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AGENDA

Committee	ENVIRONMENTAL SCRUTINY COMMITTEE
Date and Time of Meeting	WEDNESDAY, 16 MARCH 2022, 4.30 PM
Venue	REMOTE VIA MS TEAMS
Membership	Councillor Patel (Chair) Councillors Derbyshire, Owen Jones, Lancaster, Jackie Parry, Parkhill, Owen, Sandrey and Wong

		<i>Time approx.</i>
1	Apologies for Absence	4.30 pm
2	Declarations of Interest	
3	Minutes (<i>Pages 5 - 14</i>) To approve as a correct record the minutes of the meeting held on 22 February 2022.	
4	Replacement Local Development Plan - Joint Scrutiny Inquiry (<i>Pages 15 - 172</i>) For Members to discuss, amend if necessary, and approve the key findings of the Inquiry, for submission to the Cabinet Member for consideration.	4.35 pm
5	Urgent Items (if any)	4.50 pm
6	Way Forward To review the evidence and information gathered during the meeting, agree Members comments, observations and concerns to be passed on to the relevant Cabinet Member by the Chair.	4.50 pm

7 Date of Next Meeting

To be agreed by Council 17 March 2022

Davina Fiore

Director Governance & Legal Services

Date: Thursday, 10 March 2022

Contact: Graham Porter, 02920 873401, g.porter@cardiff.gov.uk

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ENVIRONMENTAL SCRUTINY COMMITTEE

22 FEBRUARY 2022

Present: County Councillor Patel(Chairperson)
County Councillors Derbyshire, Owen Jones, Lancaster,
Jackie Parry, Sandrey and Wong

51 : APOLOGIES FOR ABSENCE

Apologies were received from Councillor Owen.

52 : DECLARATIONS OF INTEREST

No declarations of interest were received.

53 : MINUTES

The minutes of the meetings held on 7 December 2021 and 13 January 2022 were approved by the Committee as a correct record.

54 : DRAFT CORPORATE PLAN 2022-2025 & DRAFT BUDGETARY PROPOSALS 2022/23

The Committee received a report providing Members with an opportunity to scrutinise those sections of the draft Corporate Plan 2022-25 and draft 2022/23 Budget Proposals that related to the Cabinet Portfolios and service areas within the remit of the Committee.

Members were advised that the Cabinet will consider the Committee's comments and recommendations prior to finalising their budget proposals. The draft Cabinet budget proposals will be taken to the Cabinet Meeting on 24 February 2022 for agreement and the Cabinet's budget recommendations would then be considered by Council at its meeting on 3 March 2022.

In terms of the draft Corporate Plan, Members were advised that in July 2017 the Council set out a policy programme and associated delivery commitments entitled 'Capital Ambition' establishing the Cabinet's key priorities for the municipal term, and outlining a programme of action to continue to drive the city economy forward, whilst ensuring that the benefits of success are felt by all residents.

In January 2020 the Cabinet approved an update of the Administration's policy programme, priorities and commitments entitled, Capital Ambition, our Continuing Commitments for Cardiff. The commitments set out within the Capital Ambition focuses on four main priorities, which form the basis for the Corporate Plan 2022-25:

- Working for Cardiff: making sure that all our citizens can contribute to, and benefit from, the city's success
- Working for Wales: A successful Wales needs a successful capital city
- Working for the Future: Managing the city's growth in a sustainable way.
- Working for Public Services: making sure our public services are delivered efficiently, effectively and sustainably in the face of the rising demand and reducing budgets.

The Well-being of Future Generations Act also places a statutory duty on Public Bodies to publish well-being objectives. In Cardiff, the Council and the Public Service Board have adopted the same 7 Well-being Objectives reflecting their shared aspirations for the city and a common understanding of challenges. The Corporate Plan is structured around Capital Ambition priorities and 7 well-being-objectives and makes clear the steps the Council will undertake to make progress in achieving these objectives. Appendix 1 to the report set out the sections of the Corporate Plan 2022-25 that fall within this Committee's terms of reference.

The report provided a summary of the background and context within which the draft budget proposals have been set, including the financial implications of the Covid-19 pandemic in terms of additional costs and loss of income for the Council. A summary of the financial support provided by the Welsh Government was set out in the report. Members were advised that Welsh Government support funding would not be in place during 2022/23 and the budget must, therefore, be sufficiently robust to ensure that the Council can continue to manage the financial pressures associated with Covid-19.

The draft 2022/23 budget proposals reflected the Provisional Funding Settlement as reported to Cabinet on 13 January 2022. Cardiff will receive a 10.7% (£52.6 million) increase, including funding for additional financial pressures. Those additional financial pressure include:

- support for the payment of the Real Living Wage in the care sector as announced by the Deputy Minister for Social Services on 21st December 2021
- allowances for increased pay and national insurance contributions from April 2022
- in the absence of any Local Authority Hardship Fund next year, the Council will need to ensure it can cover any ongoing COVID-19 related pressures (both expenditure and income) from within this allocation.

A summary of the 2022/23 revenue budget was provided in the report. The revenue budget was predicated on the delivery of £7.708 million in efficiency savings. Members were advised that all savings proposals have been screened for their equalities impact and no concerns were identified. Savings are to be made across directorates, except for Schools, which following consideration post consultation by Cabinet, have been protected for 2022/23. In order to improve the deliverability of savings and maximise the chances of securing full year savings in 2022/23, proposals are being implemented in the current financial year where possible - £2.785 million have already been achieved.

Members were advised that the draft budget proposals include a £3.8 million Financial Resilience Mechanism (FRM) which is intended to help the Council deal with funding uncertainty. The FRM is used to invest in priority areas. In the context of the better than anticipated funding position, the FRM will not be required to address the funding position and is therefore available for one-off investment. The FRM would be invested in as follows:

- Young People £1.21 million
- Community Improvement and Safety £1.648 million
- Cleaner and Greener Cardiff £670,000

- City Infrastructure £272,000

The draft budget proposals also include proposals to ensure resilience cover for the following specific contingencies:

- The difficulty in modelling potential increases in the number and complexity of Looked After Children Placements (£2.500 million.)
- The difficulty in modelling demand in Adult Services (£3.000 million)
- Market volatility in respect of recycling materials (£0.350 million)

The report also provided an overview of the draft Capital Programme 2022/23 to 2026/27. The proposed 2022/23 Budget outlines capital expenditure proposals of £1.206 billion, of which, £263 million is earmarked. for 2022/23. Details of the individual Directorates' capital programmes were included as appendixes to the report.

55 : CORPORATE OVERVIEW

The Chairperson welcomed Councillor Chris Weaver, Cabinet Member for Finance, Modernisation and Performance, Chris Lee, Corporate Director Resources and Ian Allwood, Head of Finance to the meeting. Following a statement from the Cabinet Member the officers delivered a presentation providing an overview of the 2022-23 Budget Proposals as the impact on the Committee's terms of reference.

The Chairperson invited Members of the Committee to comment, seek clarification or raised questions on the information provided. Those discussions are summarised as follows:

- Members asked how many consultation responses were received from the Citizens Panel. Members asked whether the 1,547 responses received could be considered a good response. The Committee had previously raised concerns that hard to reach groups were less likely to respond to online consultations. The Cabinet Member stated that the overall response was reasonable and compared well with other local authorities. The Cabinet Member accepted that there were clear limitations to the online method. However, the consultation period started at a point when the community was under Covid-19 related restrictions and the consultation period was time limited. Members were advised that the Corporate Plan includes proposals to develop a Citizen Engagement Strategy within the first few months of the new administration.
- Members noted that the Welsh Government recycling target will soon be increased to 70% and the Council is currently struggling to attain the current target. Members asked what budget proposals would help the authority achieve the necessary increase in its recycling rate. The Cabinet Member stated that one-off funding was provided for the segregated recycling trial. The Recycling Strategy was being consulted upon and that will set the direction of travel for the Council and budget will be put in place to support the policy. The Corporate Director Resources stated that appropriate budget has been provided to the service over the medium-term in terms of this requirement.
- Members sought assurance that increases in energy costs had been taken into account and the budget has resilience built in to cope. The Cabinet Member stated that work has been undertaken to understand known and expected

increases in costs, anticipating those and preparing a budgeting accordingly. Account has been taken of the expected increases in energy costs, including whether these are long term increases or more temporary. A £2 million contingency has been included and the FRM can also be used in future years. Welsh Government have provide 2 years of indicative funding also. The Corporate Director Resources agreed that this was a key risk. The budget is not increased incrementally each year and modelling is used over the medium term that links to those contingencies.

- Members asked what funding was in place to provide a replacement dogs home in the city. The Cabinet Member suggested that this question be put to the portfolio holder.
- Members ask how the budget was accounting for increases in wages, whether there was a strategy in place to maintain the Council workforce and whether there were any longer term plans to grow the workforce in the future. The Cabinet Member stated that there was a Workforce Strategy in place and every directorate conducts workforce planning. These will be refreshed early in the next administration. Members were advised that some areas within the Council have had difficulties in recruiting staff and this impacted on service delivery. The Council's Into Work Service has launched HGV driver training and has been working with in partnership with training providers in the construction industry to address the shortage of workers in those professions. Budget setting also considers what a likely public sector pay award will be. It was anticipated that the Welsh Government proposal to pay the 'Real Living Wage' in the care sector will have an impact on the labour market. The Corporate Director Resources stated that over the period of the Medium Term Financial Plan (MTFP) of £131 million cost pressures, £57 million are employee related pressures. In addition to the real living wage there are also changes to National Insurance contributions and changes to the teacher pension scheme.
- Members noted that the Cabinet report includes proposals for a review of staffing arrangements resulting in a saving of approximately £1 million and yet also includes proposals for an increase of 58.3 FTE posts being created. The Corporate Director Resources stated that the 58.3 FTE increase is a net increase. The increase relates to additional staff taken on in the policy growth areas identified in the budget.
- Members sought clarification on the £4 million reduction in 'external spend' highlighted in the presentation and whether there was anything relating to the Committee's portfolio. The Cabinet Member stated that the efficiency savings proposals in relation to the Committee's remit were highlighted in Appendix 5 to the report. The bulk of the 'external spend' savings related to other directorates.
- Officers were asked to clarify the comments regarding market volatility in recycling materials in the section of the report relating to the Financial Resilience Mechanism. The Cabinet Member advised that the market price the Council receives for recycling materials often varies. Officers advised that the key driver for the price received is the cleanliness of the material. Segregating recycling at source helps to maximise the market price received.

- Council Tax would increase by 1.9%. Members asked how this compared with other local authorities in Wales. Members were advised that not all Councils have published their proposals but it was anticipated that Cardiff's increase would be at the lower end of the scale.

RESOLVED – That the Chairperson writes to the Cabinet Member on behalf of the Committee to convey any comments, observations and recommendations made during the way forward.

56 : STRATEGIC PLANNING AND TRANSPORT PORTFOLIO

The Chairperson welcomed Councillor Caro Wild, Cabinet Member for Strategic Planning and Transport and officers from the Planning, Transport and Environment directorate.

Following a brief statement by the Cabinet Member, the Committee were invited to comment, seek clarification or raise questions on the information received. Those discussions are summarised as follows:

- Members requested further information regarding the regeneration investment proposals for district shopping centres, and in particular how that investment would affect the highway in areas such as City Road. Members asked whether investment in sustainable transport and active travel was likely to result in a fall in traffic enforcement and parking revenues and whether account had been taken of this. The Director stated that the core of the local district centre regeneration schemes would sit within another service areas portfolio. However, Strategic Planning and Environment would work closely with colleagues in terms of the works taking place to ensure that those works align with other opportunities. Proposals for City Road have not yet been brought forward but some improvements a crossing points that link to improvements in pedestrian access have been provided using Section 106 funding. The Director stated that officers were aware of significant infringement in terms of parking in City Road and enforcement would be increased as a short-term tactical measure. More broadly, in terms of income, it is anticipated that parking will still play a key role in traffic management and this will work in parallel with active travel and sustainable transport options.
- Members noted the £3 million investment for the redevelopment of Churchill Way during 2022/23. Members asked whether the project was likely to be completed during that period. The Director stated that the delivery of phase 1 of the redevelopment was anticipated to be completed within 12 months.
- A Member commented that in the past the Council has been criticised at the level of parking enforcement income attributed to administration costs. The Member asked what proportion of traffic and parking enforcement income would be ringfenced specifically for traffic management schemes. The Director stated that there is a commitment in place that any additional income from moving traffic offences and parking enforcement would be ringfenced for the development and delivery of transport projects. The Director recognised the point made. All conversations for use of the parking reserve take place in consultation with colleagues from Finance and are subject to due diligence and a business case.

