# **Planning Statement**

Sloper Road, Cardiff, CF11 8AB December 2024





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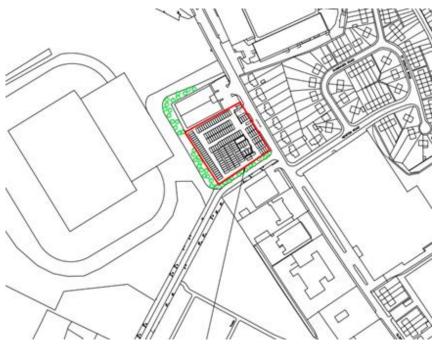
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# Client This statement has been prepared on behalf of Pink Storage. This Planning Statement accompanies a retrospective Full Planning Application for "use as a self-storage facility (Use Class B8 Storage and Distribution) together with the siting of shipping containers and associated infrastructure" at Sloper Road, Cardiff.

### **Site Details**

### Site Location

Fig.1 Site location plan



### Site Description

The Pink Storage Facility (the 'Site') is broadly square in shape and is located in a mixed-use residential and industrial area. The Site was previously used for bus and coach storage associated with Cardiff Bus and Coach Station, which is located on Sloper Road within close proximity of the Site. With this previous use having ceased in December 2021, the Site is now used as a self-storage with individual shipping containers and associated infrastructure located across majority of the Site. The Site is surfaced in hard standing (primarily tarmacadam), with a pre-existing coach shed located near the front of the site that now houses several storage units. To the northern, southern and western boundaries the Site is enclosed by palisade fencing. To the east the Site is bound by green wooden fencing, with the entrance restricted by a mesh gate that is operated by a key code. Beyond the immediate site boundaries, existing residential properties lie to the east at the, to the west lies the Cardiff City Stadium and industrial and commercial businesses lie to the north and south.

The Site is well positioned in relation to highway access, public transportation, and major road networks, allowing for easy access to the storage site. The site offers a strategic location for both the public and private business, catering both personal and commercial needs. The storage facility is accessed by a combined pedestrian and vehicular access along Sloper Road, that links to Leckwith Road which allows direct access to Cardiff Central to the east and the A4 to the west. The site is well located in respect of

active travel routes, with walking and cycling made available adjacent to the site. Cardiff central is approximately a 30-minute walk, in conjunction with this, Ninian Park Train Station resides a 7-minute walk along Sloper Road which provides direct access to the Cardiff City Centre. Several bus routes also align themselves within walking distance to the site, with Ninian Park and Sloper Road Bus Stop existing within a 1-minute walk from the storage facility.

The Pink Storage Facility comprises of a series of shipping containers sited across the Site which can be rented on an individual basis. Clients are provided with a shared access code to access the site via a highly secured gate at the site entrance, equipped with 24-hour security and 24/7 public access, and a key to their individual container which can be accessed 24/7.

### **Relevant Planning Policy**

Local Development Plan The Development Plan for the area comprises of the Cardiff Local Development Plan 2006 – 2026. The adopted LDP provides the statutory framework for the development and use of land within Cardiff over the Plan period (2006-2026). The policies and details contained within this LDP is used by Cardiff Council to guide and control development and provide the statutory local policy context for determining planning applications. The site is subject to the following designations within the adopted Local Development Plan:

- Within settlement boundary
- Within Existing Employment Area (Policy EC1)



Fig.2 Adopted LDP proposals map

The following key Local Development Plan policies are of relevance in this instance:

### **EC1: Existing Employment Land**

The city's existing employment areas outside of the Central and Bay Business Areas (as designated on the Proposals Map) will be protected for B Use Class employment generating uses (together with appropriate ancillary and/or complementary uses and activities as referred to in Policy EC2).

### **KP5: Good Quality and Sustainable Design**

This policy stipulates that all new development will be required to be of a high quality, sustainable design and make a positive contribution to the creation of distinctive communities.

### **KP8: Sustainable Transport**

The purpose of this policy is to ensure that developments are properly integrated with the transport infrastructure necessary to make developments accessible by sustainable travel modes and achieve a necessary shift away from car-based travel. These are the relevant requirements to make the proposed scheme contributing towards low-carbon mobility.

