaces for new and existing residents in the locality.

The amount of developable area identified in the Concept Masterplan is considered appropriate for the site. Neighbouring development is of a low density and is predominantly detached houses. The proposed scheme would reflect this character whilst providing a greater mix of dwelling types.

The scale of the proposed housing will be informed by the site characteristics and the local context. The surrounding residential areas are largely two-storey – therefore any proposed building heights will reflect this. Taller dwellings may be included at key locations to help create a sense of place.

10	To ensure the resilience of ecosystems by protecting and enhancing Cardiff's green and blue Infrastructure, its biodiversity and other natural assets.	<p>There are no statutory designated sites within the Site. A suite of ecological surveys have been undertaken, including dormouse surveys, bat activity surveys and reptile surveys. Bat activity and dormouse presence have been confirmed and a European Protected Species will be obtained accordingly. The masterplan would also incorporate mitigation by design measures such as avoidance of artificial lighting on key features and minimising woodland and hedgerow loss.</p> <p>A green infrastructure-led approach would be adopted as part of the master planning process to achieve net benefit for biodiversity. Any planning application that comes forward for the site will demonstrate how the masterplan observes the step-wise approach in accordance with Planning Policy Wales (Edition 12). The Concept Masterplan demonstrates a vision that is heavily defined by both blue and green infrastructure to ensure that any built form respects the edge of settlement location.</p>
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Delivery

Bogod Group Ltd and members of the Bogod family are the freehold owners of the site and can confirm that it is immediately available should a site allocation be forthcoming and would be able to prepare and submit a planning application without delay.

The suite of preliminary technical appraisals and design exercises has established a firm basis for more detailed assessment work, which remains ongoing, that can form the necessary submissions to accompany a planning application to support the future development of the site.

Other matters relevant to the delivery of the site are considered in detail in technical documents submitted previously:

- Transport Assessment (Vectos)
- Flood Consequence Assessment and Conceptual Drainage Strategy (RPS, Report ref. HLEF81041)
- Ecology Survey Update Document (RPS, Report ref. ECO01965)

References

Cardiff Council, 2023 '7th Annual Monitoring Report'. Available at: <https://www.cardiffldp.co.uk/annual-monitoring-report/>

Cardiff Council, 2025 'Background Technical Paper 1: Housing'. Available at: [https://r2.consultation.ai/cardiffldp/deposit-plan/background-technical-papers/Background Technical Paper 1 Housing English.pdf](https://r2.consultation.ai/cardiffldp/deposit-plan/background-technical-papers/Background%20Technical%20Paper%201%20Housing%20English.pdf)

Cardiff Council, 2025 'Cardiff Replacement LDP Deposit Plan'. Available at: [https://r2.consultation.ai/cardiffldp/deposit-plan/deposit-plan-documents/Deposit Plan January 2025 English.pdf](https://r2.consultation.ai/cardiffldp/deposit-plan/deposit-plan-documents/Deposit%20Plan%20January%202025%20English.pdf)

Welsh Government, 2020 'Development Plans Manual (Edition 3)'. Available at: <https://www.gov.wales/sites/default/files/publications/2020-03/development-plans-manual-edition-3-march-2020.pdf>

Welsh Government, 2021 'Future Wales: The National Plan 2040'. Available at: <https://www.gov.wales/sites/default/files/publications/2021-02/future-wales-the-national-plan-2040.pdf>

- Mr James Robbins

Respondent: Mr James Robbins NA

Submission Date: 15/04/25
13:37

Proposals Map

Proposals Map

1. Which part(s) of the Plan (or supporting documents) are you commenting on?

LDP policy or site allocation number(s)

LDP Policy - Proposals Map

LDP paragraph or section number(s)

Proposals Map

LDP Proposals Map reference(s)

'Housing Commitment over 100 dwellings SP1'

If your representation relates to a supporting document (e.g. the Sustainability Appraisal), insert the name(s) and reference(s) here

5. Please set out your comments below.

REF Email Simon Gilbert to James Robbins 30/03/25 'St Fagans - Replacement LDP Map Error'

It was confirmed that the proposals map is inaccurate and the boundary for 'Housing Commitment over 100 dwellings SP1'. The boundary has changed from the existing LDP and now covers an area that is in the St Fagans Conservation Area as well as being classified as a Special Landscape Area. It was confirmed that the maps will be updated to correct this. It was also noted that there will be no increase in Green Field development and the map is currently showing advancement into new greenfield space.

6. If you are objecting to the LDP, do you want to speak at a hearing session of the public examination?

* I do not want to speak at a public hearing and am happy for my written representations to be considered by the Inspector.

8. If you wish to speak, it would be helpful if you could indicate in which language you would like to be heard.

* I wish to be heard in English

Rhif Sylwedydd / Representor Number:

31

Rhif Sylw / Representation Number(s):

31.01 – 31.02

Enw Sylwedydd / Representor Name:

Mary Davis

From: [REDACTED]
To: [Local Development Plan / Cynllun Datblygu Lleol](#)
Subject: Cardiff Replacement Local Development Plan 2021-2036
Date: 08 April 2025 17:51:43

EXTERNAL: This email originated from outside Cardiff Council, take care when clicking links.

ALLANOL: Daw'r e-bost hwn o'r tu allan i Gyngor Caerdydd, cymerwch ofal wrth glicio ar ddolenni.

Good Afternoon

My concern lies within Bae Caerdydd in particular Housing Led Regeneration Areas H2.5 (2,310 units) and H2.4 (316).

The Deposit Plan - Summary Version says:-

What has changed since Preferred Strategy

. support to Play and informal recreation

DEPOSIT PLAN says:-

“8. Main changes since Preferred Strategy

Allocation of housing led regeneration areas that provide an opportunity for high density sustainable, mixed-use development to assist regeneration and relieve pressure for development on greenfield sites”

No mention of “Greener” here.

I live at the eastern edge of Cardiff Bay between H2.5 and H2.4. Where there is already high density housing. Office space is at present being adapted for living accommodation, also student accommodation is being built nearby which will further raise the density.

We have NO facility for play, sport or general recreation. There is nothing GREEN here, plenty of water!!

To accommodate the number of proposed units I imagine tall buildings must be built.

Under the heading Tall Buildings

“ Take into account the needs of people at the human scale creating neighbouring spaces that allow for trade, play, sport or relaxation within an attractive landscape that in particular benefits the residents.”

Can this and will this be achieved? - it would be a significant step forward if developers and council took the need for green spaces seriously. They have failed here.

Please think carefully about the residents of this area, especially those with children living in flats.

Mary Davis

[REDACTED]

Rhif Sylwedydd / Representor Number:

32

Rhif Sylw / Representation Number(s):

32.01 – 32.30

Enw Sylwedydd / Representor Name:

Pentyrch Community Council

PCC RESPONSE TO DRAFT LOCAL DEVELOPMENT PLAN FOR 2021 – 2036 Deposit Plan.

Introduction

Penttyrch Community Council (PCC) welcomes the opportunity to comment on the Deposit Plan.

PCC in general supports the Strategic Vision and Strategic Objectives and welcomes the proposed strategy which reflects a lower level of growth than the current plan and takes into consideration the learnings since 2019.

PCC provides specific comments reflecting views of our residents in this feedback document especially focusing on the needs of Northwest Cardiff.

PCC are also encouraging residents to provide their feedback directly on the RDLP consultation website prior to 15th April 2025.

PCC strongly objects to development on any further greenfield sites.

We recommend investigating the huge potential for re-use of existing brownfield sites or buildings and repurposing new buildings. Cities across the country are recognising the changing nature of city centres & the increasing amount of both retail & commercial property that is empty. "Change of use" is a formidable tool available to planning authorities.

PCC requests additional focus on Transport and Services for the Northwest villages to improve the current challenges residents are facing.

Protection of the integrity of the special landscape area / green wedge should be an overriding aim of the Deposit Plan. The landscape needs to be protected from noise, air pollution and degradation of flora, fauna soil & water quality.

PCC is particularly mindful of the environmental damage caused by the operation of the quarries in our area.

Objectives

PCC supports the Preferred strategy objectives with the following comments.

Objective 3 - To ensure the adequate and timely provision of new infrastructure to support communities and future growth

This objective requires further consideration in relation to the additional infrastructure needed to ensure residents in villages along the Northwest edge of Cardiff have adequate access to public services because the location of these villages creates specific needs for transport, connectivity, schools and services.

As more houses are constructed PCC is receiving increasing numbers of complaints from both new & existing residents about:

- Traffic volumes
- Noise from traffic
- Lack of public transport
- Lack of active transport route
- Lack of adequate car parking
- Health facilities

Objective 5 - To make the city easier to move around with a focus on active travel.

Requires further consideration in relation to the specific public transport challenges faced by residents in villages along the Northwest edge of Cardiff and the severe limitations of active travel options to the villages due to the location and infrastructure.

It is our view that that more village centre to village centre public transport is required to enable residents to travel around the outer most areas of Cardiff and into Cardiff without the need of a car. Current transport arrangements including access to Health facilities are an increasing worry for residents.

Improved and more reliable public transport services are needed around and in and out of the City Centre together with more integrated service provision, such as bus / train and park and ride. Residents are regularly complaining about poor, unreliable services which are adversely impacting their health and quality of life.

Objective 9 -To use the place making approach to create sustainable places, improve the city centre and neighbourhoods and maximise regeneration opportunities, enhance the role of public spaces, ensure that future growth can be effectively managed and deliver developments of high-quality design.

PCC specifically supports this objective and especially the intention that 'the plan will promote development in the most sustainable locations and the efficient use of land with a 'brownfield first' priority.'

Of concern is the inability of the communities of Northwest Cardiff to access essential services, including those provided by Cardiff Council, & shops in Radyr & Whitchurch by public transport.

Objective 10 – To ensure the resilience of ecosystems by protecting and enhancing Cardiff's green and blue infrastructure, its biodiversity and other natural assets.

PCC supports this objective and as a landowner and custodian of part of the Special Landscape Area / Green Wedge, and a representative of residents who are also landowners, requests involvement with any discussions relating to this objective.

PCC notes that the strategy has identified the importance of the need for further assessment of Habitats and looks forward to reviewing the outcomes.

Objective 11 - Historic and Cultural Assets

PCC recognises that it is home to a significant number of Cardiff's conservation areas & historic monuments & requests involvement in discussions about their future.

Strategic Policies

The 23 Strategic policies are supported in principle by PCC.

It is noted that the preferred strategy recognises Cardiff's population fell by 1% between 2019 and 2021 and that traffic levels rose.

The residents of PCC are concerned by the noticeable increase in traffic through our villages as new housing increases. Evidence of increased traffic has been recorded by local speed watch. Residents are also aware of the increase in trunk road traffic noise which is now noticeable year-round rather than only during the winter months. Residents are concerned about the increased cut through traffic from the new developments and are requesting traffic calming measures in order to reduce risk of accidents.

It is recognised that Cardiff Council faces enormous challenges in seeking to:

- Combat climate change
- Maintain & improve biodiversity
- Provide an environment within which residents have opportunities to participate in activities which will enhance well-being
- Provide a highway network which limits vehicle & noise pollution

And provide sufficient homes for residents.

PCC welcomes the recognition of the reduction in population in the Proposed Strategy and the associated proposed reduction in planned house building.

Strategic Vision

We recommend that the plan further recognises all current & anticipated societal changes.

Population Growth

The existing LDP anticipated a population growth that has not materialised.

Significant development sites have not progressed as expected & this has undoubtedly been due to both the changing needs of society & the commercial decisions taken by developers. Cardiff Council needs to recognise that both factors determine the need for new house building & it should not be considering candidate sites solely on their attractiveness to developers.

Public Services

SP5 Securing New Infrastructure (Transport, Schools, Health Care)

The quality of public services is a key determinant of the quality of life enjoyed by residents.

Quality of life impacts upon well-being & the support residents require from public services in later years.

Poor or inadequate public services will place increasing financial pressures on the public services required by future generations.

“Plan for the future & do not simply try to react when it arrives”.

The latter will ensure failure and Cardiff Council’s over-arching objective should be to ensure both Health Services & Council services adequately meet the needs of residents.

Significant service shortfalls already exist in terms of population needs, particularly in relation to:

- schools
- health services
- facilities for young people and the elderly
- cycling and walking routes
- public transport routes

As part of its plans to facilitate further population growth PCC recommends Cardiff Council explains what it is doing to address these service shortfalls, which would help to reduce the concerns of residents.

SP 7 – Supporting Place Making Plans

PCC welcomes place making plans for our communities & requests involvement in the development of these plans.

Communities should be engaged in the formulation of design considerations

SP10 – Supporting Tourism

It is recommended that this policy would benefit from improved Public Transport in and out of Cardiff, to and from the Airport and improvements to connections between car, rail, bus and air transport.

SP11 Maintaining a supply of minerals.

Quarry activity impacts PCC residents and local biodiversity. Air pollution, noise pollution and reduction in habitat being some of the concerns and high volumes of heavy lorry movements which in turn cause further air and noise pollution as well as potential hazard to road users. Therefore, while we recognise the need to maintain supplies, we strongly urge careful consideration of permissions related to extraction and consideration of recycled materials where possible.

The environmental damage to areas within the Special Landscape Area / Green Wedge should not be underestimated. Residents are already alarmed by the loss of woodland & hedgerows and adverse impact on wildlife around our quarries.

Blasting is causing damage to properties in Gwaelod & Pentyrch.

SP12 Sustainable Neighbourhoods

PCC recognises the importance of this policy & looks forward to seeing plans to connect our villages.

The lack of connectivity creates inequalities for residents.

SP13 – Health & Wellbeing

PCC is very concerned about the service inequalities being created by public service providers

The Health Service is designed services without regard for public transport limitations.

Cardiff Council has removed bus services from the most isolated community within Cardiff.

SP 16 Protecting the setting of the city through a green wedge. and SP17 Managing Spatial growth through settlement boundaries.

PCC supports both SP16 and SP17 and welcomes these principles being strengthened. It is these green principles which enable many elements of the strategy.

Protection of the green wedge will be key to Cardiff' progress towards net zero

PCC welcomes the minimal change to settlement boundaries

Highway Network

SP18 Delivering Sustainable Transport and Active travel.

SP19 Securing new transportation infrastructure.

PCC supports these policies but has serious concerns about delivery within our area.

Transport is a significant issue for the residents of PCC. Concerns include a severe lack of public transport, increasing volumes of traffic and lack of connection to active travel routes and increasing numbers of cars parking in unsuitable locations due to lack of parking spaces. Residents regularly complain about road safety in our area and lack of public transport and access to services. PCC recommends special consideration to improving transport links for the residents of PCC.

For many years the investment in the highway network has not kept pace with the increase in vehicle usage.

Traffic volumes have dramatically increased and with it increasing resident concerns about the risk of accidents and the impact of increasing pollution from idling vehicles adversely affecting resident's health, particularly young children and those with underlying health conditions. Difficult decisions have been taken in other cities to endeavour to improve air quality.

Llantrisant road is a strategic access point for the city & the housebuilding both completed & proposed has dramatically increased journey times and increased through traffic in existing villages.

PCC strongly oppose candidate sites in this area given the further environmental damage that will be caused & adverse impact on resident's well-being. Instead, it

is suggested that Cardiff Council should invest in initiatives to support active travel & improve the public transport infrastructure.

SP21 - Protecting, compensating, and enhancing green infrastructure and biodiversity.

PCC supports SP21 and considers this as another key foundation to the long-term sustainability of Cardiff.

The importance of the upland grassland & meadows within Northwest Cardiff should be recognised.

SP22 – Impact on Natural Resources

PCC recommends Cardiff Council commit resources to the mapping of the quality of agricultural land.

SP23 – Managing Waste

PCC recommends Cardiff Council review the recycling centres available to the residents of Northwest Cardiff.

Candidate Sites-PCC area

a) Site Reference 21 - Land Adjacent Llantrisant Road (A4119), Capel Llaniltern. (Spicer, Jenkins, and Pink Land)

31 ha proposed for residential.

As described in the current LDP, the eastern portion is part of the Site D Strategic Site, but the western portion is described as outside of the proposed Settlement Boundary and does not form part of Site D.

Both portions are the subject of a single current planning application for the development of 160 dwellings and associated infrastructure, including a new access from Llantrisant Rd.

The western portion lies adjacent to two Listed Buildings (the Grade 2 Church of St Eldeyrn at Capel Llanilltern, and the Grade 2* Pencoed House).

The site includes many trees covered by Tree Preservation Orders and lies immediately adjacent to the Nant-y-Glaswg: Site of Importance for Nature Conservation; and also the Former Llantrisant No.1 Branch Line: Site of Importance for Nature Conservation.

The RDLP Preferred Strategy Key Diagram indicates that the western portion of the site lies within an area of open countryside which should be subject to the policy of 'Protect and Enhance'.

PCC contends that the western portion of this site should be enhanced and protected as part of the RDLP and **PCC objects** to the inclusion of this site for development within the new RDLP.

b) Site Reference 17 - Land at Henstaff Court

41ha proposed for residential.

As described in the current LDP, this site is identified as 'Potential future expansion in Plan Period' and lies to the west of Strategic Site D which has already been partly developed.

The site contains and lies immediately adjacent to several Sites of Importance for Nature Conservation (Nant Henstaff; Henstaff Rhos Pasture; Groes Faen Wood; Nant Coslech and Groes Faen Fen Meadow).

The RDLP Preferred Strategy Key Diagram indicates that the site lies within an area of countryside which should be subject to a policy of 'Protect and Enhance'.

PCC contends that this site should be enhanced and protected as part of the RDLP and PCC objects to the inclusion of this site for development within the new RDLP.

c) Site Reference 81 – Land at Llwynioli Farm, North of Junction 33

3.4 ha proposed for mixed use.

As described in the current LDP, this site is part of the much larger Site D Strategic Site but has not yet been the subject of a planning application for development.

PCC recommends that this site should not be considered in isolation but should only be considered as part of the wider development of Site D. No further access points should be permitted to the Llantrisant Road and the adjacent Cadoxton & Trehafod Branch Line: Site of Importance for Nature Conservation should be fully protected.

The possible route of the Northwest Rapid Transit Corridor (as identified in the current LDP) also requires protection.

d) Site Reference 13 - Land at the Old Forge Capel Llanilltern

1.2 ha proposed for housing.

As described in the current LDP, this site lies outside the existing settlement boundary and within the Green Wedge and Special Landscape Area. The site also contains a Grade 2 Listed Building.

PCC contends that this site should be enhanced and protected as part of the Special Landscape Area & Green Wedge and **PCC objects** to the inclusion of this site for development within the new RDLP.

e) Site reference 43 - Land at Ty Newydd, Main Rd, Gwaelod-y-Garth

0.36 ha proposed for 'Residential/amend settlement boundary'.

As described in the current LDP, this site lies outside the existing settlement boundary and within the Green Wedge and Special Landscape Area.

PCC contends that this site should be enhanced and protected as part of the Special Landscape Area and Green Wedge and **PCC objects** to the inclusion of this site for development within the new RDLP.

f) Site Reference 22 - Land East of Heol Pant-Y-Gored, Creigiau

5.3 ha proposed for residential.

As described in the current LDP, this site lies outside the existing settlement boundary and within the Green Wedge and Special Landscape Area.

The RDLP Preferred Strategy Key Diagram indicates that the site lies within an area of countryside which should be subject to a policy of 'Protect and Enhance'.

This is a very visible site and lies at the entrance to the village of Creigiau. The rural and open nature of this area has already suffered greatly under the existing LDP and through the uncontrolled intensification of uses in the immediate area. The purpose and integrity of the SLA and Green Wedge designations must be upheld, and PCC contends that this site should be enhanced and protected as part of the Special Landscape Area and Green Wedge. Therefore, **PCC strongly objects** to the inclusion of this site for development within the new RDLP.

g) Site Reference 20 - Land off Brummell Drive, Creigiau

10.5 ha proposed for residential.

As described in the current LDP, this site lies outside the existing settlement boundary and within the Green Wedge and Special Landscape Area.

The RDLP Preferred Strategy Key Diagram indicates that the site lies within an area of countryside which should be subject to a policy of 'Protect and Enhance'.

The site includes many trees covered by Tree Preservation Orders and lies immediately adjacent to the Pant y Gored Wet Woodland; and Cadoxton & Trehafod Branch Line Sites of Importance for Nature Conservation

PCC contends that this site should be enhanced and protected as part of the Special Landscape Area and Green Wedge and **PCC objects** to the inclusion of this site for development within the new RDLP. The possible route of the Northwest Rapid Transit Corridor (as identified in the current LDP) also requires protection.

h) Site Reference 18 - Land to the South of Creigiau

38.8 ha proposed for residential.

As described in the current LDP, this plot is the Site E Strategic Site and lies to the South of the existing Creigiau Settlement Boundary.

The site is the subject of a current outline planning application for the development of approx. 650 dwellings and includes 2 new vehicular access points from Llantrisant Rd.

The site includes many trees covered by existing Tree Preservation Orders and the Castell-y-Mynach Wood; and Cadoxton & Trehafod Branch Line Sites of Importance for Nature Conservation

PCC objects to the inclusion of this site for development as it is a greenfield site and is not now required to meet local housing demand. The rural and open nature of the site should be protected under the new RDLP. The possible route of the Northwest Rapid Transit Corridor (as identified in the current LDP) also requires protection.

i) Site Reference 19 - Land to the South of Llantrisant Road (Part of Site D)

13ha proposed for residential.

As described in the current LDP, this site is part of the much larger Site D Strategic Site but has not yet been the subject of a planning application for development.

PCC recommends that this site should not be considered in isolation but should only be considered as part of the wider development of Site D. No further access points should be permitted to the Llantrisant Road.

The site includes many trees covered by Tree Preservation Orders and the Nant Henstaff Site of Importance for Nature Conservation should be fully protected.

The possible route of the Northwest Rapid Transit Corridor (as identified in the current LDP) also requires protection.

j) Site Reference 15 - Robin Hill, Creigiau

0.4 ha proposed for residential.

As described in the current LDP, this site lies outside the existing settlement boundary and within the Green Wedge and Special Landscape Area.

The RDLP Preferred Strategy Key Diagram indicates that the site lies within an area of countryside which should be subject to a policy of 'Protect and Enhance'.

Part of this site has already been developed but PCC contends that the remainder of this site should be enhanced and protected as part of the Special Landscape Area and Green Wedge and **PCC objects** to the inclusion of this site for development within the new RDLP.

k) Site Reference 80 - Land at Cwm Farm Morganstown
29.22 ha proposed for residential.

As described in the current LDP, this site lies outside the existing settlement boundary and within the Green Wedge and Special Landscape Area.

The RDLP Preferred Strategy Key Diagram indicates that the site lies within an area of countryside which should be subject to a policy of 'Protect and Enhance'.

The site includes many trees covered by Tree Preservation Orders and a Site of Importance for Nature Conservation which should be fully protected.

PCC objects to the inclusion of this site for development as it is an important site for nature and is not required to meet local housing demand. The rural nature of the site should be fully protected under the new RDLP.

L) Site Reference 86 - Land adjacent to Dwrllyn Cottage, Capel Llanilltern
0 ha proposed for residential

PCC objects to the inclusion of this site for development as it outside the settlement boundaries.

Candidate Sites -outside but close to PCC Area:

a) Site Reference 23 - Plasdŵr Uchaf

144 ha proposed as residential-led mixed use development forming an extension to the existing Plasdŵr allocation.

As described in the current LDP, this site lies outside the existing and proposed settlement boundaries and forms a large and significant parcel of open countryside. The site lies to the north and south of the Llantrisant Rd and to the west of Strategic Site C.

The RDLP Preferred Strategy Key Diagram indicates that all the site lies within an area of countryside which should be subject to a policy of 'Protect and Enhance'.

The site includes the Ty Du Moor SSSI, one of the best remaining areas of marshy grassland in the Cardiff area. It contains many marshland plants and grasses including rare species. The site is also home to several Sites of Importance for Nature Conservation (SINC), including Nant Rhydlafar, Nant Dowlais, Coed y Glyn and Ty Du Marsh. Nant Rhydlafar and Nant Dowlais streams provide water to the SSSI.

PCC contends that this very large site should be enhanced and protected as part of the RDLP and **PCC objects** to the inclusion of this site for development within the new RDLP.

b) Site Reference 14 - Land at Llanfair, Junction 33

9 ha proposed for Housing, retail, industrial.

Site lies some distance to the south of the M4 and immediately to the east of the A4232 Link Road and straddles the narrow country lane known as Heol St y Nyll at Llanfair Court.

The site currently comprises open countryside/agricultural fields and the RDLP Preferred Strategy Key Diagram indicates that the western portion of the site lies within an area of countryside which should be subject to a policy of 'Protect and Enhance'.

PCC contends that this site should be enhanced and protected as part of the RDLP and **PCC objects** to the inclusion of this site for development within the new RDLP.

c) Site Reference 61 - Goitre Fawr, Plasdŵr

57 ha proposed for residential-led mixed use development forming an extension to the existing Plasdŵr allocation.

As described in the current LDP, this site lies outside the existing and proposed settlement boundaries and forms a large and significant parcel of open countryside. The site lies to the north of the Llantrisant Rd, south of the M4 and lies between Rhydlafar and the Radyr Golf Course.

This site is an area of "countryside to be protected and enhanced". It is crossed by well-used public footpaths and the Preferred Strategy acknowledges it is a "valuable and finite resource which is under pressure from all kinds of development".

The site includes four SINCs and borders the Penrhos Branch Line nature reserve.

The RDLP Preferred Strategy Key Diagram indicates that all the site lies within an area of countryside which should be subject to a policy of 'Protect and Enhance'.

PCC contends that this site should be enhanced and protected as part of the RDLP and **PCC objects** to the inclusion of this site for development within the new RDLP.

d) Site Reference 60 - Radyr Station Car park.

Size 0.93ha

The proposal is for transit orientated development through the reconfiguration of the car park to deliver transport integration measures and potential redevelopment for employment / residential uses.

PCC supports the delivery on transport integration measures.

PCC opposes any reduction in car parking spaces at the train station as this is an important park and ride facility for the surrounding villages and by enabling access to the train services helps reduce private car use, one of the stated aims of the Preferred Strategy.

Candidate Sites – Quarries

a) Ton Mawr Quarry

The Community Council objects to this candidate site on the grounds of highway safety & the adverse impact on both the environment & residential property.

Residents experience of the recent increase in quarrying has led to a dramatic increase in complaints about:

- Noise
- Damage to property
- Road safety due to lorry activity &
- Road safety due to size of vehicles on inadequate highways

- Air Quality
- Environmental damage due to loss of woodland
- Loss of public rights of way

PCC is therefore very concerned about additional quarrying at Ton Mawr. The number & size of vehicles has already caused significant damage to Heol Goch.

During the last 20 years there has been huge change in traffic volumes on Heol Goch due to:

- Population growth, particularly along Llantrisant Road

- Commuter traffic using Pentyrch as a short cut
- Recreational cycling which has focused around Heol Goch

The existing access to the Quarry requires a turning circle which places huge vehicles on the wrong side of the road.

Cardiff Council is asked to confirm that:

- the width of the road is sufficient for lorries & buses to safely pass each other
- the national speed limit remains appropriate for Heol Goch

A further 20 years operation of the Quarry will have a significant impact on the community through noise pollution, vibration, dust & reductions in air quality and is disappointed that the Quarry have not sought to offer support to the community.

Should this candidate site be agreed the Community Council is of the view that:

- limits should be placed upon the number of vehicle trips to & from the Quarry each day
- limits should be placed upon the times of operation of vehicles accessing / leaving the Quarry e.g., not during rush hour
- the Quarry should establish liaison arrangements with community

Rhif Sylwedydd / Representor Number:

33

Rhif Sylw / Representation Number(s):

33.01

Enw Sylwedydd / Representor Name:

Neurodivergent Friendly
Cardiff (Eluned Evans)

From: [REDACTED]
To: [Local Development Plan / Cynllun Datblygu Lleol](#)
Subject: LDP Consultation Feedback
Date: 09 April 2025 10:36:49
Attachments: [Outlook-kfu31dfk.png](#)

Good Morning,

I wanted to provide some feedback regarding Strategic Policy 4- Securing Good Quality and sustainable design. Please see below:

It is really positive that this policy makes reference to ensuring inclusive design and accessibility of buildings and spaces. I think it would be helpful to include **specific reference** to accessibility for those with hidden disabilities and neurodivergence, for example, those with sensory differences. Cardiff has made a commitment of working towards becoming a neurodivergent friendly city and it would be really positive to see this reflected by encouraging and promoting inclusive development.

Many Thanks,
Eluned

[Eluned Evans \(She/ Her\)](#)

Caerdydd sy'n Deall
Niwrowahaniaeth
Neurodivergent
Friendly Cardiff



Fy hoff ddulliau cyfathrebu yw e-bost, Microsoft Teams, cyfarfodydd sydd wedi'u trefnu ymlaen llaw / My preferred methods of communication are by Email, Microsoft Teams and pre-arranged meetings.

Mae'n well gen i wybod pwnc cyfarfodydd o flaen llaw / I prefer to know the subject of meetings in advance.



Rhif Sylwedydd / Representor Number:

34

Rhif Sylw / Representation Number(s):

34.01

Enw Sylwedydd / Representor Name:

Ruth Evans

From: [REDACTED]
To: [Local Development Plan / Cynllun Datblygu Lleol](#)
Subject: LDP
Date: 10 April 2025 15:11:11

Dear Cardiff Council,

The rec (Roath Recreation ground)

What an awful waste of money. Please, if you have to install lighting, make it dim and low to the ground, in keeping with the park and not disturbing bats, birds and the growth of trees.

There are insufficient dropped kerbs near the rec so wheelchair users such as myself cannot access it.

Ridiculous of the council to claim this vanity project was to benefit disabled people. You have harmed disabled people. A much smaller amount of money could have been spent putting lots of dropped kerbs for all of us who are trapped in our terraced houses in the area because of the poor pavement particularly kerbs.

Why are you allowing the rest of Roath park to go to ruin? You need another several park Rangers or gardeners to maintain it. Do this for public mental and physical health. It is less expensive than rebuilding or building new things. Quick fix mentality does not work in parks. Please listen to gardeners.

Another stupid and pointless project was the canal off Queen St. Because the canal has so much steel and glass hiding it it's of little benefit. The thick railings are particularly a hindrance to actually being able to see the water. Meantime the pavement on Queen St is not being maintained and replaced with ugly tarmac which wears quickly. Look after what we have instead of new stupid unwanted vanity projects.

The recycling scheme blue and red bags are such a disappointment. I believe in recycling but the amount of rubbish left around on the road and pavement after bin day is saddening. This rubbish ends up in our drains and then the sea which defeats the purpose.

Please bring back bins around Roath. It's increasingly dirty. It's going downhill for this fact alone.

Please don't chop down trees in Llandaff fields to create an event venue. This is vandalism. Vandalism. It is I'll thought out and the public object. Please don't. It's deeply upsetting. Please leave the trees. Trees are more valuable. You are destroying our historic parks.

In summary, please stop destroying Cardiff parks and replacing it with hideous glass and steel monstrosities. People need lawns, grass, trees and space. Maintain what we have.

Thank you

Ruth EVANS,

[REDACTED]

Rhif Sylwedydd / Representor Number:

35

Rhif Sylw/ Representation Number(s):

35.01 – 35.04

Enw Sylwedydd / Representor Name:

Asbri Planning

From: [REDACTED]
To: [Local Development Plan / Cynllun Datblygu Lleol](#)
Cc: [REDACTED]
Subject: Land at Robin Hill, Creigiau - Deposit Plan Representation
Date: 09 April 2025 19:00:15
Attachments: [image002.png](#)
[image003.png](#)
[Robin Hill - RLDP Deposit Plan Representation - April 2025.pdf](#)

***** Warning: This email contains a Microsoft Office (Word, Excel, PowerPoint) or Adobe PDF attachment. Although this email has been scanned for threats, please think before opening attachments from unrecognised senders.**

Rhybudd: Mae'r e-bost hwn yn cynnwys atodiad Microsoft Office (Word, Excel, PowerPoint) neu PDF Adobe. Er bod yr e-bost hwn wedi'i sganio ar gyfer unrhyw fygythiadau, meddyliwch cyn agor atodiadau gan anfonwyr nad ydych yn eu hadnabod. ***

EXTERNAL: This email originated from outside Cardiff Council, take care when clicking links.

ALLANOL: Daw'r e-bost hwn o'r tu allan i Gyngor Caerdydd, cymerwch ofal wrth glicio ar ddolenni.

Good Evening

Please find a formal representation to the Replacement LDP Deposit Plan consultation attached, which relates to 'Land at Robin Hill, Creigiau'.

As required, the representation is duly submitted by the closure of the statutory consultation period, and we trust that the content of the representation will be given due consideration in advance of the submission of the plan for examination.

In summary, and as set out in detail in the attached representation, it has been established as part of the Replacement LDP evidence base that the site comprising Land at Robin Hill makes no contribution to the function of the Green Wedge, and is unsuitable for designation as Special Landscape Area. The positioning of the settlement boundary as presented within the Deposit Plan remains illogical, and it is requested that the Proposals Map of the Deposit Plan is amended (in line with the replacement LDP evidence base) to allow for the inclusion of the Robin Hill site within the settlement boundary, and the associated de-allocation of the land from the Special Landscape Area and Green Wedge accordingly.

Please contact me should you require any further information. I would be grateful to receive acknowledgement of receipt of the representation.

Kind regards

Catherine

Date: 9th April 2025
Our Ref: CB/21.237

Unit 9 Oak Tree Court
Mulberry Drive
Cardiff Gate Business Park
Cardiff
CF23 8RS

Tel: 02920 732 652
www.asbriplanning.co.uk

Local Development Plan Team
Cardiff Council
Room 219
County Hall
Atlantic Wharf
Cardiff
CF10 4UW

SENT BY EMAIL: ldp@cardiff.gov.uk

Dear Sir/Madam,

**Cardiff Replacement Local Development Plan –Deposit Plan Consultation
Land at Robin Hill, Creigiau (Candidate Site Ref. 15)**

Further to the publication of the 'Deposit' version of the Cardiff Replacement Local Development Plan (LDP) in January 2025, we write to provide a formal representation to the statutory Deposit Plan consultation. As required, the representation is duly submitted by the closure of the statutory consultation period, and we trust that the content of the representation will be given due consideration in advance of the submission of the plan for examination.

Background

As the Authority will be aware, the following formal submissions have been made in relation to the site over the course of the Replacement LDP preparation process. For completeness, the previously submitted representations are re-attached for reference:

- Candidate Site Representation (submitted 13th August 2021) (attached at Appendix A)
- Representation to Preferred Strategy consultation (submitted 22nd September 2023) (attached at Appendix B)

In summary, the original Candidate Site Representation submitted in 2021 set out a detailed case for the inclusion of Land at Robin Hill (and infill parcel to the south of Brummell Drive / north of Robin Hill) within the settlement boundary, and associated de-allocation from the Special Landscape Area and Green Wedge accordingly (please refer to representation attached at Appendix A for full details).

The subsequent representation to the Preferred Strategy consultation in 2023 responded to the comments contained within the Council's 'Candidate Site Register' (published July 2023) which specified that the site had "not progressed to next stage assessment". The clear case for the review of the settlement boundary within the vicinity of Robin Hill site was reiterated within this representation (please refer to Appendix B for full details).

Settlement Boundary in Deposit Plan

Further to the representations outlined above, the Deposit Plan (January 2025) has subsequently been published by the Authority. From reviewing the Deposit Plan Proposals Map, it is understood that a settlement boundary review has been undertaken in relation to the settlement of Creigiau. The version of the Proposals Map as contained within the existing/adopted LDP versus that contained within the recently published Replacement LDP Deposit Plan is shown in Figure 1 and 2 below. As illustrated, the settlement boundary has been amended within the Deposit Plan to include the built form to the south of Brummell Drive within the designated settlement (so as to incorporate the 8no. residential dwellings constructed at Bryn Briallu). However, the settlement boundary has not been amended to logically include the adjacent parcel of built form at Robin Hill.

Figure 1: Positioning of Settlement Boundary - Adopted LDP Proposals Map





Settlement Boundary 

Figure 2: Positioning of Settlement Boundary - Deposit Plan Proposals Map



Settlement Boundary 

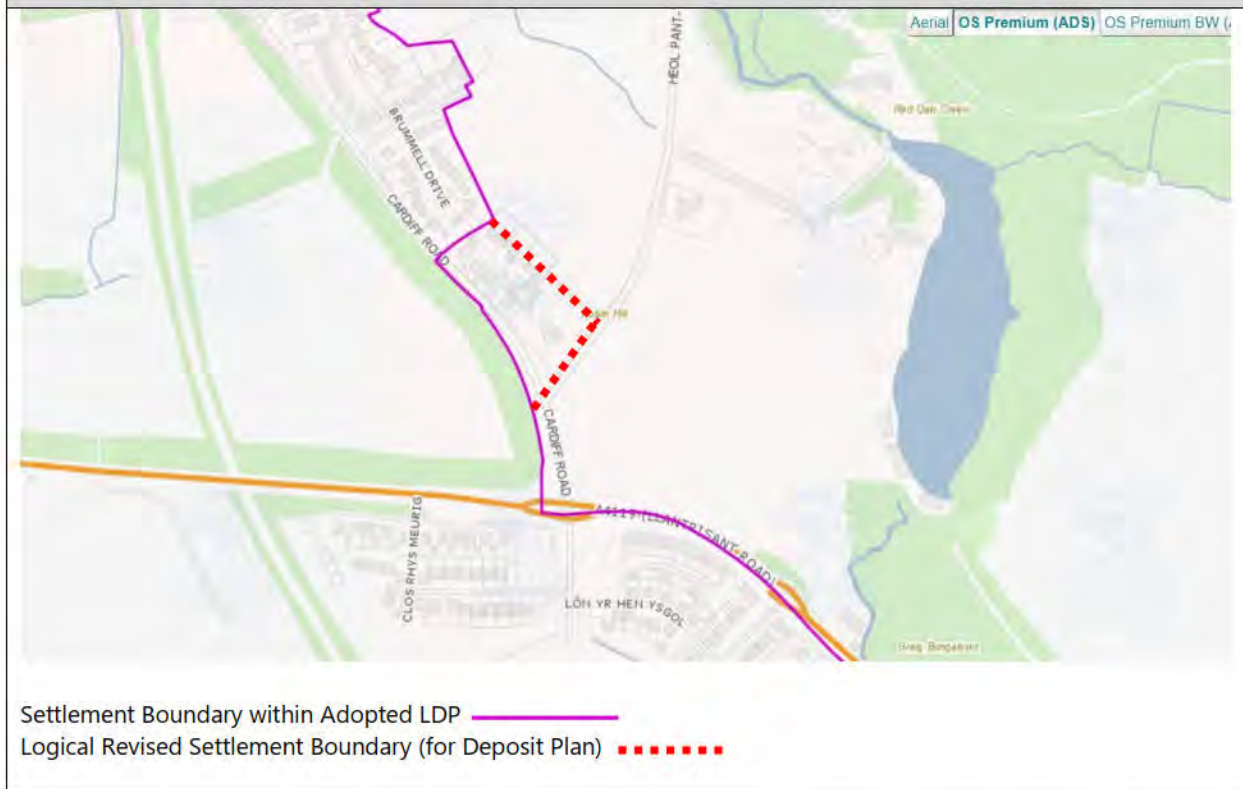
If it is the case that the Authority are minded to amend the positioning of the settlement boundary to incorporate the built form at Bryn Briallu, it is logical that the existing built form comprising Robin Hill which is located directly adjacent to Bryn Briallu should also be included within the settlement boundary. The pattern of built form does not simply stop at the southern extent of Bryn Briallu – it continues southwards to the abutment of the highway at Heol Pant Y Gored. The position is clearly evident in viewing an aerial image of the land – the built form at the southern extent of the settlement of Creigiau clearly terminates at Heol Pant Y Gored, not at the rear of Bryn Briallu (as shown in Figure 3).

Figure 3: Aerial Image of Extent of Built Form at Southern Extent of Settlement of Creigiau



Based upon the above, it is considered that the positioning of the settlement boundary as presented within the Deposit Plan remains illogical. Notwithstanding the amendment to incorporate the 8no. residential dwellings to the south of Brummel Drive, it still remains the case that the built form comprising Land at Robin Hill should similarly be included within the settlement. As per the previous representations made in relation to this matter, the logical positioning of the settlement boundary (which is requested to be taken forward in the version of the Deposit Plan which is submitted to Welsh Government for examination) is identified in Figure 4 overleaf.

Figure 4: Logical Positioning of Settlement Boundary for Replacement LDP



Replacement LDP – Evidence Base

As the Authority will be aware, the Welsh Government's 'Development Plans Manual' (Edition 3, March 2020) specifies that *"Plans should be based on robust evidence"*. As part of the preparation of a robust evidence base, the Authority have commissioned a specialist consultant to review the position in relation to both green wedge and local landscape designations. The relevant evidence base documents are highly pertinent to the consideration of the positioning of the settlement boundary within the vicinity of Land at Robin Hill.

'Cardiff Landscape Evidence Base Update Local Landscape Designations' (prepared by LUC January 2025)

Cardiff Council commissioned LUC in January 2024 to undertake a review of local landscape designations across the local authority area to provide evidence for the emerging LDP. One of the objectives of the study included: *"to provide up to date evidence and justification for the existing SLA areas and their boundaries"*. It is the case that within the adopted LDP, the Robin Hill site is included within the boundary of the 'Garth Hill and Pentyrch Ridges' Special Landscape Area (SLA).

Within the 'Cardiff Landscape Evidence Base Update Local Landscape Designations' evidence base document, a map is provided (at Figure 1.2) which sets out the 'proposed' extent of the Garth Hill and Pentyrch Ridges SLA (for the purposes of the Replacement LDP). As shown on this map (copied at Figure 5), it is the case that the Robin Hill site is not included within the SLA (as shown at a closer scale at Figure 6).

