

Clydesmuir Industrial Estate

Planning Statement

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Prepared For:

Pegasus Developments and Wales and West
Housing Association

Our Ref:

30295735-AUK-00-XX-RP-TC-0001-01-Planning Statement



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Contents

1	Introduction.....	1
2	Site Description and Context	6
3	Proposed Development.....	7
4	Planning Policy Context.....	14
5	Planning Assessment	23
6	Summary and Conclusion	27

Tables

Table 1-1 – Supporting Documentation for Planning Application.....	3
Table 3-1 – Accommodation Schedule.....	7
Table 4-1 – Adopted LDP Policies.....	15
Table 4-2 – Replacement LDP Policies.....	19

Appendices

Appendix A

Employment Land Assessment

1 Introduction

1.1 Background

- 1.1.1 Arcadis Consulting (UK) Limited has been commissioned by Pegasus Developments (the Applicant) to prepare this Planning Statement (PS) for the submission of a full planning application for a project at Clydesmuir Industrial Estate, Cardiff (the Application Site), for the development of 96 affordable homes, together with associated access, parking, landscaping, sustainable drainage features and supporting infrastructure hereafter referred to as 'the Proposed Development'. The redevelopment will require the demolition of the existing light industrial and warehouse buildings and change of use of the site to residential, in accordance with Cardiff's strategic objectives for housing delivery, brownfield regeneration, and sustainable placemaking.
- 1.1.2 The Application Site is located entirely within the boundaries of Cardiff Council, who are therefore the determining Local Planning Authority (LPA) for this application.
- 1.1.3 The Statement is informed by a pre-application enquiry submitted to Cardiff City Council and draws upon a comprehensive site context and policy appraisal. It is supported by technical assessments covering flood risk, ecology, transport, noise, air quality, and land contamination, along with a detailed Employment Land Review and Demolition Statement appended to this report.

1.2 Proposed Development

- 1.2.1 This full planning application seeks full planning permission for the Proposed Development outlined below:

The demolition of existing industrial buildings and redevelopment to deliver 96 affordable houses, associated works including access roads, drainage, landscaping, open space and other works.

1.3 Benefits of the Scheme

- 1.3.1 This Proposed Development will make a valuable contribution to the City's affordable housing supply, directly addressing local housing needs and supporting the Council's policy objectives. The Proposed Development promotes social inclusion by providing high-quality, tenure-blind affordable homes in a well-designed, sustainable setting. The varied housing mix and tenure options will cater to a broad range of households, while the provision of generous amenity space and sustainable drainage features will enhance residents' wellbeing and environmental resilience. Overall, the development will create a vibrant, inclusive, and sustainable neighbourhood that benefits both future residents and the wider community.

1.4 Pre-Application Advice

- 1.4.1 The Applicant engaged in pre-application discussions with Cardiff Council on 13/11/2025 (LPA ref. PA/25/00121). The advice received from the LPA has been considered when finalising this planning application. During the pre-application engagement the LPA confirmed that it supported the principle of development in this location. This is set out in the accompanying Pre Application Consultation Report.

1.5 Environmental Impact Assessment (EIA) Screening

1.5.1 It is understood that the Proposed Development does not pass the threshold to be considered EIA development. These proposals are considered to amount to an 'Infrastructure Project' for the purposes of Schedule 2 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (Development Type 10 (b)). However, the threshold of 150 dwellings is not met. Thus, these proposals do not pass the thresholds to be considered EIA development under Schedule 2.

1.6 Principle of Development

1.6.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that an application for planning permission should be determined in accordance with a Development Plan, unless material considerations indicate otherwise. The Development Plan for Cardiff is the CCC Local Development Plan (adopted LDP) (January 2016). CCC are also currently preparing a replacement LDP (replacement LDP) which is at an advanced stage, having gone through Deposit consultation in early 2025, and this may be the adopted LDP at the time of determination of a future application.

1.6.2 Other material planning policy considerations include national planning policy, namely Planning Policy Wales (Edition 12) and Future Wales: The National Plan 2040, in addition to CCC's Supplementary Planning Guidance (SPG).

1.6.3 The Site is unallocated land within the Cardiff settlement boundary. The settlement boundaries displayed both within adopted and forthcoming replacement LDPs set out the urban extent of Cardiff and the towns and villages in its hinterland. For land within settlement boundaries, the current and emerging LDPs are clear that development will be permitted within settlement boundaries subject to any other material planning considerations. The overarching principle of the Proposed Development is considered acceptable on the Site.

1.6.4 The Site is situated within a highly built-up area of Cardiff, characterised by a diverse range of uses including residential, employment and transport related uses. Notably, existing residential uses directly abut the Site, reflective of the strong residential pattern of development in the immediate vicinity. The Site benefits from proximity to established transport infrastructure, facilitating ease of movement and accessibility for future residents.

1.6.5 The Site is considered highly sustainable due to its close proximity to major transport routes and public transport provision; readily available services and facilities within walking or short travel distance and its walkability – the built-up nature of the area promotes walkability and reduces dependency on private vehicles. In view of the above, the principle of development is considered acceptable.

1.6.6 Given its location, surrounding land use and accessibility it is well suited to residential development. The Proposed Development would complement the existing character of the area and contribute positively to Cardiff's housing supply in a sustainable manner.

1.6.7 The principle of the Proposed Development in this location is considered acceptable.

1.7 Supporting Documentation

1.7.1 The planning application for the Proposed Development comprises the following plans and documents in Table 1-1. These submission materials should be read in conjunction with this PS.

Table 1-1 – Supporting Documentation for Planning Application

Document / Plan	Reference
Application Forms	January 2026
Covering Letter	January 2026
Planning Statement	30295735-AUK-00-XX-RP-TC-0001-01- Planning Statement
Design and Access Statement	January 2026
Site Location Plan	CMWW-HMA-ZZ-ZZ-D-A-90000 - Site Location Plan-S0-P01
Existing Site Plan	CMWW-HMA-ZZ-ZZ-D-A-90001 - Existing Site Plan-S0-P01
Proposed Site Plan	CMWW-HMA-ZZ-ZZ-D-A-90002 - Proposed Site Plan-S0-P03
Proposed Site Layout	CMWW-HMA-ZZ-ZZ-D-A-90003 - Proposed Site Layout-S0-P02
Proposed Site Boundary Treatments	CMWW-HMA-ZZ-ZZ-D-A-90004 - Proposed Site Boundary Treatments Plan-S0-P01
Proposed Storage Strategy Plan	CMWW-HMA-ZZ-ZZ-D-A-90005 - Proposed Storage Strategy Plan-S0-P01
1B2P Walkup Flat Ground Floor Plan	CMWW-HMA-XX-00-DR-A-00210-1B2P Walkup Flat - Ground Floor Plan-S0-P01
2B3P Walkup Flat Ground Floor Plan	CMWW-HMA-XX-00-DR-A-00310-2B3P Walkup Flat - Ground Floor Plan-S0-P01
1B2P Walkup Flat First Floor Plan	CMWW-HMA-XX-01-DR-A-00211-1B2P Walkup Flat - First Floor Plan-S0-P01
2B3P Walkup Flat First Floor Plan	CMWW-HMA-XX-01-DR-A-00311-2B3P Walkup Flat - First Floor Plan-S0-P01
Apartments Proposed Ground Floor Plan	CMWW-HMA-XX-XX-DR-A-00110-Apartments- Proposed Ground Floor Plan-S0-P01

Document / Plan	Reference
Apartments Proposed First Floor Plan	CMWW-HMA-XX-XX-DR-A-00111-Apartments - Proposed First Floor Plan-S0-P01
Apartments Proposed Second Floor Plan	CMWW-HMA-XX-XX-DR-A-00112-Apartments - Proposed Second Floor Plan-S0-P01
Apartments Proposed Elevations Plan	CMWW-HMA-XX-XX-DR-A-00130-Apartments - Proposed Elevations-S0-P01
1B2P Walkup Flat Elevations Plan	CMWW-HMA-XX-XX-DR-A-00230-1B2P Walkup Flat - Elevations-S0-P01
2B3P Walkup Flat Elevations Plan	CMWW-HMA-XX-XX-DR-A-00330-2B3P Walkup Flat - Elevations-S0-P01
2B4P Elevations Plan	CMWW-HMA-XX-XX-DR-A-00430-2B4P - Elevations-S0-P1
3B5P Elevations Plan	CMWW-HMA-ZZ-XX-DR-A-00530-3B5P Elevations-S0-P1
2B4P Ground and First Floor Plans	CMWW-HMA-XX-ZZ-DR-A-00410-2B4P - Ground & First Floor Plans-S0-P1
3B5P Ground and First Floor Plans	CMWW-HMA-ZZ-XX-DR-A-00510-3B5P Ground & First Floor Plans-S0-P1
Landscape General Arrangement Plan	30295735-ARC-EGN-ZZ-TR-ZZ-00004
Landscape Planting Plan	30295735-ARC-EGN-ZZ-TR-ZZ-00005
Landscape Typical Details Plan	30295735-ARC-EGN-ZZ-TR-ZZ-00006
Outline Specification and Material Schedule	30295735-ARC-EGN-ZZ-TR-ZZ-00001
Landscape Moodboard	30295735-ARC-EGN-ZZ-TR-ZZ-00007
Engineering General Arrangement Plan	25000.101
Transport Statement	25-01068-TS01
Noise Impact Assessment	30295735-AUK-00-XX-RP-TC-0001-01-Noise Impact Assessment