- i. Achieve the target of a 50:50 modal split between journeys by car and journeys by walking, cycling and public transport.
- ii. Reduce travel demand and dependence on the car;
- iii. Enable and maximise use of sustainable and active modes of transport;
- iv. Integrate travel modes;
- v. Provide for people with particular access and mobility requirements;
- vi. Improve safety for all travellers

### **KP9: Responding to Evidenced Economic Needs**

Provisions will be made for a range and choice of new employment sites including those identified in the KP2 for different types of employment and in different geographical locations to effectively deliver the level of growth set out in the plan together with putting in place a framework to protect the role of existing employment land.

### **KP13: Responding to Evidenced Social Needs**

This policy covers a range of measures to develop sustainable neighbourhoods, tackle deprivation and improve the quality of life for all.

The most relevant measure is the first one which seeks the provision of "range of dwelling sizes, types and affordability including seeking to provide a target of 6,646 affordable dwellings over the remaining 12 years of Plan period".

### **KP15: Climate Change**

This Policy provides a framework for sustainable growth by promoting development that mitigates the causes of climate change, and which is able to adapt to its likely effects. New development should be adhered to the following factors as relevant to the proposals:

- i. Reducing carbon emissions;
- iv. Promoting energy efficiency and increasing the supply of renewable energy;
- v. Avoiding areas susceptible to flood risk; and
- vi. Preventing development that increases flood risk."

### T1: Walking and Cycling

The purpose of this Policy is to encourage developments which include design features and facilities that make it easy for people to walk and cycle for everyday journeys instead of travelling by car.

### **T5: Managing Transport Impacts**

"The purpose of this Policy is to ensure that all new developments for which planning permission is required:

- i. Properly address the demand for travel and its impacts;
- ii. Contribute to reducing reliance on the private car, in line with national planning policies and the strategic transport objectives and policies of the LDP;
- iii. Make satisfactory provision for access, parking and circulation, particularly by pedestrians, cyclists, public transport users and disabled people with mobility impairments and particular access needs; and
- iv. Avoid unacceptable harm to safe and efficient use and operation of the road, public transport and other movement networks and routes."

### **T6: Impact on Transport Networks and Services**

This policy states that development will not be allowed which would cause unacceptable harm to the safe and efficient operation of the highway, public transport and other movement networks including pedestrian and cycle routes, public rights of way and bridle routes.

### C3: Community Safety/Creating Safe Environments

This policy seeks to ensure that all new development will be designed to promote a safe and secure environment and minimise the opportunity for crime, in particular by maximising natural surveillance, having a good standard of lighting, and by good design promoting secure movement and a distinction between public and private spaces.

### Planning Policy Wales

### Planning Policy Wales (12th Edition February 2024)

Fig.3 Placemaking outcomes (extract from PPW) Edition



Planning Policy Wales (PPW) forms the overarching national planning policy document within Wales, providing guidance to Local Planning Authorities (LPAs) for the preparation of development plans and the determination of planning applications through their development management functions. Paragraph 2.8 acknowledges that "planning policies, proposals and decisions must seek to promote sustainable development and support the well-being of people and communities across Wales" and "the most appropriate way to implement these requirements through the planning system is to adopt a placemaking approach to plan making planning policy and decision making" as per Paragraph 2.9.PPW defines placemaking as a "holistic approach to the planning and design of development and spaces, focused on positive outcomes". This approach "considers the context, function and relationships between a development site and its wider surroundings"

and "adds social, economic, environmental and cultural value to development proposals resulting in benefits which go beyond a physical development boundary".

Figures 4 and 5 of PPW set out the Key Planning Policies and the National Sustainable Placemaking Outcomes which bring about sustainable development and, in particular, inform the preparation of development plans and the assessment of development proposals.

Having regard to the PPW framework, the following content is deemed pertinent to the determination of this application.

### **Good Design**

Paragraph 3.3 confirms that "design is not just about the architecture of a building but the relationship between all elements of the natural and built environment and between people and places". PPW 11 sets out five key aspects of good design as follows:

### Access and Inclusivity

This can be achieved "making provision to meet the needs of people with sensory, memory, learning and mobility impairments, older people and people with young children" (Paragraph 3.6) and through measures and features that "enable easy access to services by walking, cycling and public transport" and "encourage people to meet and interact with each other".