Figure 5 Cardiff Landscape Evidence Base – Proposed Extent of Garth Hill and Pentyrch Ridges SLA

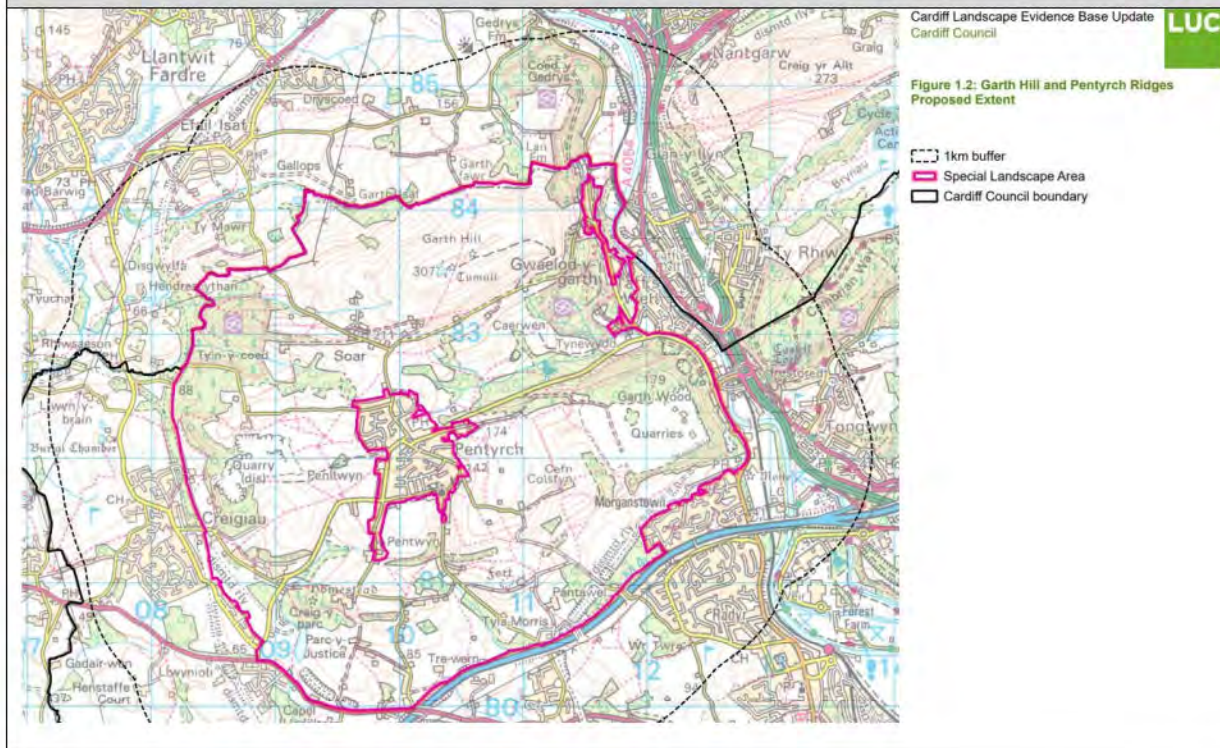


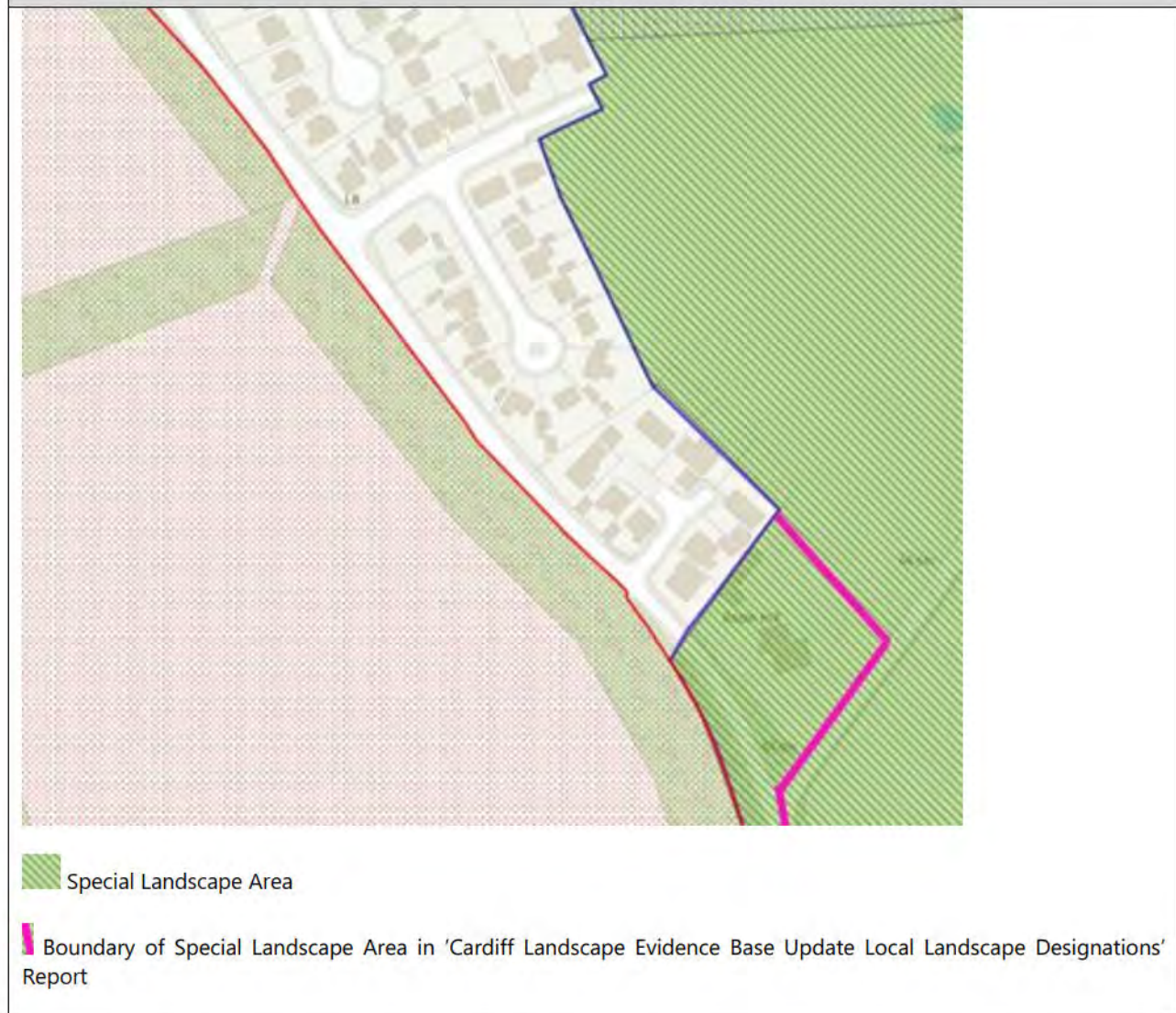
Figure 6: Boundary of SLA (excluding land at Robin Hill from within the SLA)



The recommendations contained within the 'Cardiff Landscape Evidence Base Update Local Landscape Designations' report (i.e. the specialist evidence base document prepared to inform the replacement LDP) are therefore essentially that land at Robin Hill does not contribute to the special landscape features of the SLA, and therefore the boundary of the SLA is proposed to be amended to exclude the Robin Hill site from the SLA (as shown on Figure 1.2 of the document).

However, as shown on the Deposit Plan Proposals Map, the Robin Hill site is incorrectly retained within the boundary of the SLA (which does not accord with the conclusions of the evidence base) – as demonstrated on the plan at Figure 7 below.

Figure 7: Deposit Plan Proposals Map – Special Landscape Area Boundary



'Cardiff Green Wedge Assessment' (prepared by LUC, January 2025)

In addition to the above, an assessment has been undertaken by LUC to inform the review of green wedges in Cardiff ('Cardiff Green Wedge Assessment', LUC January 2025), which also forms part of the LDP evidence base. It is acknowledged that within the current/adopted LDP, the Robin Hill land is identified as falling within the Green Wedge (as is the residential development parcel directly to the north).

Paragraph 1.2 of the Green Wedge Assessment report states that *"Green wedges are areas in which the retention of openness (freedom from built development, as opposed to visual openness) is considered necessary in order to manage urban form"*. The Robin Hill site is occupied by an existing residential dwelling with associated residential curtilage and hardstanding – it is clearly not 'free from built development', and therefore does not contribute in any way to the retention of openness in this location.

The area of the Green Wedge within which the Robin Hill site is located is reviewed as part of the LUC assessment. The assessment identifies the following with regards to the Robin Hill site (and the adjacent residential parcel to the north): *"The parcel includes two groups of dwellings which form part of the urban area and make no contribution to the*

green wedge purposes. A single, older dwelling on a larger plot lies adjacent to the southernmost of the above groups, on Bryn Briallu (Cardiff Road), and so can also be considered part of the urban area and makes no contribution to the green wedge purposes”.

It is specified (within the evidence base document) in uncertain terms that the ‘single, older dwelling’ i.e. Robin Hill:

- “can be considered part of the urban area”; and
- “makes no contribution to the green wedge purposes”.

The relevant extract from the report is copied at Figure 8 below for clarity:

Figure 8: Cardiff Green Wedge Assessment (Prepared by LUC, January 2025) – Description of Contribution of Land at Robin Hill to Green Wedge

Description

- The parcel comprises a continuous open field to the south-east of Creigiau, including a section of disused railway corridor.
- The parcel includes two groups of dwellings which form part of the urban area and make no contribution to the green wedge purposes. A single, older dwelling on a larger plot lies adjacent to the southernmost of the above groups, on Bryn Briallu (Cardiff Road), and so can also be considered part of the urban area and makes no contribution to the green wedge purposes.
- The parcel abuts residential dwellings on the eastern edge of Creigiau and lacks any strong urban edge boundary feature.
- As a result, there is some urbanising influence within the parcel.
- Land has a strong association with the wider countryside, with views to wooded high ground to the north-east.

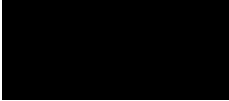
It is therefore the case that the site comprising Land at Robin Hill has been identified as unsuitable for inclusion in the Green Wedge – this conclusion is made by the specialist consultant who has prepared the detailed green wedge assessment on behalf of the Council as an evidence base document to underpin the replacement LDP. As stated above, the Welsh Government’s ‘Development Plans Manual’ (Edition 3, March 2020) specifies that “Plans should be based on robust evidence”. The conclusions of the Cardiff Green Wedge Assessment (LUC, January 2025) should therefore be reflected in the Deposit Plan, and the Proposals Map should be amended (to remove the Robin Hill site from the Green Wedge) accordingly.

Conclusions

It has been established as part of the Replacement LDP evidence base that the site comprising Land at Robin Hill makes no contribution to the function of the Green Wedge, and is unsuitable for designation as Special Landscape Area. The positioning of the settlement boundary as presented within the Deposit Plan remains illogical, and it is requested that the Proposals Map of the Deposit Plan is amended (in line with the replacement LDP evidence base) to allow for the inclusion of the Robin Hill site within the settlement boundary, and the associated de-allocation of the land from the Special Landscape Area and Green Wedge accordingly.

We trust that the content of this representation will be given due consideration by the Authority in advance of the submission of the plan for examination. Please contact me if you require any further detail.

Yours faithfully



Catherine Blyth
Associate

APPENDIX A

Candidate Site Representation (submitted 13th August 2021)

Date: 13 August 2021
Our Ref: JH/21.237

Local Development Plan Team
Cardiff Council

BY EMAIL

Unit 9 Oak Tree Court
Mulberry Drive
Cardiff Gate Business Park
Cardiff
CF23 8RS

Tel: 02920 732 652
www.asbriplanning.co.uk

Dear Sir,

Cardiff Replacement Local Development Plan – Settlement Boundary Review

Further to Cardiff Council's Call for Candidate Sites in May 2021, this Candidate Site Representation has been prepared by Asbri Planning on behalf of the landowner, in relation to Land at Robin Hill, Creigiau.

It is requested (as part of this representation) that the Authority undertake a settlement boundary review within the vicinity of this area, and that the Site is **included within the settlement boundary** accordingly. Associated with this is the proposed **de-allocation of the site from a Special Landscape Area and Green Wedge**. It is important to note that the representation also relates to additional land between Robin Hill and the houses currently within the settlement boundary which have recently been constructed (discussed in more detail below)

The proposed realignment of the settlement boundary is illustrated at Figure 2 of this Statement. It is requested that the settlement boundary review is implemented within the Replacement LDP, in accordance with the amended settlement boundary as put forward as part of this submission

Site Character and Context

The site is located on land to the North East of Cardiff Road. The site is broadly square in shape and occupies an area of approximately 0.4ha in area.

In terms of existing land use, the site comprises a residential dwelling, and associated garden area. The **site's boundaries comprise the following:**

- North west: Existing residential dwellings
- North east : Agricultural land
- East: Agricultural land
- South West: Cardiff Road

To the south **west of the site, on the opposite side of Cardiff Road**, lies one of the Council's Strategic Residential Sites, as proposed within current LDP.

Figure 1: Site Location Plan



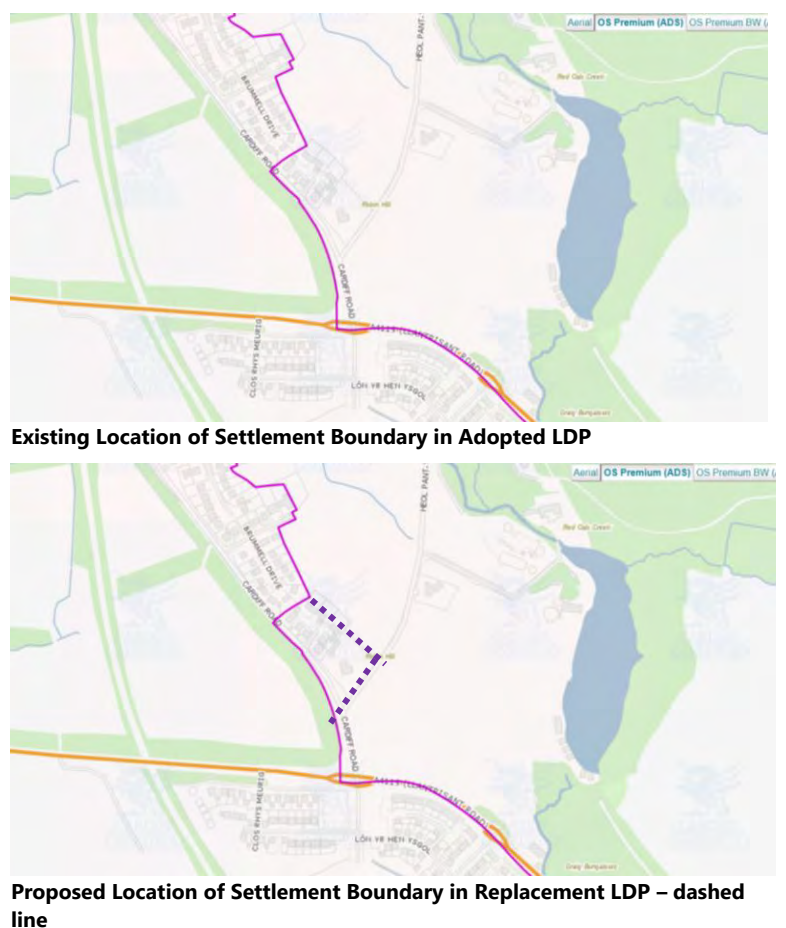
Planning History

The adjacent site to the north west, was granted planning permission (ref: 14/02360) for 8 dwellings in 2015. These have been constructed and it is proposed that they are now also included within the settlement boundary, alongside Robin Hill.

Require Amendment to Settlement Boundary

As indicated above it is requested that a settlement boundary review is undertaken. It is considered that the current positioning of the settlement boundary within this area of Creigiau is illogical, with 9 existing dwellings located outside the settlement boundary at present. It is considered appropriate that the settlement boundary is re-drawn to include the existing built form which is well-related to the existing settlement to the north west (as demonstrated on the proposed amended Settlement Boundary drawing at Figure 2 below

Figure 2: Proposed Amended Settlement Boundary



The proposed amended boundary clearly follows the existing pattern of development along this section of Cardiff Road, and will include the substantial number of new dwellings that have been developed.

Summary

As outlined above, the proposed settlement boundary change – and associated de-allocation of the site from a Special Landscape Area and Green Wedge – should be implemented (within the Deposit LDP), in accordance with the amended settlement boundary as put forward as part of this submission

Yours faithfully,

Jon Hurley

Director

Enc: Site Location Plan
Candidate Site Form

APPENDIX B

Representation to Preferred Strategy consultation (submitted 22nd September 2023)

Date: 22nd September 2023
Our Ref: JH/21.237

Unit 9 Oak Tree Court
Mulberry Drive
Cardiff Gate Business Park
Cardiff
CF23 8RS

Tel: 02920 732 652
www.asbriplanning.co.uk

Local Development Plan Team
Cardiff Council
Room 219
County Hall
Atlantic Wharf
Cardiff
CF10 4UW

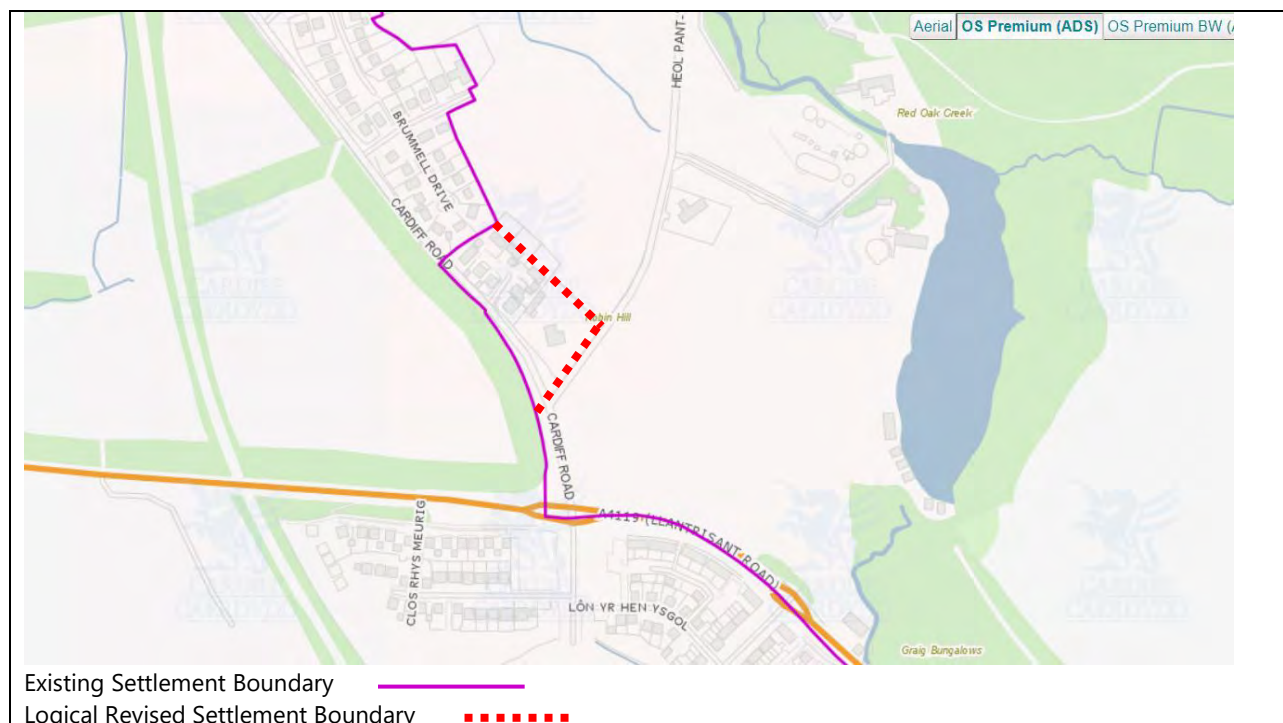
SENT BY EMAIL: ldp@cardiff.gov.uk

Dear Sir,

**Cardiff Replacement Local Development Plan – Preferred Strategy Consultation
Land at Robin Hill, Creigiau (Candidate Site Ref. 15)**

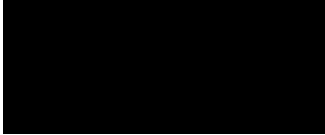
Further to the submission of the Candidate Site Representation in August 2021 in regards to land at Robin Hill, Creigiau (Candidate Site Ref. 15), we note that the comments contained within the Council's Candidate Site Register (published July 2023) specify the following "*Site not progressed to next stage assessment*". We understand that this is in light of the site's positioning within the Green Wedge within the current/adopted LDP.

As per the Candidate Site Representation of August 2021, it is requested that the settlement boundary within the vicinity of Robin Hill is amended (so as to include Robin Hill, and the additional 8 dwellings to the north west of Robin Hill, within the settlement). Notwithstanding the site's Green Wedge status, the positioning of the settlement boundary is illogical in light of the infill development to the south of Brummell Drive / north of Robin Hill. As such, an amended positioning of the settlement boundary is requested, as illustrated below.



It is requested that the settlement boundary review is implemented within the Deposit version of the Replacement LDP accordingly.

Yours faithfully,



Jon Hurley

Director

Rhif Sylwedydd / Representor Number:

36

Rhif Sylw / Representation Number(s):

36.01 – 36.03

Enw Sylwedydd / Representor Name:

Radyr and Morganstown
Community Council

From: [REDACTED]
To: [Local Development Plan / Cynllun Datblygu Lleol](#)
Cc: [REDACTED]
Subject: RESPONSE FROM RMCC IN RESPECT TO LDP
Date: 10 April 2025 15:38:54
Attachments: [Outlook-A qr code](#)
Importance: High

EXTERNAL: This email originated from outside Cardiff Council, take care when clicking links.

ALLANOL: Daw'r e-bost hwn o'r tu allan i Gyngor Caerdydd, cymerwch ofal wrth glicio ar ddolenni.

Dear sirs

In response to the consultation of the LDP due to close at 15th April 2025, The Response from the Radyr and Morganstown Community Council to the Replacement Local Development Plan is as follows.

1. We support your conclusion to exclude further development on Greenfield sites and to concentrate on Brownfield ones.
2. We are particularly pleased that Plas Dwr Uchaf (23) Goetre Fawr(61) and Cwm Farm(80) are not included in future development and that they will be protected in the future by becoming part of a "Green wedge" around the city.
3. We are also happy that you reject Transport for Wales' suggestion of building on the car park at Radyr Station. Radyr is in a difficult situation in that TfW's pricing policy has one price for greater Cardiff. This means that Radyr station is the first/last station on the Valleys Lines at this price, This means that many people travel by car to Radyr to catch the train, not only from the Rhondda, Taff and Cynon Valley's but we also know of people who park in Radyr Station from the Rhymney Valley. This puts a great stress on the Radyr Station car park, which is usually full by 8.30 a.m. on a weekday morning. There is a knock on from this in parking terms, in that the streets within walking distance of the station, are also used to park during the day and are heavily congested. Without that car park Radyr would grind to a halt.
4. We note that this will be the last LDP for Cardiff alone and that future LDP's will cover south east Wales.
5. We also note that the present agreed development with the Community Council area is not expected to be completed on schedule.

In brief we are entirely supportive of the proposed Replacement Local Development Plan.

Please confirm acceptance of receipt of the e mail.

Yours sincerely
Allan Cook
Chair
RMCC
On behalf of the Full Council.

*Radyr & Morganstown Community Council
Old Church Rooms, Park Road, Radyr, Cardiff CF15 8DF*

Rhif Sylwedydd / Representor Number:

38

Rhif Sylw / Representation Number(s):

38.01 – 38.04

Enw Sylwedydd / Representor Name:

Mr & Mrs McDonald

Cardiff Council

Replacement Local Development Plan 2021–2036

Deposit Plan

Representations Form

We would like your views on the Cardiff Replacement Local Development Plan (RLDP) and also on documents which support the RLDP.

This form should be used for all representations (i.e. comments or objections). If you are submitting a paper copy, attach additional sheets as necessary.

This form has two parts: Part A (Personal details) and Part B (Your representation). Please note that Part B will be made publicly available and will be forwarded to the Planning Inspectorate.

Your representations must be received on or before 15th April 2025. Please return forms to:
LDP@cardiff.gov.uk LDP Team, Room 250 County Hall, Cardiff CF10 4UW

This form is available in Welsh / Mae'r ffurflen hon ar gael yn Gymraeg

PART A: Contact details

Your / your client's details		Agent's details (if relevant)
Name	Mr and Mrs McDonald	Jason Evans
Organisation (where relevant)		c/o Evans Banks Planning Ltd
Email address	c/o Agent	
Address		
Signed		
Date	09/04/2025	

PART B: Your representation

Your name / organisation

Jason Evans c/o Evans Banks Planning Ltd

1. Which part(s) of the Plan (or supporting documents) are you commenting on?

LDP policy or site allocation number(s)

Policy SP16

LDP paragraph or section number(s)

LDP Proposals Map reference(s)

If your representation relates to a supporting document (e.g. the Sustainability Appraisal), insert the name(s) and reference(s) here.

2. Before you set out your comments in detail, it would be helpful to know whether you think the Plan is sound and meets the procedural requirements.

For more information on soundness and procedural requirements, see the guidance notes.

I think the LDP is sound and meets procedural requirements.

I think the LDP is unsound and should be changed.

X

I think that the procedural requirements have not been met.

3. Would you like the LDP to include a new policy, site allocation or paragraph?

Tick all that apply.

New site allocation

New Policy

New paragraph or supporting text

4. If you want to add a new site allocation, have you previously submitted the site as a Candidate Site? If so, please give the Candidate Site name and reference (if known).

Site name

Site reference

If you want to suggest a new site, please attach a site plan identifying the boundaries of the site you wish to be included in the Plan and provide details of its proposed use. You should consider whether it is necessary for this comments form to be accompanied by a sustainability appraisal. Where proposed changes to a development plan have significant sustainability effects, you will need to provide the relevant sustainability appraisal information. This information must be consistent with the scope and level of detail of the sustainability appraisal conducted by the Authority. It should also refer to the same baseline information in identifying the likely significant effects of the revised policy or new site.

5. Please set out your comments below.

Include all the information, evidence and supporting information necessary to support / justify your representation. Please indicate which soundness test(s) the LDP meets or does not meet, and why (see guidance notes for more information). This will help the Authority and the Inspector to understand the issues you raise. You will only be able to submit further information to the examination if the Inspector invites you to address matters that he or she may raise. Please note that the Inspector will not have access to comments you may have made in response to previous consultations.

Please see accompanying Statement of Objection

Tick here if you are submitting additional material to support your representation.	X
6. If you are objecting to the LDP, do you want to speak at a hearing session of the public examination? At this stage, you can only make comments in writing (these are called 'written representations'). However, everyone that wants to change the Plan can appear before and speak to the Inspector at a 'hearing session' during the public examination. But you should bear in mind that your written comments on this form will be given the same weight by the Inspector as those made verbally at a hearing session. Please also note that the Inspector will determine the most appropriate procedure for accommodating those who want to provide oral evidence.	
I do not want to speak at a public hearing and am happy for my written representations to be considered by the Inspector.	
I want to speak at a public hearing.	X
If you want to participate in a hearing, indicate below what you want to speak about (e.g. 'Housing site at Pen y Graig' or 'The overall housing target'). <div></div>	
8. If you wish to speak, it would be helpful if you could indicate in which language you would like to be heard.	
I wish to be heard in Welsh	
I wish to be heard in English.	X

Cardiff Council

Replacement Local Development Plan 2021–2036

Deposit Plan

Representations Form

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This form is available in Welsh / Mae'r ffurflen hon ar gael yn Gymraeg

PART A: Contact details

Your / your client's details		Agent's details (if relevant)
Name		Jason Evans
Organisation (where relevant)		c/o Evans Banks Planning Ltd
Email address		
Address		
Signed		
Date	09/04/2025	

PART B: Your representation

Your name / organisation

Jason Evans c/o Evans Banks Planning Ltd

1. Which part(s) of the Plan (or supporting documents) are you commenting on?

LDP policy or site allocation number(s)

Policy SP1: Providing for Sustainable Growth

LDP paragraph or section number(s)

LDP Proposals Map reference(s)

If your representation relates to a supporting document (e.g. the Sustainability Appraisal), insert the name(s) and reference(s) here.

2. Before you set out your comments in detail, it would be helpful to know whether you think the Plan is sound and meets the procedural requirements.

For more information on soundness and procedural requirements, see the guidance notes.

I think the LDP is sound and meets procedural requirements.

I think the LDP is unsound and should be changed.

X

I think that the procedural requirements have not been met.

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Tick all that apply.

New site allocation

New Policy

New paragraph or supporting text

4. If you want to add a new site allocation, have you previously submitted the site as a Candidate Site? If so, please give the Candidate Site name and reference (if known).

Site name

Site reference

If you want to suggest a new site, please attach a site plan identifying the boundaries of the site you wish to be included in the Plan and provide details of its proposed use. You should consider whether it is necessary for this comments form to be accompanied by a sustainability appraisal. Where proposed changes to a development plan have significant sustainability effects, you will need to provide the relevant sustainability appraisal information. This information must be consistent with the scope and level of detail of the sustainability appraisal conducted by the Authority. It should also refer to the same baseline information in identifying the likely significant effects of the revised policy or new site.

5. Please set out your comments below.

Include all the information, evidence and supporting information necessary to support / justify your representation. Please indicate which soundness test(s) the LDP meets or does not meet, and why (see guidance notes for more information). This will help the Authority and the Inspector to understand the issues you raise. You will only be able to submit further information to the examination if the Inspector invites you to address matters that he or she may raise. Please note that the Inspector will not have access to comments you may have made in response to previous consultations.

We object to the Policy on the grounds that the proposed level of growth is unachievable. This is on the basis that the anticipated level of provision from Strategic Housing Sites (Policy H1A) and Non-Strategic Housing Allocations (Policy H1B) will not be delivered within the Plan period, for the reasons set out in separate submissions.

As a result and in order to ensure that the Plan is made 'sound', further sites will need to be allocated for residential development.

Tick here if you are submitting additional material to support your representation.

6. If you are objecting to the LDP, do you want to speak at a hearing session of the public examination?

At this stage, you can only make comments in writing (these are called 'written representations'). However, everyone that wants to change the Plan can appear before and speak to the Inspector at a 'hearing session' during the public examination. But you should bear in mind that your written comments on this form will be given the same weight by the Inspector as those made verbally at a hearing session. Please also note that the Inspector will determine the most appropriate procedure for accommodating those who want to provide oral evidence.

I do not want to speak at a public hearing and am happy for my written representations to be considered by the Inspector.

I want to speak at a public hearing.

X

If you want to participate in a hearing, indicate below what you want to speak about (e.g. 'Housing site at Pen y Graig' or 'The overall housing target').

Provision of Housing to be delivered within the Plan period.

8. If you wish to speak, it would be helpful if you could indicate in which language you would like to be heard.

I wish to be heard in Welsh

I wish to be heard in English.

X

Guidance notes

The Cardiff Replacement Local Development Plan (RLDP) will be examined by an independent Inspector appointed by the Welsh Government. It is the Inspector's job to consider whether the Plan meets procedural requirements and whether it is sound.

'Sound' may be considered in this context within its ordinary meaning of 'showing good judgement' and 'able to be trusted'. The questions or 'tests' which the Inspector will consider in deciding whether the Plan is sound are:

1. Does the plan fit? (i.e. is it consistent with other plans?)
2. Is the plan appropriate? (i.e. is it appropriate for the area in the light of the evidence?)
3. Will the plan deliver? (i.e. is it likely to be effective?)

More information on the soundness tests and procedural requirements is provided in the Planning Inspectorate's LDP Examinations Procedural Guidance.

If you are making an objection, you should say why you think the Plan is unsound and how the Plan should be changed to make it sound.

Where you propose a change to the Plan it would be helpful to make clear which test(s) of soundness you believe the Plan fails. If your comment relates to the way in which the Plan has been prepared or consulted on, it is likely that your comments will relate to 'procedural requirements'.

Failing to identify a test will not mean that your comments will not be considered, providing it relates to the Plan or its supporting documents. You should include all your comments on the form, using accompanying documents and supporting evidence where necessary.

If you seek more than one change to the Plan, it is not always necessary to complete separate forms for each part of your representation. It may, however, be helpful to use two separate forms if you wish to speak at a hearing about some objections but not others.

Where a group shares a common view on how it wishes the Plan to be changed, it would be helpful for that group to send a single form with their comments, rather than for a large number of individuals to send in separate forms repeating the same point. In such cases the group should indicate how many people it is representing and how the representation has been authorised. The group's representative (or chief petitioner) should be clearly identified.



STATEMENT OF OBJECTION

TO

REPLACEMENT CARDIFF LOCAL DEVELOPMENT PLAN 2021-2036

DEPOSIT PLAN

POLICY SP16 AND POLICY SP17

**on behalf of
Mr and Mrs McDonald**

**Our Ref: 1225.a
Date: April 2025
Prepared by: JDE**

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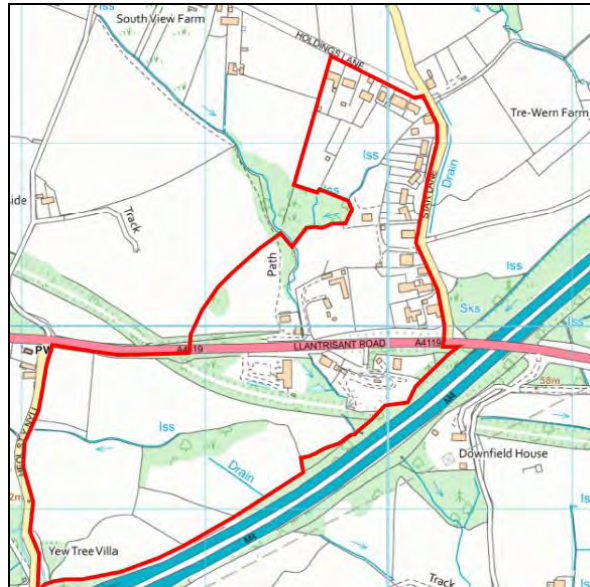
1.0 INTRODUCTION

- 1.1 Evans Banks Planning Ltd. were instructed by Mr and Mrs McDonald to submit the land shaded red on Plan A below for the purposes of residential development at the Candidate Site stage of the preparation of the *Replacement Cardiff Local Development Plan* (RLDP) for the purposes of residential development.



Plan A

- 1.2 The submission was made as a linked submission to a separate representation made on behalf of our Clients, with respect to the proposal for a new Settlement Boundary in the RLDP for the settlement of Capel Llanilltern, including our Clients residential property and the strategic site to the south. The extent of the proposed Settlement Boundary are illustrated in Plan B below.



Plan B

- 1.3 Subsequent to these submissions, further representations were made to the Council's published Preferred Strategy and supporting documentation in relation to the site illustrated in Plan A and the settlement. As a result, copies of all these previous submissions accompany this current submission and should be read in conjunction with the comments of this Statement of Objection.
- 1.4 This current submission then relates to the recently published *Replacement Cardiff Local Development Plan – Deposit Plan*. Specifically, it raises objections to the provisions of **Policy SP16 (Protecting the setting of the City through a Green Wedge)** and **Policy SP17 (Managing Spatial Growth through Settlement Boundaries)** in relation to the land edged red in Plan B. For the purposes of this submission in relation to the current consultation exercise with regards to the RLDP Deposit Plan, the Candidate Site is represented by the land edged red on Plan B.
- 1.5 The Statement therefore begins in Section 2 by providing a summary of any changes or additional information to that previously submitted to the Council in terms of both our Clients property and wider settlement of Capel Llanilltern. Section 3 and Section 4 then provides an assessment of the respective policies in relation to the Candidate

Site and the wider settlement and whether in their current form of the RLDP satisfy the three Tests of Soundness with respect to the matters in question.

2.0 SITE CONTEXT

2.1 THE CANDIDATE SITE

- 2.1.1 A detailed description of the Candidate Site was included within the Supporting Statement originally submitted to the LPA in 2021 in its call for Candidate Sites, with further information then provided in submissions to the Council at the Preferred Strategy Stage. The form and nature of the Candidate Site continues to remain the same as previously advised.
- 2.1.2 In addition to the above, we would reiterate the lawfulness of all of our Clients property as a domestic residence, which is soon to be the subject of an application for a Certificate of Lawfulness for such purposes. The land surrounding the existing dwelling – including that to the north and west – has been actively used as garden for in excess of 20 years. This is clearly illustrated by the historic aerial photographs below.



Photograph 1
(June 2023)



Photograph 2
(July 2021)



Photograph 3
(May 2020)



Photograph 4
(December 2012)

2.1.3 As can be seen from the above therefore, it is evident from its manicured appearance that the property is in stark contrast to the character of the agricultural land to its north and west.

2.2 THE SETTLEMENT OF CAPEL LLANILLTERN

2.2.1 Again, significant information has been presented previously with respect to the settlement of Capel Llanilltern, clearly identifying it as an established settlement and part of the local built form. This information again accompanies this submission, but we would also highlight the following pertinent points.

2.2.2 For ease of reference, the photographs below again provide a series of aerial views of the Candidate Site and surrounding adjoining land.



Photograph 5
(Capel Llanilltern)



Photograph 6
(Capel Llanilltern)



Photograph 7
(Land to the North West)



Photograph 8
**(Land to the South West -
Strategic Development Site)**

2.2.3 Photograph 5 illustrates that our Clients property adjoins and is well related to the existing settlement and its associated development directly to its east and north east, as also illustrated in Photograph 6.

2.2.4 In contrast to the above, our Clients property and settlement of Capel Llanilltern are very different in character to the open land to the north west pictured in Photograph 7, despite these three elements all forming part of the currently designated area of a Green Wedge.

2.2.5 The final photograph – Photograph 8 – is then of land to the south west of Capel Llanilltern, which as can be seen, is again dominated by parcels of agricultural land. However, the land is currently designated and continues to be proposed for

designation as part of a wider Strategic Development Site, expected to deliver 150 new residential units.

- 2.2.6 In summary, the above photographs illustrate that the existing built form of the settlement of Capel Llanilltern. It is also clear that its general form, character and appearance is in stark contrast to the adjoining and surrounding agricultural land, some of which is being actively promoted by the LPA for residential development purposes.

3.0 POLICY SP16 – PROTECTING THE SETTING OF THE CITY THROUGH A GREEN WEDGE

3.1 POLICY CONTEXT AND BACKGROUND

- 3.1.1 As part of the Deposit RLDP, the Authority have proposed the inclusion of Policy **SP16 (Protecting the setting of the City through a Green Wedge)**, with the proposed area that this Green Wedge relates to being shaded green on the Proposals Map. The relevant element relating to the subject of this Statement of Objection and the surrounding area is reproduced below, with our Clients property marked by a red star.



Plan C

- 3.1.2 The Policy's text sets out that the purpose of the Green Wedge is "*To strategically manage the urban form of Cardiff and to protect the setting of the urban area, ...*". The supporting text of the Policy also provides some insight into how the extent of the Green Wedge has been determined, providing the following statements:

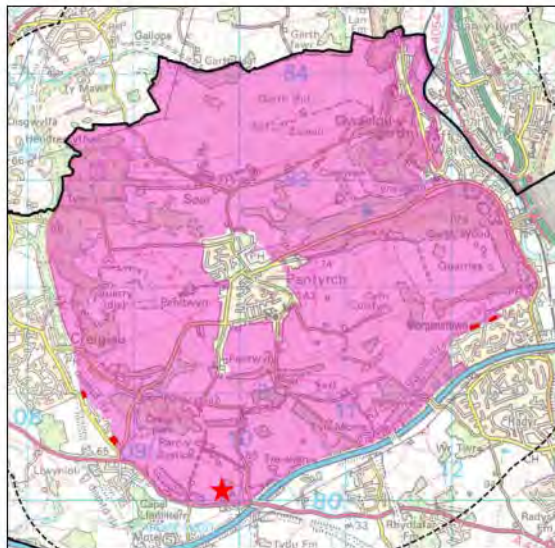
“The designated area forms land North of the M4 in Cardiff ...”

“The land is also generally well contained by the strong physical boundary of the M4 Motorway to the south.”

3.1.3 The Policy therefore justifies its form on the basis that the M4 defines its southern limit.

3.1.4 Further analysis and justification for the extent and coverage of the Green Wedge is provided in the background papers entitled *“Cardiff Landscape Evidence Base Update – Local Landscape Designations”* (LEBU) and *“Cardiff Green Wedge Assessment”* (CGWA).

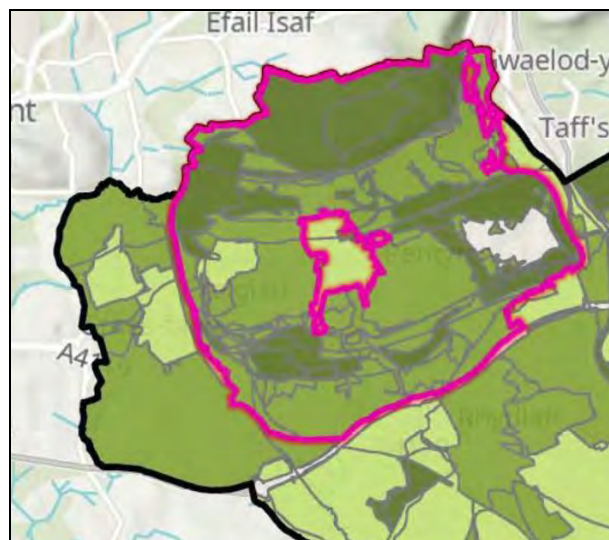
3.1.5 The LEBU sets out the findings of a review undertaken on behalf of the Council of the current extents of designated Special Landscape Areas (SLA). Under these provisions, our Clients property (indicated by the red star on Plan D below) and settlement of Capel Llanilltern forms part of the Garth Hill and Pentyrch Ridges SLA, the extent of which is shaded pink on the plan below.



Plan D

3.1.6 Plan D also provides an indication of the proposed amendments to the SLA as part of the Deposit RDLP, with those areas to be removed shaded red on Plan D. The rationale for their removal as set out in the LEBU is on the basis that they are developed areas.

3.1.7 The LEBU also provided information on the scoring of different areas of the County in landscape quality terms, based on an analysis of LANDMAP data. With respect to the area illustrated in Plan D, Plan E provides an illustration of the results.

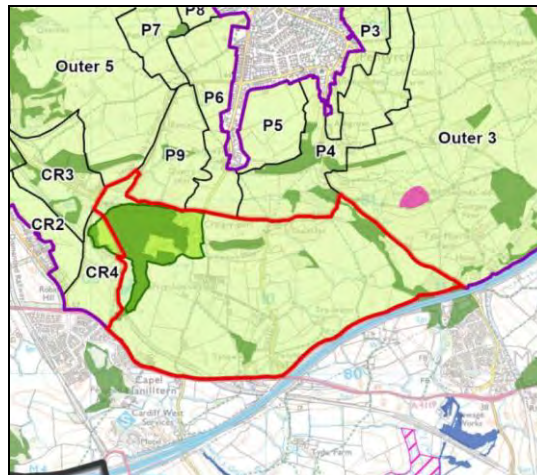


Plan E

3.1.8 As can be seen, our Clients property and the settlement of Capel Llanilltern attained the same score as land to its south and west, currently proposed for residential development.

3.1.9 In a similar vein to the LEBU, the CGWA sets out the findings of a review undertaken on behalf of the Council of the current extents of its designated Green Wedges. The document begins by setting out that *“Green wedges are areas in which the retention of openness (freedom from built development, as opposed to visual openness) is considered necessary in order to manage urban form.”*

3.1.10 The CGWA provides a detailed assessment of all elements of the Green Wedge, splitting its assessment into separate assessment areas. With respect to our Clients property and settlement of Capel Llanilltern, they have been placed into what the CGWA refers to as “OA4” or Outer 4, the area of which is illustrated in the plan below.



Plan F

3.1.11 The CGWA makes a number of observations, some of which are as follows:

“Woodland and agricultural land close to the south of Pentyrch and southeast of Creigiau”

“The parcel contains a row of residential dwellings on Star Lane, a school and some scattered farmsteads. These do have some impact on Green Wedge openness, ...”

“The M4 forms a consistent boundary to the south of the parcel and intervening landform and thick, wooded field boundaries form strong boundaries from Creigiau and Pentyrch. However, there is development within the parcel. As a result, there is urbanising influence on the parcel.”

3.1.12 In its assessment of Outer 4, the CGWA then scores the area in terms of the considered 5 roles of a Green Wedge, scoring it Weak, Weak, Strong, Strong and Equal respectively. Despite this, the conclusion of the CGWA is that the potential for the designation of the whole of Outer 4 is 'High' on the basis that *"The parcel makes a strong contribution to assisting in safeguarding the countryside from encroachment and protecting the setting of an urban area. It plays a major buffer role. Therefore, potential for green wedge designation is high."*

3.1.13 As a result of the above, our Clients property and settlement of Capel Llanilltern continue to be recommended for inclusion within the Green Wedge and so are proposed as so in the Deposit Plan's Proposals Maps.

3.2 ASSESSMENT OF POLICY SP16 IN TERMS OF CLIENTS PROPERTY AND CAPEL LLANILLTERN

3.2.1 As can be seen from the above, both the LEBU and CGWA identify that our Clients property and the existing settlement of Capel Llanilltern represent a developed area that contributes to 'urbanising' this element of the Green Wedge. Despite this, the Deposit Plan proposes to designate our Clients property and Capel Llanilltern as forming part of the Green Wedge.

3.2.2 The above decision is extremely puzzling and quite frankly illogical, as it clearly does not follow the overarching principle of the CGWA in that *"Green wedges are areas in which the retention of openness (freedom from built development, as opposed to visual openness) is considered necessary in order to manage urban form."* As an area of 'built development' it is therefore unclear as to why the land in question should be allocated as Green Wedge, when undeveloped 'open' greenfield land to its south and west remains outside of it. In adopting this erroneous approach, it is clear that the Council has failed to adhere to published national planning policy, and in particular, the guidance and requirements of *Planning Policy Wales* (Edition 12) (PPW).