Document / Plan	Reference
Land Contamination Report	16032021-15927-1
Green Infrastructure Statement including Net Biodiversity Benefit Statement	30295735-ARC-EGN-ZZ-TR-ZZ-0000
Preliminary Ecological Appraisal	30295735-AUK-00-XX-RP-TC-0001-01
Arboricultural Impact Assessment	30295735-ARC-XX-XX-RPT-ARB-001-AIA_V1
Air Quality Assessment	30295735-AUK-00-XX-RP-TC-0001-01-Air Quality Impact Assessment
Flood Consequences Assessment including Drainage Strategy	D100-Drainage and FCA_CIE
Visualisation 1	January 2026
Visualisation 2	January 2026

1.8 Report Structure

1.8.1

The structure of this PS is set out as follows:

- Chapter 2 sets out the location, local context, and relevant planning history of the Site.
- Chapter 3 provides a description of the proposed development.
- Chapter 4 sets out the planning policy relevant to the Site and the proposed development.
- Chapter 5 provides an appraisal of how the proposed development complies with relevant local and national planning policy and guidance.
- Chapter 6 summarises the report and concludes with reasons for planning approval.

2 Site Description and Context

2.1 Application Site and Context

- 2.1.1 Clydesmuir Industrial Estate is situated within the Cardiff settlement boundary, on previously developed (brownfield) land in Tremorfa. The site measures 1.84ha and currently operates as an industrial estate, occupied by a variety of light industrial and commercial businesses including warehouses, a flea market, self-storage facilities, and an upholstery company. The site is accessible via an unnamed adopted road connected to Clydesmuir Road, with a network of internal service roads.
- 2.1.2 Surrounding the site to the north and west are railway lines, while to the east lies St Catherine's Industrial Estate. The southern boundary is characterised by residential dwellings, marking a clear transition between employment and residential land uses. The physical context presents an opportunity to repurpose an underused industrial estate for housing, with the site benefitting from proximity to public transport, local amenities, employment centres, and established residential communities.
- 2.1.3 The site is generally flat, with a legacy of hardstanding and service infrastructure. Vegetation is limited primarily to the boundaries, and there are no significant ecological or archaeological constraints identified by initial surveys. The Site is located within a pluvial Flood Zone 2 and is classified as a highly vulnerable development under national planning policy. However, it is also situated within a Defended Zone for this type of flooding, providing a degree of protection. For this area subject to flood risk, a robust drainage and sustainable urban drainage strategy is proposed.
- 2.1.4 The Site is not subject to any statutory or non-statutory environmental, landscape, or heritage designations.
- 2.1.5 There are no Public Rights of Way within or nearby the Site.

2.2 Planning History

- 2.2.1 The Site has comprised an industrial estate for a significant period of time. It was historically a biscuit factory. As such, there are several planning applications seeking consent for the alteration and change of use of the buildings within it. The Proposed Development will result in the change of use of the site to residential and will include the demolition of all buildings on site and reconfiguration of the highway layout. Previous applications are considered to be of limited relevance to the Proposed Development.

3 Proposed Development

3.1 Description of the Proposed Works

3.1.1 This planning application seeks full planning permission for the Proposed Development outlined below:

The demolition of existing industrial buildings and redevelopment to deliver 96 affordable houses, associated works including access roads, drainage, landscaping, open space and other works.

3.1.2 The application proposes the demolition of all existing industrial buildings and the delivery of a new residential neighbourhood comprising 96 affordable homes. The scheme will offer a balanced mix of dwelling types and sizes, including one, two, and three-bedroom apartments and houses. All homes will be delivered as affordable units, covering a blend of tenures tailored to meet identified local need, with full compliance to the Welsh Government's Development Quality Requirements (DQR).

3.1.3 The table below presents the accommodation schedule, as shown on the Proposed Site Layout Plan (drawing reference CMWW-HMA-ZZ-ZZ-D-A-90003).

Table 3-1 – Accommodation Schedule

House Type	Unit Count
3B5P House	12
2B4P House	36
2B3P Walkup	6
1B2P Walkup	24
1B2P Flats	18
Total	96

3.1.4 The site layout has been carefully planned to provide a legible street hierarchy, with a new access road running through the development and connecting to Clydesmuir Road. The internal road network is designed to prioritise pedestrian movement, encourage cycling, and ensure safe vehicular access for residents and service vehicles. Parking provision meets the requirements for affordable housing, with dedicated spaces for disabled users and secure cycle storage for all dwellings.

3.1.5 Private and communal amenity spaces are integrated throughout the scheme, with landscaped green corridors and rain gardens forming part of a wider strategy to enhance biodiversity and green infrastructure. The development incorporates a comprehensive sustainable drainage (SuDS) solution, including permeable paving, attenuation basins, and planting to manage surface water and improve the site's ecological value.

3.1.6 Architecturally, the scheme draws inspiration from both contemporary design and local context. Buildings are predominantly two to three storeys in height, utilising a robust material palette of brickwork, render, and metal cladding that references local vernacular while establishing a distinct identity for the new neighbourhood.

3.2 Design Principles

3.2.1 The design rationale for the proposed redevelopment of Clydesmuir Industrial Estate has been informed by a set of principles and key constraints and opportunities for the Site, intended to create a high-quality, sustainable and inclusive residential neighbourhood. These principles are:

- **Functional Design:** The site layout and dwelling types have been developed to maximise the efficient use of the site, providing a range of affordable homes while ensuring high standards of amenity, safety, and accessibility for future residents.
- **Environmental Sensitivity:** The positioning of buildings, roads, and open spaces is designed to minimise adverse impacts on the surrounding environment, including neighbouring residential properties and existing infrastructure.
- **Landscape Integration:** The development seeks to be unobtrusive within its urban context by incorporating soft landscaping, tree planting, and sensitive boundary treatments. Existing mature trees and hedgerows are retained where possible, with new green corridors introduced to enhance the site's appearance and ecological function.
- **Access and Connectivity:** Existing access routes from Clydesmuir Road are maintained and enhanced to provide safe and efficient vehicular and pedestrian links. The internal road layout prioritises accessibility for all users, including those with disabilities, and integrates with the wider street network.
- **Biodiversity Enhancement:** The scheme maximises opportunities for ecological improvement through the creation of new habitats, rain gardens, and green spaces, supporting biodiversity net gain and climate resilience.
- **Community Safety and Amenity:** The design ensures natural surveillance over shared spaces, clear demarcation between public and private areas, and incorporates secure cycle and bin storage to promote a safe and attractive living environment.

3.3 Layout

3.3.1 The proposed site layout has been developed to be safe, functional and efficient, informed by technical studies and best practice guidance. Residential blocks are arranged along a clear internal street network, with direct links to Clydesmuir Road and secondary access for emergency vehicles. The design provides legible movement routes for vehicles, pedestrians and cyclists, incorporating traffic calming and safe crossings.

3.3.2 The layout responds to environmental receptors and constraints identified in supporting studies, including noise, air quality, ecology, and existing utilities. Dwellings are oriented to optimise sunlight and privacy, with communal green spaces and play areas located centrally for ease of access and supervision.

3.3.3 The built footprint is minimised relative to the overall site area, with substantial provision for soft landscaping, tree planting, and biodiversity habitat zones around the perimeter and within internal courtyards. These areas create natural screening, visual interest, and space for informal recreation.

3.3.4 The final layout is illustrated in the submitted site plans, showing the arrangement of residential blocks, associated parking, cycle storage, bin stores, and landscaped amenity spaces. Secure boundaries are provided where appropriate, ensuring privacy and safety for residents.