- Members stated that a considerable proportion of the income received is set aside for overheads such as staff salaries and Members considered that the original scheme brought forward by Welsh Government was not designed for that purpose. Members asked whether additional budget would be provided for the service area that would allow for the income revenue to be truly ringfenced for transportation projects. The Director stated that a decision has been taken that means any additional income received will be ringfenced for transportation projects. Other budgets are set corporately. The Director stated that when capital funding is in place for a transport improvement project there is also a need to have the staff in place to deliver the project on the ground. However, the broad principle of the point made was accepted.
- Members noted that, in terms of modal shift, the target for public transport usage in the Corporate Plan is 22%. Members asked whether there were any indications of continued low usage as a result of the pandemic and whether, if this continued, there would be any financial pressures on public transport providers as a result. The Director stated that the situation is dynamic and, whilst things are returning to normality, there is still some uncertainty. City centre businesses and the Council's partner organisations are moving towards a hybrid position in terms of their staffing arrangements. Public transport usage is still significantly below the pre-pandemic period. Incentive schemes were brought in before Christmas and there are currently discussions ongoing with Welsh Government regarding the reintroduction of incentive schemes to support bus and rail services. Responding to further comments from the Committee regarding projected usage and the financial modelling of major transport projects, the Director stated that fundamentally there would no long term detrimental impact on the need for public transport or for the new transport networks, but there may be adjustments in travel patterns.
- Members asked the Director to comment on the delivery timelines for new infrastructure as part of the metro project, such as the new stations. The Director stated that the targets were ambitious but realistic. Some of the projects listed were dependent on funding and therefore there was some risk associated. Where Cardiff Council is taking the lead the Director was confident that projects will be delivered within the timescales.
- Members noted that there had been delays in delivering existing projects such as city centre sections of the Cardiff to Newport cycleway. Members asked what lessons had been learned that would ensure delivery of the entire 10 mile cycleway by 2025. The Director stated that work has been progressing behind the scenes on the scheme in terms of its design. Lessons have been learned from the implementation of a small section of the scheme during the covid pandemic and implementation is therefore improving. The scheme is funded and is a key priority for the Welsh Transport Commission. The Director considered the 2025 target to be ambitious but achievable.
- Members requested clarification and further details of the grant scheme aimed at assisting the taxi fleet in the city to move towards more environmentally friendly vehicles. The Director stated that the funding for the scheme has only just been confirmed and the detail of how that would best be used is yet to be finalised. The Director agreed to report back to the Committee on the details of the scheme.

RESOLVED – That the Chairperson writes to the Cabinet Member on behalf of the Committee to convey any comments, observations and recommendations made during the way forward.

57 : CLEAN STREETS, RECYCLING AND ENVIRONMENT PORTFOLIO

The Chairperson welcome Councillor Michael Michael, Cabinet Member for Clean Streets, Recycling and Environment and officers from the directorate.

Following a statement from the Cabinet Member, the Committee were invited to comment, seek clarification or raise questions on the information received. Those discussions are summarised as follows:

- Members noted that the Welsh Government recycling target would soon increase to 70%. Members asked how that would be achieved. The Cabinet Member considered that the 70% target was unachievable under the previous waste collection arrangements. However, improvements such as the replacement of the waste collection vehicle fleet, better working relationships, digital technology and the reorganisation of rounds now mean the target is achievable. The kerbside sort trial is ongoing and is designed to reduce the amount of contamination. Initial findings suggest that contamination has been reduced from 30% to 3% under the trial. The Cabinet Member considered that kerbside sort will mean the 70% target is achievable and the recycling produced will be of better quality, so income will also increase. It will also remove 24 million green recycling bags from the waste stream.
- Members asked what budget has been provided to progress the replacement of the Cardiff Dogs Home. The Cabinet Members stated that a site has been identified and planning constraints are currently being considered before a report is brought forward to the Cabinet. The Director stated that this was a priority project. Due diligence will be undertaken during the next financial year and the capital programme will hopefully recognise the opportunity to provide a new dogs home in the following year.
- Members asked for further information on the savings proposals in Shared Regulatory Services. The Head of Shared Regulatory Services stated that the service is currently operating under budgetary pressures and in the aftermath of the response to the covid pandemic, with a number of staff still being seconded to other roles. There are a number of key areas where the service is behind – such as food standards. The service is following the FSA Recovery Plan which will lead to improvements over time. There have also been difficulties in the recruitment suitably qualified staff. The Cabinet Member for Finance and Performance stated that the savings proposals relate mainly to business administration within Shared Regulatory Services.
- Members asked whether there have been any improvements to sickness rates since the introduction of the 4-day working week pattern. The Cabinet Member stated that there has been no improvement in sickness absence rates.
- Members requested further details of the large scale renewable energy projects referred to in the Corporate Plan. The Cabinet Member stated that future projects

have been identified but he was unable to provide any further details at this point.

- Members asked for a progress update on the provision of a replacement recycling facility in the north of the city. The Cabinet Member stated that a suitable site for such a facility has not yet been identified.
- Members welcomed proposals to provide additional staff for the street cleansing teams. Members asked where those additional resources would be deployed. The Cabinet Members stated that Neighbourhood Services is currently being remodelled. Officers stated that the funding would be used to create an additional 'blitz team' to respond where and when needed and a 'lanes team' which would respond to the high number of fly-tipping incidents reported in gated lanes. An additional 4 mechanical cleaners would also be provided.
- Members noted the 4 posts created for delivery of the One Planet Cardiff agenda. Members requested further details. The Director advised that the additional staff would be used to enhance the existing One Planet Cardiff team and will work across directorates. One post is at OM2 level and will be the lead officer for programme delivery. The other posts are project management posts which will support corporate initiatives.
- Members noted proposals to increase income at the Bessmer Road HWRC site by approximately £172,000. Members asked whether this could confidently be achieved. The Cabinet Member stated that since the introduction of the appointment system there has been an increase in commercial income and he was reasonably confident that this figure could be achieved. The Director of Economic Development stated that the figure was based on the improvement seen over the past year. Fees and charges have also been reset.
- Responding to a question from the Committee, officers stated that the target for income from landfill gas at Lamby Way has not been adjusted for 4 years. The amount of gas produced has fallen during that period and the budget line now reflects the adjusted position.

RESOLVED – That the Chairperson writes to the Cabinet Member on behalf of the Committee to convey any comments, observations and recommendations made during the way forward.

58 : URGENT ITEMS (IF ANY)

No urgent items were received.

59 : WAY FORWARD

60 : DATE OF NEXT MEETING

Members were advised that the next Environment Scrutiny Committee is scheduled for 7 March 2022.

61 : CORRESPONDENCE FOLLOWING THE COMMITTEE MEETING

The meeting terminated at 5.15 pm

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CYNGOR CAERDYDD
CARDIFF COUNCIL

ENVIRONMENTAL SCRUTINY COMMITTEE

16 MARCH 2022

REPLACEMENT LOCAL DEVELOPMENT PLAN INQUIRY

Purpose of Report

1. To provide Members with the '*Replacement Local Development Plan*' Inquiry draft findings, attached at **Appendix 1**, for discussion, amendment, and approval, prior to submission to the Cabinet Member for consideration.

Background

2. Scrutiny of the first stage of the Replacement Local Development Plan (RLDP) by the five Scrutiny Committees in September 2021 resulted in a collective letter being sent to Cabinet. Following this, Scrutiny Committees in October 2021 supported the establishment of a Task and Finish Group to undertake further RLDP scrutiny. The group was led by the Environmental Scrutiny Committee, with representation from all 5 Scrutiny Committees to ensure that all aspects affected by the RLDP could be considered.
3. Following initial scoping meetings, Members agreed the following terms of reference:
 - *To explore, scrutinise and act as a consultee on the Strategic Options for the Replacement LDP focusing on how these have addressed:*
 - *Accessibility and Inclusivity*
 - *One Planet Cardiff.*
 - *To review the Council's consultation process to date; to examine its effectiveness and make recommendations for future consultation on the next stages of the Replacement LDP*
 - *To understand the supporting rationale for the projected growth provided by Welsh Government in order to consider whether the evidence base is robust, realistic, and viable.*
 - *To consider how Cardiff's replacement LDP and the Strategic Options are aligned with regional planning.*

- *To hear and consider views of stakeholders to inform the recommendations of Scrutiny on both the Strategic Options and the Council's consultation processes.*
 - *To coordinate and provide a single joint response from the Scrutiny Committees.*
 - *To make recommendations that will inform the decisions and considerations that the Council's Executive will make in the development of the Preferred Strategy.*
 - *To make recommendations that will inform any future scrutiny of the replacement LDP.*
4. The five Scrutiny Committees agreed the following membership for this task group:
- Councillor Ramesh Patel (Chair)
 - Karen Dell'Armi (CYP Co-optee)
 - Councillor John Lancaster
 - Councillor Sue Lent
 - Councillor Norma Mackie
 - Councillor Adrian Robson
 - Councillor Emma Sandrey
 - Councillor Joel Williams
 - Councillor Peter Wong.
5. The Task and Finish Group has held five meetings to hear evidence from internal and external witnesses, including:
- Councillor Wild – Cabinet Member, Strategic Planning & Transport
 - Simon Gilbert – Head of Planning
 - Stuart Williams – Group Leader, Local Development Plan
 - Stuart Hardisty – Hardisty Jones Associates – *Employment & Economic Modelling*
 - Andrew Fowler – Edge Analytics – *Population Modelling*
 - Grace Boden – Edge Analytics – *Population Modelling*
 - Andy Robinson - Natural Resources Wales
 - Geoff Hobbs - Natural Resources Wales
 - Richard Mann – UWHA
 - Huw Owen - Alzheimer's Society
 - Adrian Field - For Cardiff
 - Sheila Hendrickson-Brown – Cardiff Third Sector Council
 - Gladys Hingco – Principal Scrutiny Research Officer.
3. As part of the Inquiry, Scrutiny Research issued a Call for Evidence, seeking stakeholder views on the consultation process and on the strategic options. A total of 18 responses were received. Two summaries, one focused on the

consultation process and one on the strategic options, were presented to the Inquiry by Scrutiny Research, highlighting key findings from the responses.

4. Following the meeting in November 2021 to consider the consultation process, the Task and Finish Group sent a letter to Cllr Wild, Cabinet Member – Strategic Planning and Transport, setting out recommendations aimed at improving the ongoing consultation on the Strategic and Delivery Options. A response to this letter was received, accepting all the recommendations bar one, which was partially accepted. In addition, all the recommendations resulting from the scrutiny in September 2021 were accepted.
5. The final evidence gathering meeting was held on 31 January 2022. At this meeting, the Task and Finish Group were informed that the scrutiny officer supporting the Inquiry was leaving the authority mid-February 2022 and that therefore there was limited resource to complete the usual Inquiry Report.
6. The Task and Finish Group considered the next stages of the Inquiry and decided it was best for the scrutiny officer to:
 - focus on capturing the key findings for the Inquiry and to formulate these into matrices, indicating the evidence supporting the findings
 - draft a letter to Cllr Wild, highlighting the headline findings and including the recommendations sent earlier regarding the consultation process. In addition, the matrices would be shared as attachments to evidence these findings and recommendations
 - share the non-confidential Call for Evidence submissions with planning officers, to enable them to be counted and considered as consultation responses on the Strategic Options.
7. The Task and Finish Group met on 2 March 2022 to review the letter, key findings, recommendations, and attachments. Some amendments were agreed, and these have been incorporated into the documents at Appendix 1, which detail the findings of the Inquiry. Appendix 1 consists of the following:

- Appendix 1 – Letter to Councillor Wild, Cabinet Member – Strategic Planning & Transport, with the following appendices:
- App A – Inquiry Terms of Reference
- App B – November 2021 Letter to Cllr Wild with consultation recommendations
- App C – Response from Cllr Wild to App B letter
- App D – Letter from Scrutiny Chairs – Sept 2021
- App E – Response from Cllr Wild to App D letter
- App F – evidence matrix – consultation
- App G – evidence matrix – Strategic Options and Delivery
- App H – evidence matrix – Accessibility, Inclusivity, Environmental Sustainability
- App I – evidence matrix – further findings, observations, and future scrutiny.