3.2.3 PPW at Paragraph 3.64 sets out that Green Wedges are ‘local designations’, to be “... *only employed where there is a demonstrable need to protect the urban form and alternative policy mechanisms, such as settlement boundaries, would not be sufficiently robust.*”. Paragraph 3.64 goes on to advise that “*The essential difference between them [Green Wedges] is that land within a Green Belt should be protected for a longer period than the relevant current development plan period, whereas green wedge policies should be reviewed as part of the development plan review process.*”.

3.2.4 Paragraph 3.65 goes on then to advise that “*The main aim of Green Belts is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.*”. Paragraph 3.67 then sets out the purposes of a Green Belt, which are listed as follows:

- *prevent the coalescence of large towns and cities with other settlements;*
- *manage urban form through controlled expansion of urban areas;*
- *assist in safeguarding the countryside from encroachment;*
- *protect the setting of an urban area; and*
- *assist in urban regeneration by encouraging the recycling of derelict and other urban land.*

3.2.5 In considering the above national planning policy, it is clear that the review of the Green Wedge has not been undertaken in a robust or logical manner. Whilst recognising that a key aspect of a Green Wedge is its ‘openness’, the CGWA has gone against its own recommendations of excluding development from it, by then including the existing built form of Capel Llanilltern. This appears completely illogical, particularly when its inclusion within the Green Wedge would not assist in achieving any of the 5 purposes set out in Paragraph 3.67 of PPW.

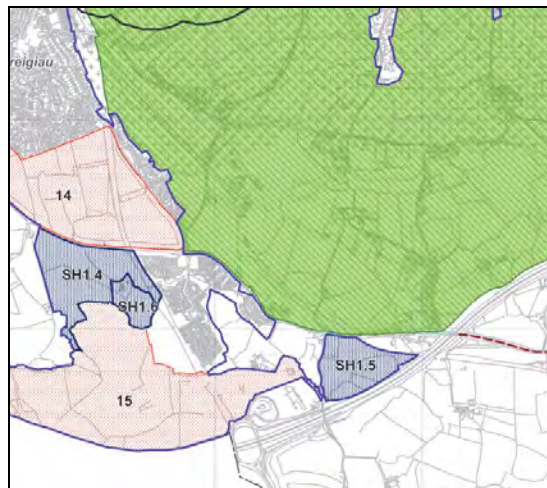
3.2.6 In summary therefore, the inclusion of any of the land edged red on Plan B of this Statement of Objection is contrary to national planning policy and so fails to adhere to Test 1 of the Tests of Soundness resulting in the RLDP being unsound. As a result,

we formally object to the allocation of any of the land edged red on Plan B as part of the Green Wedge as defined by Policy 16 of the RLDP.

4.0 POLICY SP17 – MANAGING SPATIAL GROWTH THROUGH SETTLEMENT BOUNDARIES

4.1 POLICY CONTEXT AND BACKGROUND

- 4.1.1 As part of the Deposit RLDP, the Authority have proposed the inclusion of Policy **SP17 (Managing Spatial Growth through Settlement Boundaries)**, with the extent of settlement boundaries indicated by a blue line on the Proposals Maps. The relevant extract in relation to the area of land edged red on Plan B of this Statement of Objection is reproduced below.



Plan G

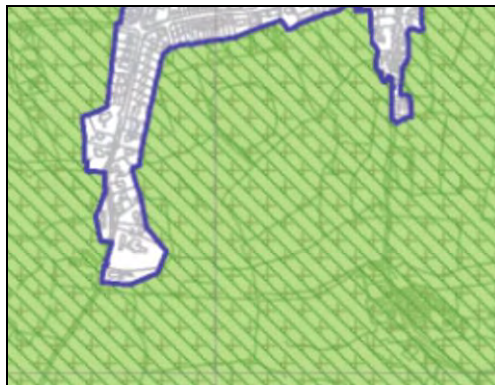
- 4.1.2 As can be seen from Plan G, the proposed Settlement Boundaries of the Deposit Plan seek to include the undeveloped Strategic Housing Site (Ref. No. SH1.5) to the south of Capel Llanilltern, but all built up elements of Capel Llanilltern have been excluded from the proposed Settlement Boundaries.
- 4.1.3 The text of Policy SP17 sets out the purpose of settlement boundaries is to “... *strategically manage the spatial growth of Cardiff, ...*”. The Policy’s supporting text then goes on to advise that “*Settlement boundaries are a key mechanism for helping*

to manage growth by defining the area within which development would normally be permitted, subject to material planning considerations.”.

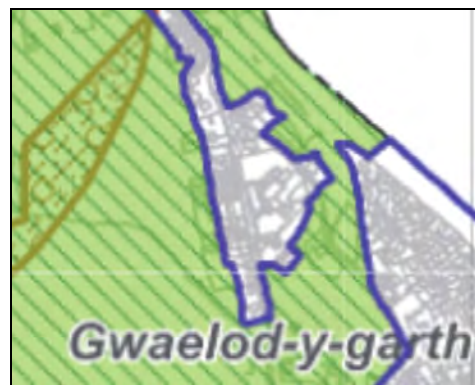
- 4.1.4 Unlike the Green Wedges of Policy SP16, the rationale for the proposed Settlement Boundaries has not been subject to such assessment or scrutiny. It is therefore not clear as to what rationale the application of specific Settlement Boundaries on a case by case basis has followed. Notwithstanding this, it is clear that the Settlement Boundaries of Policy SP17 are there to protect the countryside from inappropriate development and manage the growth of the existing urban area.

4.2 ASSESSMENT OF POLICY SP17 IN TERMS OF CLIENTS PROPERTY AND CAPEL LLANILLTERN

- 4.2.1 In considering the above rationale for Settlement Boundaries, the exclusion of the existing form of Capel Llanilltern from them is both illogical and contradictory.
- 4.2.2 Policy SP17 advises that the purpose of Settlement Boundaries is to manage and limit growth and further development, but much of the land within the Candidate Site on Plan B of this Statement, is already developed. Furthermore, the remainder is a longstanding allocation and aspiration of the LPA for further, new residential development. It is therefore illogical and without reason as to why one element (current undeveloped) should be included with the proposed Settlement Boundaries, whilst the other element (existing development), that it will clearly be connected to should be excluded.
- 4.2.3 The above clearly creates a dangerous inconsistency within the proposed Deposit Plan and if it remains unchanged, would ultimately lead to the Plan failing Test 1 of the Tests of Soundness and so in turn resulting in the Plan becoming unsound. This is no more so evident when the use of Settlement Boundaries are considered elsewhere, such as the examples in Plan H (Pentyrch) and Plan I (Gwaelod-y-garth) below.

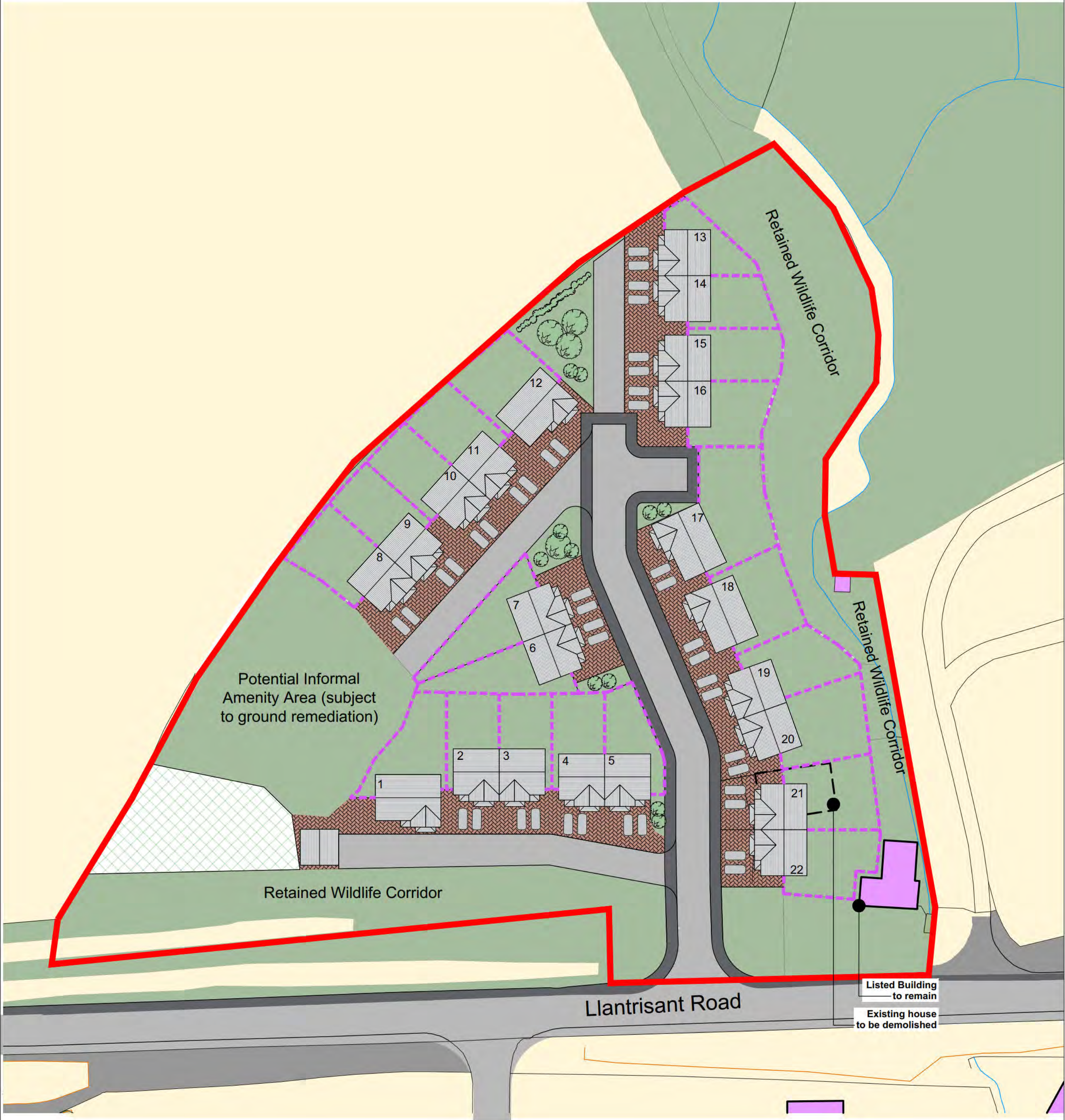


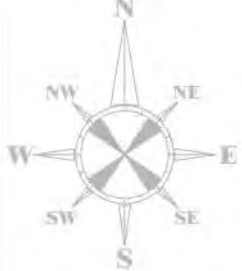

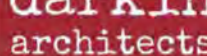
Plan H

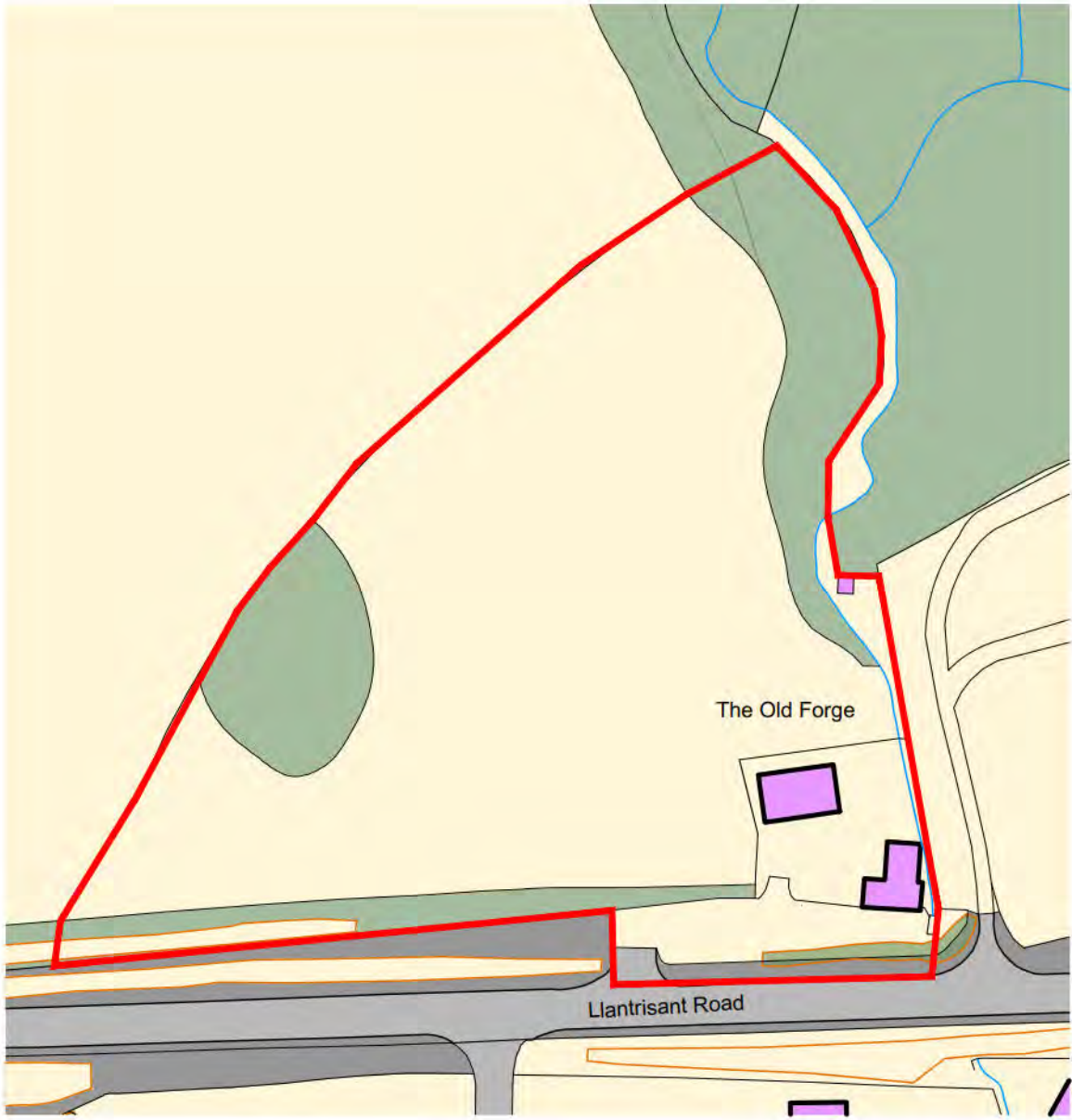



Plan I

- 4.2.4 The above examples have clear similarities in terms of scale and character to that of Capel Llanilltern, but in their instances, have been considered appropriate to be included within Settlement Boundaries by the Council. Without addressing this consistency and including all elements of land edged red on Plan B within the Settlement Boundaries, the RLDP is therefore considered to be 'unsound'.
- 4.2.5 In summary therefore, the exclusion of all of the land edged red on Plan B of this Statement of Objection from the defined Settlement Boundaries is inconsistent with the Plan's own policies and so fails to adhere to Test 1 of the Tests of Soundness resulting in the RLDP being unsound.
- 4.2.6 As a result, we formally object to the Settlement Boundaries as defined by Policy 17 of the RLDP.



NOTES		REVISIONS		CLIENT:			
<div>Dwelling Gross Floor Area (estimate):<ul style="list-style-type: none">• Detached: 107m²• Semi-detached: 78m²</div> <div>Total Road Length (estimate):<ul style="list-style-type: none">• Adopted: 125m• Private: 133m</div> <div></div>	Ordnance Survey, (c) Crown Copyright 2021. All rights reserved. Licence number 100022432	Rev	Comment	By	Date		
		A	Layout Amended	AV	10.03.2021		
		B	Property Boundary Amended	AV	12.03.2021		
		C	Layout Amended	AV	24.03.2021		
		D	Page Size Amended	AV	08.04.2021		
		E	Details Added	AV	23.04.2021		
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		SCALE: 1:500		DRAWN BY: AV	REP: NC080	DRAWING NO: 003	REV: E
		CARDIFF 02921 197 196 LLANELLI 01554 778 730 NEATH 01639 368 000 info@darkinarchitects.com © Copyright Darkin Architects 2021		<div><div> Chartered Practice</div><div> drawing on experience</div></div>			



NOTES	REVISIONS			CLIENT: Luke McDonald			
	Rev	Comment	By	Date	PROJECT TITLE: Residential Development		
<div>Ordinance Survey, (c) Crown Copyright 2021. All rights reserved. Licence number 100022432</div> <div></div>					PROJECT ADDRESS 1: Old Forge, Llantrisant Road		A3
					PROJECT ADDRESS 2: Cardiff, CF5 6JR		CHECKED BY: TOM
					DRAWING TITLE: Location Plan		APPROVED BY: TOM
	A	Property Boundary Amended	AV	22.03.2021	DATE: 08.03.2021	SCALE: 1:1250	DRAWN BY: AV
					REF: NC080	DRAWING NO: 001	REV: A
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CANDIDATE SITE SUPPORTING STATEMENT
FOR
REPLACEMENT CARDIFF LOCAL DEVELOPMENT PLAN 2021-2036

LAND AT OLD FORGE, LLANTRISANT ROAD, CARDIFF

on behalf of
Mr and Mrs McDonald

Our Ref: 1225.a
Date: May 2021
Prepared by: JDE

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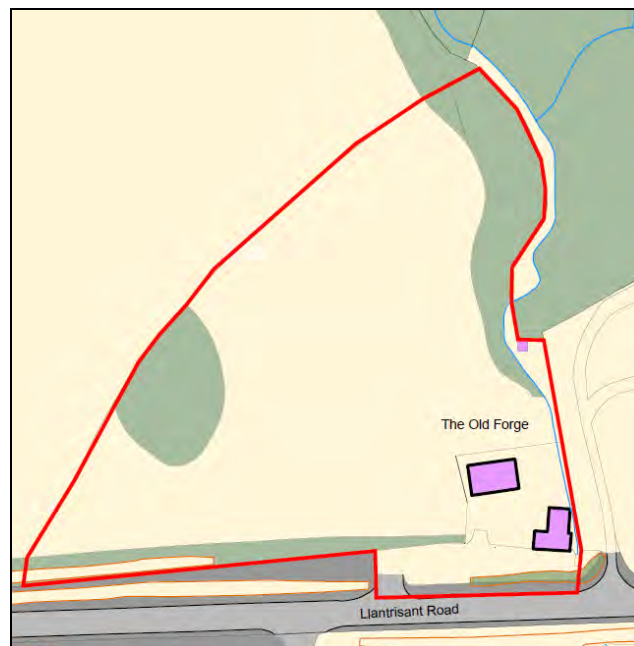
1.0 INTRODUCTION

- 1.1 Evans Banks Planning Ltd. has been instructed by Mr and Mrs McDonald to prepare and submit a Candidate Site Supporting Statement for the allocation of land at the Old Forge, Llantrisant Road, Cardiff for the purposes of residential development in the forthcoming replacement *Cardiff Local Development Plan* (LDP). It should be noted that this forms a linked submission to a further representation made on behalf of our Clients with regards to new Development Limits with respect to the settlement in question.
- 1.2 This statement has been prepared in line with the Authority's published site assessment and selection documents. The contents of this Statement therefore addresses each point raised within these documents as well as ensuring that it complies with regards to the guidance and requirements of *Planning Policy Wales (Edition 11)* when it comes to the preparation of development plans and the allocation of land for residential purposes as part of them.
- 1.3 The contents of this Statement therefore provide a comprehensive case for the allocation of the land for residential development purposes, and it should also be read in conjunction with the accompanying information and indicative drawing package.

2.0 SITE CONTEXT

2.1 THE SITE AND CURRENT CONTEXT

- 2.1.1 The Candidate Site relates to a parcel of land measuring approximately 3 acres in area, edged red on the plan below.



Plan A

- 2.1.2 The Site currently relates to an existing domestic dwelling with associated Listed outbuilding (The Old Forge), together then with its associated domestic curtilage (Photographs 1 and 2).



Photograph 1



Photograph 2

2.1.3 As can be seen from the photographs above, the majority of the Candidate Site is currently laid to lawn with a gentle north to south downward slope. Notwithstanding this, the Site does have strongly defined boundary features in the form of mature wooded strips, as highlighted in the accompanying ecological survey report. The Site is therefore largely greenfield in nature.

2.1.4 In terms of vehicular access, the Site currently gains direct access of the A4119 (Llantrisant Road), which runs in an east to west direction directly to the south of the Site. Visibility in both directions is considered to be very good, as demonstrated by the photographs below:



Photograph 3



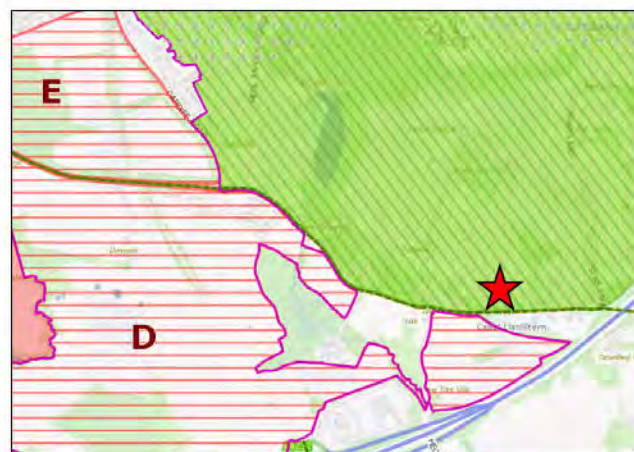
Photograph 4

- 2.1.5 With regards then to other means of access, the site lies next to a well-served bus stop and also has a number of pedestrian linkages via the footway that runs along the A4119 and the local Public Footpath network (Plan B).



Plan B

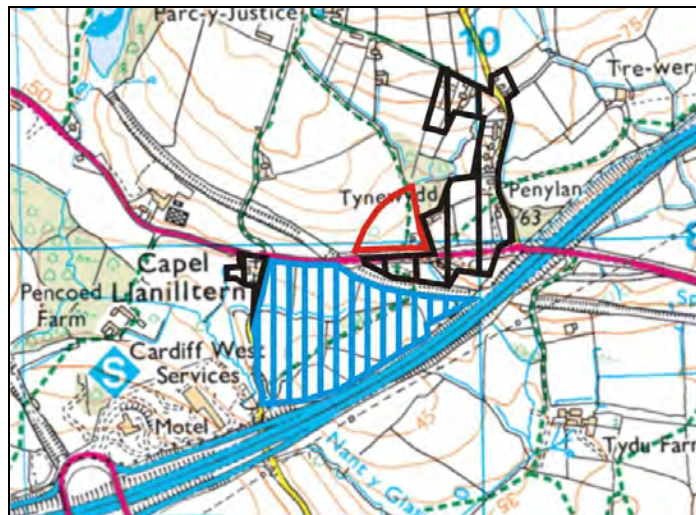
- 2.1.6 Under the provisions of the current Cardiff LDP, the Site presently forms part of a Green Wedge and so lies outside of the defined Development Limits of nearby settlements. However, as the extract of the Proposals Map below illustrates, the Site (red star) is extremely close to both existing development and that currently under construction as part of the strategic sites forming part of the current adopted LDP.



Plan C

2.2 THE ADJOINING SETTLEMENT

2.2.1 The Candidate Site forms part of a small hamlet called Capel Llanilltern, located between the larger settlement of Creigiau to its north west and the urban form of Cardiff itself to the south east. In the immediate sense however, under the provisions of the current adopted LDP and recent planning permission approvals, the Candidate Site (edged red on Plan D) will soon be positioned between the hamlet's existing development form (hatched black) and its immediate future growth to the south (hatched blue), changing the urban status of the settlement.



Plan D

2.2.2 As is clear from the above therefore, the Candidate Site will relate well to existing residential development in the immediate locality.

2.2.3 In terms then of accessibility, as detailed above, the Candidate Site lies on the A4119, providing easy and good access to the aforementioned larger built-up areas with their associated wide range of community facilities and local services. Many of these services are also within walking distance, as well as being easily accessed via public transport thanks to the presence of a number of bus stops located close to the Candidate Site. The location therefore of residential development at the location in

question would therefore assist in the Authority promoting and achieving its sustainability objectives.

2.2.4 In terms of current housing allocations under the provisions of the LDP, two sites are of note in the locality of the Candidate Site – *Strategic Site D* (North of J33 on M4) (SSD) and *Strategic Site E* (South of Creigiau) (SSE). Both are expected to deliver a substantial amount of new housing during the plan period (circa 2,650 new homes), with construction of Strategic Site D well under way and having already delivered a large number to date. Strategic Site E is currently the subject of an outline planning application for approximately 650, but although submitted in 2019, the application remains undetermined and so to date, the Strategic Site has failed to deliver any new units since the adoption of the current LDP.

2.2.5 The above figures provide therefore a mixed picture. The area surrounding the Candidate Site is clearly one where there is a strong demand for new housing, with a large number of new units having been or about to be delivered. However, it is also evident that there are significant questions in relation to the delivery of one Strategic Site and its contribution to local housing supply. A more mixed approach to housing supply in the Replacement Plan should perhaps therefore be considered, looking at allocations of a varying scale to ensure that delivery of new units continues at its current pace.

3.0 THE PROPOSAL

3.0.1 As part of the requirements for the promotion of sites for residential development, this Statement is accompanied by an indicative layout for a potential residential scheme that could be developed on the site. It should be emphasised that the accompanying layout is for illustrative purposes and that other design solutions for the site could also be reached. Notwithstanding this, the accompanying layout drawing has taken account of all the potential assets and constraints of the site and demonstrates that it is capable of delivering 22 units in a deliverable and sustainable manner. The following information therefore expands on this principle.

3.1 DEVELOPMENT OVERVIEW

3.1.1 It is proposed that the Candidate Site be allocated in the forthcoming replacement LDP for the purposes of 22 residential units. As detailed above, the accompanying illustrative layout (reproduced below) demonstrates that the site is capable of accommodating this number in a deliverable and sustainable manner.



Plan D

- 3.1.2 As illustrated above, the site is capable of accommodating a mix of unit sizes and types, with the associated density – 22 units – having therefore taken into consideration this potential mix, as well as striking a balance of being reflective of the existing form and density of residential development in the immediate locality.
- 3.1.3 With regards then to access, following the recommendations of the accompanying Transport Statement, it is proposed that the Candidate Site would be served by an access that would alter the current provision to create an adoptable road with a new junction serviced by the required level of visibility. Footway connections would also be created at the entrance of the Site and throughout it.
- 3.1.4 It is recognised that a proportion of the site could also be used for informal/formal open space and this has been incorporated into the accompanying indicative site layout drawing. It is also recognised and supported that an element of the proposed units would be affordable in nature, with the level of provision forming part of the review of the current LDP.

3.2 INFRASTRUCTURE CONSIDERATIONS

- 3.2.1 Any development of the Candidate Site for residential units would be served by mains water, public sewer and electricity, connections to which we understand lie within or in close proximity to the Site.
- 3.2.2 With regards then to surface water, it is considered that as a result of on-site features, there would be a number of options available to any development of the site in terms of its disposal, ensuring its development adheres to current regulatory requirements.

4.1 ECOLOGICAL ATTRIBUTES

4.1.2 With regards then to statutory designations, the site does not form part of any local or national nature conservation designation. In the wider content, there is then only 1 SSSI designation within 3km of the Candidate Site (red star on Plan E), who's location is illustrated on the plan below.



Plan E

4.2 HISTORICAL ASSETS

- 4.2.1 As detailed previously, the Site includes a Listed Building (The Old Forge), positioned in its south eastern corner. The building is modest in nature and currently used for domestic storage purposes by our Clients.
- 4.2.2 Taking into consideration its current form, use and position with respect to the existing residential dwelling on site, it is not considered that the proposed use of the site – residential – would differ greatly, ensuring the character and setting of the Listed Building would be retained.
- 4.2.3 There are then no other historic assets within or near the Site.

4.3 ENVIRONMENTAL CONSTRAINTS

- 4.3.1 The Candidate Site is not categorised as being at risk of flooding in terms of the Development Advice Maps or those produced by Natural Resources Wales.
- 4.3.2 Due to its greenfield nature and agricultural use, the Candidate Site has no ground contamination related constraints.
- 4.3.3 It should also be noted that the site does not lie within a Development High Risk Area by the coal authority. There are therefore no known surface or underground workings, or mine entries or associated ventilation shafts within the Site or surrounding area.

5.0 VIABILITY

5.1 As part of the preparation of any development plan, it is vital to ensure that allocations within it are both viable and deliverable. To not make efforts to explore both these aspects is to then risk that the Plan may be unsound and so in turn fail to meet its own targets or objectives.

5.2 Although detailed viability appraisals are difficult to prepare at this stage of the Plan's preparation due to the absence of, for example, such things as full engineering details, it is possible to undertake such appraisals at a strategic or in-principle level. As a result, the table below provides a viability appraisal summary of the indicative layout, based on currently accepted industry costings.

Costs	Cost Per Unit/Metre	No. Units/Metres	Total
Four Bed Dwelling	149800	4	599200
Three Bed Dwellings	109200	18	1965600
Shared Private Road	500	133	66500
Road Construction	1200	300	360000
Utility Connections	3000	22	66000
Professional Fees*	-	-	676060
SUDS	3000	22	171680
Sprinklers	3500	22	77000
Four Bed Dwelling	149800	4	599200
Total			3982040
Sales			
Four Bed Dwelling (Open Market)	360000	4	1440000
Three Bed Dwellings (Open Market)	300000	12	3600000
Three Bed (Affordable)	181900	6	1091400
Total			6131400
Developers Profit (15%)		Total	919710
Residual Land Value			1229650

Figure 1

* - Professional Fees

Planning Application Fee	£10,120
Estate Agency Fee – 1% of Sales	£613,140
LABC Warranty (£1,200 per unit)	£26,000
Other Professional Fees (£1,200 per unit)	£26,400

- 5.3 This is therefore a suitably detailed summary appraisal that provides sufficient evidence at this stage to show the development of the Site is both viable and deliverable.
- 5.4 In terms of a delivery timescale, with a developer secured, it is envisaged that the site could be capable of being completed within 5 years from the adoption of the replacement LDP.

6.0 NATIONAL PLANNING POLICY CONSIDERATIONS

6.0.1 In the preparation of any development plan, consideration must be given to national policy and guidance. At present, this takes the form of *Planning Policy Wales* (PPW) (Edition 11) and a series of Technical Advice Notes (TAN) that deal with a range of topic areas.

6.1 HOUSING SUPPLY

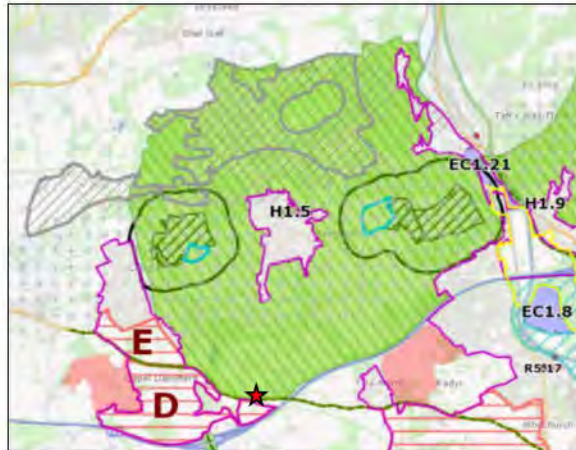
6.1.1 With regards to the provision of housing, Paragraph 4.2.2 of PPW gives the following requirements the planning system must fulfil:

- *Identify a supply of land to support the delivery of the housing requirement to meet the differing needs of communities across all tenures;*
- *Enable the provision of a range of well designed, energy efficient, good quality market and affordable housing that will contribute to the creations of sustainable places; and*
- *Focus on the delivery of the identified housing requirement and the related land supply*

6.1.2 In addition to the above, Paragraph 4.2.10 of PPW states “*the supply of land to meet the housing requirement proposed in a development plan must be deliverable*”. As detailed previously, it is considered that the LPA have to date failed to accomplish this requirement under the provisions of the current LDP, where only 1 Strategic Site in the area has seen units delivered since the Plan’s adoption. In order therefore to re-dress this deficiency in provision, and provide a more robust approach to housing provision through a mixed site-scale approach, there is an urgent need to identify alternative deliverable housing allocations in the replacement Plan. Based on the accompanying information, it is clear that the Candidate Site represents one such example.

6.2 GREEN WEDGE

- 6.2.1 It is recognised that under the provisions of the current LDP, the Candidate Site (red star) forms part of a much larger Green Wedge, shaded green on the Plan below.



Plan F

- 6.2.2 Notwithstanding the above, as Paragraph 3.64 clearly states, "... *green wedge policies should be reviewed as part of the development plan review process.*", recognising that they are not permanent features in a policy context. PPW at Paragraph 3.70 goes on to highlight that "... *green wedge boundaries should be chosen carefully using physical features and boundaries to include only that land which it is necessary to keep open in the longer term.*".
- 6.2.3 In view of the above, it is considered that the inclusion of the Candidate Site and associated settlement highlighted in Plan D should form part of the Authority's review of the Green Wedge in question. It is clear from the information contained within this Statement and that which accompanies it that the continued inclusion of the Site as part of the Green Wedge is questionable. The Site does not contribute to the 'openness' of the surrounding area, being defined by very strong, established and significant boundaries. Furthermore, the Site is encapsulated by existing

development and so its development would represent a logical infill addition in the local context.

- 6.2.4 In view of the above, the exclusion of the Candidate Site and the associated hamlet from any future Green Wedge designation would therefore be in line and full adherence of national planning policy on the matter.

7.0 CONCLUSION

- 7.1 Although currently undeveloped, the Candidate Site forms a logical extension to an existing settlement, being well related to it and being positioned at a location within the wider landscape to not form a prominent or logical part of the surrounding open countryside. The Site also represents a logical connection between the comprehensive development of the Strategic Site to the south west and the existing settlement to the north east.
- 7.2 From a wider sense, the Site benefits from well served excellent public transport links to the nearby settlements, as well as the greater urban area of Cardiff to the south, further increasing the facilities and services available to future residents of the Site via sustainable transport means. In tandem to this, the development of the Site will in turn ensure a deliverable source of future housing for the area in which it lies, which through the failure of Strategic Site D to deliver any units during the Plan period, has seen a dangerous level of under provision. The development of the Site will help to redress this imbalance and it is strongly suggested that the Authority closely scrutinises those sites currently allocated in the LDP in terms of their suitability and deliverability if it is to continue to allocate them. National planning policy however would suggest that in view of the uncertainty in relation to their delivery, such sites should not form part of the replacement LDP.
- 7.3 With the Candidate Site having no access, ground condition, flood risk, hydrological, ecological, archaeological or land ownership related constraints, its delivery if allocated is assured. Combined therefore with its locational characteristics, the Site in question represents a sustainable candidate for future housing development.
- 7.4 In view of the above and information provided in this Statement, it is respectfully requested that the Candidate Site in question be designated for residential development.

MR L. MCDONALD

LAND NORTH OF A4119, CAPEL LLANILLTERN

PRELIMINARY ECOLOGICAL APPRAISAL

NOVEMBER 2020



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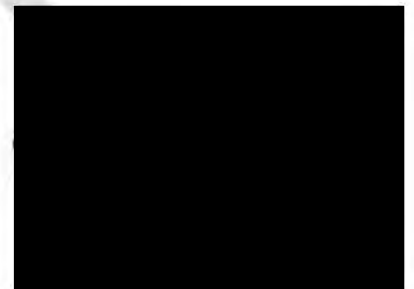
MR L. MCDONALD

LAND NORTH OF A4119, CAPEL LLANILLTERN

PRELIMINARY ECOLOGICAL APPRAISAL

DOCUMENT REF: E2098701/DOC 01 – 25 NOVEMBER 2020

Issue	Revision	Stage	Date	Prepared by	Approved by
1	-	Draft for review	25 November 2020	Ben Satherley (Ecologist)	Dr M Watts (Director)



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Appendix I Site Location Plan

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SUMMARY

Soltys Brewster Ecology were commissioned by Mr L. McDonald (the landowner) to undertake a preliminary ecological appraisal of an area of land north of the A4119 near Capel Llanilltern, Cardiff. The area is being promoted as a candidate site for residential development as part of the LDP review process. The ecological baseline conditions at the candidate site were established in November 2020 through a combination of desk study and Extended Phase 1 Habitat Survey.

Desk based consultation confirmed that the candidate site holds no designations for nature conservation. A total of eight locally designated SINC's are located within 1km of the candidate site. While most of these SINC's were not considered of particular ecological relevance to the candidate site, an existing woodland corridor (designated as ancient semi-natural woodland) at the eastern boundary of the candidate site is likely to provide ecological connectivity for mobile species to SINC's and other habitat features (e.g. hedgerow) in the local area. The Ty Du Moor SSSI is also located approximately 940m south-east of the site however, this is separated from the candidate site by both the M4 and A4119 carriageways and was not considered of ecological relevance.

The desk study returned a number of records of protected fauna and flora within 1km of the candidate site. This included the identification of a number of historical bat roosts within 450m of the candidate site as well as several other foraging and commuting bats within 1km of the site. Records of Badger, Otter and a single field sign of Hazel Dormouse were also identified within the 1km search radius. Other priority mammalian species included in the desk study findings were Polecat and Hedgehog, with hedgehog being the only protected species identified within the site's boundaries. No recent amphibian or reptile records exist within 1km of the site, however there were several historical Common Frog records associated with various ponds all found within 700m of the candidate site. The desk study returned a short list of protected and priority bird species records within the 1km radius with multiple records of Barn Owl found within 350m of the candidate site.

An Extended Phase 1 Habitat survey undertaken in November 2020 identified a range of habitats present at the candidate site including poor semi-improved grassland, broad-leaved woodland, dense scrub, running water, hedgerows and buildings. The survey found no evidence of any invasive plant species at the candidate site. Of the habitats present within the development footprint, the semi-improved grassland which has been intensely managed and regularly cut/mowed along with areas of bare ground were considered of limited ecological importance and represent the most suitable areas for development. The dense scrub was considered of some ecological value in a local context while the boundary woodland corridors and northern boundary hedgerow were considered to carry the greatest ecological value locally, providing habitat connectivity across the site and to habitats in the wider environment such as the Former Llantrisant No.1 Branch Line and Craig-y-Parc SINC's to the west.

The linear features at the site including the broad-leaved woodland, wooded stream corridor and northern boundary hedgerow as well as the dense scrub were considered capable of supporting a range of foraging and commuting bat species. There were also a number of broad-leaved trees at the site with moderate and low potential to support roosting bats along with a single building that was assessed to have a low potential to support roosting bats. The broad-leaved woodland and dense scrub were also identified as being potentially suitable to support nesting birds, while the woodland and scrub edges were considered suitable to support individual or small numbers of common reptiles. While no evidence of Badger was found at the site, recent records of Badger exist in the local area and the woodland corridors are likely used by commuting/foraging Badgers on at least an occasional basis.

Further survey work would be recommended to inform a planning submission at the candidate site and to inform any specific mitigation or licensing requirements with regards to bats. Any future vegetation clearance (i.e. scrub and grassy verges) and earthworks at the proposed site would also need to consider the presence of nesting birds and reptiles. As such, works should follow a precautionary approach e.g. undertaken outside of the nesting bird season and following a directional two-stage process, to minimise the risks to any potential nesting birds and reptiles that may be present.

There is no over-riding ecological constraint to development at the candidate site and opportunities for local biodiversity enhancement should be considered. Habitats of ecological value in the context of the site are primarily associated with the southern and eastern woodland corridors and northern boundary hedgerow. As part of the local green infrastructure network, the woodland corridors and hedgerow should be retained and protected as part of any development layout. Doing so would maintain the connectivity between habitats in the surrounding areas and to allow for continued movement of mammals such as foraging bats, Badger & Hedgehog around and through the site. Furthermore, the northern hedgerow could be strengthened with new native scrub/tree planting or with species of a known benefit to biodiversity. Finally, other enhancement measures could include the inclusion of bat and bird boxes onto new buildings and retained trees and the creation of 130mm x 130mm gaps at the bottom of any garden and boundary fencing as to allow continued connectivity through the candidate site for Hedgehog and other small mammals.

1.0 INTRODUCTION

- 1.1 Soltys Brewster Ecology were commissioned by Mr Luke McDonald (the landowner) to undertake a preliminary ecological appraisal of an area of land near Capel Llanilltern, Cardiff. The area is being promoted as a candidate site for residential development as part of the LDP review process, although at the time of writing no proposed layout plan was available. A survey to establish the ecological baseline conditions and identify any ecological constraints or opportunities at the site is required to inform the LDP promotion.
- 1.2 The candidate site is located near Capel Llanilltern, immediately north of the A4119 carriageway (central grid reference: ST 09834 80041), and comprises of an area of approximately 1.5ha in size as shown in Appendix 1. The candidate site mostly consists of grassland with boundary woodland and a hedgerow. The site also contains a number of buildings and structures located in the south-west corner and along the southern perimeter of the plot.
- 1.3 The current report presents the findings of an ecological desk study and Extended Phase 1 Habitat survey undertaken at the candidate site in November 2020. The current report describes the existing ecological conditions as well as identifying any potential ecological constraints/opportunities associated with residential development at the site.

2.0 METHODOLOGY

- 2.1 In order to establish the baseline ecological conditions at the candidate site and adjacent habitats, a combination of desk-based consultation and Extended Phase 1 Habitat survey were undertaken in November 2020.

Desk study

- 2.2 The desk study involved consultation with the South East Wales Biodiversity Records Centre (SEWBRc) to identify any records of rare, protected or notable flora and fauna at the candidate site and within a radius of 1km extending from the central point of the candidate site (Appendix II). The search criteria also included information relating to the location and citation details (where available) for any sites designated for their nature conservation interest such as Sites of Special Scientific Interest (SSSIs) or Local Wildlife Sites (LWS). Other sources of information were also consulted. This included direct consultation with the LA Ecologist to acquire additional information on the local Sites of Importance for Nature Conservation (SINC) designation reasons.

Extended Phase 1 Habitat Survey

- 2.3 The fieldwork was undertaken on 12th November 2020 by two suitably experienced ecologists¹ and followed standard Phase 1 Habitat Survey protocol (JNCC, 1990) as amended by the Institute of Environmental Assessment (1995). All habitats within and immediately adjacent to the site boundary, were classified and mapped as accurately as possible. Habitats considered to have potential to support rare, protected or otherwise notable species of flora and fauna were noted, as were any direct signs of these species (e.g. Eurasian badger *Meles meles* setts and dung-pits). Incidental observations of birds on or flying over the site were also recorded and any incidence of invasive weed species (e.g. Japanese knotweed *Fallopia japonica*) noted.
- 2.4 A map of habitats was drawn up and target notes were used to identify features of ecological interest. Where possible, habitats were cross-referenced to any relevant important UK or Wales priority habitats as identified under Section 7 of the Environment Act (Wales) 2016.
- 2.5 During the field survey any trees or structures (e.g. buildings) at the candidate site were assessed for their potential to support roosting bats and were categorised in relation to the bat roosting features (BCT, 2016). The categories are as follows:
- **Known or confirmed roost**
 - **High** - A tree or structure with one or more potential roost sites that are obviously suitable for use by larger numbers of bats on a more regular basis and potentially for longer periods of time due to their size, shelter, protection, conditions and surrounding habitat.

¹ Full and Qualifying Members of the Chartered Institute of Ecology & Environmental Management (CIEEM)

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- **Moderate** – A tree or structure with one or more potential roost sites that could be used by bats due to their size, shelter, protection, conditions and surrounding habitat but unlikely to support a roost of high conservation status.
- **Low** – A structure with one or more potential roost sites that could be used by individual bats opportunistically. Or: A tree of sufficient size & age to contain PRFs (Potential Roost Features) but with none seen from the ground or features seen with only very limited roosting potential.
- **Negligible** – Negligible habitat features on site likely to be used by roosting bat

External/Internal Building Inspection

2.6 The Extended Phase 1 Habitat survey also comprised of an external/internal inspection of the existing buildings present at the site. The focus of the building inspection was to establish the likelihood that the buildings could be used by roosting bats (or nesting birds) and aimed to identify:

- If bats are, or have been, present within the building and if so, which species are present;
- The type of roost (e.g. maternity roost, day roost used by males or non-breeding females, feeding perch, night roost, mating roost, transitional roost, hibernaculum);
- How bats use the building (e.g. location of exit and entrance points to potential roosts).