3.4 Scale, Massing and Appearance

3.4.1 The scale of the proposed development is determined by the need to deliver a mix of affordable homes in a manner that respects local character and context. Buildings range from two to three storeys, with a massing strategy that places taller elements centrally and transitions to lower-rise forms at the boundaries. This is shown on the visualisations which accompany the planning application.

3.4.2 All buildings are designed with a contemporary architectural approach, using brickwork, render, and metal cladding in muted tones to complement surrounding development. Rectilinear forms and simple rooflines are used to limit visual intrusion, while articulation and detailing provide interest and identity.

3.4.3 The highest residential blocks will reach up to three storeys, but the majority of homes are two storeys. Ancillary structures such as cycle stores and bin stores are single-storey and discreetly located. Boundary treatments, including railings and hedges, are designed for security and integration with landscaping.

3.4.4 Material details, colours, and finishes will be confirmed at the detailed design stage and secured by planning condition. All external treatments are selected for durability, sustainability, and visual harmony.

3.5 Landscaping

3.5.1 The landscape strategy for the proposed development has been designed to create an attractive, functional, and sustainable environment for future residents and the wider community. The approach integrates high-quality public and private outdoor spaces, while enhancing local biodiversity and supporting well-being.

3.5.2 Key elements of the proposed landscape scheme include:

- **Public Open Space:** The development incorporates areas of open green space designed to provide opportunities for recreation, relaxation, and informal play. These spaces are accessible to all residents and are positioned in relation to natural surveillance.
- **Private Gardens:** All houses benefit from private rear gardens, offering secure and usable outdoor space for residents.
- **Communal Amenity Space:** For apartments communal open space is provided across the site, ensuring all occupants have access to high-quality outdoor amenity regardless of tenure.
- **Planting Strategy:** The planting scheme, as set out on the Landscape Planting Plan (drawing reference: 30295735-ARC-EGN-ZZ-DR-ZZ-00005) will include a mix of native trees, hedgerows and shrubs, wildflower planting, amenity grass and species selected for their biodiversity value, visual interest, and seasonal variation. Proposed tree planting will help to define streets, provide shade, and enhance the site's ecological value.
- **Boundaries and Screening:** Boundary treatments, as shown on the Proposed Site Boundary Treatments Plan (drawing reference: CMWW-HMA-ZZ-ZZ-D-A-90004) will comprise vertical feather edged board fencing, black metal estate fencing, and brick walls to ensure privacy, security, and a positive relationship with neighbouring properties.

- **Sustainable Drainage:** Landscape features will incorporate sustainable drainage measures, such as swale and rain garden planting, to manage surface water and support site sustainability.
- A detailed Landscape Planting Plan is submitted with this application, illustrating the layout, planting, and hard landscape elements proposed. The landscape approach has been carefully coordinated with the wider site layout and access arrangements.

3.6 Access and Parking

3.6.1 Access to the site is via the existing adopted road network, with improvements to internal circulation and connections to public transport and pedestrian links. The Transport Statement provides full details of proposed access arrangements, including swept path analysis for refuse and emergency vehicles.

3.6.2 No public rights of way traverse the site, and none will be adversely affected by the development during construction or operation. Permeable footpaths and cycle routes are provided throughout, enhancing accessibility for all users.

Construction and Operation Access

3.6.3 During construction, site access will be managed to minimise disruption to neighbouring properties, with temporary controls and signage as required. Operational access post-completion will be limited to residents, visitors, and service vehicles, with low anticipated trip generation given the affordable housing tenure.

3.6.4 The scheme is not expected to generate significant additional vehicle movements. Occasional management and maintenance visits will occur, but the primary mode of travel for residents is anticipated to be walking, cycling or public transport due to the site's sustainable location.

Parking

3.6.5 A total of 86 car parking spaces are proposed, including provision for disabled users and electric vehicle charging. Parking is arranged in small groups adjacent to dwellings and amenity spaces, with secure cycle storage provided for all homes. The layout ensures parking does not dominate the streetscape, and landscaping is used to screen and soften paved areas. There is one space per house or walk up unit proposed and a total of 4 spaces per apartment block proposed.

3.7 Drainage

3.7.1 The Drainage Strategy developed for the proposed development provides a comprehensive approach to managing surface water runoff in accordance with current best practice and regulatory requirements. The proposed run off rate for all storm events is calculated at 28l/s, which has been agreed in pre application correspondence with the Cardiff SAB. It incorporates sustainable drainage systems to attenuate surface water flows, ensuring that runoff rates from the site will not exceed agreed rates. This includes the use of features such as permeable paving, swales, and attenuation basins, which work together to capture, slow, and treat surface water before controlled discharge to the local drainage network. These measures are designed to accommodate rainfall up to and including the 1 in 100 year storm event, with an allowance for climate change, as detailed in the Drainage Strategy report.

3.7.2 By implementing the proposed drainage measures, the strategy ensures that there will be no increased risk of flooding either on the development site itself or to adjacent land and downstream receptors. Surface water will be managed in a way that mimics natural drainage patterns and

reduces the volume and rate of water leaving the site. The Drainage Strategy confirms that the scheme is fully compliant with local planning policy and national guidance, and that with the recommended mitigation in place, the development will not contribute to off-site flood risk.

3.8 Noise

- 3.8.1 The noise assessment concludes that, with appropriate mitigation measures, the proposed residential development is suitable for habitation despite its proximity to the railway and industrial estate. Standard sealed double-glazed windows (minimum 4/12/4 specification) fitted with acoustic trickle vents are recommended for all dwellings facing these noise sources to ensure adequate internal sound insulation. In addition, the use of close boarded fencing for gardens near the railway and industrial estate will help to address elevated external noise levels and improve the quality of outdoor amenity spaces.
- 3.8.2 Overall, provided that these recommendations are implemented and verified through additional assessment at the detailed design stage, the development can achieve good acoustic performance. Importantly, the assessment also finds that vibration from the railway is not expected to adversely affect future residents.

3.9 Energy

- 3.9.1 In accordance with the Welsh Government Design Guidance (WDQR) governing new grant-funded residential developments, stringent energy efficiency standards must be achieved to support the transition to low-carbon, sustainable communities. To comply with requirements for an Energy Performance Certificate (EPC) rating of 'A', the incorporation of renewable energy technology is essential. Photovoltaic (PV) cells are therefore proposed as a key strategy to deliver on-site renewable energy generation, helping to reduce carbon emissions and lower operational energy costs for future residents.
- 3.9.2 The PV panels are designed to be "in line" within the plane of the roof, ensuring they are fully integrated and visually unobtrusive. This approach not only meets WDQR and EPC 'A' targets but also maintains the aesthetic integrity of the residential development, avoiding the visual impact often associated with surface-mounted panels. The integration of PV technology will be carefully coordinated with other design and construction elements to optimise energy performance, comply with all relevant regulations, and contribute to the overall sustainability of the scheme.

3.10 Waste Management Plan

- 3.10.1 The proposed development has been carefully designed to ensure effective and convenient waste management for all future residents, in line with local authority requirements and best practice.
- 3.10.2 For the houses, each dwelling will be provided with private, dedicated waste storage areas. These storage spaces are located within the curtilage of each property, allowing residents to securely store refuse and recycling bins away from public view, while ensuring they are easily accessible for collection on designated days.
- 3.10.3 For the apartments, communal waste storage facilities will be provided. These secure, purpose-built communal stores are located within close proximity to the apartment entrances and are easily accessible to all residents. The communal stores have been sized to accommodate the required number of bins for general waste, recyclables, and food waste, and have been positioned to facilitate efficient collection by the local waste management service.

- 3.10.4 The accompanying Proposed Storage Strategy Plan (drawing reference: CMWW-HMA-ZZ-ZZ-D-A-90005) clearly illustrates the location and arrangement of all private and communal waste storage areas, as well as the design of these units. The layout of the proposed development ensures that waste collection vehicles have safe and convenient access to all relevant locations, minimising disruption to residents and ensuring compliance with the operational requirements of the local waste collection authority.
- 3.10.5 If necessary, details of the Waste Management can be addressed through an appropriate planning condition.

