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15 April 2025

Dear Stuart,

**Cardiff Council – Replacement Local Development Plan (LDP) Deposit Plan Consultation:
Welsh Government Response**

Thank you for consulting the Welsh Government on the Cardiff Council Replacement Local Development Plan (LDP) – Deposit Plan. It is essential the authority is covered by an up-to-date LDP to give certainty to local communities and businesses and provide a robust basis for decision making.

Without prejudice to the Minister's powers, the Welsh Government is committed to assisting Local Planning Authorities (LPAs) minimise the risk of submitting unsound plans by making comments at the earliest stages of plan preparation. The Welsh Government looks for clear evidence that the plan is in general conformity with Future Wales: The National Development Framework, aligns with Planning Policy Wales (PPW) and the tests of soundness, as set out in the LDP Manual.

National planning policies are set out in Planning Policy Wales (PPW) Edition 12 and seek to deliver high quality, sustainable places through a place-making approach (the LDP should ensure it takes into account any further iterations of PPW prior to the examination). The implementation of the core policy areas in PPW, such as adopting a sustainable spatial strategy, appropriate housing and economic growth levels, infrastructure delivery and place-making, are articulated in more detail in the LDP Manual (Edition 3). **We expect the core elements of the Manual, in particular Chapter 5 and the 'De-risking Checklist(s)' to be followed. Failure to comply with these key requirements may result in unnecessary delays later in the plan making process.** The development planning system in Wales is evidence-led and demonstrating how a plan is shaped by the evidence is a key requirement of the LDP examination.

After considering the key issues and policies in Future Wales, the Welsh Government is of the opinion that the Replacement Deposit Plan is in general conformity with Future Wales: The National Development Framework. Specific comments are set out in the Statement of General Conformity (Annex 1 of this letter). **Annex 2 also highlights a range of issues that need to be addressed for the plan to align with PPW and the DPM.** Collectively, our comments highlight a range of issues that need to be addressed for the plan to be considered 'sound' as follows:

Annex 1 – General Conformity with Future Wales

- Regional Collaboration - **Further clarity required**

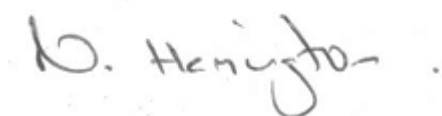
Annex 2 – Core matters that need to be addressed (PPW and the DPM)

- Maximising Affordable Housing Provision
- Gypsy and Traveller Provision
- Delivery & Implementation – General
- Biodiversity

I would urge you to seek your own legal advice to ensure you have met all the procedural requirements, including the Sustainability Appraisal (SA), Strategic Environmental Assessment (SEA) and Habitats Regulation Assessment (HRA), as responsibility for these matters' rests with your authority. A requirement to undertake a Health Impact Assessment (HIA) arising from the Public Health (Wales) Act 2017, if appropriate, should be carried out to assess the likely effect of the proposed development plan on health, mental well-being and inequality.

My colleagues and I look forward to meeting you and the team to discuss matters arising from this response.

Yours sincerely,



Neil Hemington
Chief Planner Welsh Government

For matters relating to general conformity with Future Wales and planning policy please contact: PlanningPolicy@gov.wales / For matters relating to Local Development Plan procedures and compliance with the Development Plans Manual please contact: mark.newey@gov.wales and candice.coombs001@gov.wales

Annex 1 - Statement of General Conformity

The Welsh Government is of the opinion that the Cardiff Replacement Local Development Deposit Plan (2021-2036) is in general conformity with Future Wales - the National Development Framework, as set out in paragraphs 2.16 – 2.18 of the Development Plans Manual (Edition 3).

This conformity statement is based upon the evidence currently available. Currently, there is reference to how Cardiff relates to adjoining Local Authorities (LAs) with regards to the scale of growth. However, further evidence is required to demonstrate how regional collaboration has influenced the scale of growth at Cardiff and the relationship to adjoining LAs.

Reasons

Future Wales places emphasis on the development of National Growth Areas in a sustainable manner. Growth areas must be sustainably planned, reduce the need to travel by car, encourage walking and cycling (active travel), maximise public transport usage and incorporate green infrastructure. Growth areas must embed these principles within a wider regional consensus, focussing on the opportunities they bring to promote social and economic benefits across a broader geographical area. The WG supports sustainable growth in national growth areas to respond to the climate change and biodiversity emergencies and make the best use of our resources.