2.7 The external/internal inspection of the buildings involved the use of binoculars and hand torches to identify possible access/entry points into the structures and any evidence of use by bats such as droppings, prey remains, staining etc. The buildings were assigned to the relevant categories listed in paragraph 2.5, as per guidelines published by the Bat Conservation Trust (BCT, 2016). An assessment of the buildings potential to support nesting birds was also undertaken.

Survey Constraints

2.8 The Extended Phase 1 survey was conducted in November 2020 and whilst habitat characterisation was possible, much of the ground flora was no longer in flower. A full assessment of the ground-flora species associated with the grassland and woodland/scrub habitats was not possible at the time of writing although this was not considered to affect the broad habitat categorisation and subsequent mapping. No internal inspection of the existing residential property was undertaken – the house is still occupied and the loft space forms part of the dwelling space of the property (i.e. there is no accessible loft or roof void).

3.0 RESULTS

Desk Study

SEWBreC Records

- 3.1 Consultation with SEWBreC confirmed that the candidate site does not contain any designations for nature conservation. The desk study did however return a number of locally designated SINC's within 1km of the candidate site's boundary including the Former Llantrisant No.1 Branch Line and Craig-y-Parc SINC's (see Table 1 & Appendix II). An existing woodland corridor running along the candidate site's southern boundary likely provides some ecological connectivity for mobile species between the site and the immediate surrounding area including hedgerow corridors and the two SINC's. Although few protected or priority species have been recorded inhabiting these SINC's, they are still considered to be of some relevance to the candidate site as the connecting woodland corridor may allow the movement of mobile species (e.g. bats, birds etc.) into habitats present at the site on at least an irregular or occasional basis.
- 3.2 The candidate site's eastern boundary also contains part of, and shares a border with, an ancient semi natural woodland parcel found immediately north-east of the candidate site (see Appendix II).
- 3.3 The remaining SINC's, which have mostly been designated for their priority habitats and vegetation, were not considered of particular ecological relevance to the candidate site due to the pre-existing barriers (residential development, farmland and the A4119 and M4 carriageways) and physical separation between them. The Ty Du Moor Site of Special Scientific Interest (SSSI) is also located approximately 940m south-east of the site (Table 1) however, this again is separated from the candidate site by both the M4 and A4119 carriageways and was not considered of ecological relevance to the candidate site. is unlikely to be impacted by the proposal. Summary plans to illustrate the SEWBreC records are included in Appendix II.

Table 1: Statutory and non-statutory designated sites within 1km of the candidate site boundary.

Site Name	Citation	Distance from Candidate Site
Former Llantrisant No.1 Branch Line SINC	Abandoned GWR Branch line with primarily Ash <i>Fraxinus excelsior</i> secondary woodland which is an example of a continuous section of disused railway line supporting semi-natural vegetation.	Approx. 125m south
Nant-y-Glaswg SINC	The Nant-y-Glaswg has been designated a SINC as a small watercourse which is comparatively unmodified, supports good aquatic, emergent or bankside plant communities, and where the water is not grossly polluted by long-term sources. This SINC is also designated for fish feature with Trout having been recorded.	Approx. 450 south-west

Pencoed Wood SINC	An area of semi-natural ancient Oak <i>Quercus sp.</i> and Hazel <i>Corylus avellana</i> ancient woodland with Alder <i>Alnus glutinosa</i> carr bounding the banks of the Nant-y-Glaswg stream.	Approx. 575m west
Craig-y-Parc SINC	An area of ancient semi-natural Beech <i>Fagus sylvatica</i> woodland with south facing semi-improved grassland to the east being encroached by Bracken. Protected and priority species recorded here include Brown Long-Eared Bat <i>Plecotus auratus</i> and Noctule <i>Nyctalus noctule</i> .	Approx. 600m north-west
Tre Wern Field, Pentyrch SINC	Diverse site supports neutral grassland, calcareous grassland and marshy grassland. The site is notable for grassland fungi, which occur on the drier grassland in the north of the field.	Approx. 725m north
M4 Junction 33 Spoil Tip SINC	An area of grassland formerly used as a tip for spoil. The depauperate and unimproved soil of this grassland has developed a sward of relatively species-rich grassland.	Approx. 750m west
Cadoxton & Trehafod Branch Line (878m)	SINC has been designated for its lowland meadows, lowland calcareous meadows and open mosaic habitat that is found on previously developed land. Fauna recorded here include Common Lizard <i>Zootoca vivipara</i> and a variety of protected and priority birds and invertebrates.	Approx. 875m south-west
Coed Tre Wern (883m)	An area of broadleaved valley woodland along the Nant Gwladys where Impeded drainage has resulted in dominance of Alder in the canopy. Priority habitats here include River and Wet Woodland.	Approx. 900m north
Ty Du Moor SSSI	This site is of special interest for its base enriched fen meadow vegetation, which is associated with a range of marshy grassland, flush, swamp and carr communities.	Approx. 950m south-east

3.4 The data search returned a number of protected species records within 1km of the candidate site. A single bat record of unknown species was identified within 650m of the site, recorded as road mortality along the M4 carriageway. The search also contained a number of historic (>10 years old) bat records, including three roosts of unknown species located within 500m of the site. Other historical bat records within 1km of the site include foraging/commuting field observations of Common Pippistrelle *Pipistrellus pipistrellus*, Daubenton's bat *Myotis daubentonii*, Brown Long-Eared bat, Natterer's bat *Myotis nattereri* and Noctule.

3.5 Other incidents of mammals found within the data search include several records for Badger. While no Badger setts were identified within 1km of the candidate site, recent and historical records show that Badgers are present in local area including within the Pencoed Wood and Craig-y-Parc SINCS both west of the candidate site. A single field sign (nest) of Hazel Dormouse was found near Junction 33 of the M4, approximately 925m

south-west of the site, while a single historic Otter *Lutra lutra* road kill record was also reported approximately 970m north of the site. Other S7 priority listed small mammals recorded within 1km of the candidate site include Polecat *Mustela putorius* and Hedgehog *Erinaceus europaeus*, with Hedgehog being the only protected species recorded within the site boundaries.

- 3.6 The data search returned no recent amphibian or reptile records within 1km of the candidate site. There were however several historical records for Common Frog *Rana temporaria* associated with various ponds all found within 700m of the candidate site.
- 3.7 The desk study identified a short list of records of birds listed under Schedule 1 of the Wildlife and Countryside Act (1981) (as amended) within 1km of the candidate site including several records of Barn Owl *Tyto alba* as well as Kingfisher *Alcedo atthis* and Hobby *Falco subbuteo*. The data search also included a limited number of Priority bird species under Section 7 of Environment Act (Wales) 2016 within 1km of the candidate site including Bullfinch *Pyrrhula pyrrhula*, Dunnock *Prunella modularis*, House Sparrow *Passer domesticus*, Song Thrush *Turdus philomelos*, Lesser Spotted Woodpecker *Dendrocopos minor* and Kestrel *Falco tinnunculus*.
- 3.8 There were no recent records of listed priority invertebrate species under Section 7 of the Environmental Act (Wales) 2016, however historical records for Wall *Lasiommata megera* and Shaded Broad-bar *Scotopteryx chenopodiata* were identified within 650m of the candidate site.
- 3.9 Invasive species listed under Schedule 9 of the Wildlife and Countryside Act (1981) (as amended) such as Himalayan Balsam *Impatiens glandulifera*, Japanese Knotweed and Rhododendron ponticum *Rhododendron ponticum* have been recorded within habitats in a 950m radius of the candidate site boundary.

Extended Phase 1 Habitat Survey

- 3.10 The distribution and extent of habitats recorded in November 2020 at the candidate site are illustrated on the Extended Phase 1 Habitat Plan with accompanying target notes in Appendix III. The candidate site supports a range of habitat types consistent with its semi-rural location and existing use as a detached residential dwelling including poor semi-improved grassland (lawn), broad-leaved woodland, dense scrub, running water, hedgerows, bare ground and buildings.

Poor Semi-Improved Grassland

- 3.11 The majority of the site consists of a poor semi-improved grassland lawn that has a very short sward height and has been recently cut/mowed. Species here include Perennial Rye Grass *Lolium perenne*, Cock's Foot *Dactylis glomerata*, Annual Meadow Grass *Poa annua*, False Oat Grass *Arrhenatherum elatius*, Bent grasses *Agrostis* sp., Dandelion *Taraxacum officinale*, Creeping Buttercup *Ranunculus repens* and White Clover *Trifolium repens*. Other

species identified around the margins of the grassy field include Ribwort Plantain *Plantago lanceolata*, Herb-Robert *Geranium robertianum*, Thistle *Cirsium sp.*, Dock *Rumex sp.*, Hogweed *Heracleum sphondylium* and Common Nettle *Urtica dioica*.

Plate 1 – Poor semi-improved grassland lawn



- 3.12 A small strip of poor semi-improved grassland of similar species assemblage can be found on the southern embankment of a residential driveway in the southern section of the site. The patch of grass has also been recently cut/mowed short.

Broad-leaved Woodland

- 3.13 A wooded stream corridor is located along the eastern site boundary. This far eastern sections of this broad-leaved woodland corridor forms part of an ancient semi natural woodland parcel. Woody species here mostly consist of tall mature Ash and Oak trees with occasional strands of Hazel, Alder, Field Maple *Acer campestre*, Holly *Ilex aquifolium*, Larch *Larix sp.*, Willow *Salix sp.*, Wild Cherry *Prunus avium*, Silver Birch *Betula pendula* and Blackthorn *Prunus spinosa*. Several of the Ash trees here and throughout the rest of the site appear to be in poor condition (i.e. large amounts of dead wood) and show signs of Ash dieback. The woodland ground-flora contained low lying Ivy *Hedera helix*, Common Nettle, Bramble *Rubus fruticosus*, Wilson's Honeysuckle *Lonicera nitida*, Hart's-Tongue Fern *Asplenium scolopendrium* and other unidentified ferns, with Hard rush *Juncus inflexus* and unidentified sedges found in close proximity to the banks of the stream.

Plate 2 – Woodland corridor along eastern site boundary



- 3.14 Another parcel of broad-leaved woodland can be found within a large circular crater located near the north-western boundary of the candidate site (see Target Note 11). The crater, which is approximately over 5m deep and 40m wide, may historically have been a local quarry or a sink hole that has since been colonised by scrub and trees. Woody species found within this woodland parcel include Ash, Oak, Hazel, Holly and Sycamore *Acer pseudoplatanus*, while ground-flora was again limited to low lying Common Nettle, Bramble, Ivy and Hart's-Tongue Fern.
- 3.15 A third strip of woodland can be found along the site's southern boundary, separating the candidate site from the adjacent A4119 carriageway to the south. A line of tall mature Oak and Ash trees can be found growing along the northern margin of this woodland, marking the boundary of the residential garden (see Target Note 15). Further south of this and nearer to the A4119 road verge, the trees are typically younger and mostly consist of semi-mature Hazel, Sycamore, Birch *Betula sp.* and Field Maple. The ground-flora species assemblage is again similar to that of other woodland parcels found at the site.

Plate 3 – Woodland corridor along southern site boundary**Dense Scrub**

- 3.16 An area of dense scrub can be found in the far western corner of the plot. The scrub mostly consists of dense Bramble and Rosebay Willowherb *Chamaenerion angustifolium* with occasional stands of Hawthorn *Crataegus monogyna*, Blackthorn and Hazel.

Running Water

- 3.17 The candidate site supports a small stream that flows from north to south along a woodland edge near the site's eastern boundary. This slow flowing stream is shallow (<5cm), approximately 0.5m wide and has gentle sloping muddy banks and a rocky substrate. While flowing through the site, the stream passes through a small plastic culvert before later leaving the site through two larger concrete culverts in the south-western corner of the plot.

Plate 4 – Stream running along woodland edge



Hedgerows

- 3.18 A defunct species-poor hedgerow marks the northern boundary of the candidate site. The hedgerow has a metal wire fence running throughout it and consists of a mixture of Hazel, Hawthorn and Blackthorn with an understory containing Common Nettle and unidentified ferns. The hedge has been intensively managed and had been cut/trimmed to a height of approx. 1.5 – 2.0m.

Plate 5 – Defunct species-poor hedgerow



- 3.19 Two hedgerows consisting entirely of Cherry Laurel *Prunus laurocerasus* are found lining each side of a driveway near the southern site boundary.

Bare Ground

- 3.20 There is a small amount of bare ground (gravel and tarmac) associated with a residential driveway and courtyard outside of a house and converted barn in the southern section of the site.

Buildings

- 3.21 The candidate site contains a number of buildings including a residential house, a converted barn and several other smaller structures including a shed. Buildings at the site were subject to an internal/external inspection with the findings summarised in paragraphs 3.34 – 3.39.

Other

- 3.22 A stone wall can be found running along the southern boundary of the site.

Invasive Species

- 3.23 The survey found no incidences of any invasive plant species listed on Schedule 9 of the Wildlife and Countryside Act (1981) (as amended) at the candidate site.

Fauna

- 3.24 In the course of the survey, a search of field signs for protected or notable species was undertaken and the potential of the habitats to support these species considered. In the context of this report, these species meet any of the following criteria:

- Species protected by British or international law;
- Priority species included on Section 7 (Environment Act, Wales);
- Nationally rare or nationally scarce species;
- Species of Conservation Concern (e.g. JNCC Red List, RSPB/BTO Red or Amber Lists);

Amphibians

- 3.25 The SEWBRc data search identified no recent or historic records of Great Crested Newt *Triturus cristatus* within a 1km radius of the candidate site, neither did it find any recent records of any other amphibian species within the same search radius. During the survey, no bodies of standing water were found within the candidate site boundaries and a review of OS mapping did not find any bodies of standing water in the lands adjacent to the site. The nearest body of standing water that was identified by OS mapping appears to be approximately 700m to the west of the site. The site therefore lacked any suitable features to support breeding amphibians.

While the site did contain some suitable terrestrial habitat for amphibians, such as the woodland edge and dense scrub, the presence of amphibians on the site was still considered to be unlikely due to the considerable distance to the nearest known body of standing water. As such, no further consideration is given to Great Crested Newts or any other amphibian species during the current report.

Badger

- 3.26 SEWBRReC records identified a number of recent Badger records within the surrounding 1km, with the closest being approx. 200m south-west of the candidate site near the M4 carriageway. During the survey no evidence to suggest current use by Badger (i.e. setts or latrines) was found on site. Several generic mammal runs were identified along the edge of a woodland parcel (see Target Note 10) however these were considered too small to have been created by Badger and more likely belonged to other smaller mammals such as Rabbit *Oryctolagus cuniculus*, Fox *Vulpes Vulpes* or Hedgehog. While no signs of Badger were found at the site, the availability of suitable habitat (i.e. woodland, open grassland and hedgerows) combined with the known recent records of Badger in the local area, indicate that the candidate site may still be used by commuting/foraging Badgers on at least an occasional basis.

Bats

- 3.27 While the grassland and hedgerow at the site which have been intensely managed likely provide limited foraging resources for bats, other ecological features including the wooded stream corridor, parcels of broad-leaved woodland and dense scrub, were considered suitable to support a range of foraging and commuting bat species. Woodland corridors found along the eastern and southern boundaries of the site are likely to act as important habitat corridors for bats in the wider landscape and connect the site to the Llantrisant No.1 Branch Line and Craig-y-Parc SINC to the west, where species including Brown Long-Eared Bat and Noctule have previously been recorded.
- 3.28 The survey also identified a number of mature trees at the site, primarily along the woodland margins, with the potential to support roosting bats (see Target Notes). This included 3no. trees with a moderate potential to support roosting bats and 5no. trees considered to have a low potential to support roosting bats. These trees were found to contain a number of potential roost features (PRFs) such as woodpecker holes, thick ivy stems, split branches, lifted bark, deadwood and other features which may have led to hidden cavities within the tree that could not be assessed from ground level. A line of mature Oak and Ash trees found along the site's southern boundary were also considered collectively to have a low potential to support roosting bats due to the presence of dense ivy cover. The woodland parcels at the site contained many other trees, some of which had dense ivy cover, however these trees were mostly young/semi-mature or had narrow trunks with no obvious PRFs and were considered unlikely to support roosting bats (Negligible/Low potential).

- 3.29 An external inspection of buildings located within the candidate site boundary was undertaken during the Extended Phase 1 Habitat survey. The findings are summarised in paragraphs 3.34 – 3.39.

Birds

- 3.30 A small number of bird species were seen flying over or within the habitats present at the candidate site during the survey including Robin *Erithacus rubecula*, Blue Tit *Cyanistes caeruleus*, Blackbird *Turdus merula*, Magpie *Pica pica*, Wood Pigeon *Columba palumbus*, Buzzard *Buteo buteo*, Nuthatch *Sitta europaea*, Wren *Troglodytes troglodytes* and Jay *Garrulus glandarius*. The survey also found evidence of nesting birds at the site with nests noted under the soffit of a converted barn, within a small run down shed (Plate 6), within a metal storage container and within a gap in the masonry of a stone wall. The habitats present at the site e.g. broad-leaved trees, dense scrub, hedgerow and stream are likely to provide foraging and nesting opportunities for a range of bird species.

Plate 6 – Bird nests located under the soffit of converted barn (left) and within a run-down shed (right)



Hazel Dormouse

- 3.31 The desk study identified a single field sign (nest) record of Dormouse approximately 925m south-west of the site, although the M4 and A4119 carriageways separate this area from the candidate site. No evidence of Dormouse (i.e. gnawed nuts) was found on-site during the survey. While the hedgerow marking the northern boundary of the site contained some suitable food options for Dormouse (e.g. Hazel and Bramble) and was connected to nearby woodland parcels, its ability to support Dormouse was considered unlikely as it had a 'gappy' understory and has been subjected to intense management (regularly cut/trimmed). The woodland

parcels at the site also lacked a diverse and well-developed understory that this species requires. Based on a combination of the lack of evidence found on-site, the physical separation from the nearest recorded Hazel Dormouse record and the limited suitability of habitats present at the site, the presence of this species within boundary hedgerow/woodland is unlikely.

Otter and Water Vole

- 3.32 The habitats at the candidate site were not considered suitable to support Otter or Water Vole *Arvicola amphibius*. The stream found close to the eastern site boundary is small in size/depth and is unlikely to support sufficient prey sources for Otter, while its banks were mostly muddy and lacked suitable bankside vegetation capable of supporting foraging Water Voles. As such, no further consideration is given to Otter and Water Vole during the current report.

Reptiles

- 3.33 The data search identified no recent or historic records of reptiles within the 1km search area. Although south facing, management of the semi-improved grassland lawn and hedgerow present at the site has restricted their potential to support foraging/basking reptiles. Habitats of greater suitability include the woodland and scrub edges which likely provide some suitable foraging, basking and sheltering opportunities for common reptiles such as Common Lizard and Slow Worm *Anguis fragilis*. The survey also identified a number of suitable refuges at the site including brash and log piles (see Target Notes 3 and 13). The woodland corridor along the southern site boundary may allow the movement of some reptiles between the site and more suitable habitats found to the west but the majority of the remaining habitats surrounding the candidate site (i.e. cultivated farmland to the north and physical road barriers to the south) likely act as barriers restricting reptile movement. This, combined with the lack of records for reptiles in the local area, means that the potential of the site to support common reptiles is limited and the presence of anything other than individual or small numbers of animals was considered unlikely.

Other

- 3.34 A series of Mole *Talpa europaea* hills were noted in the grassland nearest the hedgerow at the northern site boundary.

External/Internal Building Inspection

Building 1

- 3.35 A residential home located in the south-east corner of the plot (see Plate 7). The house is approximately 20 years old and is of brick construction with concrete rendering. Access inside the building was unavailable at the time of the survey but the homeowner revealed that the structure had no loft and that the space was instead occupied as a bedroom. Externally, the building appeared to be in a good condition with no obvious damage to roof tiles, windows, flashing, soffit or fascia boards. The structure was considered to have negligible potential to support roosting bats.

Plate 7 – Building 1: Residential Home



Building 2

- 3.36 A converted barn currently being utilised as a garage/car workshop is situated in the south-east corner of the plot near the residential house (Plate 8). This building is of stone construction with wooden support beams and a recently updated slate tiled roof. Discussion with the land owner revealed that the structure was a listed building. An internal inspection of the building found no bats or evidence to suggest that the building has recently been used by bats (e.g. dropping or wall staining). An internal membrane lined the roof and appeared to be new and in good condition with no obvious entrances/exits that bats could use to access the building. The building had a large stone chimney (Plate 9) but inspection of chimney's internal cavity found no light sources, suggesting it was sealed/capped and contained no obvious access points that could bats could use to enter the building. Cobwebs were also seen within the chimney and along the rafters of the structure suggesting no bats had recently flown inside the structure. Externally the building appeared in good condition. The only noticeable

feature were gaps between the slate tiles and the fascia on the north facing wall, however no droppings/staining were seen on the fascia board below these gaps. The structure was considered to have a low potential to support roosting bats. A single bird's nest was seen under the soffit of the north facing wall of this building (see Plate 6).

Plate 8 – Building 2: Converted Barn (left) with gaps under tiling (right)



Plate 9 – Building 2: Converted Barn ceiling (left) and chimney (right)



Building 3

- 3.37 A wooden shed that is currently being used for storage is located near the eastern boundary of the site (Plate 9). Gaps between the walls and soffit on the north and south facing walls provide an access point for bats into the building. Internal inspection found no bats or evidence of use by bats and the building is in regular use and is likely too disturbed to support roosting bats. The building is considered to have negligible potential to support roosting bats.

Plate 9 – Building 3: Storage Shed



Building 4

- 3.38 A secondary outbuilding can be found near the eastern site boundary, north of the storage shed. The building is of stone construction with wooden support beams and a corrugated metal roof. The building is not in use and has become derelict. There are multiple access points into the structure including through an open doorway and through a large hole in the roofing, which both allowed light to enter the building. Internal inspection found no evidence of bats. The building was considered to have a negligible potential to support roosting bats but may be used by opportunistically by individual bats as a feeding perch or night roost. A bird's nest was also found inside this structure (see Plate 6).

Building 5

- 3.39 There is a sheet metal container that is currently being used for storage found near the southern site boundary (Plate 10). The only obvious feature or entry point into the container is through the shutter door which at the time of the survey was being kept wide open, allowing light inside. Internal inspection found no evidence of bats

and the structure was considered to have a negligible potential to support roosting bats. A number of birds flew out of the container when approached and a nest was found inside.

Plate 10 – Building 5: Storage Container



Building 6

- 3.40 The final structure was another wooden shed that was found on the site's southern boundary, near to the building 5. This structure appears unused but may have previously functioned as a chicken coop. Ivy growing over the door prevented an internal examination and also indicated that no one had entered the building for some time. The only visible entry point into the building was through a low-down access door likely installed for poultry. Cobwebs were found across the access door, suggesting no bats have recently entered the shed. The building was considered to have a negligible potential to support roosting bats.

4.0 POLICIES AND PLANS

- 4.1 The following local and national planning policy relating to nature conservation and biodiversity are considered of relevance to the site.

Planning Policy Wales (2018)

- 4.2 This document set out the land use planning policies of the Welsh Government with Chapter 6 dealing with Distinctive and Natural Places which covers Biodiversity and Ecological Networks. The advice contained within PPW is supplemented for some subjects by Technical Advice Notes (TAN's), with TAN 5 addressing Nature Conservation & Planning.
- 4.3 TAN 5 identifies a number of key principles, which the town and country planning system in Wales should consider. Those relevant are detailed below:
- Work to achieve nature conservation objectives through a partnership between local planning authorities, Natural Resources Wales (NRW), voluntary organisations, developers, landowners and other key stakeholders;
 - Integrate nature conservation into all planning decisions looking for development to deliver social, economic and environmental objectives together over time;
 - Ensure that the UK's international obligations for site, species and habitat protection are fully met in all planning decisions;
 - Look for development to provide a net benefit for biodiversity conservation with no significant loss of habitats or populations of species, locally or nationally;
 - Promoting approaches to development which create new opportunities to enhance biodiversity, prevent biodiversity losses, or compensate for losses where damage is unavoidable. Minimising or reversing the fragmentation of habitats and improving habitat connectivity through the promotion of wildlife corridors;
 - Local planning authorities should seek to protect trees, groups of trees and areas of woodland where they have natural heritage value or contribute to the character or amenity of a particular locality;
 - The presence of a species protected under European or UK legislation is a material consideration when a local planning authority is considering a development proposal which, if carried out, would be likely to result in disturbance or harm to the species or its habitat.

Environment (Wales) Act, 2016

- 4.4 Part 1 of the Environment Act Wales' came into force in May 2016 and sets out the approach to planning and managing natural resources at a national and local level with a general purpose linked to statutory 'principles of sustainable management of natural resources' defined within the Act.

Section 6 - Biodiversity and resilience of ecosystems duty

- 4.5 Section 6 of the Act places a duty on public authorities to 'seek to maintain and enhance biodiversity' so far as it is consistent with the proper exercise of those functions. In so doing, public authorities must also seek to 'promote the resilience of ecosystems'.

Section 7 - Biodiversity lists and duty to take steps to maintain and enhance biodiversity

- 4.6 This section lists living organisms and types of habitat in Wales which are considered of key significance to maintaining and enhancing biodiversity in relation to Wales. The Welsh Ministers are required to take all reasonable steps to maintain and enhance the living organisms and types of habitat included in any list published under this section, and encourage others to take such steps.

Adopted Local Development Plan – Cardiff Council 2006-2026

KP16: GREEN INFRASTRUCTURE

Cardiff's distinctive natural heritage provides a network of green infrastructure which will be protected, enhanced and managed to ensure the integrity and connectivity of this multi-functional green resource is maintained. Protection and conservation of natural heritage network needs to be reconciled with the benefits of development. Proposed development should therefore demonstrate how green infrastructure has been considered and integrated into the proposals. If development results in overall loss of green infrastructure, appropriate compensation will be required. Natural heritage assets are key to Cardiff's character, value, distinctiveness and sense of place. They include the City's:

- Undeveloped countryside and coastline (EN1 and EN2);
- landscape, geological and heritage features which contribute to the City's setting (EN3);
- Strategically important river valleys of the Ely, Taff, Nant Fawr and Rhymney (EN4);
- Biodiversity interests including designated sites and the connectivity of priority habitats and species (EN5, EN6 and EN7);
- Trees (including street trees), woodlands and hedgerows (EN8);
- Strategic recreational routes, cycleways and the public rights of way network (T5, T6 and T8);
- Parks, playing fields, green play areas and open spaces (C4 and C5); and
- Growing spaces including allotments, community orchards and larger gardens; and

- Holistic integrated surface water management systems (EN10).

EN4: RIVER CORRIDORS

The Natural Heritage, character and other key features of Cardiff's river corridors will be protected, promoted and enhanced, together with facilitating sustainable access and recreation.

EN5: DESIGNATED SITES

Development will not be permitted that would cause unacceptable harm to sites of international or national nature conservation importance. Development proposals that would affect locally designated sites of nature conservation and geological importance should maintain or enhance the nature conservation and/or geological importance of the designation. Where this is not the case and the need for the development outweighs the conservation importance of the site, it should be demonstrated that there is no satisfactory alternative location for the development which avoids nature conservation impacts, and compensation measures designed to ensure that there is no reduction in the overall nature conservation value of the area or feature.

EN6: ECOLOGICAL NETWORKS AND FEATURES OF IMPORTANCE FOR BIODIVERSITY

Development will only be permitted if it does not cause unacceptable harm to:

- Landscape features of importance for wild flora and fauna, including wildlife corridors and 'stepping stones' which enable the dispersal and functioning of protected and priority species;
- Networks of importance for landscape or nature conservation. Particular priority will be given to the protection, enlargement, connectivity and management of the overall nature of semi natural habitats. Where this is not the case and the need for the development outweighs the nature conservation importance of the site, it should be demonstrated that there is no satisfactory alternative location for the development and compensatory provision will be made of comparable ecological value to that lost as a result of the development.

EN7: PRIORITY HABITATS AND SPECIES

Development proposals that would have a significant adverse effect on the continued viability of habitats and species which are legally protected or which are identified as priorities in the UK or Local Biodiversity Action Plan will only be permitted where:

- The need for development outweighs the nature conservation importance of the site;
- The developer demonstrates that there is no satisfactory alternative location for the development which avoids nature conservation impacts; and
- Effective mitigation measures are provided by the developer.

Where harm is unavoidable it should be minimised by effective mitigation to ensure that there is no reduction in the overall nature conservation value of the area. Where this is not possible compensation measures designed to conserve, enhance, manage and, where appropriate, restore natural habitats and species should be provided.

EN8: TREES, WOODLANDS AND HEDGEROWS

Development will not be permitted that would cause unacceptable harm to trees, woodlands and hedgerows of significant public amenity, natural or cultural heritage value, or that contribute significantly to mitigating the effects of climate change.

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5.0 CONCLUSIONS AND RECOMMENDATIONS

- 5.1 The combination of desk study and Extended Phase 1 Habitat survey identified a range of habitats at the site consistent with its semi-rural setting and current use as a detached residential property including poor semi-improved grassland, broad-leaved woodland, dense scrub, running water, hedgerows, bare ground and buildings. The largest habitat on site was poor semi-improved grassland (lawn) which has been intensely managed and was considered of limited ecological importance. This grassland along with the areas of bare ground represent the areas of the candidate site most suitable for any proposed development. The broad-leaved woodland corridors, dense scrub and northern boundary hedgerow represent the areas of greatest ecological interest, connecting the site to the wider environment and having the potential to support foraging and commuting bats, nesting birds and Badgers. Several mature trees and buildings at the site were also considered suitable to support roosting bats. Further surveys in relation to bats would be recommended to inform any proposed development layout and to advise on appropriate mitigation measures for habitats and species as part of a planning application.

Badger

- 5.2 No setts were identified on-site and no evidence of Badger was found during the survey. However, the data search found several recent records within the local area and the boundary habitats at the site (i.e. woodland corridors and northern hedgerow) provide suitable habitat for the occasional use of foraging/commuting badgers. In the unlikely event that a badger sett was found, works will stop immediately and the project or local authority ecologist contacted for advice. Any development should also seek to retain the boundary features to maintain the connectivity between habitats in the surrounding areas and to allow for continued movement of mammals such as Badger around and through the site.

Bats

- 5.3 The linear habitat features at the candidate site including the wooded stream corridor, woodland edges and northern boundary hedgerow were considered likely to support a range of foraging and commuting bats species. While the data search returned a limited list of bat records within a 1km radius of the site, existing ecological connectivity (i.e. the southern woodland corridor) connects the site to more suitable habitat in the local area such as the Llantrisant No.1 Branch Line and Craig-y-Parc SINC to the west where bats have been previously recorded. Given the connectivity that exists between habitats at the site and in the local area, further activity surveys (manual transects and automated surveys) would be required at the planning submission stage to establish how bats are using the candidate site to inform any particular mitigation/avoidance measures. At this early stage of the sites promotion, no further surveys would be required although retention of habitat corridors as described above should form part of any proposed development layout.

- 5.4 The survey identified a number of trees with varying potential to support roosting bats including 3no. with a moderate potential to support roosting bats and 5no. with a low potential. Any future development at the candidate site should seek to retain any trees identified as having potential to support roosting bats. However, given the current condition of some Ash trees at the candidate site (which show signs of Ash Dieback and have large amounts of standing deadwood) some would likely need to be removed for development and/or H&S reasons – in this case further survey work (presence/absence surveys) would be required to inform a planning submission and/or any tree management works. The 5no. trees assessed to have a low potential to support roosting bats do not require any further survey work under the BCT (2016) guidelines. However, on a precautionary basis if any trees with low potential were to be removed as part of any future development a soft-felling approach would be recommended. Trees should be section felled with cut tree limbs carefully lowered and left grounded overnight to allow any bats present to leave (Jackson, 2015).
- 5.5 Buildings present at the site were subject to an internal/external building inspection (with the exception of the residential house and a shed where internal access was restricted). Two buildings (Building 2 and Building 3) were assessed to have a low potential to support roosting bats. Further survey work may be required dependant on the development impacts. If any of the buildings (with Low potential) are to be demolished as part of any future development design it is recommended that a single survey visit (either a dusk emergence or dawn re-entry survey) is undertaken between May – September in appropriate weather conditions.
- 5.6 The design of any site lighting should also seek to reduce artificial light spill onto retained boundary habitats and linear features (e.g. woodland corridors or boundary hedgerow). These habitat features should be maintained as dark corridors for bats and other nocturnal wildlife. See lighting guidance note produced by BCT & ILP (2018) for advice on how to mitigate for impacts of artificial lighting on bats.

Birds

- 5.7 The broad-leaved trees, scattered scrub and boundary hedgerow at the candidate site are likely to be used by foraging and nesting birds. A number of old bird nests were also found across the site. Under the Wildlife and Countryside Act (1981) (as amended), all wild birds are protected against killing or injuring and their nests against damage or destruction whilst in use or being built. Given the likelihood of nesting birds being present within the habitats at the site it is recommended that any future vegetation clearance i.e. tree/scrub removal is undertaken outside of the nesting bird season (between September – February). If this is not possible an ecologist should be on site to inspect habitats for the presence of nesting birds prior to removal and to supervise vegetation clearance.

Hedgerows

- 5.8 As previously mentioned, the northern boundary hedgerow present at the candidate site is likely to support nesting birds, foraging/commuting bats and small mammals. Hedgerows, as a S7 priority habitat, should be retained where possible and incorporated as part of a strategic green infrastructure network for the new development. Development at the candidate site also provides opportunities for localised enhancements through the strengthening of the existing defunct species-poor hedgerow with new native scrub/tree planting or with species of a known benefit to biodiversity.

Reptiles

- 5.9 Based on the physical barriers surrounding the site (i.e. agricultural farmland and roadways), the lack of reptile records in the local area and the current management of the semi-improved grassland and hedgerow at the site (regularly cut/mowed), the presence of anything other than individual or small numbers (if any) of reptiles is unlikely. All common species of reptile are protected against killing or injury under Schedule 5 (sections 9(1) and 9(5)) of the Wildlife and Countryside Act 1981 (as amended) and are an important ecological consideration in terms of site development. A targeted reptile survey is not deemed appropriate for the site but on the assumption that individual or small numbers of reptiles may be present on-site, a precautionary approach to vegetation clearance is recommended when reptiles are active (typically April-Sept). This would involve:

- Directional, phased clearance of vegetation from east to west encouraging the movement of reptiles toward the retained woodland corridor that runs along the site's southern boundary;
- Vegetation clearance to be undertaken using a combination of tractor mounted cutter/flail capable of delivering a clean cut and hand tools such as strimmers, brush cutters and hedge trimmers;
- Cutting of established scrub > 1m should be done in two phases. An initial cut to 300mm. A second cut undertaken 24hrs later down to 50mm with all arisings removed from site within 48hrs. Low lying, non-woody vegetation could be cleared in one phase down to 50mm with all cuttings removed from site within 48hrs;
- Vegetation clearance should be undertaken in September/October to avoid the bird nesting season.

Other considerations

- 5.10 Other enhancement measures as part of any proposed development at the candidate site would include the inclusion of bat and bird boxes onto new buildings and retained trees and the creation of 130mm x 130mm gaps at the bottom of garden and boundary fencing as to allow continued connectivity through the candidate site for Hedgehog and other small mammals². Partial retention of the larger trees associated with the quarry/sink hole in the north west of the site would also be recommended as part of a layout. Retention of

² Based on the 'Hedgehog Street' principle advised by the People's Trust for Endangered Species (PTES) and other conservation groups: <https://www.hedgehogstreet.org/>

Mr L. McDonald

Land North of A4119, Capel Llanilltern

Preliminary Ecological Appraisal

E2098701/01

this feature in its existing condition is unlikely to be appropriate as part of a residential development although retention of larger peripheral trees and infilling to create an informal open space could be considered.

- 5.11 The survey work undertaken to date did not identify any over-riding ecological constraint to promotion and subsequent development of the site for residential use through the LDP. Important ecological features in the context of the site have been identified and recommended for retention/enhancement as part of any development. Further surveys for protected species (e.g. bats) would be required to inform a planning submission but would not be required at this stage of the site promotion as important site features could be retained and incorporated as part of a development layout.

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APPENDIX I SITE LOCATION PLAN

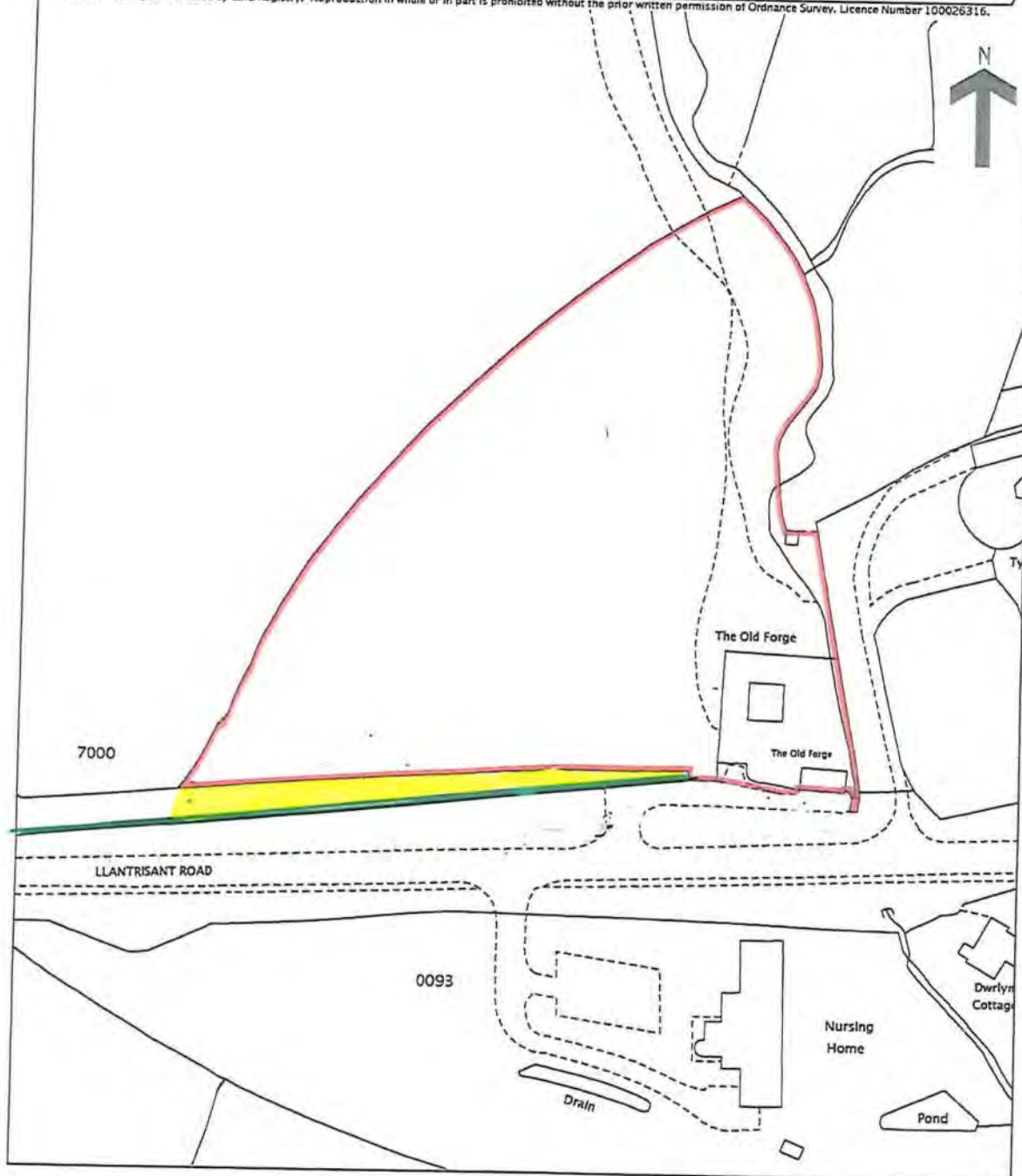
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Land Registry
Current title plan

Title number **CYM8554**
Ordnance Survey map reference **ST0980SE**
Scale **1:1250 enlarged from 1:2500**
Administrative area **Cardiff / Caerdydd**



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-  - land being acquired through adverse possession
-  - Boundary line

ADVI

*

CARDIFF COUNTY COUNCIL
CYNGOR SIR CAERDYDD

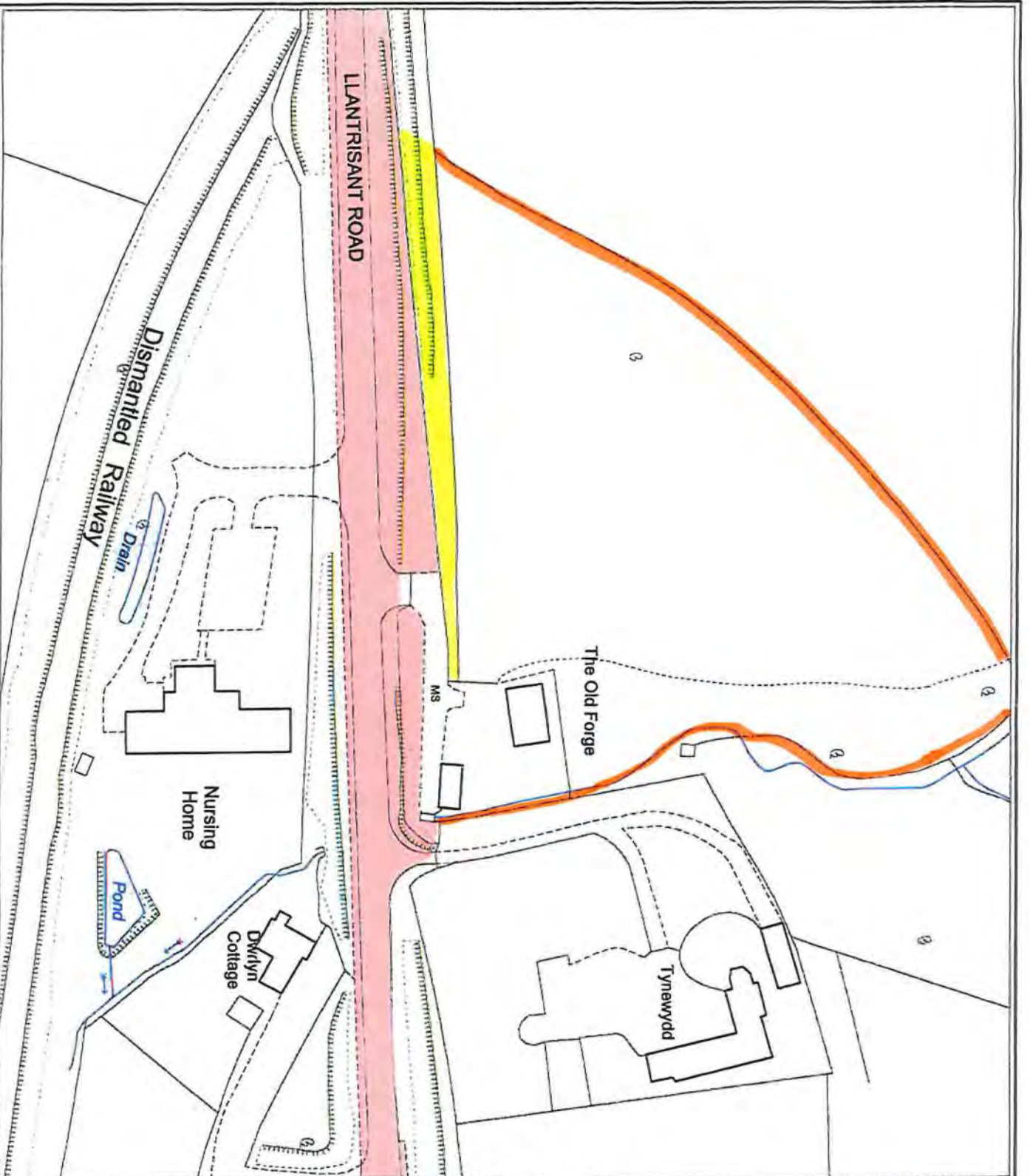


CHIEF EXECUTIVE
Paul Orders.
County Hall
Atlantic Wharf
Cardiff CF10 4UW
tel: 029 20872000

Title:

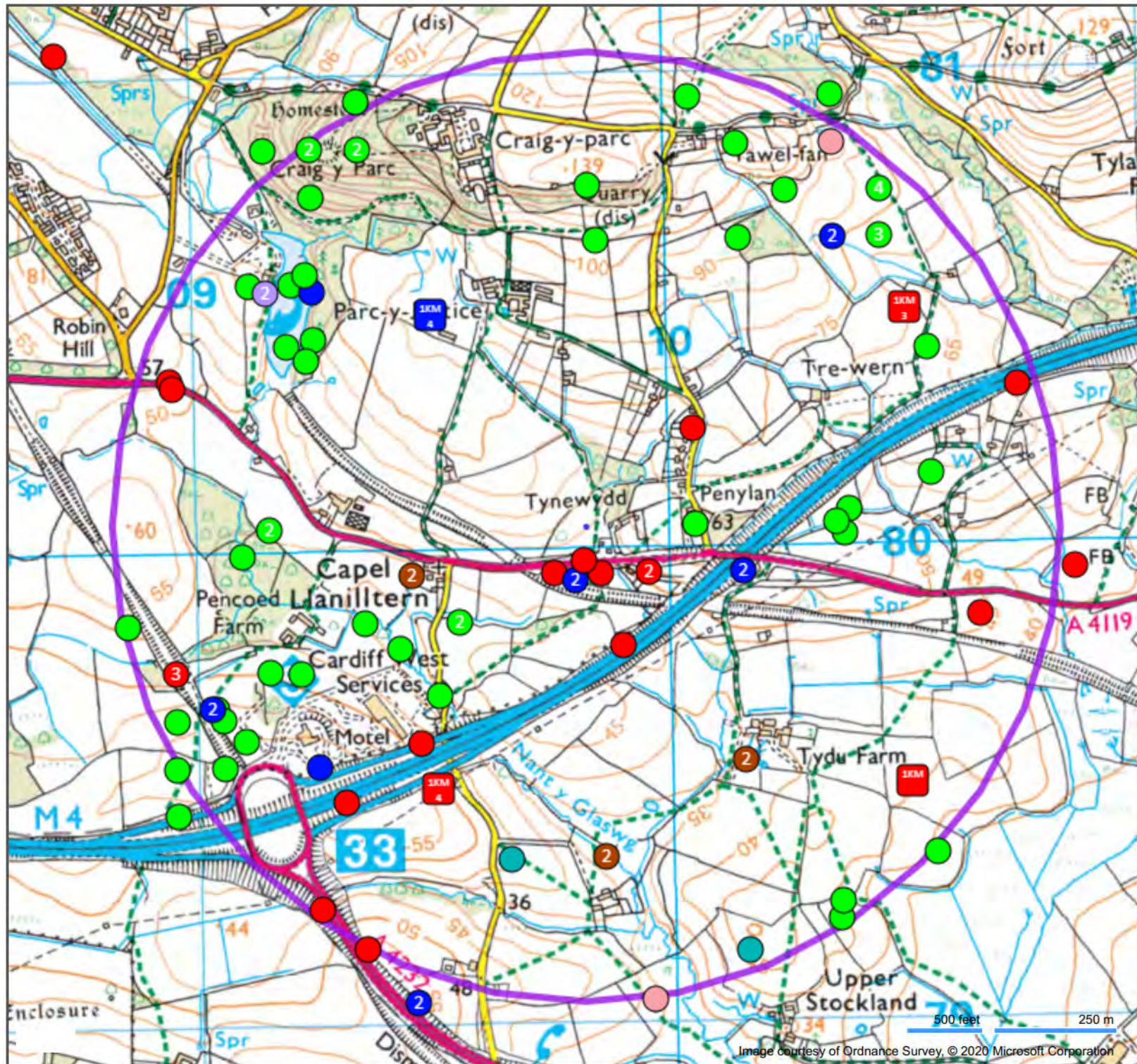
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APPENDIX II DESK STUDY INFORMATION RECEIVED FROM SEWBRcC

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Aderyn
LERC Wales Biodiversity &
Reporting Database





eMapper for LERC Wales Aderyn Commercial




ben-satherley_10/11/2020_land-off-llantrisant-road / 2343/0201-525

Key

- Search Locaon
- Search Buffer (1000m)
- Bees, Wasps, Ants and Sawflies
- Birds
- Bu erflies and Moths
- Fish
- Fungi, Lichen and Slime Moulds
- Mammals
- Other Invertebrates
- Plants
- Reples and Amphibians

APPENDIX III EXTENDED PHASE 1 HABITAT SURVEY PLAN & TARGET NOTES

Target Note	Description/Comment
Birds seen/ heard: Robin, Blue Tit, Blackbird, Magpie, Wood Pigeon, Buzzard, Nuthatch, Wren, Jay.	
1	<p>Mature Ash. Tree is in poor condition with lots of dead wood and appears to have Ash Dieback. Tree has several features including Woodpecker holes, split branches, snapped limbs, dead wood and lifted bark. Tree has Moderate Potential to support roosting bats.</p>  
2	<p>Mature Alder. Large sections of the tree are covered in a dense layer of Ivy which may be hiding potential roosting features that cannot be seen from ground level. The tree also has several split branches. Low Potential to support roosting bats.</p>

		
3	Large log and brush Pile near eastern boundary.	
4	Mature Ash. Tree is in poor condition and appears to have Ash Dieback. The tree is also covered in a dense layer of Ivy which may be hiding potential roosting features. Low Potential to support roosting bats.	
5	Semi-mature Oak. Tree has several smaller features including lifted bark and snapped branches. Low Potential to support roosting bats.	