3.11 Demolition

- 3.11.1 The proposed redevelopment involves the demolition of the existing industrial units on site to enable the delivery of much-needed affordable housing. The existing units are either currently vacant, or tenancies are ending in 2026 (see Appendix A for a full assessment of the employment land) and are no longer suited to modern industrial or employment needs. Their removal will facilitate a more efficient and sustainable use of the land, contributing to local housing targets and the creation of a high-quality residential environment.
- 3.11.2 The demolition works will be carefully managed to minimise any potential impacts on neighbouring properties, local residents, and the surrounding environment. All demolition activities will be carried out in accordance with best practice and relevant health and safety legislation. Key considerations will include the management of noise, dust, vibration, traffic and site access, as well as the appropriate handling and disposal of waste materials.
- 3.11.3 It is proposed that a detailed Demolition Method Statement be secured via a planning condition. This Statement will be submitted and approved by the Local Planning Authority prior to the commencement of demolition works. The Demolition Method Statement will address:
 - A full schedule of the demolition process and phasing.
 - Measures for controlling noise, dust and vibration.
 - Site security and safety arrangements.
 - Traffic management and contractor parking.
 - Hours of work.
 - Waste management and recycling.
 - Procedures for dealing with hazardous materials (if any).
 - Communication with neighbouring residents and businesses.
- 3.11.4 By securing the details of the demolition through an appropriate planning condition, the Council and local community can be assured that demolition will be undertaken in a safe, orderly, and considerate manner, paving the way for the site's redevelopment for affordable housing.

3.12 Outline Construction Environmental Management Plan

- 3.12.1 The Construction Environmental Management Plan (CEMP) for the demolition of existing industrial units and subsequent development of residential dwellings will establish robust procedures to manage and mitigate environmental impacts throughout all stages of the project. Key considerations will include dust and noise suppression, waste management, protection of local watercourses, and safeguarding of biodiversity within and adjacent to the site. The plan will also detail measures for traffic management, site security, and communication with local stakeholders, ensuring that construction activities are conducted responsibly and in accordance with best practice standards.

3.12.2 To ensure effective implementation, a detailed CEMP could be secured via a planning condition prior to commencement of works. This condition will require the submission and approval of a comprehensive CEMP that fully addresses all potential environmental risks identified during the planning process. The approved CEMP will be subject to regular review and monitoring by the local planning authority, with compliance required throughout demolition and construction phases. This approach ensures that environmental protection remains a priority and that appropriate mitigation measures are enforced, supporting sustainable development and minimising disruption to the surrounding community.

4 Planning Policy Context

4.1.1 This chapter sets out the national and local planning policy relevant to the Application Site and the Proposed Development.

4.2 Overview

4.2.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 (PCPA) requires applications to be determined in accordance with policies of the statutory Development Plan unless material considerations indicate otherwise.

Development Plan

4.2.2 For the purposes of Section 38(6) and in considering the development proposal the Development Plan comprises the following relevant documents:

- Cardiff Local Development Plan (LDP) (January 2016)

Material Considerations

4.2.3 In addition to the Development Plan there are several material considerations. Relevant material considerations are listed below:

- Supplementary Planning Guidance
- Future Wales (The National Plan)
- Planning Policy Wales (Edition 12) (PPW)
- Technical Advice Notes (TANs)
- Cardiff Replacement LDP (Deposit Consultation Draft 2025)

4.3 Development Plan

City of Cardiff Local Development Plan 2006-2026 (LDP)

4.3.1 The adopted Cardiff Council LDP 2016–2026 sets the planning framework for the site. Policy KP3(B) defines settlement boundaries as a key tool for managing spatial growth, indicating where development is generally acceptable, subject to further planning considerations.

4.3.2 Design and sustainability are central themes within the LDP. Policy KP5 requires all new development to demonstrate high-quality, sustainable design that enhances community identity, safety, and supports active modes of travel such as walking and cycling. In support, Policy T1 seeks to increase accessibility to jobs, services, and community facilities via sustainable travel options. Policy KP8, focused on sustainable transport, aims for a 50:50 split between car and non-car journeys by maximising public transport use and ensuring accessibility for all.

4.3.3 The LDP also addresses waste management and social needs. Policy KP12 mandates that new developments provide for effective waste storage and recycling, helping to meet environmental targets. Policy KP13 and Policy H3 emphasise the delivery of sustainable neighbourhoods and affordable housing to meet local needs and improve quality of life. Protection and enhancement of green infrastructure is covered by Policy KP16 and linked policies, including C4 and C5, which safeguard open spaces and provide for recreation, while Policy EN8 protects trees, woodlands, and hedgerows from harmful development.

4.3.4 Policy EC3 relates to Alternative Use of Employment Land and Premises and is of relevance to the project due to the proposed redevelopment of the Site to deliver affordable housing. The Policy sets out that *'development of business, industrial and warehousing land will only be permitted if:*

The land or premises are no longer well located for business, industrial and warehousing use; or

There is no realistic prospect of employment use on the site and/or the property is physically unsuitable for employment use, even after adaption/refurbishment or redevelopment; or

There is no need to retain the land or premises for business, industrial or warehousing use, having regard to the demand for such land and premises and the requirement to provide for a range and choice of sites available for such use; and

There will be no unacceptable impact on the operating conditions of existing businesses.'

4.3.5 Further relevant adopted LDP policies are set out below.

Table 4-1 – Adopted LDP Policies

Topic pic	Adopted LDP Policy
Overarching Policy	<ul style="list-style-type: none">• KP5: GOOD QUALITY AND SUSTAINABLE DESIGN• C3: COMMUNITY SAFETY/CREATING SAFE ENVIRONMENTS
Housing	<ul style="list-style-type: none">• KP1: LEVEL OF GROWTH• H3: AFFORDABLE HOUSING
Environmental Protection	<ul style="list-style-type: none">• KP16: GREEN INFRASTRUCTURE• EN6: ECOLOGICAL NETWORKS AND FEATURES OF IMPORTANCE FOR BIODIVERSITY• EN8: TREES, WOODLANDS AND HEDGEROWS• EN10: WATER SENSITIVE DESIGN
Heritage	<ul style="list-style-type: none">• KP17: BUILT HERITAGE
Open Space	<ul style="list-style-type: none">• C5: PROVISION FOR OPEN SPACE, OUTDOOR RECREATION, CHILDREN'S PLAY AND SPORT
Flooding	<ul style="list-style-type: none">• EN14: FLOOD RISK• EN10: WATER SENSITIVE DESIGN
Highways and Transportation	<ul style="list-style-type: none">• KP8: SUSTAINABLE TRANSPORT• T1: WALKING AND CYCLING• T5: MANAGING TRANSPORT IMPACTS• T6: IMPACT ON TRANSPORT NETWORKS AND SERVICES
Infrastructure	<ul style="list-style-type: none">• KP6: NEW INFRASTRUCTURE

Topic pic	Adopted LDP Policy
	• KP7: PLANNING OBLIGATIONS
Pollution	• EN13: AIR, NOISE, LIGHT POLLUTION AND LAND CONTAMINATION
Climate Change	• KP15: CLIMATE CHANGE
Health, Wellbeing and Food	<ul style="list-style-type: none"> • KP14: HEALTHY LIVING • C6: HEALTH
Circular Economy / Waste	<ul style="list-style-type: none"> • W2: PROVISION FOR WASTE MANAGEMENT FACILITIES IN DEVELOPMENT

4.4 Material Considerations

Supplementary Planning Guidance

4.4.1 The following adopted guidance documents are material considerations and have been applied as part of the application submission.

Green Infrastructure SPG (November 2017)

4.4.2 The SPG consists of a series of Technical Guidance Notes covering topics such as ecology and biodiversity, trees, public rights of way, river corridors, soils, and the protection and provision of open space in new developments. For the proposed development, the most relevant aspect is the guidance on protecting and providing open space.

4.4.3 While Planning Policy Wales does not set out specific open space standards, it encourages local authorities to develop their own. In response, Cardiff City Council has adopted the Fields in Trust 'Benchmark Standard' of 2.43 hectares of functional open space per 1,000 projected population. The SPG provides detailed standards in Table 1 of its Guidance Note, ensuring a consistent approach to open space provision in new developments.

4.4.4 Section 5 of the Guidance Note outlines requirements for open space provision, and links to LDP Policy KP7 (Planning Obligations), which is used to secure mitigation for any impacts directly related to development. Planning obligations are calculated on a case-by-case basis according to SPG criteria. If a development would result in the loss of open space and create or worsen a deficiency, compensatory or alternative provision of equivalent community benefit may be considered acceptable, as further detailed in the Planning Obligations SPG.

Managing Transport Impacts (incorporating Parking Standards) (July 2018)

4.4.5 The SPG reinforces the LDP commitment to the Manual for Streets User Hierarchy, which prioritises pedestrians first, followed by cyclists, public transport users, special service vehicles, and places other motorised traffic last. The SPG also references the LDP's goal of achieving a 50:50 modal split between sustainable and car-based travel.