Policy 1 and 33 of Future Wales state that Cardiff, Newport and the Valleys will be the main focus of growth and investment in the region. **Cardiff will remain the primary settlement in the region**, its future strategic growth shaped by its strong housing and employment markets. LDPs will need to consider the interdependence of Cardiff and the wider region through a collaborative approach and understanding of the inter-relationships and implications on growth levels.

The Regional Assessment of Future Growth and Migration for the Cardiff Capital Region (EB21, May 2024) is welcomed as it evidences a range of economic options and potential implications for population change, closely aligning with the job growth in the LDP. However, further detail on how growth in adjoining Local Authorities, for example Newport, Caerphilly, Vale of Glamorgan replacement plans have shaped the scale and spatial choices made in the plan would be beneficial as the plan progresses through the statutory process (Future Wales, page 107) However, as explained in Annex 1, it is the view of **Welsh Government that limited evidence has been submitted to justify this assertion and further work is essential in respect of regional collaboration to demonstrate this conclusion.**

Annex 2 explains WG's comments in respect of the scale and location of growth. On balance and subject to the comments within Annex 2, WG considers that the Deposit Plan, including the scale and distribution of growth, is in general conformity with key policies in Future Wales namely (*not exhaustive*):

- Policy 1 – Where will Wales Grow
- Policy 2 – Shaping Urban Growth and Regeneration – Strategic Placemaking
- Policy 6 – Town Centre First
- Policy 12 – Regional Connectivity / Policy 36 – South-East Metro
- Policy 19 – Regional Planning & 33 National Growth Area Cardiff, Newport and the Valleys

Regional Collaboration – Further clarity/justification: There is limited evidence demonstrating that a regional approach has been followed and the explanation of how the wider region has been involved in shaping and agreeing the choices made is a concern and the consequences of

decisions taken by Cardiff may have for other LDPs and/or future SDPs. **The Council alludes to the strategy having no ‘negative effects’ on neighbouring authorities but there is limited evidence to support this assertion.** Further work will be required to understand how the plan has been developed within the wider regional context and how it will promote and enhance Cardiff’s strategic role in the wider region. **Future Wales brings a new perspective that all LDPs have to embrace on how each LDP sits within the region as a whole and the relationship to other LDPs, in essence, a strategic approach to cross boundary relationships in advance of the formal commencement of an SDP.**

Annex 2 – Core matters that need to be addressed (PPW and the DPM)

Spatial Strategy - Location of Growth

The Council has tested 8 spatial options:

Option 1 – Further extension of existing strategic site commitments

Option 2 – Urban intensification based on brownfield strategy only

Option 3 – Renewal and regeneration based on brownfield mixed use sites

Option 4 – Growth based around district and local centres in line with the ‘city of villages’ concept

Option 5 – Growth based around transport nodes

Option 6 – Strategic public transit growth corridor

Option 7 – Dispersed greenfield growth areas

Option 8 – Dispersed combination of brownfield and greenfield

The Council has chosen a ‘hybrid’ spatial strategy and is **not proposing to allocate any additional new greenfield allocations**. The Deposit Plan builds on options 2,3,4 and 5. The spatial strategy is one that builds on the ‘existing land bank’ of greenfield sites, with additional focus on brownfield / renewal sites within the settlement boundary adjacent to local centres and/or transport nodes. The Council considers the spatial strategy will provide a good range and choice of house types across the city with a 50% GF/50% BF split. **The Welsh Government supports the spatial strategy which accords with PPW and is in general conformity with Future Wales.**

The Level of Growth: Homes and Jobs

The City of Cardiff is in a National Growth Area identified in Future Wales Policy 1 (**See Annex 1**). The Deposit Plan (Policy SP1) makes provision for 26,400 homes to deliver a housing requirement of 24,000 (1,600 p/a) over the plan period 2021-2036, of which 5,000 to 6,000 homes (para 6.23, Deposit Plan) will be affordable. The flexibility allowance is approximately 10%. The level of new jobs proposed is 32,300 over the plan period.