6




Mature Ash. Tree is in poor condition and appears to have Ash Dieback. Tree also has several small features including a Woodpecker hole, split branches and several knot holes. **Low Potential** to support roosting bats.






7

Mature English Oak. Tree has several large features including lifted bark, split branches and knot holes. **Low Potential** to support roosting bats.

		
8	<p>Mature English Oak. This tree may be external to the site boundary. Tree has a large trunk wound as well as several other smaller features including dead wood, split branches and lifted bark. Moderate Potential to support roosting bats.</p> 	
9	Molehills seen in grassland near the northern site boundary.	
10	<p>Several small mammal pathways were noted leading into the pocket of broadleaved woodland.</p> 	

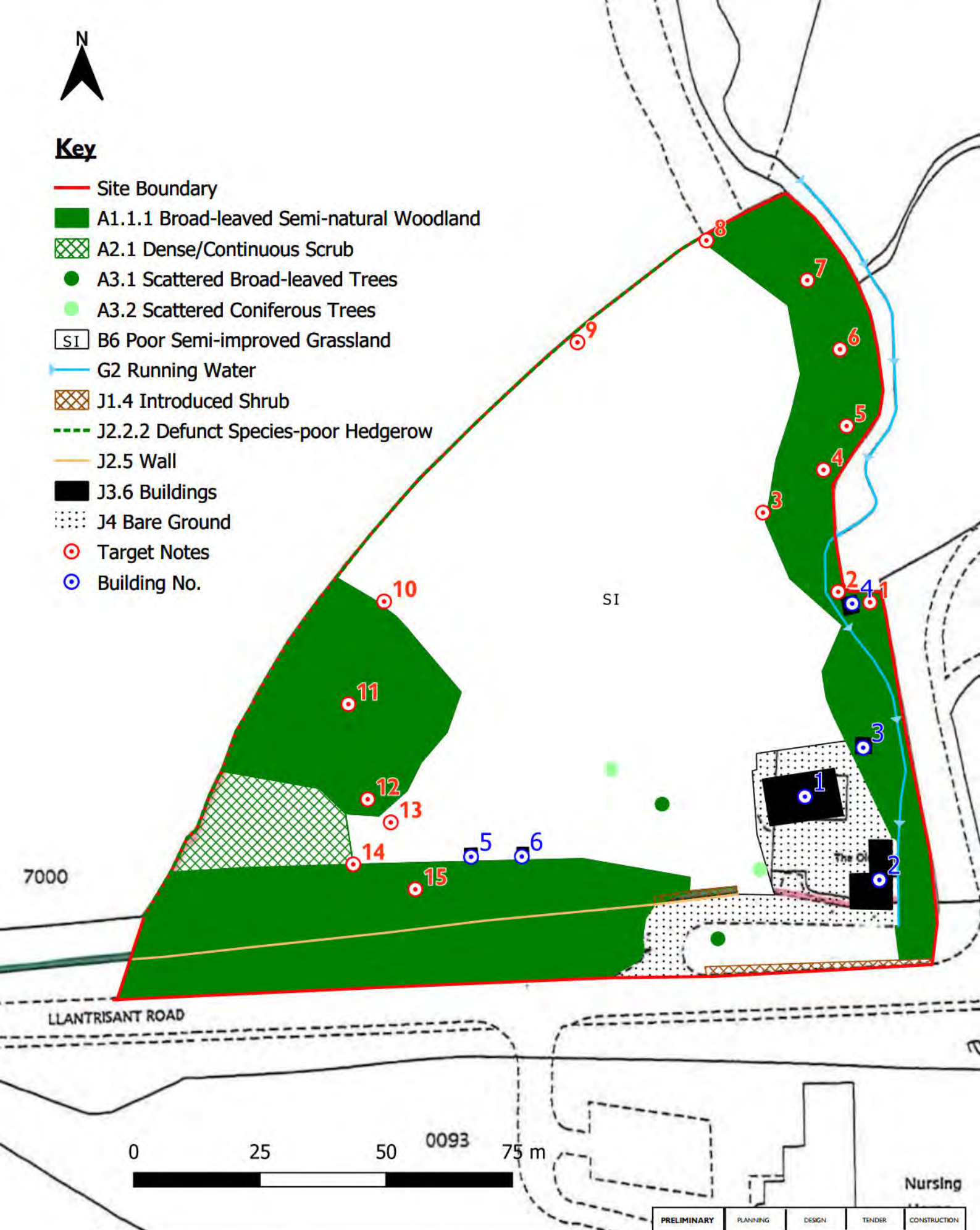
11	<p>Parcel of broad-leaved woodland in north-west of site is found growing within a large crater. Crater may have once been an old quarry that has since re-colonised.</p> 
12	<p>Mature Oak. Tree has several features including Woodpecker holes, lifted bark, split branches and thick ivy stems. Moderate Potential to support roosting bats.</p>  
13	<p>Large log and brash pile.</p>

		
14	<p>Piles of scrap metal and wood are being kept in the south-west corner of the site.</p> 	
15	<p>Line of mature Oak and Ash trees along southern site boundary. Trees have some dense Ivy cover as well as a number of other smaller features. Trees collectively each have a Low Potential to support roosting bats.</p> 	



Key

- Site Boundary
- A1.1.1 Broad-leaved Semi-natural Woodland
- ▨ A2.1 Dense/Continuous Scrub
- A3.1 Scattered Broad-leaved Trees
- A3.2 Scattered Coniferous Trees
- SI B6 Poor Semi-improved Grassland
- G2 Running Water
- ▨ J1.4 Introduced Shrub
- - - J2.2.2 Defunct Species-poor Hedgerow
- J2.5 Wall
- J3.6 Buildings
- J4 Bare Ground
- Target Notes
- Building No.



Mr L. McDonald (The Landowner)
Land North of A4119, Capel Llanilltern

Extended Phase 1 Habitat Plan

E2098701/DR01

BS

MW

25 November 2020

PRELIMINARY PLANNING DESIGN TENDER CONSTRUCTION

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APPENDIX IV BATS AND ARTIFICIAL LIGHTING IN THE UK GUIDANCE NOTE

The following is an extract from the Bat Conservation Trust and Institution of Lighting Professionals (2018) guidance note on Bats and Artificial Lighting in the UK. Section 3 contains advice on how to mitigate for the impacts of artificial lighting on bats. Full citation:

Bat Conservation Trust & Institution of Lighting Professionals (2018) *Bats and artificial lighting in the UK. Guidance Note 08/18*. Bat Conservation Trust, London.

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3. Mitigation of artificial lighting impacts on bats

This section provides a simple process which should be followed where the impact on bats is being considered as part of a proposed lighting scheme. It contains techniques which can be used on all sites, whether a small domestic project or larger mixed-use, commercial or infrastructure development. It also provides best-practice advice for the design of the lighting scheme for both lighting professionals and other users who may be less familiar with the terminology and theory.

The stepwise process and key follow-up actions are outlined in the flowchart overleaf, and are followed throughout the chapter.

The questions within this flow chart should be asked as early as possible, so that necessary bat survey information can be gathered in advance of any lighting design or fixing of overall scheme design.

Effective mitigation of lighting impacts on bats depends on close collaboration from the outset between multiple disciplines within a project. Depending on the specific challenges this will almost certainly involve ecologists working alongside architects and/or engineers; however, lighting professionals and landscape architects should be approached when recommended by your ecologist. This should be done as early in your project as possible in order to ensure mitigation is as effective as it can be and to minimise delays and unforeseen costs.

Step 1: Determine whether bats could be present on site

If your site has the potential to support bats or you are at all unsure, it is highly recommended that an ecologist is appointed to advise further and conduct surveys, if necessary. This information should be collected as early as possible in the design process, and certainly before lighting is designed, so as to avoid the need for costly revisions.

If any of the following habitats occur on site, and are adjacent to or connected with any of these habitats on or off site, it is possible that newly proposed lighting may impact local bat populations:

- Woodland or mature trees
- Hedgerows and scrub
- Ponds and lakes
- Ditches, streams, canals and rivers
- Infrequently managed grassland
- Buildings – pre 1970s or in disrepair

If you are unsure about whether bats may be impacted by your project, and an ecologist has not yet been consulted, sources of information on the presence of bats within the vicinity of your site include the following.

- Local environmental records centres (LERC) – Will provide third-party records of protected and notable species for a fee. Search <http://www.alerc.org.uk/> for more information.
- National Biodiversity Network Atlas – Provides a resource of third-party ecological records searchable online at <https://nbnatlas.org>. Typically this is less complete than LERC data. Please note: Some datasets are only accessible on a non-commercial basis, while most can be used for any purpose, as long as the original source is credited.
- Local authority planning portals – Most local planning authorities have a searchable online facility detailing recent planning applications. These may have been accompanied by ecological survey reports containing information on bat roosts and habitats.
- Defra's MAGIC map – Provides an online searchable GIS database including details of recent European protected species licences and details of any protected sites designated for bat conservation.

The professional directory at the website of the Chartered Institute of Ecology and Environmental Management (www.cieem.net) will provide details of ecologists in your area with the relevant

Step 1

Could bats be present on site?

Consult local sources of ecological information or seek advice from an ecologist

Step 2

Determine the presence of – or potential for – roosts, commuting habitat and foraging habitat and evaluate their importance.

Appoint ecologist to carry out daytime and, if necessary, night-time bat surveys and to evaluate the importance of the site's features and habitats to bats.

Step 3

Avoid lighting on key habitats and features altogether.

No illumination of any roost entrances and associated flightpaths, nor on habitats and features used by large numbers of bats, by rare species or by highly light-averse species.

Step 4

In other locations of value for bats on site, apply mitigation methods to reduce lighting to a minimum.

Spatial design

Building design

Landscaping

Set dark habitat buffers and acceptable lux limits with ecologist guidance

Step 5

Demonstrate compliance with lux limits and buffers.

Lighting professional to prepare final lighting scheme design and/or lux calculations or undertake baseline light surveys as necessary. Post-completion bat and lighting monitoring may be required.

skills/experience. The early involvement of a professional ecologist can minimise the likelihood of delays at the planning stage (if applicable) and ensure your project is compliant with conservation and planning legislation and policy.

It should be noted that the measures discussed in this document relate only to the specific impacts of lighting upon bat habitat features on or adjacent to the site. If loss or damage to roosting, foraging or commuting habitat is likely to be caused by other aspects of the development, separate ecological advice will be necessary in order to avoid, mitigate or compensate for this legally and according to the ecologist's evaluation.

Step 2: Determine the presence of – or potential for – roosts, commuting habitat and foraging habitat and evaluate their importance

Your ecologist will visit the site in order to record the habitats and features present and evaluate their potential importance to bats, and the likelihood that bats could be affected by lighting both on and immediately off site. This may also include daytime building and tree inspections. On the basis of these inspections further evening surveys may be recommended, either to determine the presence of roosts within buildings and/or trees or to assess the use of the habitats by bats by means of a walked survey. Such surveys may be undertaken at different times during the active season (ideally May to September) and should also involve the use of automated bat detectors left on site for a period of several days. The surveys should be carried out observing the recommendations within the Bat Conservation Trust's Bat Surveys for Professional Ecologists: Good Practice Guidelines (Collins, 2016).

The resulting report will detail the relative conservation importance of each habitat feature to bats (including built structures, if suitable). The ecologist's evaluation of the individual features will depend on the

specific combination of contributing factors about the site, including:

- The conservation status of species recorded or likely to be present
- Geographic location
- Type of bat activity likely (breeding, hibernating, night roosting, foraging etc)
- Habitat quality
- Habitat connectivity off-site
- The presence of nearby bat populations or protected sites for bats (usually identified in a desk study)

The evaluation of ecological importance for each feature is most commonly expressed on a geographic scale from Site level to International level, or alternatively in terms of that feature's role in maintaining the 'favourable conservation status' of the population of bats using it.

The ecologist should set out where any key bat roost features and/or habitat areas (ie flightpath habitat and broader areas of foraging habitat) lie on a plan of the site or as an ecological constraints and opportunities plan (ECOP) together with their relative importance. The ECOP and report can then be used to help guide the design of the lighting strategy as well as the wider project.

Step 3: Avoid lighting on key habitats and features altogether

As has been described in 'Artificial lighting', above, there is no legal duty requiring any place to be lit. British Standards and other policy documents allow for deviation from their own guidance where there are significant ecological/environmental reasons for doing so. It is acknowledged that in certain situations lighting is critical in maintaining safety, such as some industrial sites with 24-hour operation. However in the public realm, while lighting can increase the perception of safety and security, measureable benefits can be subjective. Consequently, lighting design should be flexible and be able to fully take into account the presence of protected species

and the obligation to avoid impacts on them.

Sources of lighting which can disturb bats are not limited to roadside or external security lighting, but can also include light spill via windows, permanent but sporadically operated lighting such as sports floodlighting, and in some cases car headlights. Additionally, glare (extremely high contrast between a source of light and the surrounding darkness – linked to the intensity of a luminaire) may affect bats over a greater distance than the target area directly illuminated by a luminaire and must also be considered on your site.

It is important that a competent lighting professional is involved in the design of proposals as soon as potential impacts (including from glare) are identified by the ecologist in order to avoid planning difficulties or late-stage design revision. Your lighting professional will be able to make recommendations about placement of luminaires tailored to your specific project.

Where highways lighting schemes are to be designed by the local planning authority (LPA) post-planning, an ecology officer should be consulted on the presence of important bat constraints which may impact the design and illuminance in order for the scheme to remain legally compliant with wildlife legislation.

Where adverse impacts upon the 'favourable conservation status' of the bat population using the feature or habitat would be significant, an absence of artificial illumination and glare, acting upon both the feature and an appropriately-sized buffer zone is likely to be the only acceptable solution. Your ecologist will be best placed to set the size of such a buffer zone but it should be sufficient to ensure that illumination and glare is avoided and so the input of a lighting professional may be required. Further information on demonstrating an absence of illumination via lux/illuminance contour plans is provided in Step 5.

Because different species vary in their response to light disturbance (as discussed in section 1 'Bats'), your ecologist will be able to provide advice tailored to the specific conditions on your project, however examples of where the no-lighting approach should be taken in particular include:

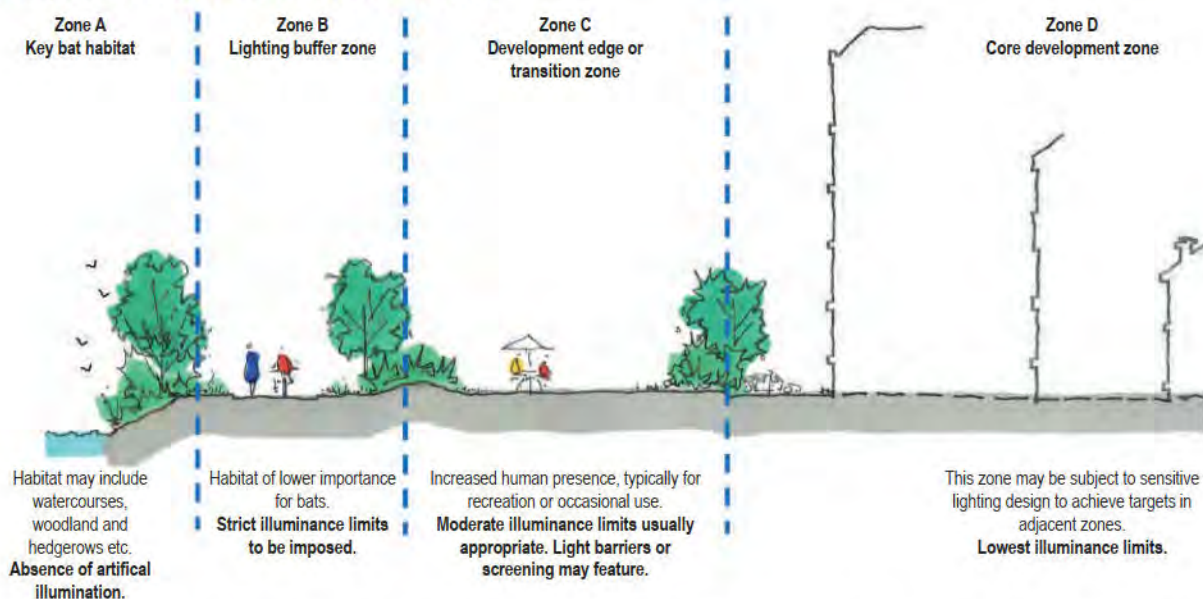
- Roosting and swarming sites for all species and their associated flightpath/commuting habitat.
- Foraging or commuting habitat for highly light-averse species (greater and lesser horseshoe bats, some *Myotis* bats, barbastelle bats and all long-eared bats).
- Foraging or commuting habitat used by large numbers of bats as assessed through survey.
- Foraging or commuting habitat for particularly rare species (grey long-eared bat, barbastelle, small *Myotis*, Bechstein's bat and horseshoe bats).
- Any habitat otherwise assessed by your ecologist as being of importance to maintaining the 'favourable conservation status' of the bat population using it.

Completely avoiding any lighting conflicts in the first place is advantageous because not only would proposals be automatically compliant with the relevant wildlife legislation and planning policy, but they could avoid costly and time-consuming additional surveys, mitigation and post-development monitoring. Furthermore, local planning authorities are likely to favour applications where steps have been taken to avoid such conflicts.

Step 4: Apply mitigation methods to reduce lighting to agreed limits in other sensitive locations – lighting design considerations

Where bat habitats and features are considered to be of lower importance or sensitivity to illumination, the need to provide lighting may outweigh the needs of bats. Consequently, a balance between a reduced lighting level appropriate to the

Example of illuminance limit zonation



ecological importance of each feature and species, and the lighting objectives for that area will need to be achieved.

It is important to reiterate the legal protection from disturbance that bats receive under the Wildlife and Countryside Act 1981, as amended. Where the risk of offences originating from lighting is sufficiently high, it may be best to apply the avoidance approach in Step 3.

Advice from an ecologist and lighting professional will be essential in finding the right approach for your site according to their evaluation. The following are techniques which have been successfully used on projects and are often used in combination for best results.

Dark buffers, illuminance limits and zonation

Dark buffer zones can be used as a good way to separate habitats or features from lighting by forming a dark perimeter around them. Buffer zones rely on ensuring light levels (levels of illuminance measured in lux) within a certain distance of a feature do not exceed certain defined limits. The buffer zone can be further subdivided into zones of increasing illuminance limit radiating away from the feature. Examples of this application are given in the figure above.

Your ecologist (in collaboration with a lighting professional) can help determine the most appropriate buffer widths and illuminance limits according to the value of that habitat to bats (as informed by species and numbers of bats, as well as the type of use).

Appropriate luminaire specifications

Luminaires come in a myriad of different styles, applications and specifications which a lighting professional can help to select. The following should be considered when choosing luminaires.

- All luminaires should lack UV elements when manufactured. Metal halide, fluorescent sources should not be used.
- LED luminaires should be used where possible due to their sharp cut-off, lower intensity, good colour rendition and dimming capability.
- A warm white spectrum (ideally <2700Kelvin) should be adopted to reduce blue light component.
- Luminaires should feature peak wavelengths higher than 550nm to avoid the component of light most disturbing to bats (Stone, 2012).
- Internal luminaires can be recessed where installed in proximity to windows to reduce glare and light spill. (See figure overleaf.)
- The use of specialist bollard or low-level downward directional luminaires to

retain darkness above can be considered. However, this often comes at a cost of unacceptable glare, poor illumination efficiency, a high upward light component and poor facial recognition, and their use should only be as directed by the lighting professional.

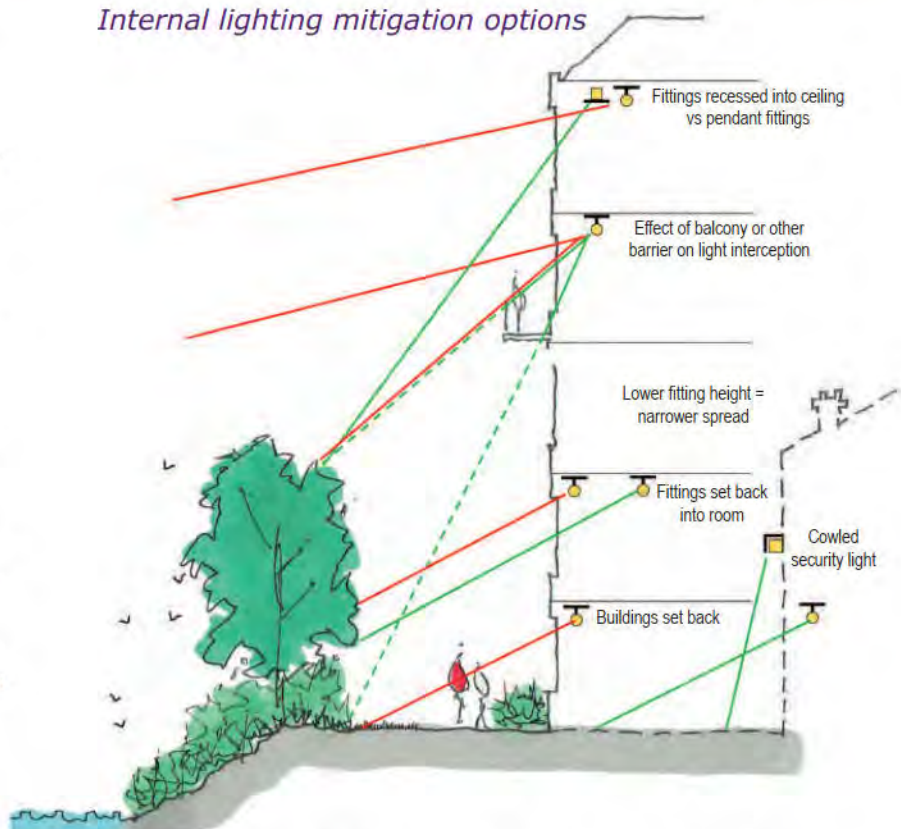
- Column heights should be carefully considered to minimise light spill.
- Only luminaires with an upward light ratio of 0% and with good optical control should be used – See ILP Guidance for the Reduction of Obtrusive Light.
- Luminaires should always be mounted on the horizontal, ie no upward tilt.
- Any external security lighting should be set on motion-sensors and short (1min) timers.
- As a last resort, accessories such as baffles, hoods or louvres can be used to reduce light spill and direct it only to where it is needed.

Sensitive site configuration

The location, orientation and height of newly built structures and hard standing can have a considerable impact on light spill (see figure above for examples of good internal lighting design). Small changes in terms of the placement of footpaths, open space and the number and size of windows can all achieve a good outcome in terms of minimising light spill on to key habitats and features.

- It may be possible to include key habitats and features into unlit public open space such as parks and gardens.
- Buildings, walls and hard landscaping may be sited and designed so as to block light spill from reaching habitats and features.

Internal lighting mitigation options



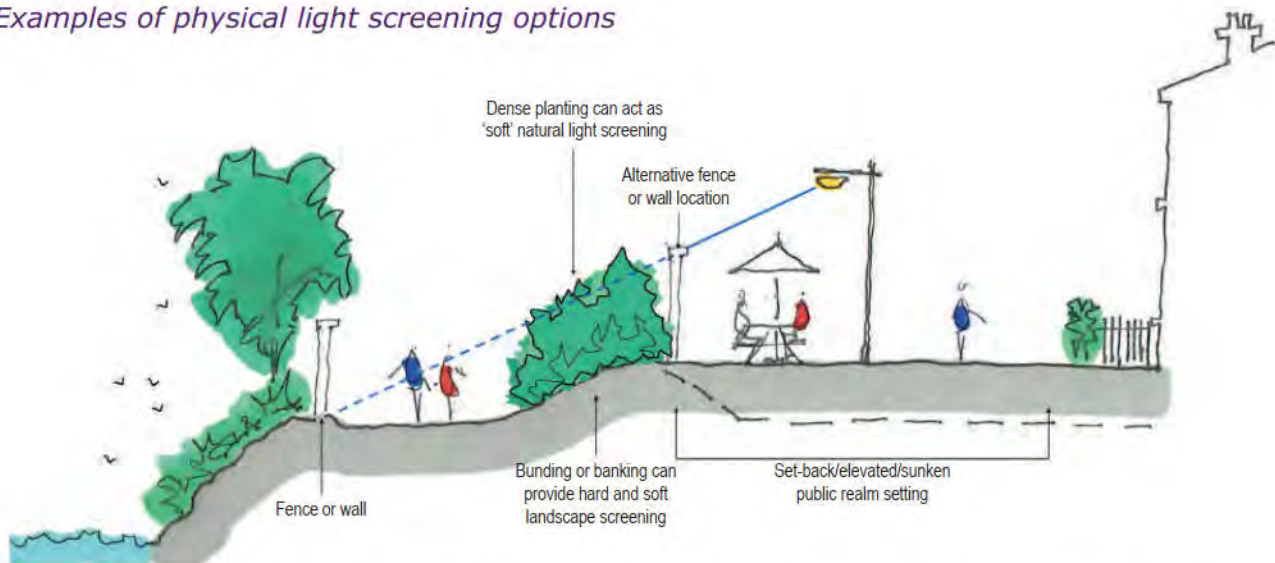
- Taller buildings may be best located toward the centre of the site or sufficiently set back from key habitats to minimise light spill.
- Street lights can be located so that the rear shields are adjacent to habitats or optics selected that stop back light thereby directing light into the task area where needed.

Screening

Light spill can be successfully screened through soft landscaping and the installation of walls, fences and bunding (see figure overleaf for example of physical light-screening options). In order to ensure that fencing makes a long-term contribution, it is recommended that it is supported on concrete or metal posts. Fencing can also be over planted with hedgerow species or climbing plants to soften its appearance and provide a vegetated feature which bats can use for navigation or foraging.

The planting of substantial landscape features integrated to the wider network of green corridors such as hedgerows, woodland and scrub is encouraged by

Examples of physical light screening options



planning policy and would make a long-term positive contribution to the overall bat habitat connectivity and light attenuation. A landscape architect can be appointed to collaborate with your ecologist on maximising these natural light screening opportunities.

It should be noted that newly planted vegetation (trees, shrubs and scrub) is unlikely to adequately contribute to light attenuation on key habitats for a number of years until it is well established. Sufficient maintenance to achieve this is also likely to be required. Consequently, this approach is best suited to the planting of 'instant hedgerows' or other similarly dense or mature planting, including translocated vegetation. In some cases, it is appropriate to install temporary fencing or other barrier to provide the desired physical screening effects until the vegetation is determined to be sufficiently established.

Given the fact that planting may be removed, die back, or be inadequately replaced over time it should never be relied on as the sole means of attenuating light spill.

Glazing treatments

Glazing should be restricted or redesigned wherever the ecologist and lighting professional determine there is a likely significant effect upon key bat habitat and features. Where windows and glass

facades etc cannot be avoided, low transmission glazing treatments may be a suitable option in achieving reduced illuminance targets.

Products available include retrofit window films and factory-tinted glazing. 'Smart glass', which can be set to automatically obscure on a timer during the hours of darkness, and automatic blinds can also be used but their longevity depends on regular maintenance and successful routine operation by the occupant, and should not be solely relied upon.

Depending on the height of the building and windows, and therefore predicted light spill, such glazing treatments may not be required on all storeys. This effect can be more accurately determined by a lighting professional.

Creation of alternative valuable bat habitat on site

The provision of new, additional or alternative bat flightpaths, commuting habitat or foraging habitat could result in appropriate compensation for any such habitat being lost to the development. Your ecologist will be able to suggest and design such alternative habitats although particular consideration as to its connectivity to other features, the species to be used, the lag time required for a habitat to sufficiently establish, and the provision for its ongoing protection and maintenance should be given.

Dimming and part-night lighting

Depending on the pattern of bat activity across the key features identified on site by your ecologist, it may be appropriate for an element of on-site lighting to be controlled either diurnally, seasonally or according to human activity. A control management system can be used to dim (typically to 25% or less) or turn off groups of lights when not in use.

It should be noted that these systems depend on regular maintenance and a long-term commitment for them to be successful. Additionally, part-night lighting should be designed with input from an ecologist as they may still produce unacceptably high light levels when active or dimmed. Part-night lighting is not usually appropriate where lights are undimmed during key bat activity times as derived from bat survey data. Research has indicated that impacts upon commuting bats are still prevalent where lighting is dimmed during the middle of the night at a time when illumination for human use is less necessary (Azam et al, 2015). Thus this approach should not always be seen as a solution unless backed up by robust ecological survey and assessment of nightly bat activity.

Step 5: Demonstrate compliance with illuminance limits and buffers

Design and pre-planning phase

It may be necessary to demonstrate that the proposed lighting will comply with any agreed light-limitation or screening measures set as a result of your ecologist's recommendations and evaluation. This is especially likely to be requested if planning permission is required.

A horizontal illuminance contour plan can be prepared by a suitably experienced and competent lighting professional (member of the Chartered Institution of Building Services Engineers (CIBSE), Society of Light and Lighting (SLL), Institution of

Lighting Professionals (ILP) or similar to ensure competency) using an appropriate software package to model the extent of light spill from the proposed and, possibly, existing luminaires. The various buffer zone widths and illuminance limits which may have been agreed can then be overlaid to determine if any further mitigation is necessary. In some circumstances, a vertical illuminance contour plot may be necessary to demonstrate the light in sensitive areas such as entrances to roosts.

Such calculations and documentation would need to be prepared in advance of submission for planning permission to enable the LPA ecologist to fully assess impacts and compliance.

Because illuminance contour plots and plans may need to be understood and examined by non-lighting professionals such as architects and local planning authority ecologists, the following should be observed when producing or assessing illuminance contour plans to ensure the correct information is displayed.

- A horizontal calculation plane representing ground level should always be used.
- Vertical calculation planes should be used wherever appropriate, for example along the site-facing aspects of a hedgerow or façade of buildings containing roosts to show the illumination directly upon the vertical faces of the feature. Vertical planes can also show a cross-sectional view within open space. Vertical planes will enable a visualisation of the effects of illumination at the various heights at which different bat species fly.
- Models should include light from all luminaires and each should be set to the maximum output anticipated to be used in normal operation on site (ie no dimming where dimming is not anticipated during normal operation).
- A calculation showing output of luminaires to be expected at 'day 1' of operation should be included, where the luminaire and/or scheme Maintenance Factor is set to one.

- Where dimming, PIR or variable illuminance states are to be used, an individual set of calculation results should accompany each of these states.
- The contours (and/or coloured numbers) for 0.2, 0.5, 1, 5, and 10 lux must be clearly shown as well as appropriate contours for values above these.
- Each contour plan should be accompanied by a table showing their minimum and maximum lux values.
- Where buildings are proposed in proximity to key features or habitats, plots should also model the contribution of light spill through nearby windows, making assumptions as to internal luminaire specification and transmissivity of windows. It should be assumed that blinds or curtains are absent or fully open although low-transmittance glazing treatments may be appropriate. Assumptions will need to be made as to the internal luminaire specification and levels of illuminance likely to occur on 'day 1' of operation. These assumptions should be clearly stated and guided by the building/room type and discussions between architect, client and lighting professional. It is acknowledged that in many circumstances, only a 'best effort' can be made in terms of accuracy of these calculations.
- Modelled plots should not include any light attenuation factor from new or existing planting due to the lag time between planting and establishment and the risk of damage, removal or failure of vegetation. This may result in difficulties in the long term achievement of the screening effect and hamper any post-construction compliance surveys.
- The illuminance contour plots should be accompanied by an explanatory note from the lighting professional to list where, in their opinion, sources of glare acting upon the key habitats and features may occur and what has been done/can be done to reduce their impacts.

N.B. It is acknowledged that, especially for vertical calculation planes, very low

levels of light (<0.5 lux) may occur even at considerable distances from the source if there is little intervening attenuation. It is therefore very difficult to demonstrate 'complete darkness' or a 'complete absence of illumination' on vertical planes where some form of lighting is proposed on site despite efforts to reduce them as far as possible and where horizontal plane illuminance levels are zero. Consequently, where 'complete darkness' on a feature or buffer is required, it may be appropriate to consider this to be where illuminance is below 0.2 lux on the horizontal plane and below 0.4 lux on the vertical plane. These figures are still lower than what may be expected on a moonlit night and are in line with research findings for the illuminance found at hedgerows used by lesser horseshoe bats, a species well known for its light averse behaviour (Stone, 2012).

Baseline and post-completion light monitoring surveys

Baseline, pre-development lighting surveys may be useful where existing on- or off-site lighting is suspected to be acting on key habitats and features and so may prevent the agreed or modelled illuminance limits being achieved. This data can then be used to help isolate which luminaires might need to be removed, where screening should be implemented or establish a new illuminance limit reduced below existing levels. For example, where baseline surveys establish that on- and off-site lighting illuminates potential key habitat, improvements could be made by installing a tall perimeter fence adjacent to the habitat and alterations to the siting and specification of new lighting to avoid further illumination. Further information and techniques to deal with modeling pre-development lighting can be found in ILP publication PLG04 *Lighting Impact Assessments* due to be published late 2018.

Baseline lighting surveys must be carried out by a suitably qualified competent person. As a minimum, readings should be

taken at ground level on the horizontal plane (to give illuminance hitting the ground), and in at least one direction on the vertical plane at, for example, 1.5m or 2m above ground (to replicate the likely location of bats using the feature or site). The orientation should be perpendicular to the dominant light sources or perpendicular to the surface/edge of the feature in question (such as a wall or hedgerow) in order to produce a 'worst case' reading. Further measurements at other orientations may prove beneficial in capturing influence of all luminaires in proximity to the feature or principal directions of flight used by bats. This should be discussed with the ecologist.

Baseline measurements should be taken systematically across the site or features in question. That is, they will need to be repeated at intervals to sample across the site or feature, either in a grid or linear transect as appropriate. The lighting professional will be able to recommend the most appropriate grid spacing.

Measurements should always be taken in the absence of moonlight, either on nights of a new moon or heavy cloud to avoid artificially raising the baseline. As an alternative, moonlight can be measured at a place where no artificial light is likely to affect the reading.

As all proposed illuminance level contours will be produced from modelled luminaires at 100% output, baseline measurements need to be taken with all lights on and undimmed, with blinds or screens over windows removed. Cowls and other fittings on luminaires can remain in place.

Where possible, measurements should be taken during the spring and summer when vegetation is mostly in leaf, in order to accurately represent the baseline during

the principal active season for bats and to avoid artificially raising the baseline.

The topography of the immediate surrounding landscape should be considered in order to determine the potential for increased or decreased light spill beyond the site.

Post-construction/operational phase compliance-checking

Post-completion lighting surveys are often required where planning permission has been obtained on the condition that the proposed lighting levels are checked to confirm they are in fact achieved on site and that the lighting specification (including luminaire heights, design and presence of shielding etc) is as proposed.

All lighting surveys should be conducted by a suitably qualified competent person and should be conducted using the same measurement criteria and lighting states used in the preparation of the illuminance contour plots and/or baseline surveys as discussed above. It may be necessary to conduct multiple repeats over different illumination states or other conditions specific to the project.

Results should always be reported to the LPA as per any such planning condition. A report should be prepared in order to provide an assessment of compliance by the lighting professional and a discussion of any remedial measures which are likely to be required in order to achieve compliance. Any limitations or notable conditions such as deviation from the desired lighting state or use of blinds/barriers should be clearly reported. Ongoing monitoring schedules can also be set, especially where compliance is contingent on automated lighting and dimming systems or on physical screening solutions.

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Our Ref / Fy nghyf: 1225.a

Date / Dyddiad: 3rd October 2023

Planning Policy Department (LDP)
Cardiff County Council
BY EMAIL ONLY

Dear Sir/Madam,

**Re: Cardiff Replacement Local Development Plan – 2021-2036
Preferred Strategy and Stage 1 Candidate Site Assessment**

We have been instructed by our Clients to review the recently published *Cardiff Replacement Local Development Plan* (RLDP), together with its associated documents, including the *Stage 1 Candidate Site Assessment* report and subsequently forward any comments or concerns we may have to the Council. Having undertaken this process, we have significant concerns on the 'soundness' of the process undertaken and the resultant documents, as there are clear failures to adhere to two of the three tests set out in the *Development Plans Manual* (Edition 3) (DPM):

Test 1 – Does the Plan fit?

Test 2 – Is the Plan appropriate?

As the process adopted has failed to adhere to the above two Tests, the subsequently prepared Preferred Strategy is in turn flawed and so has been found to be 'unsound'. The following therefore provides further information on our findings.

Test 1 – Does the Plan fit?

Table 27 of the DPM sets out clear guidance on the three tests that will be considered by an appointed Inspector at the Examination in Public into a RLDP. The DPM expands on the title of Test 1 by providing a 'check-list' of items that a local planning authority (LPA) must have followed to ensure its RLDP is sound, which includes the following:

"Does it have regard to national policy (PPW) and the WSP (NDF when published)?"

In our review of the documentation recently published by the LPA at this Preferred Strategy Stage, it is evident that the Authority has failed to adhere to the above and in particular, has failed to take into full consideration the requirements of *Planning Policy Wales* (Edition 11) (PPW) with regards to Green Wedges.

PPW at Paragraph 3.64 sets out that Green Wedges are 'local designations', to be "... *only employed where there is a demonstrable need to protect the urban form and alternative policy mechanisms, such as settlement boundaries, would not be sufficiently*

robust.”. Paragraph 3.64 goes on to advise that “The essential difference between them [Green Wedges] is that land within a Green Belt should be protected for a longer period than the relevant current development plan period, whereas green wedge policies should be reviewed as part of the development plan review process.”. In more specific terms, the paragraph repeats the latter point by highlighting that “Green wedges should be proposed and be subject to review as part of the LDP process.”