4.4.6 In line with these objectives, the SPG sets out maximum parking standards for new developments, distinguishing between Cardiff's 'Central Area' and 'Outer Area'. The application site is located within the 'Central Area', where lower car parking standards apply in order to encourage sustainable

travel. However, Paragraph 6.11 acknowledges that there may be flexibility in how these standards are implemented, depending on specific site circumstances.

4.4.7 For residential developments (Use Class C3), the SPG stipulates a maximum of one car parking space per unit and a minimum of one cycle parking space per bedroom, with disabled parking included within the overall car parking allocation. The SPG also sets out maximum car parking and minimum cycle parking requirements for any commercial uses on the ground floor, supporting the shift towards sustainable modes of transport.

Planning for Health and Wellbeing (November 2017)

4.4.8 This SPG recognises the vital role of planning in enabling healthier lifestyle choices and addressing health inequalities. It sets out a range of considerations for developers, including promoting active lifestyles by prioritising walking and cycling, ensuring interconnectivity within and between developments, and providing access to community and retail facilities. Key areas also include the provision of green spaces, supporting a healthy food environment through access to fresh produce and limiting hot food takeaways, reducing exposure to air, noise, and light pollution, ensuring access to essential services, improving road safety, and encouraging the design of healthy buildings using quality materials and good internal layouts.

4.4.9 The policy acknowledges that not all health-related issues will apply to every development, so a balanced and context-sensitive approach is required. Developers should identify and address the relevant health and wellbeing considerations within their proposals, supported by appropriate documentation. The policy provides a checklist of common issues such as affordable family housing, connectivity to walking/cycling networks, public transport promotion, highway safety, provision of health and education services, employment opportunities, and access to social infrastructure.

4.4.10 In addition, the document links these health and wellbeing principles directly to relevant Local Development Plan (LDP) policies. These cover areas such as accessible housing, public realm enhancement, noise and air pollution minimisation, open space and play space provision, opportunities for local food growing, contributions to biodiversity, flood risk reduction, and climate change adaptation. The aim is to ensure that planning decisions systematically contribute to healthier, more inclusive, and sustainable communities.

Planning Obligations (January 2017)

4.4.11 This SPG ensures that new developments contribute appropriately to the necessary infrastructure and mitigation measures required to address their impacts. Timely delivery of the right type and level of infrastructure is crucial to support new housing, economic growth, and the creation of sustainable communities, while also enhancing the quality of life for existing residents, workers, and visitors. Conversely, inadequate infrastructure provision can negatively affect the use and quality of local, countywide, and regional amenities.

4.4.12 The primary aim of the SPG is to provide developers, agents, and stakeholders with clear guidance on how planning obligations will be secured. It supplements Local Development Plan Policies KP6 (New Infrastructure) and KP7 (Planning Obligations) by outlining Cardiff's approach to securing infrastructure and environmental improvements through planning obligations. The SPG also clarifies the relationship between planning obligations and the Community Infrastructure Levy (CIL), details the types of contributions expected, and encourages early consideration of infrastructure needs in the development process.

4.4.13 The document details the infrastructure elements that will be secured via planning obligations. It specifies the types of developments from which contributions will be sought, the nature and scale of these requirements, and, where applicable, the methodology for calculating the level of obligation.

This approach ensures a transparent and consistent process for securing the infrastructure necessary to support sustainable development in Cardiff.

Residential Design Guide (January 2017)

4.4.14 This SPG outlines the issues that a design for new residential development in Cardiff should address as it seeks planning permission. It applies to major residential development proposals providing 10 dwellings or more, and which require a Design and Access Statement.

Safeguarding Business and Industrial Land and Premises (November 2017)

4.4.15 This SPG provides guidance on the assessment of alternative development proposals for protected business, industrial and warehousing land and premises and allows applicants to determine the acceptability of alternative uses on existing and allocated employment land.

4.4.16 Although the Site is currently operational as industrial land is it not allocated as employment land in the adopted LDP and therefore the guidance in this SPG does not apply. However, full assessment of the loss of industrial land has been undertaken in this PDAS in relation to LDP Policy EC3.

Waste Collection and Storage Facilities (October 2016)

4.4.17 This SPG requires that details of the location, volume, management and collection arrangements for waste and recycling must be submitted as part of all full planning applications, including:

- Proposed location and design of storage for the storage of food waste, recycling and residual waste.
- Kerbside location for collection.
- Access routes for collection vehicles.

Replacement Cardiff Local Development Plan

4.4.18 The forthcoming replacement LDP contains a specific policy, EC7 (Alternative Use of Employment Land and Premises Not Identified Within Policy EC3 (Protected Employment Land) or Policy EC6 (Protecting Offices in the Central and Bay Business Area)), for employment sites that are not allocated as an existing employment site. Where alternatives to employment uses are proposed on unallocated existing employment sites, EC7 sets out that uses including residential development will be considered favourably provided:

'The site or premises are vacant/redundant, or where premises are still occupied the relocation of existing occupiers to other suitable accommodation will need to be demonstrated.'

'Residential proposals will need to satisfy the tests of Policy H8 [it is understood that this reference is made to Policy H9, which relates to proposed residential use on unallocated sites]. In such circumstances, Affordable Housing development may be more favourably considered.'

'Proposals for mixed use residential development that include provision for new employment workspace, community facilities or health services will be favoured subject to detailed considerations.'

4.4.19 Policy EC 7 of the replacement LDP refers to Policy H8, however, it is understood that this should be Policy H9 as this relates to proposed residential uses on unallocated sites. The adopted LDP has a similar policy, H6 (Change of Use or Redevelopment to Residential Use). The tests set out in these policies are identical aside from criterion vi, which is only present in H9 of the replacement LDP. The tests are set out as follows:

'There is no overriding need to retain the existing use of the land or premises and no overriding alternative local land use requirement;

The resulting residential accommodation and amenity will be satisfactory;

There will be no unacceptable impact on the operating conditions of existing businesses;

Necessary community and transportation facilities are accessible or can be readily provided or improved;

It can be demonstrated that the change of use has been assessed in terms of land contamination risk and that there are no unacceptable risks to the end users; and

The resulting residential accommodation is accessible by walking, cycling or public transport.'

4.4.20 Further draft Replacement LDP Policies which are of relevance to the proposed development are set out below.

Table 4-2 – Replacement LDP Policies

Topic pic	Forthcoming Replacement LDP Policy
Overarching Policy	<ul style="list-style-type: none">• SP3: ENSURING A MASTERPLANNING APPROACH• SP4: SECURING GOOD QUALITY AND SUSTAINABLE DESIGN• SP12: DELIVERING SUSTAINABLE NEIGHBOURHOODS, SOCIAL COHESION AND AFFORDABLE HOUSING• C3: COMMUNITY SAFETY/CREATING SAFE ENVIRONMENT
Housing	<ul style="list-style-type: none">• SP1: PROVIDING FOR SUSTAINABLE GROWTH• H3: AFFORDABLE HOUSING
Environmental Protection	<ul style="list-style-type: none">• SP21: MAINTAINING AND ENHANCING GREEN INFRASTRUCTURE AND BIODIVERSITY• BG2: ECOLOGICAL NETWORKS AND FEATURES OF IMPORTANCE FOR BIODIVERSITY• BG3: PRIORITY HABITATS AND SPECIES• BG4: NET BENEFITS FOR BIODIVERSITY AND THE GREEN INFRASTRUCTURE STATEMENT• BG5: TREES, WOODLANDS AND HEDGEROWS
Heritage	<ul style="list-style-type: none">• SP14: PROTECTING AND ENHANCING BUILT HERITAGE AND CULTURE• HE1: THE HISTORIC ENVIRONMENT

Topic pic	Forthcoming Replacement LDP Policy
Open Space	<ul style="list-style-type: none"> • POLICY OS2: PROVISION FOR OPEN SPACE, OUTDOOR RECREATION, CHILDREN'S PLAY AND SPORT • P1: PLAY AND INFORMAL RECREATION
Flooding	<ul style="list-style-type: none"> • W1: WATER SENSITIVE DESIGN • W3: FLOOD RISK
Highways and Transportation	<ul style="list-style-type: none"> • SP18: DELIVERING SUSTAINABLE TRANSPORT AND ACTIVE TRAVEL • T1: PRIORITISING WALKING AND CYCLING • T4: MANAGING TRANSPORT IMPACTS
Infrastructure	<ul style="list-style-type: none"> • SP5: SECURING NEW INFRASTRUCTURE • SP6: SECURING PLANNING OBLIGATIONS
Pollution	<ul style="list-style-type: none"> • SP22: MINIMISING IMPACTS ON NATURAL RESOURCES • PC1: AIR, NOISE, LIGHT POLLUTION AND LAND CONTAMINATION
Climate Change	<ul style="list-style-type: none"> • SP20: SECURING CLIMATE RESILIENCE, DECARBONISATION AND RENEWABLE ENERGY IN NEW DEVELOPMENTS • RE2: NET ZERO DEVELOPMENT
Health, Wellbeing and Food	<ul style="list-style-type: none"> • SP13: SECURING HEALTH AND WELLBEING AND RESILIENCE • HF1: HEALTH, WELLBEING AND DEVELOPMENT • HF2: THE PROVISION OF ALLOTMENTS • HF3: PROVISION OF FOOD GROWING SPACE IN NEW DEVELOPMENTS
Circular Economy / Waste	<ul style="list-style-type: none"> • SP23: MANAGING WASTE • MW9: PROVISION FOR WASTE MANAGEMENT FACILITIES IN DEVELOPMENT

Future Wales: The National Plan 2040

4.4.21 Future Wales is the national development framework for Wales, setting the strategic direction for development and land use to 2040. It replaces the Wales Spatial Plan and provides a framework to address key national priorities including economic growth, housing, environment, energy, transport, water, and waste. The Plan is underpinned by the Well-being of Future Generations (Wales) Act 2015, which requires public bodies to promote sustainable development that improves the economic, social, environmental, and cultural well-being of Wales.