Way Forward

8. During their meeting, Members may wish to discuss and agree any amendments required to the Task Group key findings, attached at **Appendix 1**.

Legal Implications

9. The Scrutiny Committee is empowered to enquire, consider, review, and recommend but not to make policy decisions. As the recommendations in this report are to consider and review matters, there are no direct legal implications. However, legal implications may arise if and when the matters under review are implemented with or without any modifications. Any report with recommendations for decision that goes to Cabinet/Council will set out any legal implications arising from those recommendations. All decisions taken by or on behalf of the Council must (a) be within the legal powers of the Council; (b) comply with any procedural requirement imposed by law; (c) be within the powers of the body or person exercising powers on behalf of the Council; (d) be undertaken in accordance with the procedural requirements imposed by the Council e.g. Scrutiny Procedure Rules; (e) be fully and properly informed; (f) be properly motivated; (g) be taken having regard to the

Council's fiduciary duty to its taxpayers; and (h) be reasonable and proper in all the circumstances.

Financial Implications

10. The Scrutiny Committee is empowered to enquire, consider, review, and recommend but not to make policy decisions. As the recommendations in this report are to consider and review matters, there are no direct financial implications at this stage in relation to any of the work programme. However, financial implications may arise if and when the matters under review are implemented with or without any modifications. Any report with recommendations for decision that goes to Cabinet/Council will set out any financial implications arising from those recommendations.

RECOMMENDATION

The Committee is recommended to consider the findings of the task group, attached at **Appendix 1**, and endorse these, subject to any amendments the Committee wish to make, for submission to the Cabinet Member.

Davina Fiore

Director of Governance & Legal Services

10 March 2022

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17 March 2022

Councillor Caro Wild,
County Hall,
Atlantic Wharf,
Cardiff CF10 4UW.



Dear Cllr Wild,

Scrutiny Joint Task and Finish Group - Replacement Local Development Plan – Strategic and Delivery Options

On behalf of the Environmental Scrutiny Committee, I would like to thank you, as well as the Head of Planning and the Group Leader, (Policy) Planning, for your participation in the Scrutiny Joint Task and Finish Group's Inquiry into the Replacement Local Development Plan (RLDP) Strategic and Delivery Options.

As can be seen from the attached Terms of Reference at *Appendix A*, the Group had several key areas that they wished to explore, including the effectiveness of the Council's consultation with stakeholders and the public, with particular focus on the plans and approaches for involving hard to reach and under-represented groups. The Task Group also identified accessibility, inclusivity, and environmental sustainability as central themes to examine in relation to the RLDP Strategic and Delivery Options.

In addition to this, the Task Group sought to explore the supporting rationale for the projected growth provided by Welsh Government as well as how Cardiff's RLDP Strategic and Delivery Options are aligned with regional planning.

The Inquiry held a series of meetings with Planning Officers, yourself, and Consultant Forecasters from Hardisty Jones Associates (Economic Forecasters) and Edge Analytics (Demographic Forecasters), to explore and gather evidence on the Strategic and Delivery Options. In addition to this the Task Group assigned the Principal Scrutiny Research Officer to undertake a '*Call for Evidence*' to seek the

views of stakeholders on the suitability and robustness of the Council's approach in consulting the public and stakeholders, as well as their views on the scope and subject of the RLDP's Strategic and Delivery Options. It also sought comments on the importance of accessibility, inclusivity, and environmental sustainability in shaping future developments in Cardiff. This '*Call for Evidence*' received 18 responses from a range of stakeholders and representative groups as detailed below:

Adventure Travel
Cardiff Civic Society
Cardiff Community Housing Association (CCHA)
Cardiff People First
Cardiff Rivers Group
Cardiff Third Sector Council
Dŵr Cymru
First Bus South and West Wales
For Cardiff
Glamorgan and Gwent Archaeological Trust
Home Builders Federation
Natural Resources Wales
Play Wales
RSPB
Sustrans
3 Anonymous

Further to this, representatives from five organisations were invited to meet the Task Group for Members to hear their views on the feasibility of the Strategic and Delivery Options. These included Cardiff Third Sector Council, For Cardiff, Natural Resources Wales (NRW), The Alzheimer's Society and United Welsh Housing Association (UWHA).

Initial Findings and Recommendations on Consultation

As you are aware, following the Task Group's examination of the planned RLDP consultation process for the Strategic and Delivery Options in November, prior to consultation going live on the 30th November 2021, Members made a series of

observations and recommendations that were forwarded to yourself and the service area. The intention was that these would inform and be incorporated into the ongoing consultation. The letter containing these observations and recommendations is attached at *Appendix B*, along with your response at *Appendix C*. Out of the six recommendations made, five of them were accepted and one was partially accepted.

In addition to this, in September 2021, prior to the establishment of the Task and Finish Group, the five Scrutiny Committees considered the RLDP Vision and Objectives and collectively provided a series of recommendations, again in a letter to yourself, which included recommendations on consultation. This letter is attached at *Appendix D*, along with your response at *Appendix E*. All eight recommendations have been accepted. Your response was received on 1 March 2022, five months after the original letter, which is clearly unacceptable and something we would not wish to see happen again.

Further Findings

Given the time constraints surrounding this Inquiry and a temporary reduction in Scrutiny staffing resources, the Task Group determined to present the findings of the Inquiry via an extended letter that incorporates these early recommendations relating to the consultation process, followed by the series of findings relating to the various areas explored by the Inquiry:

- Consultation – Further Key Findings
- Strategic and Delivery Options – Key Findings
- Accessibility, Inclusivity and Environmental Sustainability – Key Findings
- Further findings, Observations and Future Scrutiny.

Therefore, this letter identifies the headline findings from the evidence gathered throughout the Inquiry, which is captured and further detailed in the attached matrices. It is **recommended** that:

- The evidence and key findings in relation to the Corporate consultation process for the Strategic and Delivery Options contained within this letter and the attached matrix (*Appendix F*) are used to inform and develop the consultation process for

the Preferred Strategy and all other consultation processes for future stages of the RLDP.

- The evidence and key findings on the Strategic and Delivery Options contained within this letter and the attached matrix (*Appendix G*) are incorporated as formal responses and given equal weighting to those from the Corporate consultation process. Planning Officers agreed to this during a Task Group meeting and requested that they receive copies of the Call for Evidence submissions so that these can be counted and considered as consultation responses.
- The evidence and key findings in relation to accessibility, inclusivity and environmental sustainability contained within this letter and the attached matrix (*Appendix H*) are:
 - incorporated as formal responses and given equal weighting to those from the Corporate consultation process in relation to the Strategic and Delivery Options; and
 - used to inform the development of the Preferred Strategy for the RLDP as part of addressing and meeting the needs of the individuals and communities in Cardiff as well as the Council's environmental responsibilities.

The 'further findings, observations and future Scrutiny' evidence and information contained within this letter and the attached matrix (*Appendix I*) will be used as the basis for future Scrutiny of the RLDP stages.

Consultation – Further Key Findings

Attached at *Appendix F* is the matrix containing the evidence that was gathered after the first meeting and initial recommendations. This includes evidence from Planning Officers who attended meetings as well as stakeholders and submissions to the Call for Evidence. Evidence has been grouped thematically, to enable the identification of key findings that the Task Group agreed at their meeting on 2nd March 2022.

Views were sought from stakeholders on the following aspects:

- Awareness of the Corporate consultation

- General feedback
- Methods used and their appropriateness
- Suitability of language used
- Format and layout
- Involving hard to reach groups
- Other comments or suggestions

A large proportion of the evidence received from stakeholders on the consultation process supports the Task Group's initial findings, namely the need for a 'User Friendly' summary that contains information relating to the types of houses and jobs that might be incorporated, as well as reference to the need for visual representation of the options and a glossary of terms provided. The Task Group expressed concern that the evidence was echoing what Members had previously raised with Planning Officers and the fact that there had been reassurances that these would be taken on board. Whilst Planning Officers reported in a meeting in January that a user-friendly guide to the LDP was being produced to inform the stages of the consultation as well as a glossary of terms, the Task Group viewed this as too late in the consultation to have any real impact and suggests that the consultation process was therefore flawed from the start.

Awareness, Methods, Language and Layout

Overall, most stakeholders who were aware of the consultation and felt it was appropriate, with suitable language and clear, easy to follow layout etc, were those that represented corporate body organisations such as First Bus Company, Glamorgan-Gwent Archaeological Trust, Dŵr Cymru, For Cardiff, and the Home Builders Federation. These consultees indicated that they were either key consultees to the Corporate RLDP or already have connections with the Council.

Those who represented the interest of the general public, whilst welcoming the opportunity to engage with the ongoing corporate consultation and recognising the challenges posed by the current pandemic in reaching stakeholders, believed that the Directorate needs to review its consultation approach and timings to reach a wider audience. These were organisations such as Cardiff Third Sector Council, Cardiff

Rivers Group, and Cardiff Civic Society. Many of these, as well as Play Wales and Cardiff People First, commented that they were not even aware of the consultation, prior to contact by scrutiny, and expressed concern regarding this.

There were comments from public interest groups that the language used was quite *'technical and formal'* and *'quite challenging'* and not easily understandable to some stakeholders and the general public who are not familiar with planning matters and vocabulary. They commented that this can put people off responding to the consultation. The suggestion was made that the consultation document should be mostly 'jargon free' and should have a glossary for the more technical terms that are presented in the consultation document.

Some stakeholders commented that the consultation document terminologies were *'unclear'* and *'not sufficiently explained'*, and that it was not child friendly and not accessible for those with learning disabilities. Play Wales consistently implied that there was a need for a child /young person version of the document. Whilst Planning Officers reported at the January meeting that two workshops were being organised for children, this Inquiry did not receive any detail on these, on their structure and format, on their content, on what has been shown to children or on the responses received from children attending these workshops. As such, Members are unable to comment on the effectiveness of these workshops.

The Task Group highlighted that there was an unusual contradiction in that witnesses were critical that young people were not being engaged effectively, even though the consultation focused on online engagement, which is often the main medium for young people to engage. Members note that to make the consultation and approach child friendly, you must make it relevant to them before asking the right questions, even when using online routes.

The Task Group notes that schools have Youth Councils who should be actively engaged in the consultation process to provide their views in relation to the RLDP and what it means for the city.

The Task Group appreciates that consultation will contain technical terms but suggests future consultation should be made available in an 'easy read' version, a child-friendly version and should use 'plain English or Welsh'.

Involving Hard to Reach Groups

Several stakeholders highlighted that more work is needed to involve hard to reach groups. The evidence provided suggested that attention still needs to be drawn to the needs of those with protected characteristics that should be considered in developing the RLDP and feature in the RLDP.

Whilst there was a positive comment made regarding references in the RLDP to the needs of Gypsy and Traveller Community, there were further comments that the document is largely silent on other protected characteristic groups. There was reference made by the Cardiff Civic Society that a conscious effort is required to seek out those who are not normally involved in the planning process and to convince them that the Council really wants to hear their views. This, according to the Civic Society, needs a shift in mindset of the Council to make it explicitly relevant to individuals from hard-to-reach groups.