Homes: The 2018 WG Principal projections are the latest projections for this Preferred Strategy. **Any future population and household projections based on the latest 2021 Census will need to be considered by the Council if they are published before the plan is examined.** The 2018 principal projection would result in a requirement of 898 units per annum or 13,470 dwellings over the plan period (*using a 3.7% vacancy/conversion rate*). The level of housing proposed in the plan (the requirement) is around 10,500 units above the WG-2018 projection. The Council has concluded that the projections are underpinned by ‘negative trends’ and when compared with the existing ‘land bank’ of 18,708 units at 1 April 2024 (Figure 11, Row 9, Background Technical Paper No. 1, January 2025) would effectively be a zero-growth strategy for Cardiff. The Council consider that such a low level of growth would mean that Cardiff would not be able to meet its housing need/demand and economic ambitions, particularly as expressed through the Cardiff Capital Region (CCR) and would not be in conformity with Future Wales. **The Welsh Government does not object to this level of growth.**

The demographic evidence (LDP Demographics Update Oct 21 – Edge Analytics) tested 14 growth scenarios that comprise: demographic led, dwelling led, and jobs led scenarios. The chosen housing requirement is based on a dwelling led scenario which would result in a population growth of 10% over the plan period with an annual net migration of 1,390 persons. The Council considers that this level of housing growth represents the most realistic and sustainable growth scenario, which is sufficiently aspirational to assist post pandemic recovery and ensure the delivery of much

needed affordable housing. The Council considers the level of homes and jobs proposed is appropriate to contribute to the delivery of the economic growth aspirations of the city region and aligns with Future Wales. The Council also considers that the level of growth proposed is not 'too high' in that it would not negatively impact on the growth strategies of neighbouring LPAs.

The Regional Assessment of Future Growth and Migration for the Cardiff Capital Region (EB21, May 2024) is welcomed as it evidences a range of economic options and potential implications for population change, closely aligning with the job growth in the LDP. However, further detail on how growth in adjoining Local Authorities, for example Newport, Caerphilly, Vale of Glamorgan replacement plans have shaped the scale and spatial choices made in the plan would be beneficial as the plan progresses through the statutory process (Future Wales, page 107) However, as explained in Annex 1, it is the view **of Welsh Government that limited evidence has been submitted to justify this assertion and further work is essential in respect of regional collaboration to demonstrate this conclusion.**

WG notes that historic completions rates in Cardiff have fluctuated considerably over various time periods. Average completions rates of 1,250 dpa were achieved over the twenty-year period 2001-2021 and completions over the 10-year period 2011-2021 were 835 dpa. WG note that higher rates have been achieved well in excess of 1,500 dpa prior to 2007. The Council considers that achieving 1,600 dpa is aspirational, but deliverable over this plan period. **Demonstrating delivery of the level of homes (and proposed sites) in the plan will be essential as per the requirements of PPW and the DPM** (see comments relating to delivery).

Before considering whether new allocations are required, PPW and the DPM explain that LPAs must first look at the existing supply and maximise brownfield land. The Urban Capacity Technical Paper (June 2023) sets out the Councils 'land bank' as of 01st April 2023, now updated to April 2024 (Housing Background Paper No.1). We note that the Council has included a 20% non-delivery allowance on the land bank (3,018 units) and a 25% non-delivery allowance to the large and small windfall components. It is noted that large windfalls are not included in the housing trajectory for the first two years, this aligns with the DPM. The above approach is supported and is in line with the requirements of the DPM.

WG note that when considering completions to date, sites under construction and those with planning permission, the Council has an **existing land bank of 18,708 homes**. In addition to this, the Council is proposing to roll forward strategic allocations in the adopted LDP (H1A 1,675 units) non-strategic allocations (H1B 240 units) and housing led regeneration areas (H2 3,751 units) **totalling 5,666 units**. We note that all new allocations proposed are currently allocated within the currently adopted LDP and the majority of the strategic allocation's are subject to existing outline or full planning permissions. **The total housing provision inclusive of land bank, allocations, small/large windfalls and other adjustments is 29,429 homes** (Housing Background Paper No.1, paragraph 7.3, Figure 11, Row 22). This is 5,429 units above the requirement (approx. 22% flexibility). Taking into account the AABR, this residual figure drops to **2,640, an 11% flexibility allowance**, to reflect what provision is actually contained within the plan period. In essence, with the exception of windfall sites, this is a 'rolled over' LDP with no new allocations. **The Welsh Government does not object to the level of growth and provision set out in the plan.**

It should be noted there appears to be a discrepancy between the Deposit Plan figures and the Housing Background Paper No. 1, albeit not significant. The WG assumes that the numbers in the plan need to be updated to reflect Housing Background Paper No. 1.