Future Wales Outcomes and Spatial Strategy

4.4.22 Future Wales establishes eleven national outcomes that guide development and land use decisions. These include creating connected, inclusive, and healthy places; promoting vibrant rural and urban communities with access to homes, jobs, and services; fostering prosperity, innovation, and culture; supporting sustainable travel and world-class digital infrastructure; managing natural resources sustainably; enhancing biodiversity and ecosystem resilience; and achieving decarbonisation and climate resilience.

4.4.23 The spatial strategy divides Wales into five regions, North Wales, Mid Wales, South East Wales, South West Wales, and the Capital Region, with policies tailored to regional opportunities and challenges. National Growth Areas are identified as primary locations for growth and investment, focusing on urban regeneration and sustainable development.

The Well Being of Future Generations (Wales) Act 2015

4.4.24 The Well-being of Future Generations (Wales) 2015 places a duty on local planning authorities to take reasonable steps in exercising their functions in meeting sustainable development (or wellbeing) objectives. It was enacted to improve the social, economic, environmental, and cultural well-being of Wales. The Act sets out seven well-being goals to ensure that the needs of the present are met without compromising the ability of future generations to meet their own needs.

Planning Policy Wales (Edition 12) (PPW)

4.4.25 Planning Policy Wales (PPW) is the Welsh Government's principal national planning policy document. It sets out the framework for the planning system to deliver sustainable development in accordance with the Well-being of Future Generations (Wales) Act 2015. PPW guides the preparation of development plans and decision-making on planning applications. The latest version was published in February 2024 and is Edition 12.

Chapter 2 – People and Places: Achieving Well-being through Placemaking

4.4.26 PPW identifies five key principles for facilitating appropriate development:

- Growing the economy sustainably: Supporting economic well-being and optimising the use of existing infrastructure.
- Making best use of resources: Prioritising previously developed land to unlock regeneration potential, applying the proximity principle to address issues locally.
- Facilitating accessible and healthy environments: Creating inclusive places that promote healthy lifestyles and mental well-being, reducing car dependency and encouraging active travel.
- Creating and sustaining communities: Delivering balanced, well-designed places with a mix of homes, jobs, services, infrastructure, and facilities.
- Maximising environmental protection: Conserving and enhancing natural, historic, and cultural assets while avoiding negative environmental impacts such as pollution.

Chapter 3 – Strategic and Spatial Choices

4.4.27 Good design is fundamental to sustainable places, with development layout, form, scale, and appearance reflecting local character. Planning should minimise car dependency by promoting sustainable transport modes and ensure community safety, accessibility, and inclusivity.

4.4.28 Higher density development is encouraged in urban centres and near major public transport nodes to support service provision. The use of previously developed land is preferred over greenfield sites,

with planning authorities encouraged to collaborate with landowners to bring forward suitable brownfield sites.

Chapter 4 – Active and Social Places

- 4.4.29 The sustainable transport hierarchy prioritises walking, cycling, and public transport over private vehicles. Development proposals should maximise accessibility by active and sustainable travel modes and provide appropriate on-site infrastructure.
- 4.4.30 The planning system must enable the delivery of a range of well-designed, energy-efficient, good quality market and affordable housing to support sustainable communities. Maximising the use of previously developed and underutilised land for housing supports regeneration and reduces pressure on greenfield sites. Where new uses involve evening or night-time activities near residential areas, appropriate mitigation should be provided to protect amenity.

Chapter 6 – Distinctive and Natural Places

- 4.4.31 Water and flood risk policies require adequate water supply and sewerage infrastructure, with drainage systems designed to ensure capacity and water quality. Developments exceeding one dwelling or 100 square metres of construction require approval from the Sustainable Drainage Systems (SuDS) Approval Body before commencement. Development must not increase flood risk on or off site.
- 4.4.32 Air quality and soundscape policies seek to secure clean air and appropriate acoustic environments. Development should avoid creating areas of poor air quality or inappropriate noise levels and incorporate measures to reduce exposure to pollution and promote suitable soundscapes.

Technical Advice Notes

- 4.4.33 The Technical Advice Notes that are relevant to the proposed development are:
 - TAN 2 – Planning and Affordable Housing (2006)
 - TAN 5 – Nature Conservation and Planning (2009)
 - TAN 6 – Planning for Sustainable Rural Communities (2010)
 - TAN 11 – Noise (1997)
 - TAN 12 – Design (2016)
 - TAN 16 – Sport, Recreation and Open Space (2009)
 - TAN 15 – Development, flooding and coastal erosion (2025)
 - TAN 18 – Transport (2007)

5 Planning Assessment

5.1.1 This Chapter provides an appraisal of how the Proposed Development complies with relevant local and national planning policy and guidance.

5.1.2 The relevant planning considerations are:

- Principle of Development.
- Affordable Housing
- Flood Risk.
- Design.
- Access and Highways.
- Ecology.
- Employment Land.
- Land Contamination.
- Noise.

5.2 Principle of Development

5.2.1 The Site is unallocated land within the Cardiff settlement boundary. The settlement boundaries displayed both within adopted and forthcoming replacement LDPs set out the urban extent of Cardiff and the towns and villages in its hinterland. For land within settlement boundaries, the current and emerging LDPs are clear that development will be permitted within settlement boundaries subject to any other material planning considerations. The overarching principle of the Proposed Development is considered acceptable on the Site.

5.2.2 The Site is situated within a highly built-up area of Cardiff, characterised by a diverse range of uses including residential, employment and transport related uses. Notably, existing residential uses directly about the Site, reflective of the strong residential pattern of development in the immediate vicinity. The Site benefits from proximity to established transport infrastructure, facilitating ease of movement and accessibility for future residents.

5.2.3 The Site is considered highly sustainable due to its close proximity to major transport routes and public transport provision; readily available services and facilities within walking or short travel distance and its walkability, the built-up nature of the area promotes walkability and reduces dependency on private vehicles.

5.2.4 In view of the above, the principle of development is considered acceptable. Given its location, surrounding land use and accessibility it is well suited to residential development. The Proposed Development would complement the existing character of the area and contribute positively to Cardiff's housing supply in a sustainable manner.

5.3 Affordable Housing

5.3.1 The Proposed Development fully accords with the requirements of Policy H3 of the Cardiff Local Development Plan (LDP) relating to Affordable Housing. The scheme comprises a residential development that exceeds the policy thresholds of 5 dwellings and 0.1 hectares in site area, thereby triggering the affordable housing requirement. In accordance with Policy H3, the development delivers well above the required percentage of affordable housing, 20% for brownfield sites, or 30% for greenfield sites, making a significant and appropriate contribution to meeting the Council's evidenced housing need. Furthermore, all affordable housing will be delivered on-site, as stipulated

by the policy, supporting the Council's ambition to foster inclusive and sustainable communities citywide.

Evidenced Need for Market and Affordable Housing

5.3.2 Whilst not yet adopted, the forthcoming replacement LDP provides the most up-to-date and robust evidence base regarding housing need in Cardiff. This emerging policy framework identifies a requirement for 1,600 new homes to be delivered annually across the plan period (2021–2036) to support Cardiff's growth aspirations and ensure sufficient provision of both market and affordable housing, thereby helping to prevent homelessness. The accompanying Local Housing Market Assessment further identifies a net need for 1,098 affordable homes per year throughout this period. This evidence demonstrates a significant and pressing demand for additional housing, particularly affordable housing, to meet the ambitions of Cardiff Council and contribute to the creation of a balanced and inclusive city.