Despite national guidance making it quite clear that green wedges are local designations that should be periodically reviewed, particularly as part of the LDP process, we have been unable to find any evidence or documentation to confirm that as part of the preparation of the Cardiff RDLDP Preferred Strategy and associated Stage 1 Candidate Site assessment report that those areas allocated as Green Wedges under the provision of the current adopted LDP have been reviewed. In fact, upon reviewing the Stage 1 assessment of the submitted Candidate Sites, it is evident that such a review has not taken place and current Green Wedge designations are to continue through to the RLDP unchanged, by virtue of them being used as a reason for preventing Candidate Sites being subjected to further assessment at the Stage 2 stage:

“Site within the Green Wedge. Site not progressed to next stage assessment.”

The above is of significant concern and clearly in breach of the requirements of national planning policy in the form of PPW and were the above situation not amended and the proper review conducted, it would result in the RLDP being unsound and failing Test 1 of the DPM.

Test 2 – Is the Plan appropriate?

As with Test 1, Table 27 of the DPM also sets out a ‘check-list’ of items for Test 2 that LPAs must have followed to ensure its RLDP is sound, which includes the following:

“Is it coherent and consistent?

Have the ‘real’ alternatives been properly considered?”

Whilst we recognise that the core document of the RDLDP has yet to have been prepared, even in draft format, it will nevertheless be based on a vast evidence base, which includes the Candidate Site Assessment process. It is therefore critical that such a foundational document adheres to the Tests set out in the DPM to ensure the subsequent RLDP is adopted on a sound basis. However, we have identified again, that under the provisions of Test 2, this would not be the case.

As identified above, it is evident that the LPA are using current local planning policy (Green Wedges) to assess Candidate Sites that may form part of the replacement policy document – which should be reviewing ALL policy areas and aspects to be covered by the new document. However, having reviewed the assessment undertaken by the LPA with regards to its assessment of Candidate Sites for the Ward of Penttyrch and St Fagans, it is clear that such sites have been reviewed inconsistently.

As discussed above, it is clear that the LPA have erroneously used current Green Wedge allocations to exclude Candidate Sites from consideration in Stage 2 of its assessment

process, and has done so for a number of sites. However, it has been identified that contrary to this position, the LPA have then determined to progress Candidate Site 22 (Land East of Heol Pant y Gored, Creigiau) to Stage 2 of the assessment process, even though it forms part of a current Green Wedge allocation.

The above is an inconsistent assessment approach taken by the LPA, which clearly demonstrates that alternative sites for development have not been properly considered by the LPA in its assessment of Candidate Sites, which in turn represents a core foundational source of evidence for the RLDP. This failure therefore to follow the requirements of Test 2 of the DPM and any decision to not review the position, will result in any subsequent RDLP being unsound.

In summary, we have significant concerns with regard to the Preferred Strategy and the evidence base it has currently been prepared upon. It is clear that there are fundamental failures in the Candidate Site assessment process and failure to review and revise this process has resulted in it failed two the tests of soundness as set out in the DPM. We therefore formally object to the document as it presently stands for the reasons set herein.

Yours sincerely

A solid black rectangular box used to redact the signature of Jason D Evans.

Jason D Evans
Director



STATEMENT OF RESPONSE
TO
ASSESSMENT OF CANDIDATE SITE 13
(LAND AT THE OLD FORGE, CAPEL LLANILLTERN)

REPLACEMENT CARDIFF LOCAL DEVELOPMENT PLAN 2021-2036

on behalf of
Mr and Mrs McDonald

Our Ref: 1225.a
Date: October 2023
Prepared by: JDE

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1.0 INTRODUCTION

- 1.1 Evans Banks Planning Ltd. were instructed by Mr and Mrs McDonald to submit the land shaded red on Plan A below at the Candidate Site stage of the preparation of the *Replacement Cardiff Local Development Plan* (RLDP) for the purposes of residential development.



Plan A

- 1.2 The submission was made as a linked submission to a separate representation made on behalf of our Clients, with respect to the proposal for new Development Limits in the RLDP for the settlement in question.
- 1.3 We understand that the Candidate Site has been assessed by the local planning authority (LPA) as part of the preparation of its Preferred Strategy and its results and findings published in the document entitled "*Background Technical Paper Number 7 - Preferred Strategy – Stage 1 Candidate Site Assessment*".
- 1.4 This Statement of Response has therefore been prepared in response to the LPAs assessment of our Clients land (illustrated above) and represents a formal objection to the findings found with the aforementioned *Background Technical Paper* (BTPN7)

2.0 SITE CONTEXT

2.1 THE SITE AND SURROUNDING AREA

2.1.1 A detailed description of the Candidate Site was included within the Supporting Statement originally submitted to the LPA in 2021, with the site largely remaining unchanged since that time. Notwithstanding this, the following provides further detail on the site and the adjoining area, in support of this submission.

2.1.2 The photographs below provide a series of aerial views of the Candidate Site and surrounding adjoining land.



Photograph 1
(Candidate Site and
Adjoining Development)



Photograph 2
(Adjoining Development
to the North East)



Photograph 3
(Land to the North West)



Photograph 4
(Land to the West
Strategic Development Site)

- 2.1.3 The above photographs provide further context to the aforementioned previous submissions and should be given full and careful consideration. Photograph 1 illustrates that the Candidate Site adjoins and is well related to existing development directly to its east and north east, as also illustrated in Photograph 2.
- 2.1.4 In contrast to the above, the Candidate Site is very different in character to the open land to the north west pictured in Photograph 3, despite these three elements all forming part of the currently designated area of Green Wedge. The land illustrated in Photograph 3 is well established agricultural land (in contrast to the domestic nature of the Candidate Site) and reaches on to the settlement of Creigiau, illustrated in the background of the photograph.
- 2.1.5 The final photograph – Photograph 4 – is then of land to the west of the Candidate Site, which as can be seen, is again dominated by parcels of agricultural land. However, the land is currently designated as part of a wider Strategic Development Site in the current LDP and we understand, benefits from planning permission for residential development.
- 2.1.6 In summary, the above photographs illustrate that the Candidate Site currently is more akin to the developed land adjoining its north eastern and eastern boundaries, but will soon also be influenced by comprehensive development to its west. Notwithstanding this, it is also clearly and starkly different to agricultural land directly to its north west.

3.0 STAGE 1 ASSESSMENT

3.0.1 As part of the publication of its Preferred Strategy for the RLDP, the LPA has published a number of background technical papers including one dealing with Stage 1 of its Candidate Site Assessment process. At Section 3 of the related paper, the LPA sets out its methodology for its initial stage of assessment, which it advises is as follows:

“The high-level assessment is the first stage of the Candidate Site assessment process following the Call for Candidate Sites. This involved an initial desk-based assessment to determine whether any of the sites should be filtered out because they:

- Are below the threshold*
- Contain fundamental constraints that cannot be mitigated*
- Proposed highly vulnerable development as residential in a high risk flood zone”*

3.0.2 Beyond the above, no further detail or explanation of the assessment methodology has been provided by the Authority and so terms such as ‘threshold’ or ‘fundamental constraints’ have not been qualified.

3.0.3 Notwithstanding the above, the following provides commentary on the LPAs assessment of our Clients Candidate Site to date, as well as making reference to another relevant Candidate Site within the same Ward. It should be noted, that due to errors and inconsistencies identified within the Assessment process undertaken to date of Candidate Sites by the LPA, a separate objection has been submitted as part of the consultation on the Preferred Strategy and this should be read in conjunction with the contents of this Statement of Response.

3.1 CANDIDATE SITE 13 – LAND AT OLD FORGE, CAPEL LLANILLTERN

- 3.1.1 As with the other submitted Candidate Sites, we understand that the LPA assessed our Clients Site (Candidate Site 13) against the aforementioned high-level criteria and reach the following conclusion and recommendation:

“Site within the Green Wedge. Site not progressed to next stage assessment.”

- 3.1.2 As detailed in the originally submitted Supporting Statement, the Candidate Site does indeed under the provisions of the current LDP form part of a wider Green Wedge allocation. However, as also highlighted in the aforementioned Supporting Statement, national planning policy is quite clear that such allocations must be reviewed as part of the preparation of any replacement LDP and so do not automatically ‘roll-over’ to new and replacement policy documents.
- 3.1.3 To date, we have not seen any evidence that this has been undertaken, that such new Green Wedge allocations have been adopted as part of the replacement LDP and so their use is wholly inappropriate and in breach of the tests of soundness set out in the *Development Plans Manual* (Edition 3) (Please see aforementioned linked objection for further details).
- 3.1.4 In addition to the above, using the LPAs own high-level methodology referred to above, it is unclear as to why Candidate Site 13 should not proceed to Stage 2 of the assessment process. The Candidate Site is of a size that would be capable of making a meaningful contribution to new housing as part of the RDLP and so in turn is of a size to be above a ‘threshold’ set for housing allocations. In addition, for reasons set out in the originally submitted Supporting Statement, the Candidate Site does not face or include any fundamental constraints that would prevent its delivery. Finally, whilst including a small element considered to be at risk of flooding from surface water in an extreme storm event, as the submitted Indicative Site Layout drawing illustrates, this would not prevent the delivery of the site for the proposed number of residential units (22).

3.1.5 In view of the above, it is quite clear that (a) Candidate Site 13 passes the LPAs own high-level assessment criteria and (b) does not conflict with any national planning policy constraints. On this basis, we would respectfully conclude that the LPAs current assessment of Candidate 13 is flawed and erroneous, and to ensure a consistent and sound process, should be progressed to the second stage of assessment.

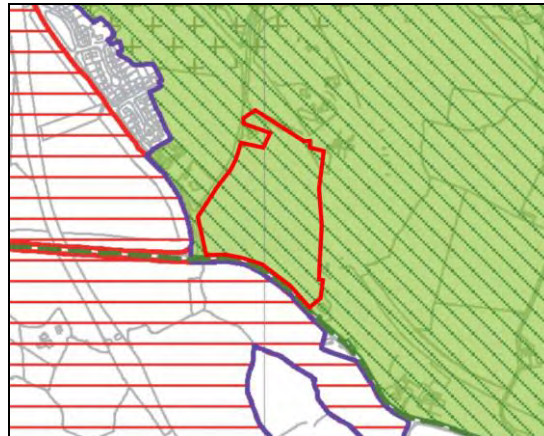
3.2 ASSESSMENT OF OTHER CANDIDATE SITES

3.2.1 As detailed above, concerns have been raised with the consistency and soundness of the approach taken with regards to the assessment process of Candidate Sites by the LPA and this has been submitted as a separate objection for its consideration, as part of the consultation process on its Preferred Strategy.

3.2.2 With regards to the above, we would highlight a specific inconsistency in the assessment process, specifically with regards to Candidate Site 22 (Land East of Heol Pant y Gored, Creigiau). In its assessment of Candidate Site 22, the LPA concluded that:

“In line with the Development Plans Manual site to progress to next stage assessment for consideration as a potential reserve site if required.”

3.2.3 However, under the provisions of the current Cardiff LDP, the Candidate Site (edged red in Plan B) the land is presently allocated as part of the same Green Wedge (green shading) as Candidate Site 13.



Plan B

- 3.2.4 The above is clearly inconsistent with the assessment of our Clients land, and yet no explanation has been given by the LPA as to why the two sites should be treated and assessed so differently, despite them being part of the very same designation that has been cited by the LPA for the omission of our Clients land from the next stage of assessment. This is particularly when the land forming part of Candidate Site 22 is so clearly detached from any existing form of development of settlement, whereas our Clients land is not.
- 3.2.5 Again, and in view of the LPAs assessment of other Candidate Sites, we would respectfully conclude that the LPAs current assessment of Candidate Site 13 is flawed and erroneous, and to ensure a consistent and sound process is followed in the preparation of the RLDP, should be progressed to the second stage of assessment.

4.0 CONCLUSION

- 4.1 As detailed in the submissions originally made with respect to the Candidate Site in question, the land forms a logical extension to an existing settlement and is well related to it, as well as being positioned at a location within the wider landscape to not form a prominent or logical part of the surrounding open countryside. This position, role and character remains unchanged to this day.
- 4.2 Notwithstanding the above and the opportunity the Candidate Site represents in assisting the Council in delivering new and much needed homes for the immediate community and wider City area, the LPA in its initial assessment has ruled it out from further consideration. However, as this and related submissions have highlighted, this assessment process has been identified as being both inconsistent and flawed, contrary to core ‘tests of soundness’ fundamental to the LDP preparation process.
- 4.3 With the Candidate Site having no access, ground condition, flood risk, hydrological, ecological, archaeological or land ownership related constraints, its delivery if allocated is assured. In the absence therefore of any fundamental constraints to its delivery, and ensure that the RLDP is prepared on a sound basis, it is clear that Candidate Site 13 should now progress to Stage 2 of the Candidate Site Assessment process, and in due course allocated for the purposes of residential development.

Land at The Old Forge, Llantrisant Road,
Capel Llanilltern

Transport Statement

14th May 2021

For and on behalf of
Mr & Mrs McDonald

Project Ref: 2021-581

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1 INTRODUCTION

- 1.1 LvW Highways Ltd is commissioned by Mr & Mrs McDonald to provide Highway and Transportation advice and prepare a Transport Statement (TS) in support of a proposed residential development on Land at The Old Forge, Llantrisant Road, Capel Llanilltern.
- 1.2 The area is being promoted as a candidate site for residential development as part of the LDP review process, although at the time of writing no proposed layout plan was available.
- 1.3 The candidate site is located near Capel Llanilltern, immediately north of the A4119 carriageway (central grid reference: ST 309834 180041), and comprises of an area of approximately 1.3ha. The candidate site mostly consists of grassland with boundary woodland and a hedgerow. The site also contains a number of buildings and structures located in the south-east corner and along the southern perimeter of the plot.
- 1.4 The site location in relation to the existing Cardiff LDP strategic sites is shown in **Figure 1**. The primary access will be from an amended junction on to the A4119 Llantrisant Road.

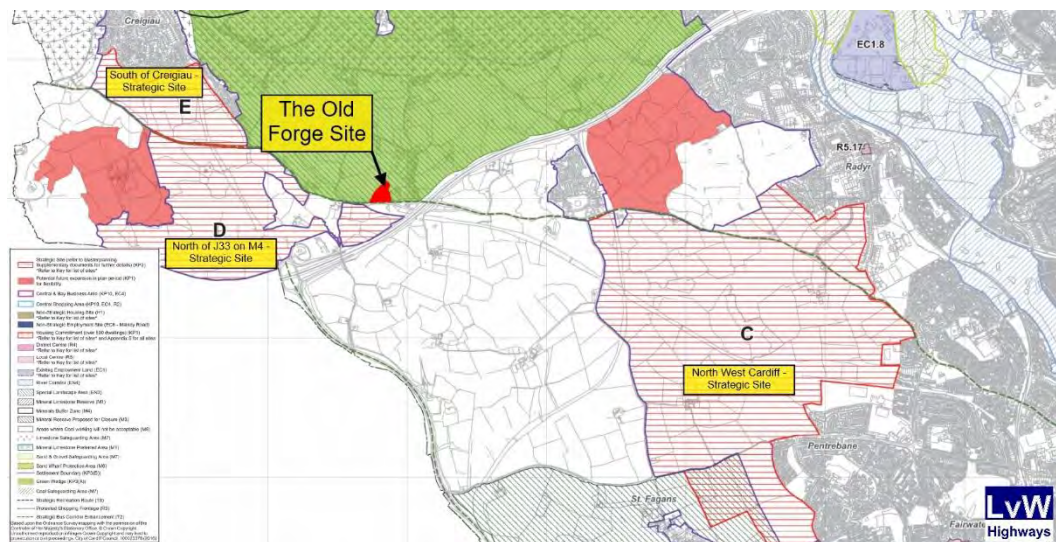


Figure 1: Site Location

Purpose of the report

- 1.5 This report will outline and assess any transport issues in relation to the site. It will consider the traffic generation of the development and potential impact on the surrounding transport network with any required mitigation measures outlined.
- 1.6 This report will outline and assess any transport issues in relation to the site and quantify whether the road network is suitable to accommodate the predicted impact of the development. The Transport Statement will also consider the access arrangements to the site for all modes of travel including walking, cycling, and public transport.
- 1.7 This Transport Statement is produced in accordance with, and in recognition of, local and central government guidance and follows our understanding of the requirements set out in TAN 18: Transport.
- 1.8 LvW Highways Ltd as independent transport planning consultants have prepared this Transport Statement providing what we consider is a fair and unbiased

appraisal of the traffic and highways issues arising due to the proposed development and with consideration of other proposed developments in the area.

Report Structure

1.9 The structure of this Transport Statement is as follows:

- Section 2 describes the site's location, the existing transport network that surrounds and serves it and the vehicle movements generated by the existing use of the site.
- Section 3 describes the proposed development, considers the likely trip generation of the proposed use of the land and considers its impact.
- Section 4 provides the scope for a Residential Travel Plan.
- Section 5 provides a summary and conclusion.

2 EXISTING CONDITIONS

Introduction

- 2.1 This section provides a review of the existing conditions at the site with relation to transport and movements. This includes a review of the site location and access to local facilities and amenities, a study of the existing local highway network and traffic conditions along with a local review of accident data.
- 2.2 The sustainability of the site is considered regarding the provision of alternative modes of transport to the car, including walking, cycling and public transport.

Site Location and Description

- 2.3 Capel Llanilltern is located in the county of Cardiff, four miles south-east of the town of Llantrisant, 14 miles west of the major city of Newport, six miles north-west of Cardiff, and 137 miles west of London.
- 2.4 The site extends to approximately 1.5 hectares and is situated approximately 300metres to the west of the M4 motorway. The site currently forms part of a residential garden, which is relatively level.
- 2.5 The sites location and its immediate surroundings is shown in **Figure 2**. Opposite the site on the south side of Llantrisant Road is Ty Hafod care centre.

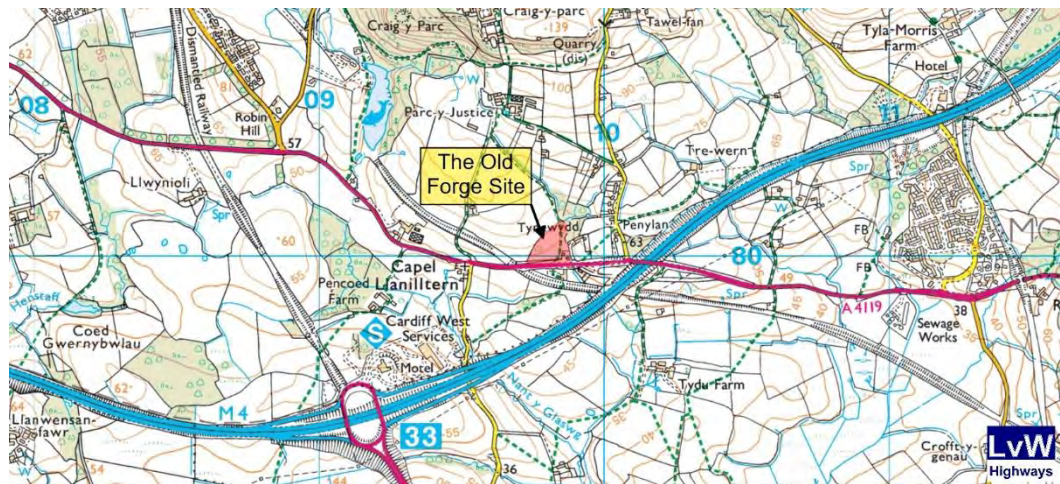


Figure 2: Site Location

Site Access

- 2.6 The existing access to the site is provided directly off Llantrisant Road from a simple T-junction on the southern boundary, **Plate 1** shows the existing site access.



Plate 1: Existing Site Access

The Active Travel (Wales) Act 2013

- 2.7 The Active Travel (Wales) Act 2013 is Welsh Government legislation aimed to support an increase in the level of walking and cycling in Wales, to encourage a shift in travel behaviour to active travel modes, and to facilitate the building of walking and cycling infrastructure.
- 2.8 The planning system has a key role to play in facilitating active travel. Planning Policy Wales (PPW) and Technical Advice Note (TAN) 18: Transport, promote walking and cycling, in line with the aims of the Active Travel (Wales) Act 2013.
- 2.9 The Active Travel (Wales) Act 2013 makes it a legal requirement for local authorities in Wales to map and plan for suitable routes for active travel, and to build and improve infrastructure for walking and cycling every year. It creates new duties to consider the needs of walkers and cyclists and make better provision for them. It also requires the consideration of walking and cycling as a mode of transport and the Act focuses on the promotion of walking and cycling for purposeful journeys, rather than as a purely recreational activity.
- 2.10 The Active Travel (Wales) Act 2013 became effective on 25th September 2014. The Act will be supported by the Active Travel Action Plan Wales (2014), and many of the actions of the Active Travel Action Plan Wales document will also benefit recreational or competitive walking and cycling. 'Walking' in the Active Travel Action Plan for Wales includes the use of wheelchairs and mobility scooters and 'cycling' includes the use of electric bikes, but not motorcycles.

Pedestrian Facilities

- 2.11 There is a continuous footway on the southern side of Llantrisant Road from the residential development at Goitre Fach (south of the M4) to the residential development at Llanilltern Village. Llantrisant Road also benefits from an appropriate system of street lighting.
- 2.12 There is a Public Right of Way (Llanilltern 10) that runs through the site as can be seen in **Figure 3**.

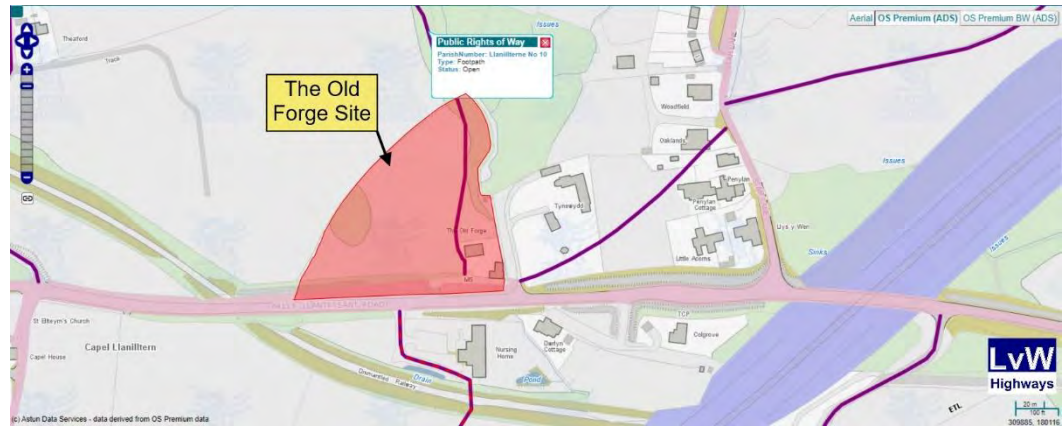


Figure 3: Public Right of Way footpaths in relation to the site

- 2.13 Access to the footway from Llantrisant Road is via an overgrown highway verge and a set of steps to take it over the old highway boundary wall. The steps can just about be seen in Plate 2 in the top centre of the image.



Plate 2: Access to footpath 10 via steps

Cycle Facilities

- 2.14 There are no dedicated cycle routes within the vicinity of the site along Llantrisant Road and therefore all cycling has to be undertaken on the carriageway.

Public Transport

Bus Services

- 2.15 In reviewing the public transport provision in the vicinity of and directly serving the area, it is evident that the site benefits from excellent bus provision.
- 2.16 The nearest bus stops to the site are located on Llantrisant Road (Capel Llanillterne, Broadlands and Capel Llanillterne, Craig-y-Parc). These stops are serviced by route 122 (circa 20 minute frequency) and route 124 (hourly) which link the site with Tonypanyd/ Maerdy and Cardiff City Centre. The journey time via bus between the site and Cardiff city centre is currently just 20 minutes.
- 2.17 All the timetables are available online at <https://www.traveline.cymru/>.
- 2.18 It is therefore concluded that the existing bus routes provide excellent opportunities for residents of the development to make both commuting and leisure trips via sustainable modes of travel.

Rail Services

- 2.19 Radyr Railway Station is some 5km to the east, accessible by foot in some 60 minutes, bicycle in circa 16 minutes and car is less than 8 minutes.
- 2.20 Danescourt Railway Station is also some 5km to the southeast and served by the aforementioned bus services, which provides further sustainable transport opportunities, particularly for trips further afield. Alternatively, Danescourt Railway Station is accessible by bicycle in just 16 minutes or car in circa 8 minutes.

Local Facilities and Amenities

- 2.21 There are a number of bus stops along Llantrisant Road that then provide access to local facilities and amenities in the area.

Personal Injury Accident Data

- 2.22 A preliminary study of Personal Injury Accident (PIA) collision data on www.crashmap.co.uk shows that there have been two collisions on Llantrisant Road in the past 5 years where full years data is available (01/01/2015 to 31/12/2019) within the vicinity of the proposed development site. The location and severity of the collisions can be seen in **Figure 4**.

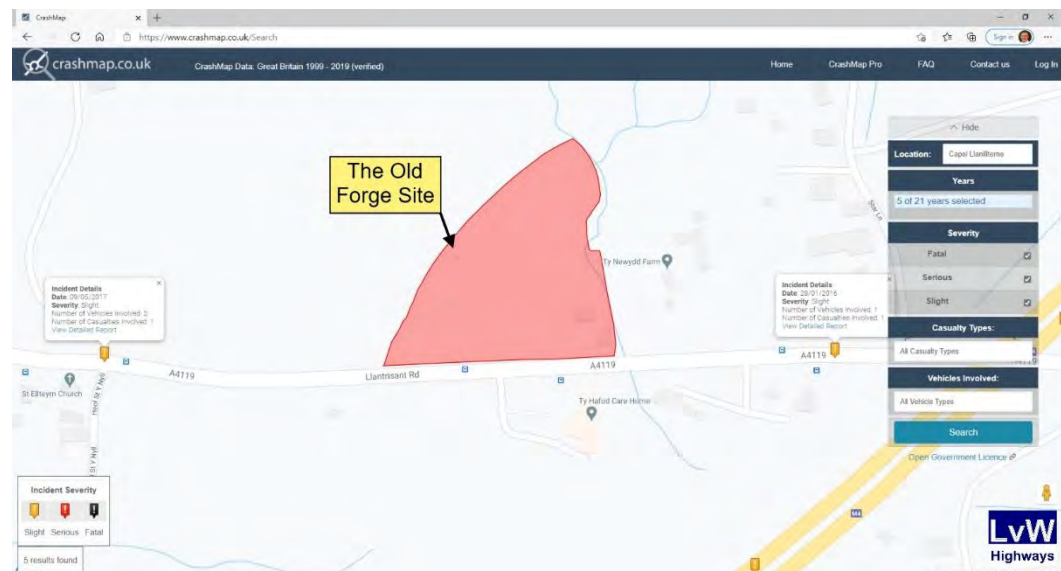


Figure 4: Location and Severity of Collisions

- 2.23 The above information suggests that there is not an identifiable safety problem that could be attributable to the road layout. The proposed development is unlikely to result in any material increase in traffic using this junction and, on this basis, the accident data does not have a negative bearing on the acceptability of the development proposals.

Air Quality Management Area (AQMA)

- 2.24 The location of the site is not within or near a designated Air Quality Management Area (AQMA).

Abnormal Loads

- 2.25 There are no abnormal load uses associated with the current site or expected with the development of the site.

3 PROPOSED DEVELOPMENT

Proposed Scheme

- 3.1 The proposed development is for 22 residential dwellings on land accessed off Llantrisant Road in Capel Llanilltern. At the time of writing this report, no proposed layout plan was available. It is likely that further discussions on the site layout will take place as part of the detail design process and therefore the plan may change as a result of the PAC processes.
- 3.2 The approach taken in developing the layout plan is founded on giving maximum encouragement to walking and cycling within the layout of the development. The inclusion of high quality pedestrian and cycle routes within the development will play an important role in connecting the development to its surroundings.
- 3.3 The layout design will place an emphasis on the principles of “Manual for Streets” in facilitating a choice of direct and attractive routes for pedestrians and cyclists that are aligned with key desire lines and take advantage of the attractiveness associated with a suburban location.
- 3.4 For the purposes of the assessment, all the residential dwellings will be classified as private properties in order to provide a robust case in terms of ownership of the properties, as houses for rent typically generate a lower volume of vehicle traffic flows.

Proposed Vehicle Access

- 3.5 Vehicular access to the development site will be provided from a new junction on Llantrisant Road. The access will be 6.0m wide with 8m junction radii. Visibility splays of 2.4m x 120m (for 40mph speed limit) can and will be provided at the junction. A plan of the site access is included in **Appendix A**.

Proposed Walking and Cycling Access

- 3.6 The internal design will allow for informal roads space to be used by all road users, creating a safe environment for pedestrians and cyclists. This will provide better scope for effective integration with the existing built-up areas and offer the levels of accessibility that are a necessary part of sustainable development.
- 3.7 The proposed development will provide an external connection to Llantrisant Road with the provision of 1.8m - 2.0m wide footways at the proposed access to the development. A footway will be provided on the development side of Llantrisant Road in the highway verge linking to the existing footway east of the site access at the bus lay-by near the bridge over the M4.
- 3.8 The most recent guidance on walking proximity is provided by Manual for Streets (MfS) which, at paragraph 4.4.1, states that:
- “Walkable neighbourhoods are typically characterised by having a range of facilities within 10 minutes’ (up to about 800m) walking distance of residential areas which residents may access comfortably on foot. However, this is not an upper limit and PPG13 (paragraph 75 of that document) states that walking offers the greatest potential to replace short car trips, particularly those under 2.0km”.*
- 3.9 Manual for Streets 2 (MfS2) clearly identifies the contribution that cycling can make to transport sustainability and accessibility, identifying this mode of travel as a good substitute for short car trips, particularly those under 5km.

Proposed Public Transport Access

- 3.10 In respect of the site and the level of development, the existing bus services are considered suitable to meet the public transport requirements of the residents of the site and achieve a tangible modal shift.
- 3.11 Bus stops are located within 100 metres of the site. Frequent bus services are provided from these bus stops to a variety of destinations.

On Site Parking

- 3.12 TAN 18 supplements Planning Policy Wales and states in paragraph 4.6 that *“Maximum car parking standards should be used at regional and local level as a form of demand management.”* and in paragraph 4.7 it requires LHA's in determining maximum car parking standards for new development, regard should be given to alternative transport modes, economic objectives, public and shared parking arrangements.
- 3.13 Paragraph 4.13 goes on to say *“Where appropriate, the local parking strategy should link parking levels on new development sites with either the existence or introduction of on-street control regimes. Maximum parking standards should not be applied so rigidly that they become minimum standards. Maximum standards should allow developers the discretion to reduce parking levels.”*

Cardiff Parking Standards

- 3.14 Parking at the site will be provided in accordance with Cardiff Council's Supplementary Planning Guidance 'Access, Circulation and Parking Standards' (January 2010).
- 3.15 Furthermore, the development will show a range of parking options other than a focus on plot dominated car parking, in line with its Residential Design Guide.

Servicing Arrangements

- 3.16 The internal layout will be designed to ensure that a refuse vehicle and fire tender can arrive and depart the site in a forward gear.

Highway Trips

- 3.17 This section describes the traffic analysis undertaken to determine the likely effect that the proposed residential development of 22 dwellings accessed off Llantrisant Road may have on the surrounding highway network. The traffic analysis includes the calculation of the number of vehicle trips associated with the development.

Trip Generation for the Proposed Development

- 3.18 Trip generation is an element of the Transport Statement and study of the highway impact caused by the proposed development, and is the process to estimate the amount of trips associated with the specific land use or development. Peak hour trips are typically estimated, as this is when the greatest impact may occur.
- 3.19 As the proposed development is not built, the best estimate of trips is based on information extracted from the TRICS® database.
- 3.20 In order to assess the impact of the development, it is necessary to produce figures for the trip generation of the site. This was achieved through an interrogation of the TRICS® Version 7.7.1 database using the parameters identified in the 'TRICS Good Practice Guide'. TRICS is a database containing details of trip generations from sites across Britain for various land uses.

Proposed use – Residential Dwellings Private

- 3.21 The vehicle trip generation rates for the proposed 22 open market residential dwellings has been obtained from the TRICS 7.7.4 trip generation database. Sites were selected on the basis of number of dwellings and the following selection criteria:
- 03/A – Houses Privately Owned (GDO use class C3); Housing developments where at least 75% of units are privately owned. Of the total number of units, 75% must also be houses (sum of “non-split” terraced, detached, semi-detached, bungalows, etc.), with no more than 25% of the total units being flats. Includes properties that are privately owned and then privately rented. Trip rates are calculated by Site Area, Dwellings, Housing Density, or Total Bedrooms.
 - Calculate multi modal trip rates.
 - Regions of the development: All.
 - No. of units: Maximum of 50.
 - Survey days: Monday – Friday, excludes weekend.
 - Locations of the development: Suburban Area, Neighbourhood Centre and Free Standing.
 - Population within 1 mile: limit to 5,001 to 10,000.
 - Population within 5 miles: limit to 75,001 to 100,000.
- 3.22 The TRICS output is provided in detail in **Appendix B** and summarised below.
- 3.23 The trip rate has been calculated based on the proposed total number of 22 private dwellings.
- 3.24 **Table 2** shows the balanced average hourly trips during the day as well as the daily flows that 22 private dwellings could typically have. These are calculated by multiplying the trip rates produced from the TRICS data with the proposed number of private dwellings.

Time Range	Arrivals	Departures	Totals
07:00-08:00	1	4	5
08:00-09:00	3	7	10
09:00-10:00	3	4	7
10:00-11:00	3	3	6
11:00-12:00	3	3	6
12:00-13:00	3	3	6
13:00-14:00	4	3	7
14:00-15:00	4	4	8
15:00-16:00	5	3	8
16:00-17:00	5	4	9
17:00-18:00	7	3	10
18:00-19:00	5	3	8
Daily Trip Rates:	46	44	90

Table 1: Vehicular Trips for 22 private dwellings (Proposed Use)

- 3.25 This clearly shows that if the 22 dwellings were occupied, it is estimated that it could attract and produce 90 vehicle movements a day.
- 3.26 To visualise how these trips arrive and depart throughout a typical day, the arrivals and departures are plotted on **Chart 1**. It can be seen that a development of 22 private dwellings there are two peak periods in the morning and the afternoon to evening.

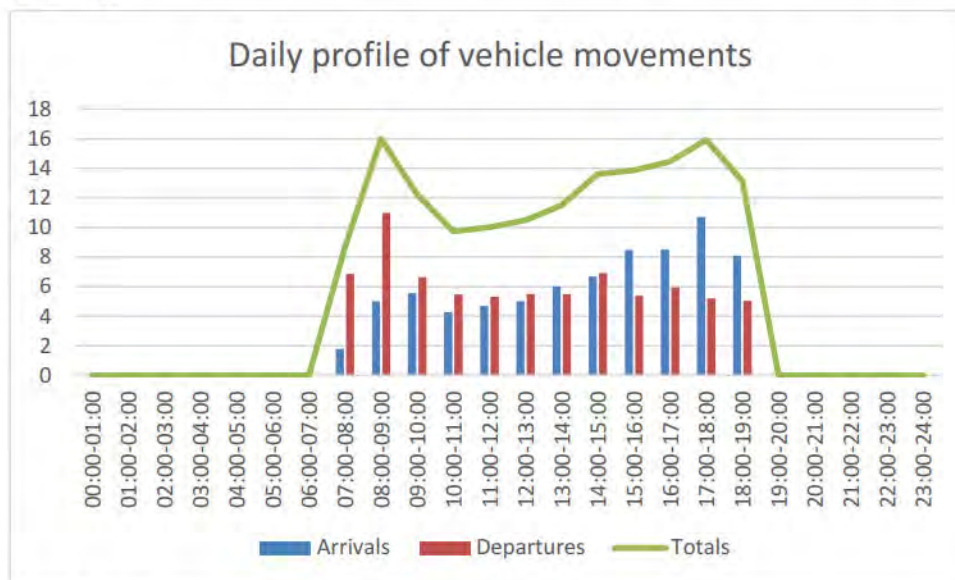


Chart 1: Vehicular Trips for 22 private dwellings (Proposed Use)

- 3.27 During the AM peak hour (08:00-09:00) it is anticipated that the proposed development could attract 3 vehicle movements (arrivals) and produce 7 vehicle movements (departures). To put this in context, vehicle movements per hour equates to on average, no more than one movement every six minutes. This is not considered to be significant.
- 3.28 During the PM peak hour (17:00-18:00) it is anticipated that the proposed development could attract 7 vehicle movements (arrivals) and produce 3 vehicle movements (departures). To put this in context, vehicle movements per hour equates to on average, no more than one movement every six minutes. This is not considered to be significant.
- 3.29 The TRICS data suggests that, based on typical trip rates for residential, the proposed development has the potential to generate around 46 arrivals and 44 departures per day. The development is likely to be at its busiest during the morning and evening peak hours and the data suggests that 10 vehicle movements will be generated during its busiest hours (08:00-09:00 and 17:00-18:00).

Mode Share

- 3.30 Of the total movements it is anticipated that, 23% of the total movements would walk or cycle, 1% would use taxis, 3% would use public transport, 1% would use ordinary goods vehicles and the remaining 73% would travel by private vehicle. This is represented graphically in **Chart 2**.

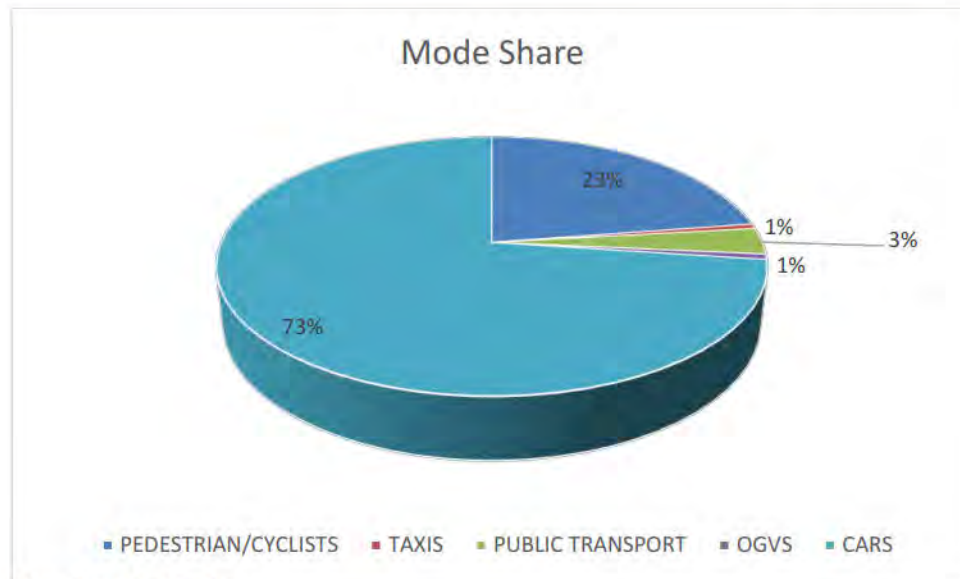


Chart 2: Mode share

Trip Distribution

- 3.31 Trip distribution refers to the estimate of origins and destinations of the new generated trips to and from the development site, which needs to be assigned across the highway network. Route assignment concerns the selection of routes between origin and destination. At this stage, the generated traffic volumes have been distributed and assigned to the adjacent road system.
- 3.32 The residents will use the access onto Llantrisant Road to access and depart from the site. It is anticipated that most will depart and arrive from the south-east (90%) using the A4119 Llantrisant Road, Cardiff direction. The remaining smaller proportion (10%) will travel in the north-west direction to access the M4 corridor at Junction 34.

Conclusion

- 3.33 This section has reviewed the proposed development and the mitigation measures, and it has concluded the following:
- 3.34 **Site Access Scheme and Parking:** A simple T-junction access to the development site is proposed at its connection with Llantrisant Road. The internal layout will be designed where pedestrians and cyclists will have priority over motorised traffic.
- 3.35 **Pedestrian and Cycle Facilities and Routes:** The development site is surrounded by good pedestrian facilities, with footways provided as part of the site access junction connecting the site with the local pedestrian network on Llantrisant Road. A number of footpaths are located within close proximity to the development that provide recreational routes to other areas of Capel Llanilltern.
- 3.36 **Public Transport:** There are several bus stops located within close proximity to the development site providing frequent access to the main towns of Cardiff and Tonypanydy/ Maerdy.

4 SCOPE OF RESIDENTIAL TRAVEL PLAN

Introduction

- 4.1 It is recognised that Travel Plans are an important means of influencing transport to and from a given site. They provide a framework within which to address the important aims of cutting down on the proportion of journeys taken by single occupancy cars and increasing the use of more sustainable transport modes. They have an important role to play in the minimisation of the negative impacts of car travel including pollution and congestion.
- 4.2 A Travel Plan (TP) is an important tool for delivering accessible and sustainable communities and can act as a mechanism for ensuring that a sustainable access to a proposed new community is considered from the earliest stages of development.
- 4.3 A Travel Plan will provide a package of measures for:
- Minimising the number and length of car trips generated by a development;
 - Supporting more sustainable travel; and
 - Reducing the need to travel.
- 4.4 The Travel Plan will incorporate a series of objectives and targets that will set up a strategy to achieve the main aims of minimising the adverse impact caused by use of the private car and maximise the use of more sustainable modes of transport.
- 4.5 Travel planning for residential developments has the potential to help achieve more sustainable communities by improving their accessibility. In the past, new housing development has been characterised by high car trip generation. However, better choices about the location and density of new housing combined with the use of TPs should have a real impact on travel patterns and aid progress toward sustainable transport and land use objectives.
- 4.6 Travel behaviour change is more likely to come about when other changes are already happening (i.e. a house move) and therefore targeting new residential developments often provides a timely intervention when travel patterns are more likely to be predisposed to change and travel habits broken.
- 4.7 To this end, a detailed TP will be implemented for the proposed development in order to reduce the impact of the development on the surrounding road network by outlining measures to maximise the use of non-car modes of transport.
- 4.8 The TP for the development has been prepared in accordance with DfT's "Good Practice Guidelines: Delivering Travel Plans through the Planning Process" from April 2009. The Good Practice Guidelines states that Travel Plans should include relevant targets and measures to ensure that these can be achieved, as well as monitoring and management arrangements.

Objectives of the Travel Plan

- 4.9 The main objectives of the TPs are to:
- Reduce the need for unnecessary travel to and from the development and assist those who need to travel to do so by sustainable modes;
 - Achieve a minimum number of additional single occupancy car traffic movements to and from the development;

- Encourage those travelling to and from the development to use public transport, cycle, walk and car share in a safe and secure manner;
- Provide adequately for those with mobility difficulties; and
- Promote healthy lifestyles and sustainable, vibrant local communities by extending the benefits of the TPs through the local area where possible.

Proposed Travel Plan Targets and Measures

- 4.10 Setting targets is essential in assessing whether or not the Travel Plan has been successful and where, if necessary, improvements/amendments could be made. These targets should be SMART:
- Specific;
 - Measurable;
 - Achievable;
 - Realistic; and
 - Time-bound.
- 4.11 The TP then provides a series of measures that will be implemented and will have regard to the following hierarchy:
- Walking;
 - Cycling;
 - Public Transport; and
 - Vehicles.
- 4.12 The TP will combine site specific “hard measures” related to the provision of infrastructure works with “soft measures” such as marketing and promotion. The proposed measures will be appropriate to the site, realistic, and likely to affect travel behaviour. Restrictions related to the modes wished to be limited will be combined with incentives to attract people to more sustainable measures.

Implementation

- 4.13 A Travel Plan Co-ordinator will be appointed for the development in order to oversee and be responsible for the TP, implement the proposed measures and ensure that the information is kept up to date and relevant.
- 4.14 The TP Co-ordinator could be a representative from the developer, an external consultant or a member of the site management committee.
- 4.15 In terms of sources of information, Travel Packs will be provided to each dwelling providing information on local walking/cycling facilities, public transport routes in the area and car sharing initiatives.