In addition to this, the Cardiff Third Sector Council highlighted the diversity of the Cardiff population as an issue to be considered. The Task Group explored this in more detail, including statistics that suggested that whilst the proportion of the Cardiff population who can speak Welsh (reasonably well) is approximately 15%, the population of individuals from a BAME background in Cardiff is approximately 16%. Cardiff Third Sector Council pointed out the fact that there are a range of other languages spoken across the city, including disability languages, that are not represented as equal to those who speak Welsh. Several stakeholders supported this, stressing the importance of effectively engaging with diverse communities including those with protected characteristics, those whose first language is not English or Welsh, the hard-to-reach groups and those who are often less likely to respond to Cardiff Council consultations.

Suggestions for how to reach out to hard-to-reach groups and communities were put forward by stakeholders. Several stakeholders advocated the Council work

collaboratively with organisations and stakeholders who are already supporting these groups, to help facilitate their involvement and contributions to local authority consultations. The Cardiff Third Sector Council for example commented that, with over 1,100 members, they can provide effective routes to engagement for a wide range of local people to have their views heard as an individual or as part of a group or community. Cardiff Rivers Group also suggested setting up a representative network of stakeholders who can be contacted for engagement purposes.

The Task Group supports the notion of utilising organisations who already have contacts with hard-to-reach communities. Members are aware that, during the covid pandemic, there were organisations that sent out Zoom invites to individuals, to get messages across and information to the BAME communities in Cardiff. For those who did not have access to computers, assistance was provided from others to allow them to participate in this process and ensure they were kept engaged and informed.

Likewise, the Task Group wish to highlight previous Scrutiny recommendations that the service look to Council Members from BAME backgrounds and utilise their knowledge of these communities. Despite the Head of Planning stating that at every meeting he had attended he had called on all those attending, such as Members and others, to engage with their respective communities, the Task Group feel that there is little evidence that Members are being effectively utilised. Members request that they are provided with something very simple that they could put out such as a poster that could be put on social media to encourage engagement and get people to get in touch and participate in the process.

Further suggestions provided in the 'Call for Evidence' include:

- face-to-face meetings - as they are viewed as much more effective than written surveys, as a better way to try to understand what motivates and drives people and respond to any specific needs
- translators and people with multi-lingual skills - to assist with engagement and to visit community hubs such as mosques to overcome language barriers.

In relation to involving hard to reach groups, the Task Group expressed concern and disappointment that in considering the evidence from the 'Call for Evidence' and

engagement with stakeholders, many of the comments that the Scrutiny Committees and Task Group had already raised in previous meetings had still not been dealt with.

The Task Group also makes the point that the 'hard to reach' label needs to be disposed of because it almost justifies not engaging with these groups.

Referring to Gypsy and Traveller sites, there was a further comment made by Cardiff Third Sector Council regarding the absence of transit sites in Wales, as this puts this group at risk of being criminalised for stopping where there is no appropriate provision for them to station their trailers. The Task Group expressed similar concern regarding this for Cardiff and the fact that the work to identify suitable sites in Cardiff had been ongoing since the last Gypsy and Traveller Accommodation Assessment (GTAA) was undertaken in 2016. As it was understood, suitable sites were identified the following year; however, five years later, a new GTAA has recently been undertaken with still no sites formally confirmed. Concern was expressed over the importance of these communities having stability in their lives and the view of the Task Group is that site identification should not be delayed any longer.

The Head of Planning highlighted that this was a very sensitive subject that Planning is a part of, in terms of identification of new sites and capturing these in the LDP. He stressed however, that the identification of sites wasn't just a Planning issue and that consideration of sites, assessment of sites and engagement of the community and neighbouring communities is often a very difficult and sensitive area. The Task Group were advised that, following the submission of the new GTAA to Welsh Government, the Council would hopefully get its' approval in order that it can be taken forward in the Preferred Strategy in the autumn/winter this year to set out how the Council will deliver these sites. This will then form part of the consultation of the next stage. The Head of Planning further stated that this work often involved housing some of the most vulnerable people and underrepresented communities and suggested that it would be best to discuss this with Housing in the first instance. Whilst Planning's role was quite clear in terms of its consideration of any new sites through the management process, with the LDP manual referencing identifying areas of land for all housing needs, Members were advised that it is fundamentally a Housing issue.

The Task Group appreciates that it is not just Planning involved in this work and that there are contributions required from a combination of service areas. The Task Group is concerned, however, that Planning and Housing view this as primarily the other's responsibility and believes there is a risk of them continuing to work in silos. A 'One Council' approach is needed in this area, to ensure progress is made.

Other Comments or Suggestions

Further comments and suggestions were provided by stakeholders including:

- the Directorate doing more to raise public awareness of the RLDP consultation using various media channels such as TV, newspapers, and local advertising.
- when covid restrictions are eased, some of the consultees suggested that more open face to face engagement, and public 'town hall' type meetings could be held in different electoral wards. They believe that this approach would allow the Directorate to effectively engage and interact with residents and give them the opportunity to explore different ward-based views on development and planning priorities. The Task Group supports this and agrees it would be extremely beneficial for the development of the Preferred Strategy.
- Suggestions for a 'Citizens Assembly' were proposed wherein city residents, supported by experts, could collectively consider options and priorities.
- the Planning Directorate to target well established groups or organisations such as homeless charities, environmental groups and seek their ideas, insights, and expertise on improvements on what would be relevant to the RLDP.

One of the areas that several stakeholders highlighted, and the Task Group also concluded, was that the consultation on the Strategic and Delivery Options was generally based around a framework of "here are the options we have decided upon, which option do you want?". It was suggested a more effective method would have been asking people "what do you, the residents, want to see happen?". Cardiff Civic Society proposed gathering the public's views on what they want in their city and for the Council to use that as the starting point for developing proposals.

The Task Group supports this and, whilst appreciating that this stage of the process was not statutory, Members wonder whether this stage could have been made a lot more open ended and conversational where people were asked what they want to see from their city, how they want it to grow, what people's thoughts are and how they want it to grow over the next few years. One way of doing this would be to use a 'Call for Evidence' approach, which would enable open ended questions to be used within a specified framework. Members are keen to stress that, whilst there are certain areas that Planning are required to seek views on, the way that views are sought, the language used and the methods used, shape whether a consultation is open, inclusive, and accessible and, ultimately, effective.

Future Consultation

Based on the evidence gathered, the Task Group expressed concern regarding the consultation approach used for the Strategic and Delivery Options. Members highlighted the risk that if people have not been engaged at this stage, they are unlikely to engage in the future. Members also noted the significant risk that, if the next stage of consultation is not undertaken correctly, there could be legal challenge for the Council.

Given this, the Task Group questioned whether the Directorate had considered going back to Welsh Government and asking for an extension of the consultation period as it would enable the Council to reach more people and undertake a better consultation. You offered to share with the Task Group a response that had already been provided on this but stated that you did not agree that the Council should restart the process and that it was difficult enough to stick to the timelines within our RLDP with the delays that already been experienced.

There was also the view from some Members that the criticism of the engagement was a little harsh as this was non-statutory consultation and not on areas of specific detail, such as HMOs. The point was also made that larger organisations should be aware of Cardiff Council's RLDP and, if they weren't, they needed to ensure that their own Policy Officers were better informed and aware and that this was more an issue for them and not Cardiff Council.

Members appreciate how difficult it has been with Covid and the fact that it had not been possible to use in-person meetings to engage many of the groups for whom this is the usual mechanism to engage. However, Members commented that this means the Council needs to push further during future consultations now that covid restrictions have been eased.

For engagement around the Preferred Strategy, the Task Group understand that some of the complex terminology is required due to the planning laws, but it is key that consultation documents are made as simple as possible. The Task Group highlight that consultation documents need to use plain English and Welsh, be accessible, have easy read versions and child-friendly versions, contain glossaries and summaries as required and be available in community languages. In addition, the Task Group highlight that groups need to be reached out to, using the methods outlined in the evidence to our Inquiry. Overall, the consultation needs to be made relevant to people so it is engaging to them and encourages them to take part and shape the city for the future.

For the next stage of RLDP consultation, as mentioned above, the Task Group **recommend** that the suggestions identified in this letter and in the key findings' matrix (*Appendix F*) are taken into consideration.

Strategic and Delivery Options – Key Findings

Attached at *Appendix G* is the matrix containing the evidence that was gathered from meetings with Planning Officers, yourself, consultants, stakeholders via the 'Call for Evidence', and stakeholder attendance at a meeting of the Task Group. Again, this has been grouped thematically, alongside the key findings that the Task Group approved at their meeting on 2nd March 2022.

Views were sought from stakeholders on the following aspects:

- Strategic Options – Views on Growth Options
- Other Additional Information that would have been useful
- Preferred Growth Option
- Views on RLDP Delivery options that should be considered
- Other Views on the Scope of the Growth and Delivery Options

Strategic Options – Views on Growth Options

Corporate body organisations, such as Dŵr Cymru, First Bus and Glamorgan-Gwent Archaeological Trust, responded with positive feedback, stating that they understood the rationale behind the options presented and that the document provided sufficient detail.

Other organisations representing the public view, such as Cardiff Civic Society, Cardiff Third Sector Council, and Cardiff Rivers Group commented that the rationale of the growth options was unclear and that there was a need for more explanatory information.

Whilst the Inquiry heard detailed explanation and rationale from the Consultant Forecasters on how the growth options had been developed, it was highlighted by the Task Group that this information was not made available as part of the consultation document, making this difficult for the public and stakeholders to understand.

NRW and Cardiff Civic Society highlighted that there was a need for clarity on how the RLDP defines growth, whether growth is identified with setting medium and long-term economic targets in terms of GDP and GDP per capita, whether it means encouraging 'Inclusive growth' which involves sharing the benefits of economic growth more equitably to mitigate societal problems such as inequality, job insecurity, low pay and poor productivity, and whether there is a need to review the presumption that growth is good. NRW also recommend that the RLDP growth options be assessed or evaluated on how they contribute or mitigate the challenges posed by the climate and nature emergencies, as identified in the WBFG Act.

There were also comments made from NRW on the need to review the population projections used in the RLDP. The Home Builders Federation expressed concern that the RLDP consultation suggested that there were only three growth options that consultees can choose from, whereas in other LAs a greater number and range of options have been considered at this early stage in the development of the LDP process.

In discussions with Planning Officers, the Task Group were advised that the statistics are based on what is known today, but that this would inevitably change and be informed by further analysis over the year as well as housing monitoring and assessment and more up to date census data. The 2018 population data was used as a baseline as this is what the WG LDP manual advises, but the Head of Planning stated that the growth options will be updated once the new 2021 census comes out in March 2022. He reassured Members that all evidence gathered covering areas such as houses and offices that are being built and planning permissions being issued, will inform the level of growth and the need for additional land to accommodate that growth. This, he stated, was being constantly monitored by Officers and included in the evidence base for the RLDP as it evolves, so that it will reflect the most up to date information.

The Head of Planning also informed the Task Group that there weren't only 3 options to choose from, and these were not set in stone, but, based on the evidence available at the time, three options were presented to indicate a low, medium, or high level of growth to try to show a balance. Whilst Members welcomed this information, they highlighted that the issue was that this explanation had not been included in the consultation document and that those taking part in the consultation would not have been aware that the options were not set in stone. Officers need to be alert to how someone with no knowledge in this area will view the information and questions in consultation documents. Again, this highlights the need for the consultation process to be constructed to be as accessible, inclusive, and open as possible, with simple language and clear explanations of options presented; this will make the consultation more effective.

Additional Information that would have been useful

Stakeholders raised a series of key areas where additional information could have been provided, including:

- Information on types of housing and jobs
- Information on types of land and associated services and facilities
- Information on the methodology in developing growth figures
- Impact of changes in work patterns on growth figures

- Implications of proposed strategic options on sustainable development
- Information on regional issues that could affect Cardiff's RLDP
- Information on how the options would be assessed.