Role of Large Windfall Sites in Meeting Housing Need

5.3.3 In this context, the housing trajectory published to support the replacement LDP states that in the first 3 years of the new plan period only 3,785 units were built, at a rate of 1261 units a year, and resultantly, demand is not currently being met. The trajectory makes up for this shortfall later in the plan period, with 390 units anticipated per annum from large windfall sites (10 or more dwellings), such as the proposed development, from 2026-2027.

5.3.4 In terms of provision anticipated from large windfall sites, the Background Technical Paper for Housing, published in support of the Deposit replacement LPD, identifies a need for 3,898 housing units to be delivered through large scale windfall development. The most up to date background evidence displays a significant housing need, which is not currently being met.

Contribution to Housing Delivery and Policy Objectives

5.3.5 The development of the Site would make a valuable contribution towards achieving the annual housing delivery targets for large windfall sites, as identified in both the adopted and forthcoming replacement LDP. Policy at both the local and national level places a strong emphasis on the delivery of affordable housing, and the evidence base outlined above demonstrates a significant requirement for new housing units in Cardiff. Bringing this Site forward for residential development will help meet these ambitious targets, particularly for affordable housing, and support the Council's objective to address unmet housing need and promote the creation of inclusive, sustainable communities.

5.4 Flood Risk

5.4.1 As set out in the FRA and Drainage Strategy, the scheme incorporates sustainable drainage and water-sensitive design measures to mitigate flood risk, ensuring safety for future residents and reducing impacts on the wider area. This demonstrates that flood risk has been appropriately assessed in accordance with Policy EN14 (Flood Risk) and EN10 (Water Sensitive Design).

5.4.2 With the appropriate mitigation and management strategies in place the proposed development is appropriate in regard to flood risk.

5.5 Design

5.5.1 The proposal demonstrates good quality and sustainable design, in full accordance with Policy KP5 (Good Quality and Sustainable Design). The layout, massing, and architectural treatments respect

the character of the area, provide high-quality amenity for future residents, and integrate landscaping to support biodiversity and climate resilience. The design also considers community safety in line with Policy C3 (Community Safety/Creating Safe Environments). Consideration has been given to mitigating noise, which is addressed further below.

5.6 Access and Highways

5.6.1 The scheme has been designed to promote sustainable transport (Policy KP8), prioritising walking and cycling (Policy T1), and ensuring integration with local transport networks (Policies T5 and T6). Safe and accessible pedestrian and cycle routes are provided, and the impact on the local highway network has been robustly assessed. Adequate parking and service arrangements are included.

5.7 Ecology

5.7.1 Ecological protection and enhancement are central to the proposal. Policies KP16 (Green Infrastructure), EN6 (Ecological Networks), and EN8 (Trees, Woodlands and Hedgerows) have been addressed through the retention and enhancement of green infrastructure, provision of habitat corridors, and new tree planting. These measures deliver a net benefit for biodiversity and support Cardiff's ecological network.

5.8 Employment Land

5.8.1 An Employment Land Assessment has been undertaken and is set out at Appendix A. As concluded through this assessment, the proposed change of use is fully justified under Policy EC3 (Alternative Use of Employment Land and Premises), with robust evidence confirming that the site is no longer suitable or viable for ongoing employment use. The assessment also demonstrates a strong local supply of alternative employment land, with existing occupiers successfully relocating to suitable premises nearby. The proposed development would not have an adverse impact on the operations of local businesses or those currently located on site, as all tenancy agreements have been concluded and occupiers are relocating to alternative accommodation.

5.8.2 The proposed redevelopment directly supports wider regeneration objectives and will make a significant positive contribution to meeting Cardiff's housing needs, particularly through the provision of affordable homes. The scheme is fully aligned with the adopted and emerging LDP, as well as national policy, and represents a sustainable and evidence-led approach to optimising brownfield land. On this basis, the proposal is considered to be sound in planning terms and merits support.

5.9 Land Contamination

5.9.1 In accordance with Policy EN13 (Air, Noise, Light Pollution and Land Contamination) an assessment of the land contamination has been undertaken and concludes that the analysis of soil samples taken across the area investigated have not identified any contaminants or risks to human health or controlled waters from site soils.

5.9.2 Further ground investigations are proposed to be undertaken and required through a planning condition. However, due to the nature of the site the industrial units will need to be demolished prior to the investigations taking place, so it is recommended that the planning condition is not a pre commencement of development condition to enable these works to occur.

5.10 Noise

5.10.1 The Noise Assessment concludes that, with appropriate mitigation measures, the proposed residential development is suitable for habitation despite its proximity to the railway and industrial estate. Standard sealed double-glazed windows (minimum 4/12/4 specification) fitted with acoustic trickle vents are recommended for all dwellings facing these noise sources to ensure adequate internal sound insulation, while close boarded fencing for gardens near the railway and industrial estate will help to address elevated external noise levels and improve the quality of outdoor amenity spaces. This ensures that the Proposed Development accords Policy EN13 of the LDP and TAN11.

5.11 Assessment

5.11.1 The Proposed Development fully satisfies the relevant criteria of Policy EC3. Significant weight should be afforded to the delivery of much-needed affordable housing, consistent with the wider objectives of the LDP and national planning policy. The flexible approach towards employment land, as reflected in emerging Policy EC7 of the forthcoming replacement LDP, further supports the acceptability of the proposals and aligns with the Council's current policy direction. Overall, the scheme should be supported as it will contribute positively to housing delivery without undermining the employment land strategy set out in the Local Development Plan.

6 Summary and Conclusion

- 6.1.1 This PS has been prepared by Arcadis Consulting (UK) Limited on behalf of Pegasus Developments in support of a full planning application for 96 affordable homes through the redevelopment of Clydesmuir Industrial Estate, Cardiff.
- 6.1.2 This planning application seeks full planning permission for:
The demolition of existing industrial buildings and redevelopment to deliver 96 affordable houses, associated works including access roads, drainage, landscaping, open space and other works.
- 6.1.3 This PS demonstrates that the proposals accord with national and local planning policy and would make a significant contribution to the identified need for affordable housing in Cardiff.
- 6.1.4 As demonstrated in this statement the loss of employment land has been considered against Policy EC3 and it is considered that the proposed development is compliant with the policy, regardless of this policy compliance the removal of this use is outweighed by the benefits of the housing delivery, and that there are sufficient existing and available units nearby to the site to accommodate the need for employment land.
- 6.1.5 The Proposed Development accords with the adopted Development Plan and therefore in accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004, it is respectfully requested that planning permission is granted for the Proposed Development.

Appendix A

Employment Land Assessment

Introduction

This section provides an assessment of the existing employment land at the Clydesmuir Industrial Estate, considering its current use, the impact of the proposed development, and the relevant planning policy context. The assessment is prepared in accordance with the requirements of the adopted Cardiff Local Development Plan (LDP) and the emerging replacement LDP. The purpose is to demonstrate that the site is suitable for alternative use, specifically residential development, and to evidence compliance with both current and future policy frameworks.

Existing Site Usage

The site currently operates as an industrial estate, accommodating a mix of industrial, commercial and warehousing uses. Historically, the estate has provided premises for various tenants, but the estate is now experiencing a decline in occupancy. Many lease agreements are coming to an end, and a majority of tenants have opted not to renew, reflecting changing market demands and a wider trend of relocation to newer or more suitable premises within the local area. The site is not allocated as employment land in the adopted LDP and is not proposed for allocation in the replacement LDP, further supporting the rationale for considering alternative uses.

The current dilapidated condition of the warehousing units has reached a stage where ongoing occupation is no longer a practical or viable option for tenants. Substantial remedial works are required simply to achieve a basic, legally compliant, and safe operational standard. In their present state, these units pose significant health and safety risks, do not conform to statutory regulations, and fall short of the energy efficiency standards expected in modern industrial facilities. The cost, time, and operational disruption required to address these deficiencies far outweigh any potential benefit of remaining in the premises.

As a result, it is more logical and commercially sensible for tenants to relocate to alternative sites that are immediately fit for use, safe, compliant, and efficient to operate within. This trend inevitably leads to the warehousing site becoming vacant, with the units left unoccupied as they are no longer suitable or attractive for ongoing business operations.

At the time of preparing this planning application all units on site have already either terminated their lease agreements or have agreed to move into adjacent units outside of the site which are of better condition. This is set out in the below table. More specific details are confidential in nature so cannot be included in this report, however it is confirmed by the Applicant that all tenancies have been agreed as below.