Maintaining and Monitoring

- 4.16 The Travel Plan will be an iterative document that will evolve over the years and will require a process of monitoring and review in order to check the effectiveness of the measures that are introduced.
- 4.17 A survey will be conducted a year after first occupation of the full development in order to collect data on travel choices, behaviour for all travel purposes and modes of transport.

- 4.18 Preliminary targets can then be set for the development in discussion with the Travel Plan Officer from Cardiff Council. The target is likely to be that single occupancy car trips should be reduced by between 5% and 10% within a five-year period.
- 4.19 Continued monitoring of the travel patterns of the new residents will be achieved by carrying out at least one more travel surveys during the five-year period of implementation of the Travel Plan, recording information of how people are travelling, and, more importantly, what might encourage them to travel differently. After the survey, there should be liaison with the Travel Plan Officer from Cardiff Council in order to revise and amend the targets as necessary.

5 SUMMARY AND CONCLUSIONS

Introduction

- 5.1 This document has been prepared in support of an application for a residential development of 22 dwellings on Land at The Old Forge, Llantrisant Road, Capel Llanilltern.

Existing Conditions

- 5.2 The site is well located in terms of access to the local road network. The main road within the study area is the A4119 Llantrisant Road.
- 5.3 There are regular local bus services serving the local towns and railway station in Cardiff that services a range of destinations.

Policy Review

- 5.4 The proposed development meets the objectives of national policy, as set out in the Planning Policy Wales (PPW) and supports the aims of current government planning guidance on the integration of land use planning and transport for a number of reasons, inter-alia:
- it encourages walking through the provision of a new footway and a network of footpaths throughout the development;
 - at the local level, Cardiff Council transport policy aspirations build upon national policy by seeking to reduce reliance on the car and encourage the use of non-car modes of transport.
- 5.5 The development proposals accord with the objectives of the adopted Local Plan in that they seek to promote travel on foot, cycle and by public transport for residents and the provision of sufficient on-site parking spaces.
- 5.6 The proposed development would accord with these policies and would also be integrated into the existing built up areas, thus enabling its residents and visitors to readily access other facilities.

Accident Data

- 5.7 We have examined the personal injury accident records in detail for the highway links and junctions in the vicinity of the site for the 5 years 2015 to 2019. This information does not identify any major accident problems on the surrounding highway network.
- 5.8 We have established from the recent personal injury accident history that there is not an identified accident problem along the local highway network in the vicinity of the proposed site.
- 5.9 Evidence shows that no serious personal injury accidents were recorded on local road links. As such, the development traffic movements associated with the development proposals should not have a detrimental effect on highway safety.

Proposed Development

- 5.10 The proposed development will comprise a residential development of 22 dwellings accessed via a new simple priority T- junction off Llantrisant Road.
- 5.11 Access to these facilities by non-motorised modes will be encouraged through the provision of footways. The layout of the development will be designed to minimise the walking distance to the public transport infrastructure.

- 5.12 Networks of footways are included throughout the site which connect and integrate various elements of the development. The proposed routes will connect to the existing public rights of way on the periphery of the site providing safe routes to and from the local area.
- 5.13 Parking will be provided in accordance with current standards as indicated by Cardiff Council.

Traffic Generation, Distribution and Assignment

- 5.14 It is expected that the proposed development would exhibit higher levels of trips by car than foot, cycle and bus due to its location and the nature of the development.
- 5.15 All vehicles will enter and leave the site via the new access junction, being the shortest distance to the wider highway network.

Impact on the Local Highway Network

- 5.16 During the AM peak hour it is anticipated that the proposed development could attract 3 vehicle movements (arrivals) and produce 7 vehicle movements (departures).
- 5.17 During the PM peak hour it is anticipated that the proposed development could attract 7 vehicle movements (arrivals) and produce 3 vehicle movements (departures).
- 5.18 It has been concluded that the highway network can satisfactorily accommodate the predicted traffic flows when the development is operational.

Overall Conclusion

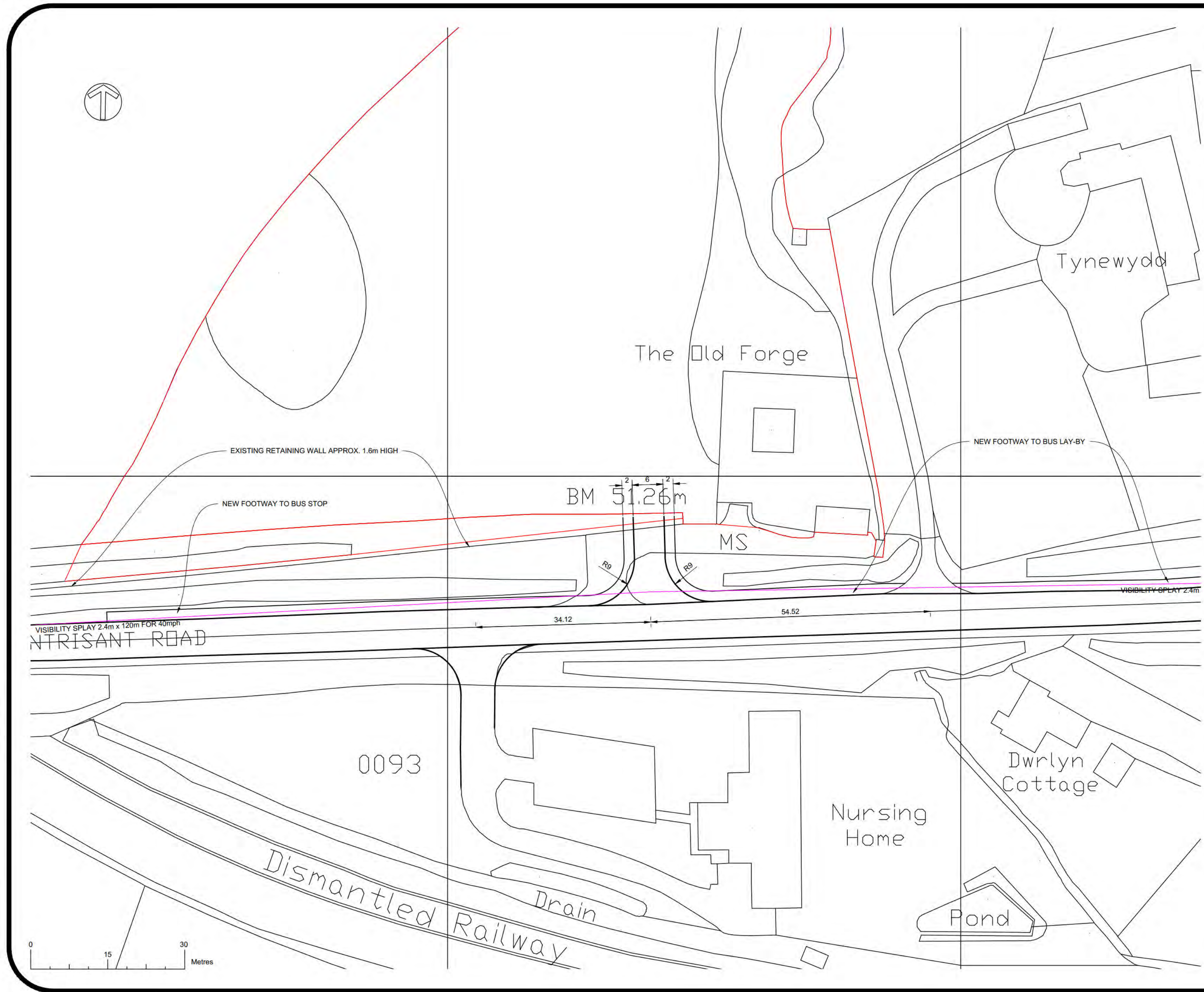
- 5.19 This report has investigated the transport implications of the development proposals for the residential development proposed on Land at The Old Forge, Llantrisant Road, Capel Llanilltern.
- 5.20 It identifies that there are no accident black spots on the surrounding highway network; that there will be negligible impact on the free flow of traffic using the highways; and that they will not be significantly compromised.
- 5.21 Therefore, we conclude that this development is appropriate and acceptable in traffic and transport terms. It is considered that the increases in traffic movements associated with the development proposals at this location would be accommodated on the highway network and not have a detrimental impact on the free flow of traffic due to the existing volumes of traffic using the local highway network.

Closure

- 5.22 LvW Highways Ltd has prepared this report with all reasonable skill, care and diligence, and taking account of the manpower and resources devoted to it by agreement with the client. Information reported herein is based on interpretation of data collected has been accepted in good faith as being accurate and fair.
- 5.23 This report is for the exclusive use of Mr & Mrs McDonald no warranties or guarantees are expressed or should be inferred by any third parties. This report may not be relied upon by other parties without written consent from LvW Highways Ltd.
- 5.24 LvW Highways Ltd disclaims any responsibility to the client and others in respect of any matters outside the agreed scope of work.

APPENDIX A

Access Junction Plan



General Notes

1. ALL DIMENSIONS ARE INDICATIVE AND IN METRES UNLESS NOTED OTHERWISE.
2. DO NOT SCALE THIS DRAWING, USE FIGURED DIMENSIONS ONLY.
3. ALL LEVELS ARE IN METRES ABOVE ORDNANCE DATUM (AOD) BASED ON THE TOPOGRAPHICAL SURVEY DRAWING SUPPLIED BY THE CLIENT.
4. ANY DISCREPANCIES TO BE REPORTED TO THE ENGINEER.
5. THIS DRAWING IS TO BE READ IN CONJUNCTION WITH ALL OTHER RELEVANT ARCHITECTS AND ENGINEERS DRAWINGS AND SPECIFICATIONS.
6. THE SPECIFICATION IN ALL ASPECTS SHALL BE IN ACCORDANCE WITH THE CURRENT RESIDENTIAL DESIGN GUIDE AND SPECIFICATION IN FORCE WITHIN THE COUNTY AT THE TIME OF CONSTRUCTION.
7. COPYRIGHT OF THIS DRAWING IS RETAINED BY THE ENGINEER AND IT MUST NOT BE REPRODUCED IN WHOLE OR PART WITHOUT WRITTEN CONSENT.

A	For Discussion	12.01.2021
No.	Revision/Issue	Date

Firm Name and Address

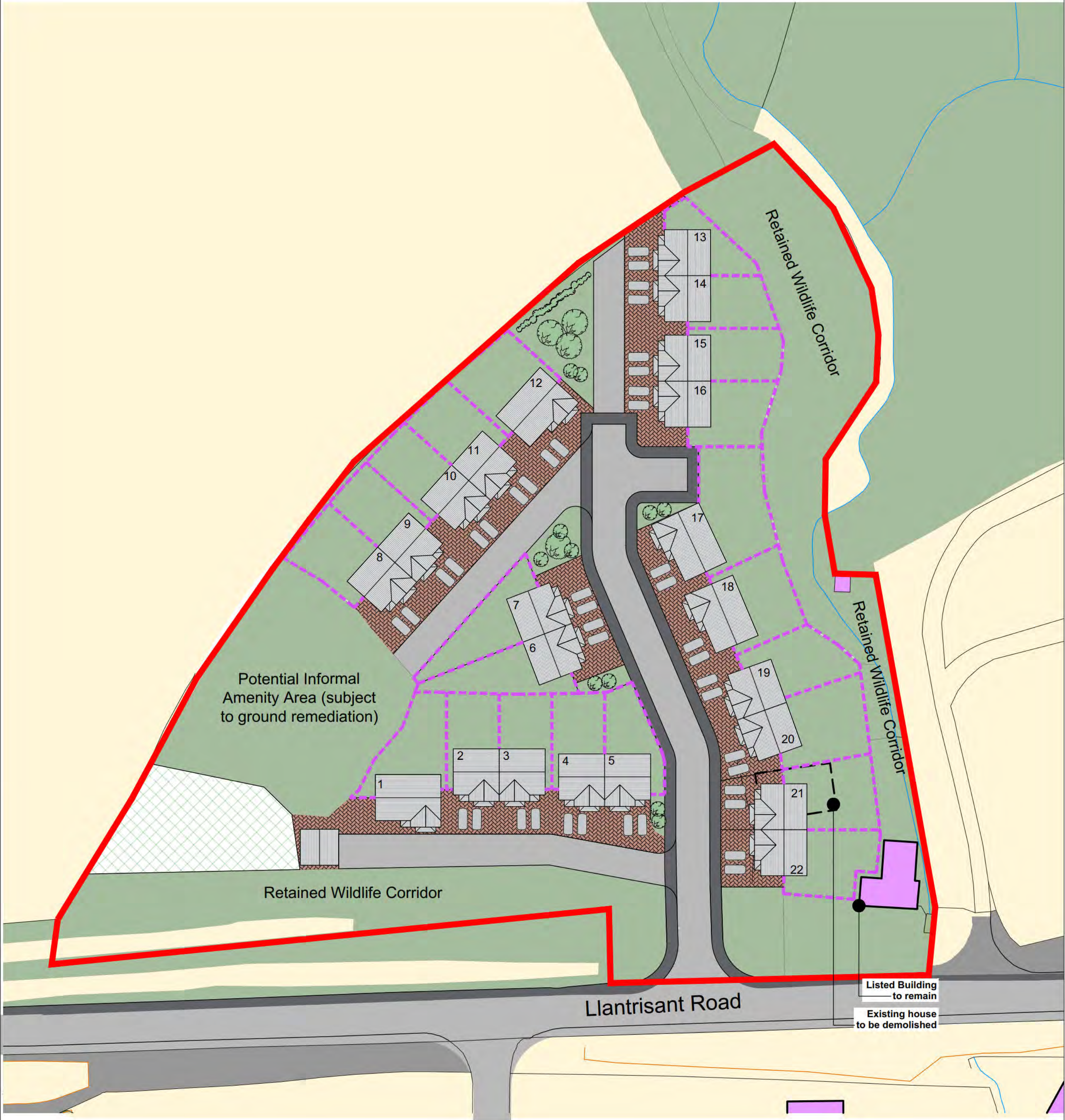
LvW
Highways

LvW Highways Ltd
Blanyparc
Fellingwm Uchaf
Carmarthen
SA32 7PR
Tel: 01267 290769
Mob: 07769 226695

Project Name and Address

THE OLD FORGE,
Llantrisant Road, Cardiff.
Proposed site access
with 2.4m x 120m
visibility splays

Project	2021-581	Sheet	SK01
Date	12.01.2021		
Scale	1:500@A2L		



NOTES		REVISIONS		CLIENT:						
<div>Dwelling Gross Floor Area (estimate):<ul style="list-style-type: none">• Detached: 107m²• Semi-detached: 78m²</div> <div>Total Road Length (estimate):<ul style="list-style-type: none">• Adopted: 125m• Private: 133m</div> <div></div>	<div>Ordnance Survey, (c) Crown Copyright 2021. All rights reserved. Licence number 100022432</div>	Rev	Comment	By	Date					
		A	Layout Amended	AV	10.03.2021					
		B	Property Boundary Amended	AV	12.03.2021					
		C	Layout Amended	AV	24.03.2021					
		D	Page Size Amended	AV	08.04.2021					
		E	Details Added	AV	23.04.2021					
		THIS DRAWING IS THE COPYRIGHT OF DARKIN ARCHITECTS AND MAY NOT BE COPIED, ALTERED OR REPRODUCED IN ANY FORM OR PASSED TO A THIRD PARTY WITHOUT THEIR CONSENT. DIMENSIONS MUST BE CHECKED AND VERIFIED ON SITE AND ANY DISCREPANCIES SHOULD BE REPORTED TO THE ARCHITECT. THIS DRAWING MUST NOT BE SCALED AND SHOULD BE READ IN CONJUNCTION WITH ALL OTHER CONSULTANT'S DRAWINGS. IF IN DOUBT ASK FOR CONFIRMATION.								
		DATE: 08.02.2021				SCALE: 1:500	DRAWN BY: AV	REP: NC080	DRAWING NO: 003	REV: E
		CARDIFF 02921 197 196 LLANELLI 01554 778 730 NEATH 01639 368 000 info@darkinarchitects.com								
© Copyright Darkin Architects 2021										
RIBA				drawing on experience						
Chartered Practice										

APPENDIX B

TRICS Output

Calculation Reference: AUDIT-452201-210127-0144

TRIP RATE CALCULATION SELECTION PARAMETERS:

Land Use : 03 - RESIDENTIAL
Category : A - HOUSES PRIVATELY OWNED

MULTI-MODAL TOTAL VEHICLES

Selected regions and areas:

02	SOUTH EAST	
	HC HAMPSHIRE	1 days
	KC KENT	1 days
	SC SURREY	1 days
	WS WEST SUSSEX	1 days
03	SOUTH WEST	
	SM SOMERSET	2 days
04	EAST ANGLIA	
	NF NORFOLK	1 days
	SF SUFFOLK	1 days
05	EAST MIDLANDS	
	LE LEICESTERSHIRE	1 days
07	YORKSHIRE & NORTH LINCOLNSHIRE	
	NY NORTH YORKSHIRE	1 days
08	NORTH WEST	
	CH CHESHIRE	1 days
09	NORTH	
	DH DURHAM	2 days
10	WALES	
	PS POWYS	1 days
12	CONNAUGHT	
	CS SLIGO	2 days
	LT LETTRIM	1 days
	RO ROSCOMMON	1 days

This section displays the number of survey days per TRICS® sub-region in the selected set

Primary Filtering selection:

This data displays the chosen trip rate parameter and its selected range. Only sites that fall within the parameter range are included in the trip rate calculation.

Parameter: No of Dwellings
Actual Range: 24 to 159 (units:)
Range Selected by User: 4 to 50 (units:)

Parking Spaces Range: All Surveys Included

Parking Spaces per Dwelling Range: All Surveys Included

Bedrooms per Dwelling Range: All Surveys Included

Percentage of dwellings privately owned: All Surveys Included

Public Transport Provision:

Selection by: Include all surveys

Date Range: 01/01/12 to 08/10/20

This data displays the range of survey dates selected. Only surveys that were conducted within this date range are included in the trip rate calculation.

Selected survey days:

Monday	3 days
Tuesday	6 days
Thursday	6 days
Friday	3 days

This data displays the number of selected surveys by day of the week.

Selected survey types:

Manual count	18 days
Directional ATC Count	0 days

This data displays the number of manual classified surveys and the number of unclassified ATC surveys, the total adding up to the overall number of surveys in the selected set. Manual surveys are undertaken using staff, whilst ATC surveys are undertaken using machines.

Selected Locations:

Suburban Area (PPS6 Out of Centre)	8
Neighbourhood Centre (PPS6 Local Centre)	10

This data displays the number of surveys per main location category within the selected set. The main location categories

This data displays the number of surveys per location sub-category within the selected set. The location sub-categories consist of Commercial Zone, Industrial Zone, Development Zone, Residential Zone, Retail Zone, Built-Up Zone, Village, Out of Town, High Street and No Sub Category.

Secondary Filtering selection:

Use Class:

C3	18 days
----	---------

This data displays the number of surveys per Use Class classification within the selected set. The Use Classes Order 2005 has been used for this purpose, which can be found within the Library module of TRICS®.

Population within 500m Range:

All Surveys Included

Population within 1 mile:

1,000 or Less	3 days
1,001 to 5,000	8 days
5,001 to 10,000	7 days

This data displays the number of selected surveys within stated 1-mile radii of population.

Population within 5 miles:

5,000 or Less	2 days
5,001 to 25,000	4 days
25,001 to 50,000	5 days
50,001 to 75,000	3 days
75,001 to 100,000	4 days

This data displays the number of selected surveys within stated 5-mile radii of population.

Car ownership within 5 miles:

0.6 to 1.0	3 days
1.1 to 1.5	11 days
1.6 to 2.0	4 days

This data displays the number of selected surveys within stated ranges of average cars owned per residential dwelling, within a radius of 5-miles of selected survey sites.

Travel Plan:

Yes	3 days
No	15 days

This data displays the number of surveys within the selected set that were undertaken at sites with Travel Plans in place, and the number of surveys that were undertaken at sites without Travel Plans.

PTAL Rating:

No PTAL Present	18 days
-----------------	---------

This data displays the number of selected surveys with PTAL Ratings.

Covid-19 Restrictions	Yes	At least one survey within the selected data set was undertaken at a time of Covid-19 restrictions
-----------------------	-----	--

LIST OF SITES relevant to selection parameters

1	CH-03-A-11	TOWN HOUSES		CESHIRE
	LONDON ROAD			
	NORTHWICH			
	LEFTWICH			
	Suburban Area (PPS6 Out of Centre)			
	Residential Zone			
	Total No of Dwellings:	24		
	Survey date: THURSDAY	06/06/19	Survey Type: MANUAL	
2	CS-03-A-03	MIXED HOUSES		SLIGO
	TOP ROAD			
	STRANDHILL			
	STRANDHILL			
	Neighbourhood Centre (PPS6 Local Centre)			
	Village			
	Total No of Dwellings:	30		
	Survey date: THURSDAY	27/10/16	Survey Type: MANUAL	
3	CS-03-A-04	DETACHED & SEMI-DETACHED		SLIGO
	R292			
	STRANDHILL			
	Neighbourhood Centre (PPS6 Local Centre)			
	Village			
	Total No of Dwellings:	63		
	Survey date: THURSDAY	27/10/16	Survey Type: MANUAL	
4	DH-03-A-01	SEMI DETACHED		DURHAM
	GREENFIELDS ROAD			
	BISHOP AUCKLAND			
	Suburban Area (PPS6 Out of Centre)			
	Residential Zone			
	Total No of Dwellings:	50		
	Survey date: TUESDAY	28/03/17	Survey Type: MANUAL	
5	DH-03-A-02	MIXED HOUSES		DURHAM
	LEAZES LANE			
	BISHOP AUCKLAND			
	ST HELEN AUCKLAND			
	Neighbourhood Centre (PPS6 Local Centre)			
	Residential Zone			
	Total No of Dwellings:	125		
	Survey date: MONDAY	27/03/17	Survey Type: MANUAL	
6	HC-03-A-23	HOUSES & FLATS		HAMPSHIRE
	CANADA WAY			
	LIPHOOK			
	Suburban Area (PPS6 Out of Centre)			
	Residential Zone			
	Total No of Dwellings:	62		
	Survey date: TUESDAY	19/11/19	Survey Type: MANUAL	
7	KC-03-A-08	MIXED HOUSES		KENT
	MAIDSTONE ROAD			
	CHARING			
	Neighbourhood Centre (PPS6 Local Centre)			
	Village			
	Total No of Dwellings:	159		
	Survey date: TUESDAY	22/05/18	Survey Type: MANUAL	
8	LE-03-A-02	DETACHED & OTHERS		LEICESTERSHIRE
	MELBOURNE ROAD			
	IBSTOCK			
	Neighbourhood Centre (PPS6 Local Centre)			
	Village			
	Total No of Dwellings:	85		
	Survey date: THURSDAY	28/06/18	Survey Type: MANUAL	
9	LT-03-A-01	SEMI-DETACHED & DETACHED		LEITRIM
	ARD NA SI			
	CARRICK-ON-SHANNON			
	ATTIRORY			
	Suburban Area (PPS6 Out of Centre)			
	Residential Zone			
	Total No of Dwellings:	90		
	Survey date: FRIDAY	24/04/15	Survey Type: MANUAL	

LIST OF SITES relevant to selection parameters (Cont.)

10	NF-03-A-01	SEMI DET. & BUNGALOWS	NORFOLK
	YARMOUTH ROAD		
	CAISTER-ON-SEA		
	Suburban Area (PPS6 Out of Centre)		
	Residential Zone		
	Total No of Dwellings:	27	
	Survey date: TUESDAY	16/10/12	Survey Type: MANUAL
11	NY-03-A-09	MIXED HOUSING	NORTH YORKSHIRE
	GRAMMAR SCHOOL LANE		
	NORTHALLERTON		
	Suburban Area (PPS6 Out of Centre)		
	Residential Zone		
	Total No of Dwellings:	52	
	Survey date: MONDAY	16/09/13	Survey Type: MANUAL
12	PS-03-A-02	DETACHED/SEMI-DETACHED	POWYS
	GUNROG ROAD		
	WELSHPOOL		
	Suburban Area (PPS6 Out of Centre)		
	Residential Zone		
	Total No of Dwellings:	28	
	Survey date: MONDAY	11/05/15	Survey Type: MANUAL
13	RO-03-A-04	SEMI DET. & BUNGALOWS	ROSCOMMON
	EAGLE COURT		
	ROSCOMMON		
	ARDNANAGH		
	Suburban Area (PPS6 Out of Centre)		
	Residential Zone		
	Total No of Dwellings:	39	
	Survey date: FRIDAY	26/09/14	Survey Type: MANUAL
14	SC-03-A-06	MIXED HOUSES & FLATS	SURREY
	AMLETS LANE		
	CRANLEIGH		
	Neighbourhood Centre (PPS6 Local Centre)		
	Village		
	Total No of Dwellings:	116	
	Survey date: THURSDAY	08/10/20	Survey Type: MANUAL
15	SF-03-A-06	DETACHED & SEMI-DETACHED	SUFFOLK
	BURY ROAD		
	KENTFORD		
	Neighbourhood Centre (PPS6 Local Centre)		
	Village		
	Total No of Dwellings:	38	
	Survey date: FRIDAY	22/09/17	Survey Type: MANUAL
16	SM-03-A-02	MIXED HOUSES	SOMERSET
	HYDE LANE		
	NEAR TAUNTON		
	CREECH SAINT MICHAEL		
	Neighbourhood Centre (PPS6 Local Centre)		
	Village		
	Total No of Dwellings:	42	
	Survey date: TUESDAY	25/09/18	Survey Type: MANUAL
17	SM-03-A-03	MIXED HOUSES	SOMERSET
	HYDE LANE		
	NEAR TAUNTON		
	CREECH ST MICHAEL		
	Neighbourhood Centre (PPS6 Local Centre)		
	Village		
	Total No of Dwellings:	41	
	Survey date: TUESDAY	25/09/18	Survey Type: MANUAL

LIST OF SITES relevant to selection parameters (Cont.)

18	WS-03-A-07	BUNGALOWS	WEST SUSSEX
	EMMS LANE		
	NEAR HORSHAM		
	BROOKS GREEN		
	Neighbourhood Centre (PPS6 Local Centre)		
	Village		
	Total No of Dwellings:	57	
	Survey date: THURSDAY	19/10/17	Survey Type: MANUAL

This section provides a list of all survey sites and days in the selected set. For each individual survey site, it displays a unique site reference code and site address, the selected trip rate calculation parameter and its value, the day of the week and date of each survey, and whether the survey was a manual classified count or an ATC count.

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED
MULTI-MODAL TOTAL VEHICLES
Calculation factor: 1 DWELLS
BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	18	63	0.050	18	63	0.199	18	63	0.249
08:00 - 09:00	18	63	0.141	18	63	0.319	18	63	0.460
09:00 - 10:00	18	63	0.156	18	63	0.193	18	63	0.349
10:00 - 11:00	18	63	0.120	18	63	0.159	18	63	0.279
11:00 - 12:00	18	63	0.132	18	63	0.154	18	63	0.286
12:00 - 13:00	18	63	0.141	18	63	0.160	18	63	0.301
13:00 - 14:00	18	63	0.169	18	63	0.160	18	63	0.329
14:00 - 15:00	18	63	0.188	18	63	0.201	18	63	0.389
15:00 - 16:00	18	63	0.238	18	63	0.157	18	63	0.395
16:00 - 17:00	18	63	0.239	18	63	0.173	18	63	0.412
17:00 - 18:00	18	63	0.301	18	63	0.151	18	63	0.452
18:00 - 19:00	18	63	0.227	18	63	0.146	18	63	0.373
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:	2.102			2.172			4.274		

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

*To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP*FACT. Trip rates are then rounded to 3 decimal places.*

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Parameter summary

Trip rate parameter range selected:
Survey date date range:
Number of weekdays (Monday-Friday):
Number of Saturdays:
Number of Sundays:
Surveys automatically removed from selection:
Surveys manually removed from selection:

24 - 159 (units:)
01/01/12 - 08/10/20
18
0
0
4
0

This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are show. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED
MULTI-MODAL TAXIS
Calculation factor: 1 DWELLS
BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	18	63	0.003	18	63	0.001	18	63	0.004
08:00 - 09:00	18	63	0.002	18	63	0.004	18	63	0.006
09:00 - 10:00	18	63	0.002	18	63	0.001	18	63	0.003
10:00 - 11:00	18	63	0.002	18	63	0.004	18	63	0.006
11:00 - 12:00	18	63	0.002	18	63	0.002	18	63	0.004
12:00 - 13:00	18	63	0.001	18	63	0.000	18	63	0.001
13:00 - 14:00	18	63	0.002	18	63	0.003	18	63	0.005
14:00 - 15:00	18	63	0.000	18	63	0.000	18	63	0.000
15:00 - 16:00	18	63	0.003	18	63	0.003	18	63	0.006
16:00 - 17:00	18	63	0.003	18	63	0.003	18	63	0.006
17:00 - 18:00	18	63	0.003	18	63	0.002	18	63	0.005
18:00 - 19:00	18	63	0.000	18	63	0.000	18	63	0.000
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:	0.023			0.023			0.046		

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

*To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP*FACT. Trip rates are then rounded to 3 decimal places.*

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED
MULTI-MODAL OGVS
 Calculation factor: 1 DWELLS
 BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	18	63	0.002	18	63	0.002	18	63	0.004
08:00 - 09:00	18	63	0.002	18	63	0.002	18	63	0.004
09:00 - 10:00	18	63	0.004	18	63	0.004	18	63	0.008
10:00 - 11:00	18	63	0.005	18	63	0.004	18	63	0.009
11:00 - 12:00	18	63	0.003	18	63	0.003	18	63	0.006
12:00 - 13:00	18	63	0.004	18	63	0.004	18	63	0.008
13:00 - 14:00	18	63	0.002	18	63	0.004	18	63	0.006
14:00 - 15:00	18	63	0.001	18	63	0.002	18	63	0.003
15:00 - 16:00	18	63	0.001	18	63	0.000	18	63	0.001
16:00 - 17:00	18	63	0.001	18	63	0.002	18	63	0.003
17:00 - 18:00	18	63	0.000	18	63	0.000	18	63	0.000
18:00 - 19:00	18	63	0.000	18	63	0.000	18	63	0.000
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.025			0.027			0.052

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

*To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP*FACT. Trip rates are then rounded to 3 decimal places.*

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED
MULTI-MODAL PSVS
 Calculation factor: 1 DWELLS
 BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	18	63	0.001	18	63	0.001	18	63	0.002
08:00 - 09:00	18	63	0.001	18	63	0.001	18	63	0.002
09:00 - 10:00	18	63	0.000	18	63	0.000	18	63	0.000
10:00 - 11:00	18	63	0.000	18	63	0.000	18	63	0.000
11:00 - 12:00	18	63	0.000	18	63	0.000	18	63	0.000
12:00 - 13:00	18	63	0.000	18	63	0.000	18	63	0.000
13:00 - 14:00	18	63	0.000	18	63	0.000	18	63	0.000
14:00 - 15:00	18	63	0.000	18	63	0.000	18	63	0.000
15:00 - 16:00	18	63	0.001	18	63	0.001	18	63	0.002
16:00 - 17:00	18	63	0.000	18	63	0.000	18	63	0.000
17:00 - 18:00	18	63	0.002	18	63	0.002	18	63	0.004
18:00 - 19:00	18	63	0.000	18	63	0.000	18	63	0.000
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.005			0.005			0.010

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

*To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP*FACT. Trip rates are then rounded to 3 decimal places.*

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED
MULTI-MODAL CYCLISTS
 Calculation factor: 1 DWELLS
 BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	18	63	0.001	18	63	0.012	18	63	0.013
08:00 - 09:00	18	63	0.004	18	63	0.019	18	63	0.023
09:00 - 10:00	18	63	0.001	18	63	0.011	18	63	0.012
10:00 - 11:00	18	63	0.008	18	63	0.002	18	63	0.010
11:00 - 12:00	18	63	0.002	18	63	0.004	18	63	0.006
12:00 - 13:00	18	63	0.006	18	63	0.001	18	63	0.007
13:00 - 14:00	18	63	0.002	18	63	0.000	18	63	0.002
14:00 - 15:00	18	63	0.005	18	63	0.001	18	63	0.006
15:00 - 16:00	18	63	0.012	18	63	0.003	18	63	0.015
16:00 - 17:00	18	63	0.014	18	63	0.007	18	63	0.021
17:00 - 18:00	18	63	0.012	18	63	0.012	18	63	0.024
18:00 - 19:00	18	63	0.010	18	63	0.011	18	63	0.021
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.077			0.083			0.160

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

*To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP*FACT. Trip rates are then rounded to 3 decimal places.*

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED
MULTI-MODAL VEHICLE OCCUPANTS
 Calculation factor: 1 DWELLS
BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	18	63	0.057	18	63	0.264	18	63	0.321
08:00 - 09:00	18	63	0.166	18	63	0.464	18	63	0.630
09:00 - 10:00	18	63	0.178	18	63	0.266	18	63	0.444
10:00 - 11:00	18	63	0.145	18	63	0.217	18	63	0.362
11:00 - 12:00	18	63	0.168	18	63	0.201	18	63	0.369
12:00 - 13:00	18	63	0.178	18	63	0.208	18	63	0.386
13:00 - 14:00	18	63	0.215	18	63	0.194	18	63	0.409
14:00 - 15:00	18	63	0.264	18	63	0.259	18	63	0.523
15:00 - 16:00	18	63	0.358	18	63	0.205	18	63	0.563
16:00 - 17:00	18	63	0.343	18	63	0.230	18	63	0.573
17:00 - 18:00	18	63	0.429	18	63	0.205	18	63	0.634
18:00 - 19:00	18	63	0.323	18	63	0.192	18	63	0.515
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:	2.824			2.905			5.729		

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

*To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP*FACT. Trip rates are then rounded to 3 decimal places.*

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED
MULTI-MODAL PEDESTRIANS
 Calculation factor: 1 DWELLS
 BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	18	63	0.012	18	63	0.066	18	63	0.078
08:00 - 09:00	18	63	0.057	18	63	0.157	18	63	0.214
09:00 - 10:00	18	63	0.081	18	63	0.067	18	63	0.148
10:00 - 11:00	18	63	0.039	18	63	0.065	18	63	0.104
11:00 - 12:00	18	63	0.058	18	63	0.042	18	63	0.100
12:00 - 13:00	18	63	0.063	18	63	0.046	18	63	0.109
13:00 - 14:00	18	63	0.050	18	63	0.051	18	63	0.101
14:00 - 15:00	18	63	0.066	18	63	0.044	18	63	0.110
15:00 - 16:00	18	63	0.147	18	63	0.088	18	63	0.235
16:00 - 17:00	18	63	0.098	18	63	0.068	18	63	0.166
17:00 - 18:00	18	63	0.079	18	63	0.036	18	63	0.115
18:00 - 19:00	18	63	0.058	18	63	0.045	18	63	0.103
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:	0.808			0.775			1.583		

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

*To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP*FACT. Trip rates are then rounded to 3 decimal places.*

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED
MULTI-MODAL BUS/TRAM PASSENGERS
 Calculation factor: 1 DWELLS
 BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	18	63	0.000	18	63	0.012	18	63	0.012
08:00 - 09:00	18	63	0.001	18	63	0.021	18	63	0.022
09:00 - 10:00	18	63	0.003	18	63	0.019	18	63	0.022
10:00 - 11:00	18	63	0.011	18	63	0.004	18	63	0.015
11:00 - 12:00	18	63	0.005	18	63	0.002	18	63	0.007
12:00 - 13:00	18	63	0.009	18	63	0.007	18	63	0.016
13:00 - 14:00	18	63	0.002	18	63	0.003	18	63	0.005
14:00 - 15:00	18	63	0.009	18	63	0.005	18	63	0.014
15:00 - 16:00	18	63	0.014	18	63	0.009	18	63	0.023
16:00 - 17:00	18	63	0.009	18	63	0.002	18	63	0.011
17:00 - 18:00	18	63	0.008	18	63	0.004	18	63	0.012
18:00 - 19:00	18	63	0.013	18	63	0.003	18	63	0.016
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:	0.084			0.091			0.175		

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

*To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP*FACT. Trip rates are then rounded to 3 decimal places.*

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED
MULTI-MODAL TOTAL RAIL PASSENGERS
Calculation factor: 1 DWELLS
BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	18	63	0.000	18	63	0.009	18	63	0.009
08:00 - 09:00	18	63	0.000	18	63	0.016	18	63	0.016
09:00 - 10:00	18	63	0.000	18	63	0.003	18	63	0.003
10:00 - 11:00	18	63	0.000	18	63	0.001	18	63	0.001
11:00 - 12:00	18	63	0.001	18	63	0.000	18	63	0.001
12:00 - 13:00	18	63	0.001	18	63	0.000	18	63	0.001
13:00 - 14:00	18	63	0.000	18	63	0.000	18	63	0.000
14:00 - 15:00	18	63	0.001	18	63	0.000	18	63	0.001
15:00 - 16:00	18	63	0.000	18	63	0.000	18	63	0.000
16:00 - 17:00	18	63	0.005	18	63	0.001	18	63	0.006
17:00 - 18:00	18	63	0.012	18	63	0.000	18	63	0.012
18:00 - 19:00	18	63	0.013	18	63	0.000	18	63	0.013
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.033			0.030			0.063

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

*To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP*FACT. Trip rates are then rounded to 3 decimal places.*

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED
MULTI-MODAL COACH PASSENGERS
 Calculation factor: 1 DWELLS
 BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	18	63	0.000	18	63	0.001	18	63	0.001
08:00 - 09:00	18	63	0.000	18	63	0.000	18	63	0.000
09:00 - 10:00	18	63	0.000	18	63	0.000	18	63	0.000
10:00 - 11:00	18	63	0.000	18	63	0.000	18	63	0.000
11:00 - 12:00	18	63	0.000	18	63	0.000	18	63	0.000
12:00 - 13:00	18	63	0.000	18	63	0.000	18	63	0.000
13:00 - 14:00	18	63	0.000	18	63	0.000	18	63	0.000
14:00 - 15:00	18	63	0.000	18	63	0.000	18	63	0.000
15:00 - 16:00	18	63	0.004	18	63	0.004	18	63	0.008
16:00 - 17:00	18	63	0.000	18	63	0.000	18	63	0.000
17:00 - 18:00	18	63	0.004	18	63	0.004	18	63	0.008
18:00 - 19:00	18	63	0.000	18	63	0.000	18	63	0.000
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.008			0.009			0.017

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

*To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP*FACT. Trip rates are then rounded to 3 decimal places.*

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED
MULTI-MODAL PUBLIC TRANSPORT USERS
 Calculation factor: 1 DWELLS
 BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	18	63	0.000	18	63	0.021	18	63	0.021
08:00 - 09:00	18	63	0.001	18	63	0.037	18	63	0.038
09:00 - 10:00	18	63	0.003	18	63	0.021	18	63	0.024
10:00 - 11:00	18	63	0.011	18	63	0.005	18	63	0.016
11:00 - 12:00	18	63	0.006	18	63	0.002	18	63	0.008
12:00 - 13:00	18	63	0.010	18	63	0.007	18	63	0.017
13:00 - 14:00	18	63	0.002	18	63	0.003	18	63	0.005
14:00 - 15:00	18	63	0.010	18	63	0.005	18	63	0.015
15:00 - 16:00	18	63	0.018	18	63	0.012	18	63	0.030
16:00 - 17:00	18	63	0.014	18	63	0.003	18	63	0.017
17:00 - 18:00	18	63	0.024	18	63	0.008	18	63	0.032
18:00 - 19:00	18	63	0.027	18	63	0.003	18	63	0.030
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:	0.126			0.127			0.253		

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

*To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP*FACT. Trip rates are then rounded to 3 decimal places.*

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED
MULTI-MODAL TOTAL PEOPLE
Calculation factor: 1 DWELLS
BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	18	63	0.070	18	63	0.363	18	63	0.433
08:00 - 09:00	18	63	0.227	18	63	0.676	18	63	0.903
09:00 - 10:00	18	63	0.262	18	63	0.365	18	63	0.627
10:00 - 11:00	18	63	0.203	18	63	0.289	18	63	0.492
11:00 - 12:00	18	63	0.233	18	63	0.249	18	63	0.482
12:00 - 13:00	18	63	0.257	18	63	0.262	18	63	0.519
13:00 - 14:00	18	63	0.269	18	63	0.247	18	63	0.516
14:00 - 15:00	18	63	0.345	18	63	0.309	18	63	0.654
15:00 - 16:00	18	63	0.535	18	63	0.308	18	63	0.843
16:00 - 17:00	18	63	0.470	18	63	0.308	18	63	0.778
17:00 - 18:00	18	63	0.544	18	63	0.261	18	63	0.805
18:00 - 19:00	18	63	0.417	18	63	0.251	18	63	0.668
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:	3.832			3.888			7.720		

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

*To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP*FACT. Trip rates are then rounded to 3 decimal places.*

Rhif Sylwedydd / Representor Number:

39

Rhif Sylw / Representation Number(s):

39.01 – 39.08

Enw Sylwedydd / Representor

Llandaff Society

Williams, Helen E (Planning)

From: [REDACTED]
Sent: 10 April 2025 16:49
To: Local Development Plan / Cynllun Datblygu Lleol
Subject: CARDIFF RLDP: RESPONSE TO DEPOSIT PLAN CONSULTATION
Attachments: Deposit_RLDP_Representations_Form 10 April 2025.docx

Follow Up Flag: Follow up
Flag Status: Completed

EXTERNAL: This email originated from outside Cardiff Council, take care when clicking links.

ALLANOL: Daw'r e-bost hwn o'r tu allan i Gyngor Caerdydd, cymerwch ofal wrth glicio ar ddolenni.

***** Warning: This email contains a Microsoft Office (Word, Excel, PowerPoint) or Adobe PDF attachment. Although this email has been scanned for threats, please think before opening attachments from unrecognised senders.**

Rhybudd: Mae'r e-bost hwn yn cynnwys atodiad Microsoft Office (Word, Excel, PowerPoint) neu PDF Adobe. Er bod yr e-bost hwn wedi'i sganio ar gyfer unrhyw fygythiadau, meddyliwch cyn agor atodiadau gan anfonwyr nad ydych yn eu hadnabod. ***

LLANDAFF SOCIETY RESPONSE TO THE RLDP DEPOSIT PLAN: APRIL 2025

1.1 On behalf of our 250 members we wish to propose wording changes to the Replacement Local Development Plan (RLDP) policies and urge the Council, and the Inspector appointed to examine it for soundness, to consider these - and our other comments - carefully. We have three general points (para 1.3), support the strengthened policy re Heritage, and suggest revised wording relating to:

- Transport;
- River Valleys, in particular the Taff River Corridor; and
- Infrastructure.

1.2 We believe that minor wording changes to the policies set out in the Deposit RLDP would contribute to the overall **soundness** of the plan by ensuring it:

- i. **fits** with Welsh Government and Cardiff Council policy, including Future Wales, the Well-being of Future Generations, and the demands of the climate and biodiversity emergencies;
 - ii. is **appropriate** in the context of other policies in the plan including sustainability, the chosen spatial strategy and environmental capacity; and
 - iii. is **deliverable**, providing a clear, consistent and logical framework for planning decisions;
- as required by Planning and Environment Wales (PEDW) Guidance on Examination Procedure published 28 November 2022.

1.3 We also urge the Council to:

- i. reduce duplication in the final version of the RLDP in order to make it clearer and more accessible to Cardiff's citizens;
- ii. focus on policies that make a significant difference to outcomes eg improved provision for walking and biodiversity to improve human wellbeing; and
- iii. strengthen policies to reduce flood risk from (the now inevitable) sea level rise, and to reduce the risk of surface water flooding.

HERITAGE

2.1 As the Civic Society for Llandaff our primary focus is on "protecting and enhancing" our precious heritage assets. We are thus pleased to see that the Deposit RLDP includes a separate category for Heritage with Historic Environment policy HE1. We welcome the fact that the policy is stronger and more comprehensive than EN9 in the Adopted LDP.