Planning Officers explained that the Options presented were deliberately not detailed and precise so as not to be seen to be favouring any option and influence people's views, and that the detail would be provided, including a spatial masterplan, at the next stage in the Preferred Strategy. This, however, supports the Task Group's findings on providing suitable explanatory information and possibly having a more open consultation process, rather than asking people to decide on a preferred option where they do not have the background information to be able to do so.

Preferred Growth Option

Linked to the issues highlighted above, when asked about a preferred growth option, there were several consultees who stated that there was insufficient information available to make an informed choice on preferred option.

A few consultees preferred Option B, citing that this preference was subject to there being an emphasis on social housing and the S106 for Affordable housing being determined.

Options B and C were perceived to be most likely to deliver the wider policy aims of the plan and National Planning Policy, with Option C having significantly more support. Some of the reasons for this were cited as it *'Fits with Cardiff as one of the fastest growing cities in the UK'*, it *'reduce levels of homelessness by providing suitable accommodation'* and *'the investment that comes with it, the regeneration, the work that can be done in brownfield, the way that we want to deliver homework arrangements, the sustainable transport that potentially comes with that'*.

Views on RLDP Delivery options that should be considered

The Task Group held discussions with Officers and Consultant Forecasters around the delivery options. These discussions made clear that the consultation sought to open up conversations around how and where Cardiff should grow. The Task Group

were advised that it was about understanding where people think the city should grow, whether there should be greenfield or brownfield development, city centre development or suburb development or a mixture of all of these.

Following this, the Task Group received a variety of views from stakeholders. These included the view that Strategic Housing sites should not be limited to Cardiff and should support growth in the Southeast Wales region. Stakeholders also raised the need to consider the impact of the pandemic on how people are now living and working, which will impact on the type and location of desired housing. Many consultees referred to the need for development sites to focus on the public being less car dependent, as follows:

- Public Transport infrastructure should be embedded into all housing developments and area plans
- Out of town retail parks require use of cars – should be a City Centre first approach
- The development of the Metro, if delivered well, is key to future development.
- Location of housing estates and transport hubs is key, from a sustainability aspect in terms of the need to reduce car travel.

NRW and Cardiff Civic Society also stated that there was a need for clarity on how the various delivery options align with the RLDP vision, addressing matters such as sustainable development and place-making, alignment with One Planet Cardiff and becoming carbon neutral, racial and social inequality, and the pronounced differences in life expectancy across the city. They also expressed the view that the delivery options needed to consider the implications of the climate and nature emergencies, considering the impact of each option scenario.

Two other main areas highlighted by stakeholders and discussed by the Task Group were developing greenfield and brownfield sites and developing affordable housing. Some stakeholders expressed the view that development should be prioritised on brownfield sites, with the Cardiff Rivers Group and Adventure Travel strongly opposed to any new building on greenfield sites. 'For Cardiff' also supported a brownfield only option, provided there is a suitable transport network in place, whilst

UWHA determined that it was inevitable that it would be a dispersed combination of brownfield and greenfield sites.

There were views expressed, from NRW, Cardiff Civic Society and UWHA, around the need to rethink the use of brownfield and greenfield sites, challenging the assumption that brownfield sites are associated with higher costs and thus less likely to deliver affordable housing. NRW mentioned other options for delivering housing development, including compulsory purchase orders and the ability to incentivise, whilst UWHA stated that affordable housing can act as a catalyst for regeneration on brownfield sites.

Both UWHA and CCHA commented that the Council needed to create a non-negotiable commitment to affordable housing in the planning process, to give a clear signal to developers to pay reasonable land costs, ensuring scheme viability. UWHA expressed the view that the Council should stop taking commuted sums on developments and follow what other Councils are doing in adopting an agreement for a certain percentage of affordable housing on every housing development. They suggest setting a target for Affordable Housing in the RLDP and sticking to it, to stop the reduction in delivery around section 106 and critically not lose the opportunity of the land. To replace the commuted sums, they propose accessing social housing grants and engaging the RSLs at an earlier stage to work more in partnership to achieve affordable housing.

Whilst asking the Council to rethink its use of brownfield and greenfield sites, NRW did point out that many brownfield sites are extremely biodiverse, and some have huge value for quiet recreation, whereas some greenfield sites might have few natural features and are less biodiverse. Accordingly, the decision for land allocation must be based upon robust evidence to transition to, and where necessary create new, sustainable communities (meeting local need within environmental constraints). Cardiff Civic Society support this, also stating that developments need to consider the response to the nature emergency and the loss of biodiversity of land, in relation to brown and green field sites.

Another key finding that a series of stakeholders highlighted for consideration in developing the RLDP and its delivery options was the repurposing and re-use of existing buildings. Suggestions associated with this include ceasing to build more student flats and large office blocks in the city centre and utilising the space for social housing, repurposing what is there and not being utilised, and maximising opportunities to reuse land and buildings whilst protecting land with high ecological value. In addition to this, 'For Cardiff' stressed the need to repurpose long term empty buildings in the city centre, particularly the larger ones, for mixed use, but highlighted that, for this to be successful, planning policies needed to be relaxed to allow for mixed use and innovative approaches, where appropriate. Part of this mixed use included flexible working space for people to hire a desk.

Further key findings based on the evidence are highlighted below:

- Brownfield approach is likely to result in less water and network infrastructure reinforcement works
- Archaeological implications of brownfield and greenfield – excavation and recording of this needs to be taken into account
- Support the development of city villages
- Building near transport nodes
- Growth delivered using a mix of various delivery strategies
- Bring in RSL at a very early stage to assist with any challenges
- Don't ringfence planning guidance - have it broader to allow for inclusion of such things as older persons' accommodation and supported accommodation.
- Need good quality urban design which aligns with the WG aspirations, have a moderate density and decent GFA, high energy efficiency
- SuDS and SAB are complicated to work through, but they create the potential for much better development design, more greenery, more sustainable transport, and places that are going to last longer.
- A City Centre First Approach to utilise the empty units and brownfield sites within the commercial core first before utilising any out or edge of town space with public services brought into the city centre.

Other Views on the Scope of the Growth and Delivery Options

Only a small number of stakeholders added final comments in the Call for Evidence relating to the overall scope of the Growth and Delivery Options.

These include views from Cardiff Civic Society that the focus of options is solely on homes and there is insufficient attention given to employment sites or to infrastructure. They also highlight that the implications of home/local working, the modal shift, and prospects for expanding public transport are critical to decision making around locations for housing.

Cardiff Third Sector Council stated that the Options should be assessed against a consistent set of pros and cons. They also point out that the RLDP consultation document makes no mention of flood plains and whether this will be limited or addressed, to reduce the impact of flood damage. They also highlighted the need to address the public transport infrastructure, to make public transport the easy, accessible, affordable choice, also impacting on delivery timescales and costs.

Finally, Adventure Travel highlighted the need to ensure that the Strategic and Delivery Options meet the infrastructure and services required by the population, such as GP surgeries etc.

The Task Group **recommend** that the evidence and key findings on the Strategic and Delivery Options contained within this letter and the attached matrix (*Appendix G*) are incorporated as formal responses and given equal weighting to those from the Corporate consultation process.

Accessibility, Inclusivity and Environmental Sustainability – Key Findings

Attached at *Appendix H* is a further matrix which addresses aspects relating to accessibility, inclusivity, and Environmental Sustainability. Whilst these findings have been collated as part of this stage of the RLDP, the Task Group feel that these findings have direct implications for the development of the Preferred Strategy. The Task Group **recommend** that these be considered and taken forward in the next stage of the RLDP to inform the decision-making process. For the purposes of the matrix, the areas have been divided up into ‘**Views on Factors Affecting the RLDP**’

and ‘**Addressing Stakeholders’ Needs**’. These have then also been sub-divided into the following categories:

Views on Factors Affecting the RLDP

- Biodiversity
- CO2 Emissions
- Climate Change
- Transport and Mobility
- Public Health
- New Working Patterns
- Historic and Cultural Assets

Addressing Stakeholders’ Needs

- Improving Access and Mobility
- Support Child Friendly City Programme
- Dementia Friendly Developments
- Diversity of Community - Supporting community cohesion and integration of communities
- Supporting the Welsh Language

The main consultees for these sections include NRW, Cardiff Rivers Group, Cardiff Civic Society, Cardiff Third Sector Council, Sustrans, Glamorgan-Gwent Archaeological Society, RSPB, and the Alzheimer’s Society. The detail behind the key findings is attached in the matrix but for the purposes of this letter they have been summarised under each section below:

Views on Factors Affecting the RLDP

Biodiversity

- Future developments and planning should consider its impact on biodiversity
 - Need to recognise the importance of spaces being able to perform multiple functions as these areas provide access to natural green space for people
 - Essential the RLDP delivers robust Green Infrastructure to help protect nature conservation.

- Creating spaces where the public can walk and enjoy biodiversity improves health.
- Biodiversity should be a major priority
 - From a land use perspective, particular attention must be given to wildlife corridors, which should be identified and protected.
 - Urgent need to address the nature emergency along with the climate emergency
 - Need to provide the framework to ensure that there is no further loss of nature and that there is a commitment to working with others to reverse the decline.
 - Commitment required from the Council protect, enhance, and deliver new environmentally supportive policies that address, with urgency the way in which we need to change our practices and policies.

CO2 Emissions

- Reduction of CO2 emission in response to climate emergency should be a key consideration in planning
- Information needed on the carbon implications of the delivery options
- Reducing car travel
 - Need to locate jobs and housing together rather than separating the land uses.
 - Encourage working from home, locally or create hot desking facilities across Cardiff.
 - Where travel is necessary, make it easier to walk, cycle or use public transport.
 - Create 20-minute neighbourhoods, building new developments within or adjoining existing urban areas where everyday destinations are walkable from people's homes and sustainable transport is viable.
 - Reducing Car dependency should be heavily weighted into any housing development with the appropriate facilities built in to allow active travel.
- Seek more green energy solutions across the city

Climate Emergency

- Consider the implications of RLDP growth options on nature and climate emergency commitments
- RLDP site allocations and settlement strategies needs to consider the flooding risks and improvements in flood defences

- Importance of green infrastructure in absorbing floodwater, should be considered in identifying strategic sites.
- Consider impact on the historic environment
- Reducing impact of climate change should be dealt with at a national policy level

Transport and Mobility

- Improving travel infrastructure
 - New strategic housing sites should ensure adequate active and public travel infrastructure to achieve modal shift targets
 - Electric charging infrastructure
- Reducing Car Use
 - Utilise planning system to change the way we think about the functioning of 'urban ecosystems', designing out the dominance of the car and reducing the length of journeys.
 - Further develop Sustrans with usable walking and cycling routes
 - Develop 20-minute neighbourhoods
 - Connect new developments to employment, education, retail, and other local services directly through high-quality cycling, walking and wheeling routes and networks, so that active travel is a convenient and attractive option.
 - Design new homes to include secure, accessible parking for cycles, including adapted cycles and cargo bikes.
- Develop a transport network which is integrated between types of transport
- Develop inclusive transport systems
- Develop 20-minute neighbourhoods or city villages
 - Planning permission should be refused for new or extended commercial developments (e.g., retail) that rely on car access.
- Improve sustainable/green transport infrastructure
- Support bus services

Public Health

- RLDP should improve access to good quality natural environments
- Need for affordable larger homes as part of growth options - - living in overcrowded homes has public health/wellbeing impact
- Statutory health and social care provisions are appropriately uplifted in funding to meet the increased demand

New Working Patterns

- Implications of pandemic on working patterns need to be considered
 - Consider opportunities to repurpose buildings for housing and/or community use where there is a surplus of office space.
 - Growth of on-line shopping and its implications on use of commercial space
 - Part time working, working from home, compressed hours etc.
 - Implications of WG's policy for 30% of workers to work from home
 - Impact on City Centre Businesses
 - Downscaling of office space
- Hybrid and home working may lead to changes in the use of historic buildings

Historical and Cultural Assets

- Preservation of the city's character and historic and cultural value of buildings
- There are policies that 'recognise' Heritage Assets, but it is difficult to 'protect' them and write robust policy for this. There are sometimes other options that can be considered such as local designations.