Jobs: The Council's dwelling led growth option results in a requirement for 32,300 new jobs (2,153 p/a) over the plan period. This level of employment and job growth has been estimated based on the Council's preferred Dwelling-led growth scenario of 1,600 units per annum (Edge Analytics, Figure 32) and is almost the mid-point between the two econometric forecasting companies of Experian and Oxford Economics as set out in the Council's Employment Land Study (Figure 8.1).

The level of employment growth proposed (2,153 p/a) over the plan period (32,300 jobs) exceeds the target in the currently adopted plan (of 2,000 jobs p/a) but is below recent trends where 2,500 jobs p/a have been achieved. This reflects the growth and job creation objectives within the Council's Economic Strategy 'Building More and Better Jobs', and through the Cardiff City Region Deal. The level of jobs proposed is realistic and is considered by the Council to be sufficiently aspirational to continue to meet the growing ambitions of the City's economy and drive prosperity in the wider city-region. The Welsh Government has **no significant concerns on the level of job growth proposed in the plan.**

In summary the Welsh Government has no substantial concerns with the level of homes and jobs proposed in the plan, which are considered to be in general conformity with Future Wales.

Employment Land

The Council appointed Hardisty Jones Associates (HJA) in, partnership with Owen Davies Consulting and NP Linnells Property Consultants to undertake an Employment Land and Premises Study (ELPS 2022) to inform the preparation of the Replacement Local Development Plan 2021-2036 (RLDP). Key findings of the evidence are:

- In quantitative terms the existing supply of office and research and development (R&D) floorspace across the range of contributing areas (current stock of vacant premises, confirmed pipeline and strategic site allocations) is more than sufficient to meet core requirements, over the plan period.
- Identified Industrial and Warehousing supply falls below the lowest estimate of future requirements. The industrial market has exceptionally low rates of vacancy at present, and there are strong levels of reported market demand. Stakeholders have stated that limited supply has constrained growth in this sector.
- Analysis suggests the LDP should provide for approximately 300,000 sqm of industrial and warehouse space. This is substantially greater than the available supply within the current pipeline and strategic site allocations. The requirement is in the order of 140,000 sqm of floorspace, equivalent to an estimated 35 hectares in land terms.

Following on from the Employment Land and Premises Study (ELPS) an update to supply figures carried out by the Council has now substantially reduced this shortfall. The total number of new sites in the pipeline with recent planning permission equates to an additional 12.6 ha of employment land. The most significant being employment land proposed at Cardiff East Park and Ride, Eastern Avenue. The proposed designation of Ipswich Road also seeks to protect a further 10 ha of employment land which was not factored into the original supply figures by HJA.

The remaining shortfall will need to be addressed over the plan period through continued refurbishment, and intensification of existing employment land, particularly in relation to light industrial units. Flexibility in policy will also need to be facilitated to allow for new employment opportunities. Finally, a regional approach where appropriate should also be supported, in accordance with national guidance.

Following WG previous comments at the Preferred Strategy Stage, the Deposit plan has:

- Identified sustainable and deliverable employment allocations, that will contribute towards the job target and meet the need identified in the Employment Land Study.
- Identified Cardiff Central Enterprise Zone as a key business district in the plan.
- Safeguarded key existing employment sites for retention for employment use, and
- Controls the loss of existing employment land for alternative or ancillary uses.

Future Wales states that significant new commercial, retail, education, health, leisure and public service facilities should be located within town and city centres (town centre first policy) with good access by public transport to and from the city and, where appropriate, the wider region. The implementation of this policy requires a sequential approach to large scale development and supports a sustainable pattern of growth where the reuse of brownfield land and importance of safeguarding valued landscapes and biodiversity are key. Large-scale development needs to reflect these principles.