2.2 The significance of this policy is evident from HE1's sub-title "Safeguarding Cardiff's Heritage Assets" and the subsequent wording that "substantial weight will be given to (protecting these assets..... in decision-making)...." In addition, sub-paragraph 5 of the policy sets out specific requirements for Archaeology and Scheduled Monuments, Listed Buildings, Conservation Areas, Registered Historic Landscapes, Parks and Gardens, Locally Listed Buildings and Non-designated Heritage Assets - these additions are to be welcomed. We look forward to future Council decision-making on proposals affecting heritage assets and their settings reflecting the increased strength of protection to these assets signalled by this policy, in particular in relation to Rookwood Hospital.

2.3 The Society supports Policy H1.2 - the allocation of the redundant Rookwood Hospital for housing, provided that its significant heritage assets (Listed Grade 2 Rookwood House, Grade 2 Summer House and Grade 2 Registered Park and Gardens) are conserved sympathetically and the site's biodiversity is protected. The Society's members and local community are keen to help find a sustainable solution for Rookwood that will benefit current and future generations.

TRANSPORT

3.1 In addition to our interest on heritage we wish to raise concern about the practicality of achieving the ambitious target - set out in the Technical Report reflecting the Council's Transport White Paper - of achieving 75% of trips by sustainable modes (walking, cycling, public transport) by 2030, involving doubling cycling and bus journeys between 2018 and 2030, in view of the lack of resources needed to achieve this. Policy SP3: ENSURING A MASTERPLANNING APPROACH should be a tool that helps to deliver a shift from car travel to more sustainable and healthier modes. However, experience to date from developments that started from an overall Masterplan indicates that we can only look forward to more car-orientated development. S106 contributions to date have funded cycleways plus an hourly bus service (no: 62) from the City Centre to Rhydlafar on the same route as Stagecoach service 122, however the latter has been cut to 1/hr hour (from 3/hr 2 years ago), and service 124 City Centre to Maerdy (1 an hour) runs at virtually the same times. Service 62 has been provided from the outset by reducing frequencies through Radyr and Morganstown to a practically useless 1/hr. However, we welcome the recent improvements in the rail service via Danescourt Station.

3.2 Without more funding and a more robust approach to achieving:

- timely provision of local services,
- new footpaths and footways linking with existing ones to encourage more people to walk, and
- more frequent public transport,

there is likely to be a continuing increase in the number of vehicles travelling into and through Llandaff - along Western Avenue, Cardiff Road, Bridge Road and Llantrisant Road. This will not be helped by the introduction of charges at Llandaff High Street car park, as this is likely to result in more car journeys to superstores in other locations.

3.3 In our view Policy T4: MANAGING TRANSPORT IMPACTS is not strong enough to contribute to achieving the target without a change to Policy SP3 that includes an absolute requirement for health services, community facilities and local employment to be developed in tandem with housing on major sites such as those being built along Llantrisant Road. It also requires early delivery of the new bus hub at the Heath Hospital, as well the one planned for Waungron Park. We seriously question whether the Heath Bus Hub can be delivered without additional support from developer/landowner contributions. The only way that this can be achieved without having an impact on house purchase costs is for the majority of the extra cost to be borne by landowners, slightly reducing their profits from land sales.

RIVER VALLEYS

4.1 Finally we wish to draw your attention to the critical importance of much greater protection for our River Valleys, including that of the Taff. These are identified in the Key Diagram, and are clearly fundamental to the sustainability, climate resilience, landscape character and biodiversity of the City in a way that is on a par with the proposed Green Wedge and Settlement Boundary policies. The River Valleys have the potential to contribute to no fewer than 4 of the 11 Plan's Objectives by

- 4: responding to the climate emergency;
- 6: helping to create healthier environments and improved well-being;
- 8: preserving areas of rural tranquillity and calm within the city; and
- 10: increasing resilience of ecosystems including green and blue infrastructure.

However this effect would be harmed by any development apart from vital flood protection works.

4.2.1 Therefore we are convinced that the significance of the River Valleys must be reflected in the RLDP by strengthening SP13, adding the words in bold after "accessible and useable green and blue spaces..." **"including the strategically important River Valleys"**

4.2.2 And their significance in helping stem the continuing decline in the number and health of species must also be reflected by adding two words (in bold) to strengthen SP21 "v. Hydrological **and biodiversity** networks including strategically important river valleys of the Ely, Taff etc..."

4.2.3 We welcome CP4: RIVER CORRIDORS, which could be an improvement on LDP policy EN4. However we are concerned that protection for our river corridors - in particular the Taff - will not be sufficiently strong unless the words in italics **cause unacceptable*" (harm) *"to"* are deleted from the 1st paragraph, and *"provides appropriate mitigation"* and *"lead to unacceptable"* deleted from the 3rd paragraph, with five words inserted after "...harm." viz: **"the rivers or their setting."**

INFRASTRUCTURE

5.1 We support SP5: SECURING NEW INFRASTRUCTURE but were disappointed that there is no mention of Community Infrastructure Levy (CIL). In line with our comments at previous stages of consultation on this RLDP we urge the Council to specify CIL as a means of raising funds for strategic infrastructure for the City as a whole from the uplift in the value of land allocated for development on greenfield sites, in addition to S106 Planning Gain for on-site infrastructure.

Cardiff Council

Replacement Local Development Plan 2021–2036

Deposit Plan

Representations Form

We would like your views on the Cardiff Replacement Local Development Plan (RLDP) and also on documents which support the RLDP.

This form should be used for all representations (i.e. comments or objections). If you are submitting a paper copy, attach additional sheets as necessary.

This form has two parts: Part A (Personal details) and Part B (Your representation). Please note that Part B will be made publicly available and will be forwarded to the Planning Inspectorate.

Your representations must be received on or before 15th April 2025. Please return forms to:
LDP@cardiff.gov.uk LDP Team, Room 250 County Hall, Cardiff CF10 4UW

This form is available in Welsh / Mae'r ffurflen hon ar gael yn Gymraeg

PART A: Contact details

Your / your client's details		Agent's details (if relevant)
Name Kay S. Powell		
Organisation (where relevant) Llandaff Society		
Email address [REDACTED]		
[REDACTED]		
[REDACTED]		
Date 10 April 2025		

PART B: Your representation

Your name / organisation	Llandaff Society	
1. Which part(s) of the Plan (or supporting documents) are you commenting on?		
LDP policy or site allocation number(s)	HE1; HE1.2 / T4 / SP13; SP21; EN4 / SP5	
LDP paragraph or section number(s)		
LDP Proposals Map reference(s)	Key Diagram	
If your representation relates to a supporting document (e.g. the Sustainability Appraisal), insert the name(s) and reference(s) here.		
2. Before you set out your comments in detail, it would be helpful to know whether you think the Plan is sound and meets the procedural requirements.		
<i>For more information on soundness and procedural requirements, see the guidance notes.</i>		
I think the LDP is sound and meets procedural requirements.		
I think the LDP is unsound and should be changed.	x	
I think that the procedural requirements have not been met.		
3. Would you like the LDP to include a <u>new</u> policy, site allocation or paragraph?		
Tick <u>all</u> that apply.		
New site allocation		
New Policy	No, but revised wording of some policies	
New paragraph or supporting text	See our email	
4. If you want to add a new site allocation, have you previously submitted the site as a Candidate Site? If so, please give the Candidate Site name and reference (if known).		
Site name		
Site reference		
If you want to suggest a new site, please attach a site plan identifying the boundaries of the site you wish to be included in the Plan and provide details of its proposed use. You should consider whether it is necessary for this comments form to be accompanied by a sustainability appraisal. Where proposed changes to a development plan have significant sustainability effects, you will need to provide the		

relevant sustainability appraisal information. This information must be consistent with the scope and level of detail of the sustainability appraisal conducted by the Authority. It should also refer to the same baseline information in identifying the likely significant effects of the revised policy or new site.

5. Please set out your comments below.

Include all the information, evidence and supporting information necessary to support / justify your representation. Please indicate which soundness test(s) the LDP meets or does not meet, and why (see guidance notes for more information). This will help the Authority and the Inspector to understand the issues you raise. You will only be able to submit further information to the examination if the Inspector invites you to address matters that he or she may raise. Please note that the Inspector will not have access to comments you may have made in response to previous consultations.

Our accompanying email sets out our support for the strengthened heritage policy in the Deposit Plan. However wording changes are needed to strengthen other policies if the RLDP is to be judged sound. Specifically these **must** ensure:

- timely strategic infrastructure delivery serving the City as a whole, and
- protection of the natural environment, mitigation of flood risk and enhanced well-being for current and future generations in the Taff River Corridor.

Tick here if you are submitting additional material to support your representation.	X (No tick symbol on my laptop keyboard)
6. If you are objecting to the LDP, do you want to speak at a hearing session of the public examination? At this stage, you can only make comments in writing (these are called 'written representations'). However, everyone that wants to change the Plan can appear before and speak to the Inspector at a 'hearing session' during the public examination. But you should bear in mind that your written comments on this form will be given the same weight by the Inspector as those made verbally at a hearing session. Please also note that the Inspector will determine the most appropriate procedure for accommodating those who want to provide oral evidence.	
I do not want to speak at a public hearing and am happy for my written representations to be considered by the Inspector.	
I want to speak at a public hearing.	X
If you want to participate in a hearing, indicate below what you want to speak about (e.g. 'Housing site at Pen y Graig' or 'The overall housing target'). <div></div>	
8. If you wish to speak, it would be helpful if you could indicate in which language you would like to be heard.	
I wish to be heard in Welsh	
I wish to be heard in English.	X

Rhif Sylwedydd / Representor Number:	40
Rhif Sylw / Representation Number(s):	40.01
Enw Sylwedydd / Representor Name:	Judith James

From: [REDACTED]
To: [Local Development Plan / Cynllun Datblygu Lleol](#)
Subject: Consultation
Date: 10 April 2025 17:10:18

Hi

I'm a Roath resident and I'd like to voice my concern at the increasing number of electric bikes that are about. They're so fast and you can't hear them coming. I'm fearful that I'm going to get knocked over- I nearly did this morning.

These electric bikes are more like motorbikes and people are bombing around the flower gardens, recreation ground and that horrendous tarmac cycle lane. I'd like to see more community officers about who can charge the inconsiderates- it just seems to be lawless and a free for all. This is a serious accident waiting to happen.

My second point of concern are the increasing numbers of campervans and Motorhomes parked on Alder Road. They seem to be living there long term not just parking overnight. I don't want my local park to turn into an encampment. Not only are they taking up precious car parking spaces but their presence is unsightly and the smell of cannabis wafting from some of them is anti-social. Please change the parking situation and do not allow people to live there full-time.

Regards
Judith James

Sent from my iPhone

Rhif Sylwedydd / Representor Number:

41

Rhif Sylw / Representation Number(s):

41.01

Enw Sylwedydd / Representor Name:

Gypsy and Traveller Wales

Cardiff Council

Replacement Local Development Plan 2021–2036

Deposit Plan

Representations Form

We would like your views on the Cardiff Replacement Local Development Plan (RLDP) and also on documents which support the RLDP.

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This form has two parts: Part A (Personal details) and Part B (Your representation). Please note that Part B will be made publicly available and will be forwarded to the Planning Inspectorate.

Your representations must be received on or before 15th April 2025. Please return forms to:
LDP@cardiff.gov.uk LDP Team, Room 250 County Hall, Cardiff CF10 4UW

This form is available in Welsh / Mae'r ffurflen hon ar gael yn Gymraeg

PART A: Contact details

Your / your client's details		Agent's details (if relevant)
Name	Louisa Devonish	Dr Simon Ruston MRTPI
Organisation (where relevant)	Gypsies and Travellers Wales	
Email address		
Address		
Signed		
Date	8th April 2025	

PART B: Your representation

Your name / organisation

Gypsy Traveller Wales

1. Which part(s) of the Plan (or supporting documents) are you commenting on?

LDP policy or site allocation number(s)

H10 / H11

LDP paragraph or section number(s)

LDP Proposals Map reference(s)

If your representation relates to a supporting document (e.g. the Sustainability Appraisal), insert the name(s) and reference(s) here.

2. Before you set out your comments in detail, it would be helpful to know whether you think the Plan is sound and meets the procedural requirements.

For more information on soundness and procedural requirements, see the guidance notes.

I think the LDP is sound and meets procedural requirements.

I think the LDP is unsound and should be changed.

Yes

I think that the procedural requirements have not been met.

3. Would you like the LDP to include a new policy, site allocation or paragraph?

Tick all that apply.

New site allocation

New Policy

New paragraph or supporting text

4. If you want to add a new site allocation, have you previously submitted the site as a Candidate Site? If so, please give the Candidate Site name and reference (if known).

Site name

Site reference

If you want to suggest a new site, please attach a site plan identifying the boundaries of the site you wish to be included in the Plan and provide details of its proposed use. You should consider whether it is necessary for this comments form to be accompanied by a sustainability appraisal. Where proposed changes to a development plan have significant sustainability effects, you will need to provide the relevant sustainability appraisal information. This information must be consistent with the scope and level of detail of the sustainability appraisal conducted by the Authority. It should also refer to the same baseline information in identifying the likely significant effects of the revised policy or new site.

5. Please set out your comments below.

Include all the information, evidence and supporting information necessary to support / justify your representation. Please indicate which soundness test(s) the LDP meets or does not meet, and why (see guidance notes for more information). This will help the Authority and the Inspector to understand the issues you raise. You will only be able to submit further information to the examination if the Inspector invites you to address matters that he or she may raise. Please note that the Inspector will not have access to comments you may have made in response to previous consultations.

Gypsies and Traveller Wales is an Advice and Advocacy organisation that has been supporting the Gypsy and Traveller community in Cardiff since 1981, helping individuals access support across all areas of Social Welfare Law. We played a key role in conducting the interview phase of the Gypsy and Traveller Accommodation Assessments (GTAA) in both 2015 and 2021. In addition to our advisory services, we are actively involved in policy and rights-based work, as well as conducting research within the community. Since 2021, we have expanded our services to cover the Gwent local authorities. In 2024, we launched a Wales-wide telephone service, and as of April this year, we are proud to offer our advice services across Ceredigion, Carmarthenshire, Powys, and Pembrokeshire.

Our Cardiff based service works with the residents of Shirenewton and Rover Way.

We have some concerns about the proposed allocation H11.

First, we note that the site is only proposed on a temporary basis:

7.67 It is important to note that this site will be used to accommodate Gypsy and Traveller pitches on a temporary basis for a minimum of 10 years. This will enable work to progress on firming up proposals to improve and extend the existing Rover Way Gypsy and Traveller site to meet the need for new pitches identified in the GTAA. This work will also investigate options for improving and realigning Rover Way and the wider master planning of the Pengam Green area.

The residents of Rover Way have been waiting for many years for their site conditions to be improved. As such, we question the need for the site to be provided on a temporary basis as this will not provide certainty for the residents. The general expectation for the allocation of any accommodation in a local plan would be that it is provided on a permanent basis.

Turning to the issue of size, the deposit plan states:

7.71 In terms of potential capacity, the area is approximately 6.8 hectares in size. It could be developed for Gypsy and Travellers in a phased manner utilising existing access roads together with room for new internal landscaping to compliment strong and mature boundary planting forming the western site boundary which extends to the north and east providing a distinctive feature in the local landscape. Based on existing pitch densities, the temporary site can deliver around 80 pitches.

This would make it the largest site in Wales, and in all probability the largest socially provided site in the UK. The Welsh Government's site design guidance states:

*3.2 New sites should comprise 20 pitches or less, other than in exceptional circumstances and where **consultation and engagement have taken place with all stakeholders.***

3.3 Exceptional circumstances may include a decision to keep a large community together if households are being re-located from an unsustainable existing site or where local circumstances, including lack of suitable land or high levels of unmet pitch needs (as defined in the Gypsy and Traveller Accommodation Assessment) occur.

3.4 However, a high level of unmet need in the area would not necessarily suggest sites in excess of 20 pitches should be developed. Instead, Local Authorities should explore other avenues to develop smaller sites in the first instance.

3.5 Where larger sites are developed, Local Authorities should consider the possible impact of the site on community cohesion, access to services and environmental sustainability. It is important that the views of prospective residents and the surrounding local community are gathered during consideration of developing larger sites. [our emphasis].

It is not clear what specific engagement has taken place with the Gypsy and Traveller communities in Cardiff, and as such national policy has not been complied with.

However, if an 80 pitch site is to be developed then we would suggest that this should be done on the basis of a number of micro sites with landscaping buffers between them. The micro sites should be tailored to family groupings and should allow for sufficient room for family expansion.

We would also suggest that the timescales for development need to be clearly articulated to the community.

Finally, we would ask to be able to comment on any rejected sites that the council have considered.

Tick here if you are submitting additional material to support your representation.	
6. If you are objecting to the LDP, do you want to speak at a hearing session of the public examination? At this stage, you can only make comments in writing (these are called 'written representations'). However, everyone that wants to change the Plan can appear before and speak to the Inspector at a 'hearing session' during the public examination. But you should bear in mind that your written comments on this form will be given the same weight by the Inspector as those made verbally at a hearing session. Please also note that the Inspector will determine the most appropriate procedure for accommodating those who want to provide oral evidence.	
I do not want to speak at a public hearing and am happy for my written representations to be considered by the Inspector.	
I want to speak at a public hearing.	Yes
If you want to participate in a hearing, indicate below what you want to speak about (e.g. 'Housing site at Pen y Graig' or 'The overall housing target').	
H10 and H11	
8. If you wish to speak, it would be helpful if you could indicate in which language you would like to be heard.	
I wish to be heard in Welsh	
I wish to be heard in English.	Yes

Rhif Sylwedydd / Representor Number:

43

Rhif Sylw / Representation Number(s):

43.01 – 43.08

Enw Sylwedydd / Representor Name:

S Kirk

From: 
To: [Local Development Plan / Cynllun Datblygu Lleol](#)
Subject: Cardiff Replacement LDP Deposit Plan
Date: 13 April 2025 19:10:24

EXTERNAL: This email originated from outside Cardiff Council, take care when clicking links.

ALLANOL: Daw'r e-bost hwn o'r tu allan i Gyngor Caerdydd, cymerwch ofal wrth glicio ar ddolenni.

Dear Sir/Madam,

I wanted to share my views regarding the consultation on the Cardiff Replacement LDP Deposit Plan.

When previous documents have been presented, I have been very enthusiastic about the proposals presented. In reality, I have been extremely disappointed with the actual delivery against these aspirations which appear to be glossed over once influential building companies have gained initial planning permission and are able to obtain further concessions from the council.

The aspiration of delivering a modern sustainable city providing a good quality environment with environmentally conscious housing for all and placing communities at the heart of decision making whilst improving biodiversity and mitigating against climate change are all highly laudable.

However, if Cardiff really wants to demonstrate that it is a leading a values driven sustainable and equitable programme, it needs to show that the people and the planet are genuinely at the forefront of this development plan.

There have been multiple occasions over the past few years where the originally agreed plans have been changed. Just one example of this is the Brains brewery development .

Whilst cycling past this week I reflected that the Brains tower is dwarfed and barely noticeable because of ugly tower blocks more than twice its size, yet when these plans were first proposed this symbol of the city's heritage was meant to be the focal point of the development. Why has that been allowed to change?

There are so many tower blocks being built for student accommodation and rental in the city centre - why isn't accommodation for Cardiff residents being made the priority?

If you want to create a model city for the future that is sustainable and fit for the future then it is my view that these poorly designed high rise buildings with ugly cheap cladding do not deliver. This has already proven challenging and costly with the replacement cladding already required on many relative new builds.

Also, why are building contracts predominantly (or possibly even exclusively) given to large building contractors? Why not allow more local building contractors to build smaller scale developments and thereby provide more diversity in design and create characterful communities rather than homogeneous builds.

Some other questions:

Why isn't it compulsory for all new builds to be environmentally sound and have net zero energy with heat pumps/solar panels as a requirement?

Why does social housing always seem to get reduced as projects progress?

Why don't all new builds have a requirement to build amenities in the first phase of the project?

Why are sewage requirements an afterthought and not required on the development site (such as the awful development in Hayley Park at present)?

Whilst it is encouraging that this plan refers to values such as social justice, equality and placing communities at the heart of decision making, this does not appear to be how it has been presented so far. The consultation document is so long and difficult to read that it makes it much harder to comment on the details and the process is frankly off-putting.

If the plan is meant to put communities at the heart with genuine consultation then there should be public meetings for the strategy to be explained and scrutinised. As far as I am aware this has not happened. I only became aware of the consultation because of something I read on social media. There should be a genuine period of consultation with all written and verbal responses proactively sought. There needs to be much more local engagement, asking what communities want and understanding their needs through "Town Hall" meetings.

It is my opinion that the Council has permitted development that is often of poor design, fails to interact with adjoining neighbourhoods and lacks sufficient and appropriate public open and green space. Such developments are not liveable, sociable, sustainable nor adaptable.

It appears that growth has been the primary focus for far too long and as a result successive councils over time have destroyed much of the city's natural and historic heritage, whilst still failing to make significant reductions to inequality and deprivation.

The canal is a good example of this. Take the section between Atlantic Wharf and Lloyd George Avenue - the canal network has been consumed by a network of ugly commercial units and homogenous properties (alongside more flats for students). In contrast this could have been a biodiverse environment with open tree-lined spaces - an inclusive urban oasis highlighting the canal - part of the rich and diverse heritage of the city and its communities.

You may be aware that there has been a recent study engaging with Cardiff residents about their concept of "beauty" in local planning. These were just a few of the types of words used by residents in this study when they were asked to describe their idea of what might make Cardiff more beautiful.

With regards to a shift to more sustainable transport - I wholeheartedly agree with this aspiration. However in my opinion as with other amenities, transport infrastructure must be built before allowing commercial and residential developments to proceed.

In summary, this plan needs to deliver a city where residents feel the planning system works for them rather than for the benefit of developers' bank balances. Climate change and biodiversity loss need to be taken more seriously with a much greater focus on the conservation of green spaces and biodiversity. There needs to be "clear blue water" between developers and the council decision makers.

The fifteen minute city concept needs to be adopted. Residents should be actively encouraged to participate in decisions about the city with multiple types of and easier access to the contents of documentation. Use of the word “beautiful” should be adopted within the plan (the aspirations that people associate with this term are much wider than its more traditional perception). There need to be transparent KPIs covering all objectives - not just transactional growth, but clear objectives on the increase in areas such as biodiversity, green energy, well-being, sustainable transport, protection and development of heritage etc. The council should be held accountable for these and they should be regarded as their measures of success.

Yours faithfully,

Sarah Kirk



From: [REDACTED]
To: [Local Development Plan / Cynllun Datblygu Lleol](#)
Subject: Cardiff Replacement LDP
Date: 11 April 2025 11:49:33

Hi,

I wanted to express my views on the Cardiff Replacement Plan.

I believe that a truly modern city, one that is fit for future challenges, must put the needs of its citizens and planet first, embodying values such as social justice, equality, placing communities at the heart of decision making, as well as addressing climate change and biodiversity loss.

Whilst the plan does mention these, there appears to be no means in which to monitor / gauge how the Council is performing in adhering to these values. I feel it is essential going forward, that as well as outlining a general strategy, the document needs to detail how it will measure success against all of its key objectives.

In my view, historically the Council has permitted development that is often poor design, fails to interact with adjoining neighbourhoods and lacks sufficient and appropriate public open and green space. Developments that are neither liveable or sociable, sustainable or adaptable. In the pursuit of growth, the city has destroyed many of its assets, both natural and historic and has failed to bring an end to inequality and deprivation.

Why is there a continuing desire to approve / allow more and more high rise towers with cladding. You only have to look at the existing high rise developments down the Bay to evidence poor design / build quality - with cladding already having to be replaced.

Surely, we would be better, with more local engagement, asking what the communities want / need and allowing more local building contractors to build more smaller scale developments. In this way, you would also see far greater variety in the type / design of housing being built and it would probably be built to far better standards.

The very large house building / construction companies appear to have far too much say / influence on the developments across the city. Also, why are developers allowed to develop sites that end up looking completely different to the plans originally detailed / advertised. A good case in point, is the Brains Brewery development, where the original building was originally going to be the centrepiece of the development, but as it has now transpired, it is dwarfed by massive high rise towers. How is this allowed to happen ?

Whilst the plan details, that it will build good quality / energy efficient homes - how will this be monitored ? Will there be a requirement on developers to build net zero homes with solar panels / heat pumps etc ?

With regard to a shift to more sustainable transport -this is a good goal and should be encouraged. But the infrastructure / sustainable transport solutions need to be put in place before allowing the development around these sites ie. If Cardiff Parkway is to be built, this needs to be done, before any commercial / residential development is allowed to proceed in the vicinity.

Finally, there is no mention of the word "Beautiful" in this plan. I am sure that if most of the population of Cardiff were asked how they would want to describe their city, they would want to say "Beautiful". Sadly, it is difficult to use that word to describe most of the recent developments across the City. Aside from the aesthetics associated with the word "Beauty", I am aware from a recent study undertaken by Cardiff Residents, when asked what might make Cardiff more Beautiful, responded as follows :-

Care, Biodiversity, Nurtured spaces, pedestrian friendly, heritage, trees, planning for community, equality a sense of place, history awareness, urban oasis, consider the human, made for local people, inclusive design

In summary, I would like Cardiff to be a city where :-

The planning system works for citizens rather than developers

Climate change and biodiversity loss are taken seriously and acted upon accordingly (why was planning allowed on the Velindre site immediately adjacent to the nature reserve?)

The 15 minute city concept is adopted

Citizens are actively encouraged to participate in decisions about our city (community town hall concepts) and that making Cardiff more “Beautiful” is adopted within the plan.

Kind Regards

Simon



Rhif Sylwedydd / Representor Number:	44
Rhif Sylw / Representation Number(s):	44.01
Enw Sylwedydd / Representor Name:	Jane Foulner

From: [REDACTED]
To: [Local Development Plan / Cynllun Datblygu Lleol](#)
Subject: RLDP
Date: 12 April 2025 09:39:11

Cardiff is a lovely city that needs to be looked after. So many people I know have returned to Cardiff recently and are worried that it is looking more and more unkempt and not always well looked after. So many lovely buildings covered in scaffolding, lots of littering and really strange new developments such as old Brains brewery area. I am really concerned that the character of St Mary's Street may soon too be wrecked by a 12 storey tower landing in the middle of it. I am just hoping that good sense will prevail on that one.

It is not too difficult to know how best to assist all citizens in Cardiff. Transport is a little fragmented. Could we may be have some smaller buses regularly frequenting areas? Trains are still very expensive. So many other cities in Europe and further afield have really reasonable and frequent public transport options. The cheap buses for young people is a good idea.

The public green spaces we do have need to be cherished and loved. A number of lovely parks have not been looked after recently and are therefore not as accessible to all. So few public toilets for instance. It's just not like that in cities abroad. Traffic wardens doubling up as litter wardens would be a good idea.

Please look at places like Copenhagen for well planned housing that suits all rather than being bossed around by giant building companies and building a load of executive houses that eat into green spaces.

Such a difficult job but proper consultation with Cardiff's amazing residents would pay so many dividends.

Thanks for all your efforts and let's all work together to make Cardiff look loved and cared for again.

Jane Foulner

Sent from my iPhone

Rhif Sylwedydd / Representor Number:	45
Rhif Sylw / Representation Number(s):	45.01 – 45.05
Enw Sylwedydd/ Representor Name:	John Griffiths

From: [REDACTED]
To: [Local Development Plan / Cynllun Datblygu Lleol](#)
Subject: Cardiff RLDP.
Date: 12 April 2025 09:49:03

EXTERNAL: This email originated from outside Cardiff Council, take care when clicking links.

ALLANOL: Daw'r e-bost hwn o'r tu allan i Gyngor Caerdydd, cymerwch ofal wrth glicio ar ddolenni.

Dear Planning.

There are some good points in the RLDP but I fear it will suffer the same criticism in 10 years time as the present LDP does now.

The intention to allocate no new greenfield sites is to be welcomed, but existing Candidate Sites should also be protected from development until such time as they are really needed, and not simply developed because they are convenient for developers. I believe some of the Candidate Sites should be removed from the RLDP to reflect the downturn in housing demand, and give some credence to Cardiff's claims to wish to protect the local environment.

There is no clear vision for a traffic free, or reduced traffic, city. Cities in France have effectively 'ring fenced' the city centre so you can only go in if you live there or have a good reason to take in a vehicle. People have to be convinced of the need to change habits and have public transport options. There is little or no encouragement at the moment. Why not have a traffic free city centre day occasionally so people could feel the difference?

How much pressure has Cardiff put on the Welsh Assembly to update the 'rules' on low energy houses and climate resilience? It seems ridiculous to be building hundreds of houses at the present time with no solar panels, no heat pumps, etc. The climate changes are not reflected in building in areas that will be subject to future flooding. St Fagans has been cut off by flooding several times over the last decade - this is almost certain to get worse. The odd flooded road may simply be an inconvenience; flooding of houses results in cost and misery. Houses in St Fagans were only saved from flooding in December 2019 by a group of volunteers putting up makeshift flood barriers on Croff y Gennau Road. Much of the water run off was from Candidate Site 16 (see below). Llantrisant Road was also flooded at the Radyr entrance as the 'pond' at the start of Heol Isaf had overflowed.

The present LDP outcome cannot be described as a success. It is essentially a ribbon development along Llantrisant Road, with clear cherry picking by developers. The original housing requirement was also far too optimistic, resulting in a slowdown of construction as the houses are not selling.

The original 'masterplan' now looks like a pie in the sky project. Where is the Plasdwr central area? Where is the public transport for these new areas? Where are the joined up cycling and walking facilities? Can people cycle safely along Llantrisant Road to get to Radyr train station for example - no! Would the Planning Committee like to join me in a cycle ride from Creigiau to Llandaff one day?

Where development is allowed, there needs to be much more pressure on the developer to provide what was promised. I'm thinking of facilities like the play area in Maes y Deri which is not fit for purpose - built from clay dug up elsewhere on the site and covered with an inch of topsoil. It's a total mess after light rain. Cardiff's success rate of getting sites 'finished' in the St Fagans area is not great. Trem y Coed took years before all the promised work was completed - and I'm not sure it's finished yet!

Site 16. This site is totally unsuitable for playgrounds as intended. Apart from being on a slope, it has a number of springs under it which run even during periods of drought. I understand that Cardiff has downgraded these springs to 'field drainage', but this is not the case. St Fagans village is surrounded by patches of wet, marshy areas caused by underground water - this is one of them. It would also, presumably, result in higher traffic volumes in the area - something the local roads cannot cope with at the moment. With 3 Primary, and 1 secondary school planned for Plasdwr, it should be possible to allow public access to their playing areas outside school hours.

Site 23. This site should be excluded from any development. Apart from having a SSSI in the middle of it (Ty Du Moor), it is an area of farming land outside the main Cardiff settlement boundary. Not sure how you can protect a SSSI in the middle of a building site. Has any thought been given to the effect of further road usage increases in the area? With the current rate of housing completion this site should be removed as a Candidate Site.

John Griffiths,



Virus-free www.avg.com

Rhif Sylwedydd / Representor Number:

46

Rhif Sylw / Representation Number(s):

46.01

Enw Sylwedydd / Representor Name:

Breedon Trading Ltd

- Breedon Trading Ltd.

Respondent: Mr Shaun Denny Breedon Trading Ltd.

On-behalf of: Breedon Trading Ltd.

Submission Date: 15/04/25
14:19

Foreword

Foreword

Comment Number: 1

1. Which part(s) of the Plan (or supporting documents) are you commenting on?

LDP policy or site allocation number(s)

MW6

LDP paragraph or section number(s)

LDP Proposals Map reference(s)

If your representation relates to a supporting document (e.g. the Sustainability Appraisal), insert the name(s) and reference(s) here

2. Before you set out your comments in detail, it would be helpful to know whether you think the Plan is sound and meets the procedural requirements.

* I think the LDP is sound and meets procedural requirements

5. Please set out your comments below.

Breedon Trading Ltd. is the operator of one of the two sand wharves illustrated by the draft Proposals Map. The way and times at which wharves operate, particularly regards the discharge of their cargo, is governed by the tide, clearly beyond the control of the wharf operator, and can often require operations to take place outside 'normal' working hours. The encroachment of other types of development that may not be compatible with this modus operandi can, therefore, restrict the way in which the wharf can operate due to noise, dust, HGV movements and lighting, as examples. The Company therefore welcomes the commitment by this policy to protected against development which would prejudice their ability to operate.

6. If you are objecting to the LDP, do you want to speak at a hearing session of the public examination?

* I want to speak at a public hearing.

7. If you want to participate in a hearing, indicate below what you want to speak about (e.g. 'Housing site at Pen y Graig' or 'The overall housing target').

Safeguarding sand wharves

8. If you wish to speak, it would be helpful if you could indicate in which language you would like to be heard.

* I wish to be heard in English

H2: HOUSING LED REGENERATION AREAS

H2: HOUSING LED REGENERATION AREAS

Comment Number: 2

1. Which part(s) of the Plan (or supporting documents) are you commenting on?

LDP policy or site allocation number(s)

H2 Housing Led Regeneration Areas

LDP paragraph or section number(s)

LDP Proposals Map reference(s)

H2.4 Roath Dock (North side)

If your representation relates to a supporting document (e.g. the Sustainability Appraisal), insert the name(s) and reference(s) here

2. Before you set out your comments in detail, it would be helpful to know whether you think the Plan is sound and meets the procedural requirements.

* I think the LDP is unsound and should be changed

5. Please set out your comments below.

The Company objects to the proposal to establish high density housing immediately adjacent to an operational wharf. In its view these landuses are not compatible, their juxtaposition goes to the heart of the justification of town planning and does not accord with the draft Plan's own policy MW6. As described in comments regards Policy MW6 wharves often have to operate, discharge vessels, during 'unsociable' hours due to tides. In its view this is not compatible with adjacent high density housing due to the potential for noise, dust, HGV movements and high intensity lighting. To locate such development in close proximity to a sand wharf has a very high potential to constrain operations to the point that the wharf use is no longer viable. Wharves have very specific criteria for their location which are challenging to meeting. The Company is not aware of another suitable location in the Cardiff area to which it could relocate this facility in the event that encroachment by housing rendered it inoperable. Its loss would have a significant negative impact on the Company's business, severely limiting its ability to supply sand to the greater Cardiff market, increasing reliance on HGV transported materials from further afield (as there's little or no material indigenous to Cardiff).

In the Company's view this allocation should be deleted as it does not accord with the Plan's own Policy MW6 and would be highly likely to compromise the operation of the Company's sand wharf. This in turn would significantly disturb the supply of sand to the greater Cardiff area, requiring alternative sources of supply from further afield and transported by road. The reference to site H2.4 Roath Dock (North side) should be deleted.

6. If you are objecting to the LDP, do you want to speak at a hearing session of the public examination?

* I want to speak at a public hearing.

7. If you want to participate in a hearing, indicate below what you want to speak about (e.g. 'Housing site at Pen y Graig' or 'The overall housing target').

Proposed high density housing at Roath Dock (North side).

8. If you wish to speak, it would be helpful if you could indicate in which language you would like to be heard.

* I wish to be heard in English

Rhif Sylwedydd / Representor Number:

47

Rhif Sylw / Representation Number(s):

47.01

Enw Sylwedydd / Representor Name:

Jane Williams

From: [REDACTED]
To: [Local Development Plan / Cynllun Datblygu Lleol](#)
Subject: LDP
Date: 12 April 2025 11:05:19

EXTERNAL: This email originated from outside Cardiff Council, take care when clicking links.

ALLANOL: Daw'r e-bost hwn o'r tu allan i Gyngor Caerdydd, cymerwch ofal wrth glicio ar ddolenni.

Dear Sirs

I am writing in relation to the proposed replacement LDP for Cardiff.

General Policies

I am pleased that the plan recognises the importance of the countryside to the community and peoples' well being, highlighted during the cofid pandemic, and the need to preserve existing flora and fauna. I agree that development must be strictly controlled in order to protect our countryside to benefit all. I support the proposal for a Green Wedge surrounding the settled area in which development will not be allowed.

However, I do not believe that many of the candidate sites included in the original LDP take into account these new general policies.

Site 16

In particular, I am concerned about Site 16 and the possible development of the fields east of Crofft y Genau Road and south of Pentrebane Lane, which until a decade ago were subject to a conservation order. The unique village of St Fagans remains a conservation area and has the most popular tourist attraction in Wales. SP4 requires any development must "maintain or enhance character of a place". Any modern, and probably fairly high intensity housing, will have the opposite effect. It will:

- abut against existing properties in the village and impinge on the character of the conservation area
 - destroy fields which are currently used for agriculture
 - endanger the existing woodland, a beneficial resource used by not only local communities but also dog walkers from further away, and the flora and fauna of the area
 - playing fields should not be necessary as I believe 3 primary and 1 secondary schools are to be built, which will have sport facilities, and which under current policy should be available to the public. Any such facilities would inevitably need buildings, a parking area, noise and illuminations which would have a serious impact on the character of the village.
 - any development would increase traffic flow through the conservation area which has intensified already as a result of the estates recently built along Llantrisant Road. During rush hour long queues of traffic form through the village with the consequently pollution endangering people and listed buildings. Indeed, during the recent half term holiday the village was grid locked and the police had to be called to relieve the pressure.
- I would submit that the conservation area should have a Green Wedge to protect, enhance and preserve it.

Sites along Llantrisant Road

Any more estates along Llantrisant will only aggravate the volume of vehicles through the conservation area and the approach to the museum.

Site23 Plasdwr Uchaf

Any development would;

- eat into a greenfield area
- destroy fields currently used for agriculture
- close a riding school
- remove an open space with public footpaths
- ruin an area of historical significance as the site of a battle during the Civil War
- surround and severely impact on a Site of Special Scientific Interest at Ty Du Moor
- destroy many Sites of Importance for Nature Conservation
- increase vehicle flow through conservation area of St fagans and along Llantrisant Road.
- affect protected species inhabiting the area, eg barn owls, horseshoe bats and great crested newts

Jane R Williams

12th April 2025

Rhif Sylwedydd / Representor Number:	48
Rhif Sylw / Representation Number(s):	48.01 – 48.02
Enw Sylwedydd / Representor Name:	Owain Williams

- Mr owain williams

Respondent: Mr owain williams

Submission Date: 15/04/25
14:57

WL1: WELSH LANGUAGE

WL1: WELSH LANGUAGE

1. Which part(s) of the Plan (or supporting documents) are you commenting on?

LDP policy or site allocation number(s)

WL1 Y Gymraeg (Polisi Manwl)

LDP paragraph or section number(s)

iv)

LDP Proposals Map reference(s)

If your representation relates to a supporting document (e.g. the Sustainability Appraisal), insert the name(s) and reference(s) here

2. Before you set out your comments in detail, it would be helpful to know whether you think the Plan is sound and meets the procedural requirements.

* I think the LDP is sound and meets procedural requirements

5. Please set out your comments below.

Dylid diwygio 'Ystyried arwyddion datblygu a gwybodaeth berthnasol dwyieithog fel deunydd marchnata a ystyried bod y Gymraeg yn cael ei defnyddio o ran arfer enwi datblygiadau' i 'Darparu arwyddion datblygu a gwybodaeth berthnasol ddwyieithog fel deunydd marchnata a bod y Gymraeg yn cael ei defnyddio wrth enwi datblygiadau' - fel bod y geiriad yn gyson â'r cymalau blaenorol yn ii) a iii) sy'n dechrau gyda'r gair *Darparu*. Nid yw 'ystyried' gwneud rhywbeth yn fesuradwy, yn ddigon cadarn i'w gynnwys mewn polisi nac yn cyd-fynd â bwriad y polisi hwn chwaith fel y'i nodir yn 7.299 a 7.300. Fel arall, gallai rhywun ddweud iddynt 'ystyried' gwneud rhywbeth - a gwneud dim!

6. If you are objecting to the LDP, do you want to speak at a hearing session of the public examination?

* I do not want to speak at a public hearing and am happy for my written representations to be considered by the Inspector.

BG1: DESIGNATED SITES

BG1: DESIGNATED SITES

1. Which part(s) of the Plan (or supporting documents) are you commenting on?

LDP policy or site allocation number(s)

BG1

LDP paragraph or section number(s)

7.357

LDP Proposals Map reference(s)

If your representation relates to a supporting document (e.g. the Sustainability Appraisal), insert the name(s) and reference(s) here

2. Before you set out your comments in detail, it would be helpful to know whether you think the Plan is sound and meets the procedural requirements.

* I think the LDP is sound and meets procedural requirements

3. Would you like the LDP to include a new policy, site allocation or paragraph?

* New paragraph or supporting text

5. Please set out your comments below.

Cwestiwn - Er mwyn cysondeb, oni ddylai'r Map Cyfyngiadau gynnwys cyfeiriad at y ffaith yr ystyrir gan yr Awdurdod Lleol bod y ddinas gyfan yn Ardal o Bwysigrwydd leithyddol - fel y tynnir sylw datblygwyr ac unrhyw un arall sydd am wybod am ddynodiadau/cyfyngiadau - at y dynodiad hwnnw hefyd (yn yr un modd ag yr amlygir pob dynodiad/cyfyngiad arall yn y brifddinas ar y map)?

6. If you are objecting to the LDP, do you want to speak at a hearing session of the public examination?

* I do not want to speak at a public hearing and am happy for my written representations to be considered by the Inspector.

'*Consider* development signs and relevant bilingual information such as marketing material and consider that the Welsh language is used in the practice of naming developments' should be amended to '*Provide* development signs and relevant bilingual information such as marketing material and that the Welsh language is used in naming developments' - so that the wording is consistent with the preceding clauses in ii) and iii) which begin with the word *Provide*. 'Considering' doing something is not measurable, is not robust enough to be included in a policy or consistent with the intent of this policy either as set out in 7.299 and 7.300. Otherwise, someone could say that they have 'considered' doing something – and do nothing!

Question - For the sake of consistency, should the Restricted Map include a reference to the fact that the whole city is considered by the Local Authority to be an Area of Linguistic Importance - so that the attention of developers and anyone else wishing to know about designations/restrictions - is drawn to that designation as well (in the same way as all other designations/restrictions in the capital city are highlighted on the map)

Rhif Sylwedydd / Representor Number:	49
Rhif Sylw / Representation Number(s):	49.01
Enw Sylwedydd / Representor Name:	Bethan Enticott

From: [Cynllun Datblygu Lleol Caerdydd | Cardiff Local Development](#)
To: [Local Development Plan / Cynllun Datblygu Lleol](#)
Subject: LDP website: Enquiry (Opposition)
Date: 12 April 2025 19:59:28

From: BETHAN ENTICOTT

E-mail [REDACTED]

Subject: Opposition

Message Body:

There is no consideration for the devastating loss of habitat fir wildlife and the devastating loss of green spaces in Thornhill and Lisvane. This plan will rip the soul out of Cardiff. Surely these irresponsible actions go against your aimof being a 'green' capital city. It will be an utter disgrace of these plans take place. It is clear that money from housing developers is worth more than
The quality of life of residents. You will turn Cardiff into a concrete jungle.

--

This form was sent from the LDP website.

Rhif Sylwedydd / Representor Number:	50
Rhif Sylw / Representation Number(s):	50.01
Enw Sylwedydd / Representor Name:	John Prior Morris

From: [REDACTED]
To: [Local Development Plan / Cynllun Datblygu Lleol](#)
Subject: LOCAL DEVELOPMENT PLAN COMMENTS
Date: 10 April 2025 13:27:12

EXTERNAL: This email originated from outside Cardiff Council, take care when clicking links.

ALLANOL: Daw'r e-bost hwn o'r tu allan i Gyngor Caerdydd, cymerwch ofal wrth glicio ar ddolenni.

"I agree with the comments that have been submitted on behalf of Llandaff Society."

John Prior-Morris

[REDACTED]