Addressing Stakeholders' Needs

Improving Access and Mobility

- Encouraging use of public transport
 - Access to public transport for everyone.
 - Measures restricting car use and parking should not inadvertently discriminate against disabled drivers
 - Frequent, reliable, cheap, comfortable public transport, supported by services such as park and ride to reduce car use.
 - Active travel needs to be encouraged for shorter commutes.
 - Integrated public transport tickets.
- Concerns with shared paths for cycling and commuters accessing public transport
- New developments should have cycle paths
- Importance of cycle lanes in new developments
- Traffic free residential streets
- Need to consider transport and mobility for accessible homes as well as local and equally accessible jobs.

- Need community-led design - involve the community in the design process so that they 'own' and support it.
- Cycling can improve accessibility
- Need to make services accessible for those with disabilities and listen to advice from representatives and those with experience on how this can be achieved.
- Identify sites in RLDP for older persons accommodation and for disabled individuals and children

Supporting Child Friendly City Programme

- Providing safe access to play, open spaces, interaction with nature, active travel
- Support the development of child-friendly public realm
- Design developments that encourage communities to interact such as playing fields, playgrounds, basketball courts, 5-a-side pitches, skateboard parks etc, that are safe from traffic as well as antisocial behaviour
- Sports and other facilities should be close to where children and young people live, rather than concentrated in a 'sports village' or an 'entertainment zone'
- Consult children and young people on what they want
- Open space, information panels and walking/activity/heritage trails.
- New developments should consider community facility which allows the use of childcare for working parents

Dementia Friendly Developments

- Local public transport is critical to people living with Dementia
- Good access to transport can reduce social isolation and loneliness which is significantly important as a third of people living with dementia live on their own.
- Local public transport routes need to be direct to community hubs and facilities like high streets, GP surgery, hospitals as well as support networks and respite services
- Need to enable people living with dementia to stay in their communities – be that in a care home or close to family members and friends
- Having properties that are adaptable or housing solutions that are adaptable for people living with dementia is vital, such as intergenerational properties
- Raising awareness in the work of the Council and ensuring this is followed through with developers.

- Home for Life Concept – so that people living with dementia can stay in their homes.
- Mandating good design through planning guidance, recognising this won't work for all types of properties such as converting city centre or old buildings into flats - there are other things you can do in these designs, to make it accessible.
- Adopt best practice on how developments can be dementia friendly.
- Suggestions for future development:
 - Traffic calming measures
 - Develop Indoor and outdoor spaces for older people as well as community facilities
 - Improved accessibility in areas for people to make independent journeys using a variety of methods including walking, cycling, wheelchair and mobility scooter.
 - Develop Community Toilet Scheme
 - Wayfinding signage
 - Improved local and regional transport links
 - Protected, safe cycle infrastructure
- Developments that foster community, that have areas with places for meeting, visiting and events, that are not on a large scale
- Consult with representative groups effectively
- Vital that the needs of people living with Dementia are considered, and this can also assist in meeting other people's needs also.
- Increase awareness of Dementia, how it affects people - with all staff, including those in planning
- Council needs to seek this evidence from Dementia Friendly Housing Charter and Dementia Friendly Housing Guide and take into account in developing RLDP.

Diversity of Community - Supporting community cohesion and integration of communities

- More should be done to engage with residents and communities
- Acknowledge differences in how people live, such as multi-generational houses
- Recognise the changes that are needed at different stages of life
- Access to range of jobs and services that meet the needs of the diverse community living there.

- Distribution of development across the city should be proportionate that supports the aim of developing the city and diverse communities inclusively
- Affordable housing units of varying sizes are required across the city
- Incorporate social infrastructure such as places to meet to encourage cohesion into a local community
- Space for social mixing is vital

Supporting the Welsh Language

- RLDP provide specific opportunities to seek community views on how Welsh language and culture interact with RLDP policies
- RLDP should align closely with the statutory Welsh Medium Education Plan.
- Simplistic use of Welsh language that is integrated into all aspects of new development
- Promoting and support of the Welsh language is already really well covered
- Promoting use of bilingual place names, road and street names, bilingual information boards and publicity.
- Promoting learning the language, fostering a cohesive feeling via this, and supporting developments that have learning centres.
- Also need to promote the diverse range of language spoken in the city.

Further findings, observations, and future Scrutiny

Attached at *Appendix I* are further findings from the Inquiry that the Task Group gathered from the Planning Officers and Consultant Forecasters covering Regional Planning, the Policy Framework and Preferred Strategy, as well as proposals for future Scrutiny.

The terms of reference for the Task Group state that Members are to consider how the RLDP Strategic and Delivery Options align with regional planning. The matrix highlights the information provided to the Task Group on this and shows that it is vitally important to get this RLDP correct in terms of levels and types of job and housing growth and requirements as this will have significant implications in the development of the Regional Plan.

Policy Framework and Preferred Strategy

On the Policy Framework and Preferred Strategy, the matrix indicates the information that has been obtained through discussions with Planning Officers. Some of the key points that the Task Group highlighted were that it was really important how the policy framework considers the spatial location of growth in the City based on its rationale and the benefits it provides to the surrounding communities. Furthermore, a strong master planning approach and policy framework is vital to ensure community needs are met. Planning Officers also agreed that there needs to be clear criteria for assessing the Preferred Strategy and that it is made accessible and not too technical, for all to understand the process clearly.

Future Scrutiny Involvement

With regards to Future Scrutiny, Planning Officers agreed it would be useful for scrutiny to continue its involvement and consider the future evidence base, such as the new census information, the housing needs assessments, and more information on housing completion schemes in the city. They also commented that it would be good to share trends with scrutiny.

In relation to the census, one of the Consultant forecasters highlighted that it would be important for Cardiff to consider this as in 2011 there was quite a readjustment made to the Cardiff population - the UPC element. He indicated that there could possibly be the same trend appearing in the 2021 census and it was important to keep a look out for it and what it tells us about Cardiff in the future.

Further to this, Planning Officers expressed the wish to explore the master planning approach and policy framework further with Scrutiny, in terms of what are the components of a good master planning approach through a policy framework, to ensure that the good principles are picked up on.

The attached matrix (*Appendix I*) also contains a series of questions suggested by NRW for Scrutiny to consider as part of their ongoing Inquiry that focus on the climate and nature emergency.

In relation to future consultation, as well as the recommendations identified earlier in this letter, the Task Group raised concerns regarding the timing of engagement with Scrutiny over the RLDP Strategic Options consultation, given that the consultation documents had already been finalised and sent for translation and branding. Whilst appreciating the invitation to provide comment and observations on the overall consultation approach, Members argued that effective Scrutiny and engagement that enabled Members to make any real direct impact had been prohibited, effectively disenfranchising Scrutiny Members and the Scrutiny process.

The Task Group therefore **recommend** that Scrutiny be prioritised in future stages of the RLDP, with early sight of RLDP consultation documents to enable their feedback to be considered prior to them being finalised for publication. Members consider that this will enable Members to undertake their role more effectively and be of more benefit to the Directorate. This practice would enable Scrutiny to undertake its 'critical friend' role to help critique and refine the consultation process.

Similarly, the Task Group **recommend** that all political groups are provided with an early draft of RLDP consultation documents for consideration before being finalised so that they can also provide comment and suggest amendments for incorporation.

I trust you find the above headline findings and attached evidence matrices useful when developing the next stage of the RLDP consultation and the Preferred Strategy. We have included our previous recommendations on consultation in the appendices, for completeness. This letter also contains recommendations, which are set out below. It is vital that the consultation process is strengthened by utilising the recommendations, evidence and suggestions set out in this letter and appendices, as well as our previous recommendations. It is also vital that scrutiny is engaged early, to use Members' knowledge and community links effectively and to benefit from our critical friend role, to strengthen the consultation process and overall Preferred Strategy.

The replacement Local Development Plan is a key document for Cardiff, its citizens, businesses, employees, and our neighbouring local authorities, particularly as it will

inform the regional plan. We are willing to work together to ensure a robust process is in place to develop it, to enable local people to have their voices heard, and to ensure the final plan is fit for purpose. I commend our recommendations to you.

Recommendation to be monitored following this scrutiny:

This Inquiry makes 6 formal recommendations, which are set out below.

As part of the response to this letter I would be grateful if you could state whether the recommendation is accepted, partially accepted, or not accepted and summarise the Cabinet’s response. If the recommendation is accepted or partially accepted, I would also be grateful if you could identify the responsible officer and provide an action date. This will ensure that progress can be monitored as part of the approach agreed by Cabinet in December 2020.

Recommendation	Accepted, Partially Accepted or Not Accepted	Cabinet Response	Responsible Officer	Implementation Date
<p>The evidence and key findings in relation to the Corporate consultation process for the Strategic and Delivery Options contained within this letter and the attached matrix (<i>Appendix F</i>) are used to inform and develop the consultation process for the Preferred Strategy and all other consultation processes for future stages of the RLDP.</p> <p>The evidence and key findings on the Strategic and Delivery Options contained within this letter and the attached matrix (<i>Appendix G</i>) are incorporated as formal responses and given equal weighting to those from the Corporate consultation process.</p> <p>The evidence and key findings in relation to accessibility, inclusivity and environmental sustainability contained within this letter and the attached matrix (<i>Appendix</i></p>				

H) are incorporated as formal responses and given equal weighting to those from the Corporate consultation process in relation to the Strategic and Delivery Options.

The evidence and key findings in relation to **accessibility, inclusivity and environmental sustainability** contained within this letter and the attached matrix (*Appendix H*) are used to inform the development of the Preferred Strategy for the RLDP as part of addressing and meeting the needs of the individuals and communities in Cardiff as well as the Council's environmental responsibilities.

That **Scrutiny be prioritised** in future stages of the RLDP, with early sight of RLDP consultation documents to enable their feedback to be considered prior to them being finalised for publication.

That **all political groups** are provided with an early draft of RLDP consultation documents for consideration before being finalised so that they can also provide comment and suggest amendments for incorporation

Regards,



Councillor Ramesh Patel

Chairperson Environmental Scrutiny Committee

Cc:

- Andrew Gregory – Director for Planning, Transport & Environment
- Simon Gilbert – Head of Planning
- Stuart Williams - Group Leader (Strategic Policy), Planning
- Imelda Seymour – Personal Assistant, Director PTE
- Jenny Goss, Cabinet Support Office
- Leaders of the Opposition
- Chair of Governance & Audit Committee
- Members of all Cardiff Council Scrutiny Committees
- Witnesses to the Inquiry
- Audit Manager
- Tim Gordon - Head of Communications & External Relations

Appendices Attached:

App A – Inquiry Terms of Reference

App B – November 2021 Letter to Cllr Wild with consultation recommendations

App C – Response from Cllr Wild to App B letter

App D – Letter from Scrutiny Chairs – Sept 2021

App E – Response from Cllr Wild to App D letter

App F – evidence matrix – consultation

App G – evidence matrix – Strategic Options and Delivery

App H – evidence matrix – Accessibility, Inclusivity, Environmental Sustainability

App I – evidence matrix – further findings, observations, and future scrutiny.

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Environmental Scrutiny Committee - Joint Task & Finish Group Inquiry

Cardiff Council Replacement Local Development Plan - Strategic and Delivery Options

Task Group Terms of Reference

- To explore, scrutinise and act as a consultee on the Strategic Options for the Replacement LDP focusing on how these have addressed:
 - Accessibility and Inclusivity
 - One Planet Cardiff.
- To review the Council's consultation process to date; to examine its effectiveness and make recommendations for future consultation on the next stages of the Replacement LDP
- To understand the supporting rationale for the projected growth provided by Welsh Government in order to consider whether the evidence base is robust, realistic, and viable.
- To consider how Cardiff's replacement LDP and the Strategic Options are aligned with regional planning.
- To hear and consider views of stakeholders to inform the recommendations of Scrutiny on both the Strategic Options and the Council's consultation processes.
- To coordinate and provide a single joint response from the Scrutiny Committees.
- To make recommendations that will inform the decisions and considerations that the Council's Executive will make in the development of the Preferred Strategy.
- To make recommendations that will inform any future scrutiny of the replacement LDP.