### **Environmental Sustainability**

Paragraph 3.7 states that "developments should seek to maximise energy efficiency and the efficient use of other resources (including land), maximise sustainable movement (Paragraph 3.7)" and be resilient through "an integrated and flexible approach to design, including early decisions regarding location, density, layout, built form, the choice of materials, the adaptability of buildings and site treatment".

Paragraph 3.8 highlights that "landscape and green infrastructure considerations are an integral part of the design process" and, in a similar manner, addressing land contamination, instability and flood risk and providing for biodiversity benefits should be part of the design.

### Character

Paragraph 3.9 highlights that "the layout, form, scale and visual appearance of a proposed development and its relationship to its surroundings are important planning considerations". It goes on to say that "the impact of development on the existing character, the scale and siting of new development, and the use of appropriate building materials" will be particularly important in areas recognised for their particular landscape, townscape, cultural or historic character and value. Paragraph 3.11 establishes that "crime prevention and fear of crime are social considerations to which regard should be given in the preparation of development plans and taking planning decisions".

### Movement

Paragraph 3.12 states that good design in this matter means "minimising the need to travel and reliance on the car, whilst maximising opportunities for people to make sustainable and healthy travel choices for their daily journeys". It also remarks that "existing infrastructure must be utilised and maximised, wherever possible".

### **Community Safety**

Paragraph 3.11 states that "crime prevention and fear of crime are social considerations to which regard should be given in the preparation of development plans and taking planning decisions.". This aspect of good design principles aims to produce safe environments that do not compromise on overall design quality.

### **Transport**

Paragraph 4.1.11 sets out that "development proposals must seek to maximise accessibility by walking, cycling, and public transport, by prioritising the provision of appropriate on-site". In this respect, "the sustainable transport hierarchy must be a key principle in the preparation of development plans, including site allocations, and when considering and determining planning applications" as per Paragraph 4.1.14. The Welsh Government policies set out the sustainable transport hierarchy which is, in this order, from walking and cycling, public transport, ultra-low emissions vehicles to other private motor vehicles.

Active travel is a cornerstone of the transport policies in Wales. Paragraph 4.1.31 confirms that "planning authorities must support active travel by ensuring new development is fully accessible by walking and cycling".

With regards to vehicle parking, Paragraph 4.1.50 advises that a design-led approach should ensure that "appropriate level of car parking is integrated in a way which does not dominate the development". Paragraph 4.1.35 requires new development to "provide appropriate levels of secure, integrated, convenient and accessible cycle parking".

### Green infrastructure

Paragraph 6.2 defines green infrastructure as "the network of natural and semi-natural features, green spaces, rivers and lakes that intersperse and connect places" and "at smaller scales, individual urban interventions such as street trees, hedgerows, roadside verges, and green roofs/walls can all contribute to green infrastructure networks".

Paragraph 6.2.5 acknowledges the role of green infrastructure in enhancing the design quality of the built environment. It goes on to state that "with careful planning and design, green infrastructure can embed the benefits of biodiversity and ecosystem services into new development and places". It is also advised that "there are multiple ways of incorporating green infrastructure, dependent on the needs and opportunities a site presents".

Paragraph 6.4.21 establishes that "planning authorities must follow a stepwise approach to maintain and enhance biodiversity and build resilient ecological networks by ensuring that any adverse environmental effects are firstly avoided, then minimized, mitigated, and as a last resort compensated for; enhancement must be secured wherever possible".

### Water management

Paragraph 6.6.25 states that "development should reduce, and must not increase, flood risk arising from river and/or coastal flooding on and off the development site itself". With regard to flooding from surface water, Paragraph 6.6.27 advises that "developments are designed and planned to minimise

potential impacts" and goes on to say that "development should not cause additional run-off, which can be achieved by controlling surface water as near to the source as possible by the use of SuDS".

Paragraph 6.69 indicates that "the adequacy of water supply and sewerage infrastructure should be fully considered when proposing development, both as a water service and because of the consequential environmental and amenity impacts associated with a lack of capacity". Paragraph 6.6.18 recommends that "the provision of SuDS must be considered as an integral part of the design of new development and considered at the earliest possible stage when formulating proposals for new development".

### Future Wales – The National Plan 2040

The National Plan 2040 is the national development framework, setting the direction for development in Wales up to 2040. It is a development plan with a strategy for addressing key national priorities through the planning system, including sustaining and developing a vibrant economy, achieving decarbonisation and climate-resilience, developing strong ecosystems and improving the health and well-being of our communities.