Lease arrangements	Quantum
Moving into an adjacent unit (agreed)	67,527 sq ft
Confirmed leaving and not renewing tenancy (agreed)	77,066 sq ft

Proposed Development and Industrial Land Removal

The proposed development seeks the demolition and removal of the existing industrial warehouses and the comprehensive redevelopment of the site for affordable housing. The transition from employment to residential use is carefully phased and managed to ensure minimal disruption to businesses.

A robust market analysis demonstrates a clear and sustained surplus of industrial and warehousing units within the local area. Many of the site's existing tenants have already secured agreements and successfully relocated to these alternative premises, confirming both the availability and suitability of replacement accommodation. This proactive approach means there is no net loss of employment opportunities locally, with business continuity maintained and local jobs preserved.

The proposal directly supports wider regeneration objectives, optimising underutilised brownfield land and contributing to Cardiff's pressing need for new housing, particularly affordable homes. The evidence-based relocation strategy, coupled with the local supply of industrial space, ensures the change of use is both logical and sustainable, benefiting the community as a whole.

Planning Policy and Assessment

The Site is not allocated for any use within the adopted LDP, and it is not currently proposed to allocate the Site in the forthcoming replacement LDP. However, given the current and historic uses present at the Site and its longstanding use as an industrial estate, the Site should be considered against the policy that seeks to protect employment uses.

Policy EC3 – Alternative Use of Employment Land and Premises

With regards to the protection of employment uses in the adopted LDP, Policy EC3 (Alternative Use of Employment Land and Premises) sets out that '*development of business, industrial and warehousing land will only be permitted if:*

- i) The land or premises are no longer well located for business, industrial and warehousing use; or*
- ii) There is no realistic prospect of employment use on the site and/or the property is physically unsuitable for employment use, even after adaption/refurbishment or redevelopment; or*
- iii) There is no need to retain the land or premises for business, industrial or warehousing use, having regard to the demand for such land and premises and the requirement to provide for a range and choice of sites available for such use; and*
- iv) There will be no unacceptable impact on the operating conditions of existing businesses.'*

The proposed demolition of the industrial warehouses is consistent with parts ii, iii and iv of Policy EC3. As set out above for part ii, there is no realistic prospect of continued employment use on the site, as the existing industrial warehouses are in a dilapidated condition that renders them physically unsuitable for ongoing employment activities. Substantial adaptation or refurbishment would be economically unviable, given the extent of works required to meet current statutory, safety, and energy efficiency standards. This is evidenced by the progressive relocation of tenants to more suitable local industrial units, for which there is clear availability in the area. As a result, the site is no longer viable or attractive for employment use, even with significant investment.

In relation to part iii, there is no longer a need to retain these specific warehouses for industrial or warehousing use. All lease agreements for the warehouses are coming to an end, and a significant number of

tenants have chosen not to renew their leases, instead opting for more modern units in the local area. The table above demonstrates that all lease agreements have now been agreed to end, with the majority of tenants relocating locally, which clearly evidences the strong availability of suitable vacant units. The remaining tenants are in the process of securing alternative premises, many of which are within local facilities.

This transition has been facilitated by the high supply of suitable industrial and warehousing space in the local area, as evidenced by current vacancy rates and market conditions. The local property market continues to offer a robust range and choice of employment land and premises, ensuring that local business needs are met without the need to retain these outdated warehouses. Furthermore, the surplus of available sites ensures that there is no adverse impact on the range and choice of employment locations in the area. This demonstrates that the retention of the current warehouses is not necessary to support local employment opportunities, and their redevelopment for residential use is both justified and aligned with local policy objectives.

Turning to part iv of the policy, the removal of the warehouses and the introduction of new housing are not expected to have an unacceptable impact on the operating conditions of existing businesses. The area already accommodates both residential and industrial uses side by side, indicating that such a mixed-use environment is well established and functional. The relocation of the remaining tenants has been managed to ensure minimal disruption, safeguarding business continuity and reducing the risk of operational impacts. Additionally, the high availability of suitable local industrial and warehousing space has enabled relocating tenants to secure alternative premises that meet their operational requirements, ensuring that their activities can continue without detriment. The proposed redevelopment will not encroach on or restrict the operations of neighbouring businesses, as the new use is compatible with the surrounding context and will be integrated with appropriate design and management measures. As such, the proposal aligns with Policy EC3 by ensuring the needs of both existing and incoming uses are balanced, and that the operating conditions of local businesses are not adversely affected by the change of use.

LDP Policy EC7 – Alternative Use of Employment Land and Premises

The forthcoming replacement LDP contains a specific policy, **EC7** (Alternative Use of Employment Land and Premises Not Identified Within Policy EC3 (Protected Employment Land) or Policy EC6 (Protecting Offices in the Central and Bay Business Area)), for employment sites that are not allocated as an existing employment site. Where alternatives to employment uses are proposed on unallocated existing employment sites, EC7 sets out that uses including residential development will be considered favourably provided:

'The site or premises are vacant/redundant, or where premises are still occupied the relocation of existing occupiers to other suitable accommodation will need to be demonstrated.'

'Residential proposals will need to satisfy the tests of Policy H8 [it is understood that this reference is made to Policy H9, which relates to proposed residential use on unallocated sites]. In such circumstances, Affordable Housing development may be more favourably considered.'

'Proposals for mixed use residential development that include provision for new employment workspace, community facilities or health services will be favoured subject to detailed considerations.'

This policy context is less restrictive when compared to the adopted LDP, and in particular sets out that residential uses will be favoured provided that the relevant criteria are complied with. As set out above, the units at the site are in the process of being vacated due to the end of lease agreements, and current occupiers are finding new locations close by.

The proposal fully aligns with Policy EC7, as it relates to an unallocated employment site where the premises are becoming redundant for ongoing employment use. The relocation of existing occupiers to suitable

alternative local accommodation is being actively facilitated and evidenced, thereby meeting the policy requirement to ensure business continuity.

Policy EC 7 of the replacement LDP refers to Policy H8, however, it is understood that this should be Policy H9 as this relates to proposed residential uses on unallocated sites. The adopted LDP has a similar policy, H6 (Change of Use or Redevelopment to Residential Use). The tests set out in these policies are identical aside from criterion vi, which is only present in H9 of the replacement LDP. The tests are set out as follows:

'There is no overriding need to retain the existing use of the land or premises and no overriding alternative local land use requirement;

The resulting residential accommodation and amenity will be satisfactory;

There will be no unacceptable impact on the operating conditions of existing businesses;

Necessary community and transportation facilities are accessible or can be readily provided or improved;

It can be demonstrated that the change of use has been assessed in terms of land contamination risk and that there are no unacceptable risks to the end users; and

The resulting residential accommodation is accessible by walking, cycling or public transport.'

The Proposed Development is considered to comply with the requirements of these criterion as set out below:

- There is no known overriding need to retain the existing uses on the land, and the only overriding alternative local land use requirement is considered to be for housing.
- The Proposed Development complies with relevant standards for accommodation and amenity provision, satisfying the needs of future users.
- Residential development already immediately adjoins the other businesses that surround the site, and the proposed housing will have no greater impact on the continued use of these businesses than that which is already in situ.
- The Site will benefit from the community and transportation facilities that already serve the existing community. Notably, a bus route runs along Clydesmuir Road, which the site is accessed off, and there are a range of community services throughout the wider Tremorfa area within which the site is located.
- The Proposed Development will be subject to all required ground investigations with phase 1 surveys underway, however, there have been no historic uses at the site that would result in concern in this regard and if identified appropriate mitigation measures will be implemented pre to occupation.
- The Site will be accessible by active travel modes which will link into the existing highways network, and public transport as set out in response to (iv).

Conclusion

The Employment Land Assessment demonstrates that the proposed redevelopment of Clydesmuir Industrial Estate fully complies with both adopted and emerging LDP policies, including EC3, EC7, and H9, regarding the change of use from employment to residential. There is no overriding need to retain the site for employment purposes, with robust evidence confirming the availability and choice of alternative employment land locally. The transition has been carefully managed to avoid negative impacts on existing businesses, with occupiers successfully relocating to suitable accommodation nearby.

Furthermore, the scheme will deliver much-needed affordable housing, directly supporting Cardiff's strategic objectives to address housing need and promote sustainable regeneration. The proposal also aligns with the principles of sustainable development by optimising the use of underutilised brownfield land and contributing positively to the local community. The evidence-led approach, ongoing engagement with affected parties, and

alignment with policy objectives provide a strong planning justification. The proposal should therefore be supported in planning terms.



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