The Welsh Government has no objection to the scale/location of employment allocations.

Maximising Affordable Housing Provision

The Draft LHMA shows that under the 1,600 dpa 'policy led' growth level chosen by the LPA, there is a net additional affordable need of 1,098 p/a, or 16,470 homes over the 15-year plan period and a broad tenure split of 72% social rented and 28 % intermediate/low cost ownership (paragraph 6.99, Deposit Plan). (It should be noted that paragraph 7.16 indicates 960/yr – 14,400 with paragraph 7.23 suggesting an 80% / 20% split which WGG assumes is a previous draft? Clarity on this point would be beneficial.) Under the WG 2018 projection led scenario, the level of need is 737 units p/a, or 11,055 homes over the plan period and a tenure split of around 70% social rented and 30% intermediate.

Policy H3 does not include an affordable housing target at the moment, this should be rectified to reflect the 5,000 – 6,000 target set out in paragraph 6.23. The current status of the LHMA should also be clarified, i.e. has it been formally agreed by WG. As previously stated, this is a plan where most of the proposed development is already committed, and most sites are already subject to agreed s106 agreements. **The LPA need to demonstrate how the delivery of much needed affordable homes has been maximised by the growth strategy chosen.**

To maximise the supply of affordable homes the Council should consider whether it would be appropriate to allocate sites for affordable housing led developments where are least 50% of the homes will be affordable.

Gwent Levels

Future Wales: the National Plan 2040 (Policy 9) identifies the Gwent Levels as a National Natural Resource Area due to its ancient landscape and special cultural significance, amongst others. The Gwent Levels spans between Chepstow (in south Monmouthshire) and Cardiff on the Severn Estuary. The Welsh Government welcomes the authority's recognition in the plan on the importance of the Levels and its ongoing collaboration with Government officials, neighbouring authorities and other key stakeholders to inform future pilot planning guidance on the Gwent Levels. Once published, the guidance must be considered as part of the plan-making process and for any future planning applications within the Gwent Levels landscape

Planning Policy Wales (PPW) is clear that SSSIs can be damaged by developments within or adjacent to their boundaries and by development some distance away (paragraph 6.4.24). The Council should be confident that development proposed within and adjoining the Gwent Levels landscape, such as Land at areas 9-12, St Mellons (Policy H1.1) and the Gypsy and Traveller allocation at Pengam Green (Policy H11), will not damage nor negatively impact on any statutory and non-statutory designations, biodiversity and supporting habitats.

The Welsh Government supports the principle of new Policy BG7: Severn Estuary and Cardiff Beech Woods Recreational Pressure. It will be for the authority to evidence how the policy can be implemented in practise.

Gypsy and Travellers

The latest Gypsy and Traveller Accommodation Assessment was undertaken in November 2021 (updated June 2024) showing a need for 73 pitches by 2026 and a total of 117 permanent Gypsy and Traveller pitches up to 2036. The allocation in the deposit plan is for 80 pitches, which meets the immediate need (up to 2026) leaving a shortfall of 37 pitches up to 2036.

Policy H11 allocates land for the provision of 80 Gypsy and Traveller pitches at Pengam Green as defined on the Proposals Map. The Council proposes to accommodate Gypsy and Travellers on this site for a temporary period of a minimum of 10-years to enable work to progress on extending the existing Gypsy and Traveller site at Rover Way. **The Welsh Government understands that once the improvements have been made (at Rover Way) this site will accommodate the full 117 pitch need by 2036. Officials would welcome clarification from the Council on this point.**

This site includes within its boundary the smaller Gypsy and Traveller site previously considered for inclusion in the adopted LDP which was not considered suitable due to flood risk by the Inspectors appointed to examine the plan in 2014. However, a comprehensive £21 million scheme to improve the flood defences along the sea wall fronting Pengam Green is now underway. It will be for the Council, in discussion with Natural Resource Wales (NRW), to evidence the significant improvements to flood risk and delivery of both sites at Pengam Green and Rover Way taking into account the requirements of national planning policy and the current/replacement TAN 15: Flood Risk and Flood Maps for Planning (FMFP). A Phase 2 Strategic Flood Consequences Assessment (SFCA) was undertaken by JBA in 2024. **It is for the Council to confirm this position and the issue has been addressed, along with potential implications on the SINC designation, land ownership, delivery timelines and that the site is supported by a transparent and robust site selection process that aligns with the requirements of Circular 005/2018 and any relevant guidance.**

Delivery & Implementation – General

In line with the key requirements of PPW, Chapter 5 of the DPM contains guidance on the key requirements in respect of the delivery and implementation of LDPs. The Council should set out site-specific details for key allocations that includes general phasing timescales, key infrastructure and placemaking principles (including concept/schematic masterplan frameworks), constraints and developer and infrastructure requirements, where appropriate.