As described above, the Welsh development framework has been designed incorporating the principles of sustainable development at its core. This comes as a result of the Well-being of Future Generations (Wales) Act 2015 ('the Act') that gives a legally-binding common purpose – the seven well-being goals – to the public sector to improve the well-being of Wales. It is through the Act that Wales will make its contribution to the achievement of the 17 United Nations Sustainable Development Goals.

In a more detailed level, the National Plan contains 18 strategic and spatial policies. In view of the nature of the development proposals, the policies below have been identified as relevant to the scheme:

- Policy 1 Where Wales will Grow
- Policy 2 Shaping Urban Growth and Regeneration Strategic Placemaking
- Policy 7 Delivering Affordable Homes
- Policy 8 Flooding
- Policy 9 Resilient Ecological Networks and Green Infrastructure
- Policy 11 National Connectivity
- Policy 12 Regional Connectivity

The Well-being of Future Generations (Wales) Act 2015

### The Well-being of Future Generations (Wales) Act 2015

Fig. 4 Seven Wellbeing Goals of Future Generations (Wales) Act 2015



The Well-being of Future Generations Act requires public bodies in Wales to think about the long-term impact of their decisions, to work better with people, communities and each other, and to prevent persistent problems such as poverty, health inequalities and climate change. The Act is unique to Wales attracting interest from countries across the world as it offers a huge opportunity to make a long-lasting, positive change to current and future generations. The Act puts in place seven well-being goals. There are 48 public bodies in Wales covered by the Act, which are required to use the sustainable development principle. The Act also establishes Public Services Boards in each Local Authority area. They are required to assess the state of well-being locally, set objectives and

produce a plan designed to improve economic, social, environmental and cultural well-being in their local area, maximising their contribution to the well-being goals.

### Technical Advice Notes

Planning Policy Wales is supplemented by a series of Technical Advice Notes (TANs) which provide further national advice and guidance on specific areas of the planning system. Of particular relevance to this application are the following TANs:

• TAN 12: 'Design' (March 2016)

• TAN 15: 'Development and Flood Risk' (2004)

• TAN 18: 'Transport' (2007)

### Supplementary Planning Guidance

Supplementary Planning Guidance (SPG) are produced to provide further detail on certain policies and proposals contained within the Local Development Plan. SPG's do not however hold the same status or weight as adopted LDP policies. The following adopted Supplementary Planning Guidance is of relevance:

The following SPG document are relevant:

Managing Transportation Impacts (Incorporating Parking Standards) (July 2018)

### **Planning History**

**Planning History** 

**99/01318/R:** Construction of single storey link and refurbishment of existing buildings

**Decision Date: September 1999 Approved** 

**10/01427/DCO:** Change of use to bus and/or car parking for up to 70 buses, new perimeter fencing, new access & egress points onto Sloper Road with new transponder activated sliding gates, new CCTV and security lighting, demolition of one existing building.

**Decision Date: November 2010 Approved** 

### **Analysis**

# Principle of Development

The application is situated on land defined as an Existing Employment Area, allocated within the settlement boundary of Cardiff by accordance with the Cardiff Local Development Plan (2006-2026).

The principle of the acceptability of the development therefore hinges on the following key LDP Policies:

- EC1 (Existing Employment Land)
- KP6 (Responding to Economic Needs)

### Policy EC1 – Existing Employment Land

Policy EC1 relates to existing Employment Land and states:

The city's existing employment areas outside the Central and Bay Business Areas (as designated on the Proposals Map) will be protected for B Use Class employment generating uses (together with appropriate ancillary and/or complementary uses and activities as referred to in Policy EC2) as described in the table below:

Site Ref	Site Name	Primary Use/Activity	Status
EC1.10	Penarth Road Area (includes Hadfield Road, Sloper Road, Bessemer Road)	B1, B2, B8	Local

The employment site identified in Policy EC1 display strong potential to continue playing an important economic role, whether this is to provide local employment on smaller sites within key neighbourhoods or whether the sites are more strategic in size, position and function.