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Ref: RK/RP/CW/22.11.2021

10th December 2021

Councillor Caro Wild,
County Hall,
Atlantic Wharf,
Cardiff CF10 4UW.



Dear Cllr Wild,

Scrutiny Joint Task and Finish Group - Replacement Local Development Plan – 22 November 2021 – Strategic Options Consultation Process

On behalf of the Environmental Scrutiny Committee, I would like to thank the Head of Planning and the Group Leader, (Policy) Planning, Transport and Environment for their attendance at the Scrutiny Joint Task and Finish Group on Monday 22nd November and for facilitating the Group's consideration of the next stage in the development of the Replacement Local Development Plan (RLDP). We were very sorry that you were unable to attend the meeting and very much missed your input into this issue. Members were disappointed that the Director, Planning Transport and Environment was also unable to attend and request that for future meetings, the Director should be in attendance, particularly if you as Cabinet Member are unable to attend.

As part of their deliberations, the Group examined the planned consultation process surrounding the RLDP Strategic Options. Given that the consultation went live on the 30th November, Members requested that it would be more beneficial that their observations and recommendations relating to it be provided immediately, rather than waiting until the end of the Task and Finish Group's inquiry. This way, Members concluded, their comments and recommendations could hopefully inform the current consultation process and be incorporated into it.

This letter, therefore, provides a summary of the comments, observations and recommendations made by the Task and Finish Group at this meeting that they have asked me to feedback to you.

Whilst understanding that the overall focus of the Strategic Options for Cardiff is on housing and job growth, there was an overall concern from the Group regarding the limited information provided in the consultation document. It was the view of the Group that in order to assist the public in understanding the various options presented and to be able to provide views on their preferred option, further background information as to the rationale behind them as well as their implications, such as that related to transport, infrastructure and climate change.

During discussions over the Growth Options, the Group queried why there was no detail as to the types of houses required under each option and likewise the types of jobs; whether there were particular sectors that the Authority envisioned these jobs in. Whilst appreciating the Officers' explanation that the aim is not to lead with any assumptions up front, without any basis for explanation for the options being presented, respondents will simply be comparing numbers with no comprehension of what difference each one will mean and what impact it will have on them or the community.

Further to this the Group expressed concern over the accessibility of the document in that the language was too technical and needed to be made simpler to allow for respondents to fully understand the RLDP process as well as the options, and thus enabling them to fully engage. It was highlighted that as it stands, only those directly engaged with the LDP, such as developers, would fully comprehend the consultation paper and what is being asked of them. Furthermore, Members referred back to the comments made at the September Scrutiny Committees over the consultation that was undertaken on the RLDP Vision and Objectives. The Group reiterated the views that it was vital that the Plan facilitate the opportunity to engage with Cardiff residents, particularly those hardest to reach. The consultation paper, in its current format and language would make it even harder for those from hard-to-reach groups such as the homeless, traveller communities, refugees, asylum seekers, BAME groups etc to participate in the process.

Members appreciate that the current consultation document cannot be amended as it has already been agreed for publication. Nevertheless, and subsequent to the Group's discussions with Officers at the meeting over their concerns highlighted above, Members wish to **recommend** the following:

- That a 'user friendly' summary be developed in addition to the consultation document, providing more explanation on what the consultation is about, a clear rationale behind the various options being presented and what the various options represent, in order that they can be compared appropriately;
- That this summary also provide clear guidance to respondents on why their views are being sought, what exactly they are being asked to provide as a response, how they can respond appropriately and how their views will be used to inform the development of the Preferred Strategy. It is suggested that the latter will also require further explanation;
- That consideration be given to presenting a visual representation of the options, in their widest sense, appreciating that exact sites have not yet been determined. Officers agreed that whilst a map of sites would not be possible at this stage, spatial infographics could be provided;
- That further details be incorporated into the summary paper of what types of houses might be included in the options presented, such as affordable or social housing, housing for older people etc. Likewise, broad details be included of what types of jobs might be considered and how they meet the assessed needs of Cardiff and its residents. This information will assist the public to understand the implications of the options presented and help provide practical comparators for respondents.
- That a glossary of terms be provided alongside the consultation paper.

In addition to the above, on the subject of hard-to-reach or under-represented groups, specifically those from a BAME background or those with disabilities, Members again referred back to some of the comments provided at the September Scrutiny Committees. One of the recommendations from these

meetings was that future consultation look to engage with Council Members who are from these backgrounds and utilise their knowledge of these communities to assist with identifying representatives and groups to engage with. So far, the Group commented that they had not seen any evidence of this and therefore **reiterated this recommendation**.

Recommendations to be monitored following this scrutiny

To summarise, the Task and Finish Group made six formal recommendations which are set out below. As part of the response to this letter we would be grateful if you could, for each recommendation, state whether the recommendation is accepted, partially accepted or not accepted and summarise the Cabinet’s response. If the recommendation is accepted or partially accepted, I would also be grateful if you could identify the responsible officer and provide an action date. This will ensure that progress can be monitored as part of the approach agreed by Cabinet in December 2020.

Recommendation	Accepted, Partially Accepted or Not Accepted	Cabinet Response	Responsible Officer	Implementation Date
1. That a ‘user friendly’ summary be developed in addition to the consultation document, providing more explanation on what the consultation is about, a clear rationale behind the various options being presented and what the various options represent, in order that they can be compared appropriately;				
2. That this summary also provide clear guidance to respondents on why their views are being sought, what exactly they are being asked to provide as a response, how they can respond appropriately and how their views will be used to inform the development of the Preferred Strategy. It is suggested that the latter will also require further explanation;				

<p>3. That consideration be given to presenting a visual representation of the options, in their widest sense, appreciating that exact sites have not yet been determined. Officers agreed that whilst a map of sites would not be possible at this stage, spatial infographics could be provided;</p>				
<p>4. That further details be incorporated into the summary paper of what types of houses might be included in the options presented, such as affordable or social housing, housing for older people etc. Likewise, broad details be included of what types of jobs might be considered and how they meet the assessed needs of Cardiff and its residents. This information will assist the public to understand the implications of the options presented and help provide practical comparators for respondents.</p>				
<p>5. That a glossary of terms be provided alongside the consultation paper.</p>				
<p>6. Future consultation look to engage with Council Members who are from these backgrounds and utilise their knowledge of these communities to assist with identifying representatives and groups to engage with.</p>				

Regards,



Councillor Ramesh Patel

Chairperson Environmental Scrutiny Committee

Cc:

- Andrew Gregory – Director for Planning, Transport & Environment
- Simon Gilbert – Head of Planning
- Stuart Williams - Group Leader (Strategic Policy), Planning

- Imelda Seymour – Personal Assistant, Director PTE
- Heather Warren, Cabinet Support Office
- Leaders of the Opposition
- Tim Gordon - Head of Communications & External Relations
- Members of Cardiff's Environmental Scrutiny Committee
- Members of Joint Task & Finish Group

**SWYDDFA CYMORTH Y CABINET
CABINET SUPPORT OFFICE**

Fy Nghyf / My Ref: CM46905
Eich Cyf / Your Ref: RK/RP/CW/22.11.2021
Dyddiad / Date: 02 February 2022



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Councillor Ramesh Patel
Chairperson
Environmental Scrutiny Committee
County Hall
Atlantic Wharf
Cardiff
CF10 4UW

Annwyl / Dear Ramesh,

Scrutiny Joint Task and Finish Group - Replacement Local Development Plan – 22 November 2021

Thank you for your letter dated 10th December 2021 setting out the comments, observations and recommendations of the Task and Finish Group on the current Strategic Options consultation.

I have appended a response to each of the recommendations, which I would be grateful if you could share with Members.

If you have any further queries, please do not hesitate to contact me.

Yn gywir / Yours sincerely,

Cynghorydd / Councillor Caro Wild
Aelod Cabinet dros Gynllunio Strategol a Thrafnidiaeth
Cabinet Member for Strategic Planning & Transport

GWEITHIO DROS GAERDYDD, GWEITHIO DROSOCH CHI

Mae'r Cyngor yn croesawu gohebiaeth yn Gymraeg, Saesneg neu'n ddwyieithog. Byddwn yn cyfathrebu â chi yn ôl eich dewis, dim ond i chi roi gwybod i ni pa un sydd well gennych. Ni fydd gohebu yn Gymraeg yn arwain at oedi.

WORKING FOR CARDIFF, WORKING FOR YOU

The Council welcomes correspondence in Welsh, English or bilingually. We will ensure that we communicate with you in the language of your choice, as long as you let us know which you prefer. Corresponding in Welsh will not lead to delay.



Recommendation	Accepted, Partially Accepted or Not Accepted	Cabinet Response	Responsible Officer	Implementation Date
1. That a 'user friendly' summary be developed in addition to the consultation document, providing more explanation on what the consultation is about, a clear rationale behind the various options being presented and what the various options represent, in order that they can be compared appropriately;	Accepted	<p>Agree that it would be helpful to develop a 'user friendly' summary to supplement the consultation document.</p> <p>This will be developed jointly with the Corporate Communications Team in order to ensure a 'user friendly' approach.</p>	Simon Gilbert/ Stuart Williams	January 2022
2. That this summary also provide clear guidance to respondents on why their views are being sought, what exactly they are being asked to provide as a response, how they can respond appropriately and how their views will be used to inform the development of the Preferred Strategy. It is suggested that the latter will also require further explanation;	Accepted	Agree that the 'user friendly' summary should also include clear guidance on these matters.	Simon Gilbert/ Stuart Williams	January 2022
3. That consideration be given to presenting a visual representation of the options, in their widest sense, appreciating that exact sites have not yet been determined. Officers agreed that whilst a map of sites	Partially Accepted	I agree that visual representations would be helpful, however it is not possible to show specific growth options spatially at this stage as no new sites have been identified or agreed. This will be captured at the preferred strategy stage.	Simon Gilbert/ Stuart Williams	January 2022

Recommendation	Accepted, Partially Accepted or Not Accepted	Cabinet Response	Responsible Officer	Implementation Date
would not be possible at this stage, spatial infographics could be provided		In this respect Members attention is drawn to display board 2 in the Virtual Consultation Room which does include a visual map showing a high-level context for the city which is useful in this regard.		
4. That further details be incorporated into the summary paper of what types of houses might be included in the options presented, such as affordable or social housing, housing for older people etc. Likewise, broad details be included of what types of jobs might be considered and how they meet the assessed needs of Cardiff and its residents. This information will assist the public to understand the implications of the options presented and help provide practical comparators for respondents.	Accepted	Agree that the 'user friendly' summary could provide more details on the types of houses and jobs that might be included in the options.	Simon Gilbert/ Stuart Williams	January 2022
5. That a glossary of terms be provided alongside the consultation paper.	Accepted	Agree that it would be helpful to provide a glossary of terms alongside the consultation paper.	Simon Gilbert/ Stuart Williams	January 2022
6. Future consultation look to engage with Council Members who are from	Accepted	Agree this is an important issue and ahead of the consultation on the Preferred Strategy	Simon Gilbert/ Stuart Williams	January 2022 and beyond

Recommendation	Accepted, Partially Accepted or Not Accepted	Cabinet Response	Responsible Officer	Implementation Date
<p>these backgrounds and utilise their knowledge of these communities to assist with identifying representatives and groups to engage with.</p>		<p>planned for autumn 2022 where we will look to engage with Members on this matter. All councillors have been asked to share information and engage with their residents on multiple occasions via member services. A copy of the 'user friendly' note has been shared with Members prompting them to engage with their communities and advise officers of further opportunities to ensure the current and future consultations are inclusive and relevant. I have also asked members at a number of full council meetings that their support is needed to ensure we get as good participation across the City.</p>		

23rd Sep 2021

Councillor Caro Wild,
Cabinet Member for Strategic Planning & Transport
Sent via e-mail



Dear Councillor Wild,

CARDIFF REPLACEMENT LOCAL DEVELOPMENT PLAN: VISION, ISSUES AND OBJECTIVES & INTEGRATED SUSTAINABILITY APPRAISAL SCOPING REPORT

On behalf of all of Cardiff Council's Scrutiny Committee Members, we would like to thank you, your Cabinet colleagues, and officers for attending the September Scrutiny meetings and providing Committee Members with an opportunity to feedback on the proposals contained in the Cardiff Replacement Local Development Plan Report to Cabinet.