The phasing, timing, funding and delivery of sites will be critical to ensure the plan delivers the scale of growth required over the plan period. The Council will need to demonstrate that both individual sites and sites in combination (including windfall assumptions) are deliverable through a housing trajectory (Appendix 7, Deposit Plan) prepared in conjunction with the Housing Stakeholder Group. Statements of Common Ground for key allocations, especially those that have been 'rolled over' from the adopted plan would be advantageous to demonstrate sites will come forward in the identified timescales.

The Welsh Government published a revised TAN15 regarding flooding, accompanied by a Chief Planner Letter (31 March 2025). **The plan will need to demonstrate that it is accordance with the revised TAN 15**, specifically the reference to an Infrastructure Plan, thereby ensuring that the development proposed can be delivered.

The WG does not object to the housing trajectory but considers that it may require clarification. The last row shows a negative value, rather than gradually decreasing to zero, thereby demonstrating the plan has built out what is required.

Agricultural Land

BMV Policy application is noted through a specific topic paper in the RLDP; it could benefit from being more detailed and specific of how BMV policy was considered in the preparation stages of the RLDP. The paper notes that throughout the preparation of the RLDP consideration has been given to the Plan's potential impact on BMV agricultural land. Specifically in the preparation of the RLDP Strategy, the spatial strategy options and the assessment of Candidate Site Submissions.

The Predictive ALC map has been used as a baseline for the spatial strategy options highlighting that BMV agricultural land is located to the west, north, and northeast of the county. There are extensive areas of detailed ALC surveys in the LDP undertaken by WG for the 2006-2026 LDP, it is unclear if these have been considered in the evidence base and assessment process. Validated ALC surveys are published by the Department on DataMap Wales.

Policy BG6 (Soils) is to be welcomed. The policy gives consideration to impacts on soils and the services and functions they provide in the decision-making process, aligning well with Policy 9 of NDF FW. The requirement for a Soil Resource Survey and Soil Management Plan to support proposals is welcomed.

The RLDP spatial strategy is brownfield sites led. Although the RLDP includes greenfield sites, allocations from the currently adopted LDP (which do impact on BMV agricultural land) the principle of development is considered established for these. The RLDP does not propose any 'new' greenfield releases and therefore does not involve the loss of any additional BMV agricultural land than is currently allocated.

In conclusion, although current allocations involving BMV will be developed, it is the WG view that the Authority has so far demonstrated a sensible and pragmatic approach to considering BMV loss in the context of national planning policy. On that basis no objection is offered.

Biodiversity

The Welsh Government consulted on proposed changes to policy on net benefit for biodiversity, the resilience of ecosystems, Sites of Special Scientific Interest (SSSI) and trees and woodlands earlier in the year which shows the direction of travel. In light of this the policy in general on biodiversity should be strengthened. Being more specific, SP21 states *...and ensure the resilience of ecosystems can be maintained* – which should be changed to include *...and enhanced*.

Minerals

The Regional Technical Statement (RTS 2nd Review) identifies a nil apportionment for land-won sand and gravel provision in Cardiff. Following this a Position Statement for the subregion (July 2022) was agreed which identified a shortfall in crushed rock requiring new allocations totalling at least 7.745mt (Policy SP11, paragraph 6.94) – See Minerals Statement of sub-regional Collaboration. Officials are aware that a planning permission for 4mt at Taffs Wells has subsequently been granted, with a further application for 3mt pending a decision by the Council. This leaves a residual quantity of 0.745mt to be identified. The plan has specified a 'Preferred Area of Search to the west of Ton Mawr quarry which should be sufficient to meet the shortfall. **The Welsh Government raises no objection on this issue.**