As B8 Storage and Distribution Use, the site would be fully aligned with Policy EC1 which seeks to protect such land for 'B Use Class employment generating uses'. Furthermore, given the site's previous use was for bus parking and storage, this particular site is demonstrably appropriate for storage and distribution use. By repurposing an old bus depot, the application aligns with the broader sustainability initiatives, reducing the need for new land development. Given the site was utilised for storage of buses, the site is considered suitable to accommodate safe access, egress and manoeuvring of large vehicles if necessary. Furthermore, the development helps revitalise unused areas of land without the need for significant construction, reducing the risk of noise and air pollution, unnecessary change to land use that could increase flood risk or development that may misalign the design and character of the surrounding area.

### **Policy KP9- Responding to Evidenced Economic Needs**

Policy KP9 relates to evidenced economic needs and states:

Provision will be made for a range and choice of new employment sites including those identical in KP2 for different types of employment and in different geographical locations to effectively deliver the level of growth set out in the plan together with putting in place a framework to protect the role of existing employment land.

Supporting text at paragraph 4.137 states that 'in order to maximise the contribution to providing jobs from existing sites and promote efficient use of land, the strategy seeks to encourage the intensification and refurbishment of existing employment land and premises which are under used, vacant or in decline'.

By retaining the site usage for storage and distribution, the Site would fully align with Policy KP9 by effectively utilizing underused or vacant land as well as enhancing the flexible employment sector. Representing one of a number of Pink Storage facilities across Cardiff, the storage company caters to the increasing demand for secure storage solutions, supporting both individuals and businesses. Its strategic location in Cardiff makes it an ideal hub for storage units. The area's infrastructure, including its good transportation links and proximity to key commercial areas, enhances the sites logistic advantages, enabling a smooth transport of goods to the units.

Moreover, the sites layout is optimally suited for storage with these shipping containers, which have seen capable of maximising the available space. Given their uniformity, the units ensure that every potential floorspace is efficiently utilized, without the need for extensive modifications and additional infrastructure. This approach has also facilitated scalability of the facility, allowing the expansion of shipping containers on top of each other with the use of gangways and stairs, without altering the design of the surrounding area and allowing to fully accommodate the sites potential. Additionally, the minimal presence of structures ensures that the site remains adaptable and can accommodate a variety of uses over time, making it a highly versatile site.

The added inclusion of security measures - such as 24-hour surveillance, external lighting, and controlled access - ensures the safety of both the units and their content and the surrounding area. These measures not only enhance the attractiveness of the site to potential users but also contribute to the broader community policies by deterring criminal activity and promoting a sense of security in the area and therefore complying with Policy C3 for community safety and creating safe environments which states; 'All new development and redevelopment shall be designed to promote a safe and secure environment and minimise the opportunity for crime'.

Overall, the sites design, and operational characteristics make it a well-suited and efficient space for storage and distribution. It is therefore concluded that, the scheme complies with Policy EC1 and Policy KP9.

# Design and Character

High quality design and character is vital in meeting Cardiff's objectives for developing a world-class capital. To comply with Policy KP5 for good quality and sustainable design, the site adheres to the objective by 'Promoting the efficient use of land, developing at highest practicable densities'.

The Site is situated in a mixed-use area of Cardiff which comprises of commercial, industrial and residential units. The storage units have not significantly altered the design or character of the surrounding area. The uniformity in the colour green for both the corrugated steel containers and the forefront fencing, result in a visual betterment to the site compared to its use as a storage hub for coaches and buses. It also alleviates congestion, compared to its previous use, to the surrounding area due to its use for occasional loading and unloading on site. In view of this, the development has adhered to the good design principles and effective placemaking strategies, aligning with the guidelines set out in Planning Policy Wales (PPW) and Policy KP5.

# Movement and Highways

Policy T6 relates to impact on transport networks and services and states:

Development will not be permitted which would cause unacceptable harm to the safe and efficient operation of the highway, public transport and other movement networks including pedestrian and cycle routes, public rights of way and bridle routes.

The purpose of this Policy is to protect the transport network and its users from developments which may otherwise cause unacceptable harm to the operation and use of key transport networks and routes.

The current use of the site generates limited car and van vehicular movements and so represents a deintensification of the use of the site compared with its previous use as a coach and bus depot. The change in site of the site would there represent a betterment in respect of the impact on the transport network and services.

As previously identified, the site is well positioned in relation to highway access, public transportation, and major road networks, allowing for easy access to the storage site. The site offers a strategic location for both the public and private business, catering both personal and commercial needs.

The storage facility is accessed by a combined pedestrian and vehicular access along Sloper Road, that links to Leckwith Road which allows direct access to Cardiff Central to the east and the A4 to the west.

The site is well located in respect of active travel routes, with walking and cycling made available adjacent to the site. Cardiff central is approximately a 30-minute walk, in conjunction with this, Ninian Park Train Station resides a 7-minute walk along Sloper Road which provides direct access to the Cardiff City Centre. Several bus routes also align themselves within walking distance to the site, with Ninian Park and Sloper Road Bus Stop existing within a 1-minute walk from the storage facility.

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Name of Service	Walking Time
Ninian Park Bus Stop	1 minute
Sloper Road Bus Stop	1 minute
Cardiff Bus Depot	3 minutes
Ninian Park Train Station	7 minutes
Leckwith Place Bus Stop	9 minutes
Hadfield Road Bus Stop	11 minutes
Railway Terrace Bus Stop	12 minutes
Jubilee Park Bus Stop	12 minutes
National Express Cardiff Coach Station	27 minutes
Cardiff Central Station	30 minutes

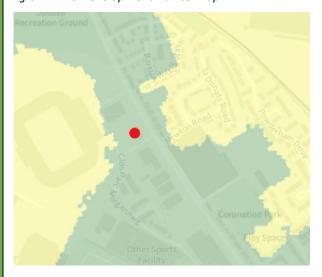
Regarding parking, the Council's adopted SPG Managing Transportation Impacts (Incorporating Parking Standards) identifies a maximum car parking provision of 1 car parking space per 1,000sq.m of floorspace. Due to the nature of the site being of use Class B8 for Storage and Distribution, the development site does not currently provide any designated parking spaces and won't either. However, despite the constrained nature of the site, there is opportunity for temporary parking spots, given the site is not highly trafficked at one given time. This layout facilitates easy circulation, enabling vehicles to park temporarily for loading and unloading without obstruction. Given the sites low traffic volume, the looped design ensures efficient use of space while minimizing any parking-related issues.

It is concluded that the development would comply with LDP Policy T5 and T6.

# Flood Risk and Drainage

The entire site is classified as a floodplain under Zone C1 on the Development Advice Map (DAM) but served by flood defences under TAN15 defended zone.

Fig.6 TAN 15 Development Advice Map



The forthcoming Flood Map for Planning show most of the Site area as lying in a Flood Zone 3 (areas considered to have a 1% AEP risk of flooding from river or sea) but defended under TAN15.

Fig.7 Flood Map for Planning



The Site is defended and it is considered that the risks of flooding can therefore be appropriately managed.

Surface water drainage would be subject to a separate SABs application.

**Ecology** 

The site is entirely hand standing (primarily tarmacadam), with no ecological present on site. Historic photographs evidence that the there has been no change in habitat on site since its former use as a bus and coach depot.

It is concluded that the development would be in compliance with Policy EN6, 'Development would only be permitted if it does not cause unacceptable harm to landscape features of importance for wild fauna and flora'.

Fig.8 2022 Aerial View of Sloper Road



Trees

The development site is entirely hard standing, with no trees present. There are trees that lie immediately offsite, just outside the boundary line, however, given that the containers have been placed on pre-existing hard-standing, the development would not have impacted on these trees.

The development would therefore be in compliance with LDP Policy EN8 which requires that 'the development will not be permitted given that it would cause unacceptable harm to trees, woodlands and hedgerows'.

### Conclusion

This statement provides a detailed examination of the relevant material planning considerations for th development. In conclusion, on the base of the comprehensive review of policies, the physical and locational constraints of the site and the design of the existing development the application should be supported for the following reasons:

- It has been evidenced that the principle of the use of the Site as a self-storage facility (B8 Storage and Distribution use) is in compliance with the key development plan policies, in particular EC1 and T6.
- With regard to transport and movement, the site is well located for easy access as a storage site as well as being in a highly sustainable location with a wide range of services and facilities in the area.
- The change of use had no impact on trees, flood risk, drainage and ecology, thus complying with the technical policy requirements stated in the Local Development Plan.
- The development has enabled this vacant piece of land to enable economic growth as well as in the implication of safety enhancing to the area.

It is therefore concluded that the as-built development would be in compliance with the regulations set out in Planning Policy Wales (PPW) and Cardiff Local Development Plan (LDP) and consequently should be supported.