The observations and recommendations offered by each Scrutiny Committee are provided in this letter.

Children & Young People Scrutiny Committee

CYPSC Members noted the statements from the Cabinet Members, particularly the commitment for the LDP to have children and young people at the heart of its development. Members documented the commitment from all Cabinet Members that embedding a child friendly approach was critical in the development of the Plan.

CYPSC Members endorsed the Cabinet Members' commitments to engage with children and young people and welcomed the news that a range of methodologies (including working with schools, use of a variety of digital platforms, social media etc) would be adopted to encourage this. Councillor Wild gave an assurance that he was working with Cllr Merry and officers within Education and Planning to develop a more detailed plan for engaging with children & young people and CYPSC Members would welcome the opportunity to be briefed on this in due course.

More widely, CYPSC Members asked about engagement with diverse groups and were informed that further work was being done on this within the corporate framework, which needed to be fit for purpose and bespoke to the individual groups and communities affected. CYPSC Members would therefore request that further details on how the Council will engage with diverse groups and individuals be submitted to all scrutiny committees when available.

CYPSC Members welcomed the acknowledgement that schools are recognised as being at the heart of the community and the 15-minute communities' approach. CYPSC Members

would like to support this statement and would call for a higher priority to be given to schools in future planning and decision making for the city. CYPSC Members believe that schools play an important part in how the city operates on a daily basis, and consideration must be given to their impact environmentally in terms of reducing emissions through private vehicle use and resulting impact on pollution, air quality, health etc.

In addition, schools must not be seen as a separate entity, but a crucial part of the community, connected with the services around them (including youth facilities). In line with other issues the Committee considers on a regular basis, schools serve an important role socially, for example the role of schools in the pandemic recovery, home schooling, summer of smiles, social interaction and improving aspirations for young people. Linked to this, Members would welcome any views on linking school curriculum development and careers advice to growth sectors, which they were unable to consider in detail at the meeting.

CYPSC Members also felt strongly about the economic impact on schools, particularly any provision (e.g., sports) being provided within schools by external providers and to ensure that this does not result in a cost bearing for the school. Any facilities should be consulted on, to ensure that this is what the community needs and must be cost neutral. CYPSC Members would seek assurances on this.

CYPSC Members agreed that it is crucial that the various strands of other plans and strategies such as the Transport Plan, One Planet Cardiff, Corporate Plan, active travel, safe routes, school catchment, the 21st Century schools programme, Child Friendly City objectives, Infrastructure plan etc are all linked together. Members would welcome feedback on this.

CYPSC Members asked whether any review was being undertaken on the current LDP and proposals for the Replacement LDP – have current commitments been met? Are there factors that connect the two? What needs to be transferred from current to replacement plan? Members would welcome further details on this, and any review be shared with all Scrutiny committees for further consideration.

Community & Adult Services Scrutiny Committee

The vision cited at the meeting, to create exemplar communities that are the best in the UK, was pleasing to hear and Committee Members urge you to ensure that this becomes a central, leading theme throughout this LDP process and therefore **recommend** the draft RLDP vision be amended to ensure this significant objective, to provide exemplar houses and communities which are the best in the UK is included.

In line with this vision, the Committee explored how the RLDP would ensure private housing developers contribute to ensuring this vision is achieved and Members highlighted the importance of the RLDP containing enough detail and authority to ensure developers adhere.

The response to this query was welcoming and it was confirmed the RLDP will reinforce the current LDP by providing clear, explicit instruction to developers along with the continued production of other documents such as Masterplans, SPGs and design guidance to ensure this objective is achieved.

During the meeting Committee raised the overestimation of previous populations projections, and clarity was sought on if this meant that additional large parcels of land are now not required within the RLDP. Members note the comments made in response surrounding the fluidity of projections and welcome the focus on quality of developments highlighted by officers. However, it is still unclear to Members if this previous over projection means additional development sites do not need to be sought within the Plan and would welcome further clarity on this point. Further to this, given the importance of the RLDP and its lasting ramifications, Members wish to highlight some of the answers provided by officers at the meeting proved lengthy and vague and were at times difficult to decipher. Members appreciate the RLDP is a complex process however wish to stress that when communicating the topic, this is done in a clear, engaging, and clarified manner to ensure thorough understanding is obtained.

Members welcomed the recognition surrounding the importance of the Plan addressing the need for affordable housing, houses for younger disabled people and liveable communities through the development of sufficient and timely infrastructure and, as offered at the meeting, Members would welcome sight of the draft Masterplans regarding community infrastructure. Regarding the issue of the viability for private developers including affordable housing in their developments, Members would appreciate further clarity on how this will be addressed.

Given the importance of the RLDP, the limited response to the public consultation was disappointing. Indicating to Members it does not provide adequate feedback from Cardiff residents nor insight from harder to reach groups. It is vital that the Plan facilitates the opportunity to engage with Cardiff residents and amplifies their voices; particularly those hardest to reach and Members welcome the intention to broaden the consultation process during the Plans next steps. However, Members do wish to stress that when broadening consultations, a cautious approach should be applied to ensure feedback is received from relevant individuals who live in Cardiff. In line with this, Members **recommend** additional avenues for generating public awareness and encouraging engagement with the Plans future consultations is sought through the use of local radio and television stations, particularly if social distancing restrictions remain or increase, and, when restrictions allow, in-person consultation exercises or public drop-in sessions are conducted.

To address the issue of density, Members highlighted the need for minimum standards for accommodation sizes and **recommend** at an appropriate time a square footage limit for properties be included in the Plan.

Economy & Culture Scrutiny Committee

Members explored the role of the Replacement LDP in protecting and enhancing specific areas that fall within this Committee's terms of reference. Specifically, Members note:

- Music – the Head of Planning has attended several Cardiff Music Board meetings to discuss and understand their views on the interface between planning and the music ecology of Cardiff, including the Night-time Economy.
- Sport & Leisure – parks officers will be involved in the process of checking candidate sites to ensure potential for green space, playing fields, playgrounds and similar are appropriate and not subject to flooding or other issues that will make them unsuitable or difficult to manage
- Employment Land – there is clear recognition of the need to protect existing employment land and to ensure good quality employment land is allocated that can provide good employment opportunities. Members also note Councillor Goodway's point that the current administration has agreed employment areas, as set out in the current Economic Strategy, with Cardiff East focusing on industrial employment, Cardiff North focusing on innovation & science employment etc., and that the replacement LDP needs to facilitate delivery of this policy. Members were interested in the discussion that followed regarding the role of Welsh Government and future Corporate Joint Committees and note Councillor Goodway's belief that these will have a light touch and replicate the current City Deal in terms of interface between regional and local policy.
- Climate Emergency – proposed objectives, coupled with the aim to deliver One Planet Cardiff, aim to protect and enhance Cardiff's green and blue spaces, including the seascape. These ensure that the replacement LDP goes further than carbon neutrality and promotes biodiversity, sustainability, and mechanisms to tackle the climate emergency.

Members understand the Preferred Strategy and Deposit Plan will contain detailed policies that aim to protect and enhance the natural and built environment of Cardiff, as well as setting out new development. Members will look to test these, to ensure they provide sufficient support in the key areas set out above.

In addition, Members explored the proposed approach to future consultation on the replacement LDP and were keen to understand how these will include under-represented groups, particularly applicants on the Housing Waiting List, people who are homeless, children and young people. Members were pleased to hear plans include focused workshops

for these groups and bespoke accessible branding to encourage engagement. Members also sought clarification on how key stakeholders in the culture, music and sports sectors will be involved and note that several stakeholder groups from these sectors are included in consultation plans and that officers are happy to receive suggestions of groups to add to these.

Finally, Members discussed the difference in population projections for the existing LDP and the replacement LDP. Members note that future consultation will include ranges of population projections, with narrative on spatial distribution of growth. Members also note the points made by the Director of Planning, Transport and Environment, Andrew Gregory, that it is important to find the middle ground in population projections and growth to avoid stop-start allocations and build.

Environmental Scrutiny Committee

Members welcomed the statements made by the Cabinet Member and Officers, particularly the point that the LDP needs to go beyond that of simply a tool for land use policy but rather a document that is a Corporate Vision of how Cardiff can move forward, aligning with major Council Strategies such as the Post Pandemic Recovery and the One Planet Cardiff Strategies.

Members note the comments made in relation to the above and further overlapping agendas across the Council and the critical nature of these strategies coming together collectively in order to get the added value. Carbon neutral was a key example discussed and Members expressed concerns over the achievement of this against the pressures for development which in itself, creates carbon. The Committee were reassured of the benefits that were already evident from interconnecting approaches such as the One Planet Cardiff work and the Transport White Paper targets with evidence suggesting that this work will eventually achieve 20% of the target set for the conversion of the City to zero carbon by 2030. Officers advised that the integration of further strategies, including the LDP, will drive forward low carbon development, which is critical to achieving carbon zero as well as economic recovery.

On the subject of open space, the Committee noted the comments made by officers that protection of open space and access to it had been clearly evident in the results of the consultation over the RLDP. Members were reassured that one of the main aims of the RLDP was to supercharge green in the City; to encourage new development that secures aspects such as green infrastructure, parks, and supports the Council's policy and National policy in tackling climate change.

The Committee highlighted concerns over houses that have been built under the current LDP with virtually no uptake of sustainable energy regeneration or micro generation. Members

explored how this was to be achieved under the Replacement LDP, particularly through private development. Officers advised that there were strong targets and requirements under the One Planet Cardiff Strategy as well as strong policy requirements within Planning Policy Wales in the National Planning Framework. Changes to building regulations, Officers stated, were also putting requirements on developers to ensure they consider the Environmental impact and build appropriately as was intervention by the Council and other partners. All these aspects, as well as others, we were informed, can be incorporated into a new Policy Framework under the RLDP. Whilst appreciating this, Members expressed concerns that historically there have been issues over policies not being strong enough, regulations and SPG not robust enough and not up to date, that has meant developers have not had to meet requirements. Members stressed the importance of having strong enough policy and framework that committed developers and agreed to explore this further through future consideration of the RLDP process.

In relation to the consultation undertaken, the Committee commented on the low number of respondents from the 16-24 category and questioned how this was to be addressed for future consultation over the RLDP. Members noted the response from Officers that there were plans for more engagement with schools to directly engage children and young people, however it was noted that some of this category would encompass university students. Given the previous controversy over student accommodation under the current LDP, the Committee **recommend** that the Council also engage university students directly as the current response indicates that online engagement may not be as effective.

The Committee requested to receive information as part of their future consideration of Waste management on the proposed 'pop-up' recycling services referred to by Cllr Michael in order to address the concerns of some Members over the loss of the recycling facility in the North of Cardiff.

The Committee queried how leaders and representatives of various focus groups were being identified, such as those from BAME backgrounds or people with disabilities, as sometimes these are not necessarily representative of the group concerned. Members asked for clarification as to how these groups were consulted, how representatives were identified, and how many of the 1215 responses were from BAME backgrounds or from people with disabilities. Furthermore, Members **recommend** that future consultation look to engage with Council Members who are from these backgrounds and utilise their knowledge of these communities. Members expressed awareness of considerable engagement with BAME communities during the pandemic over Covid related issues, but simply via different and innovative approaches. The Committee proposed that these be explored to improve the Council's own engagement with these groups, particularly for the RLDP.

During their discussions, Members sought reassurance that the Bus Strategy would be incorporated in the future RLDP. Members note the point made by Officers that planning identifies development in sustainable locations and recognises therefore a direct link between access and connectivity to a frequent and reliable bus service and the location of development.

The Committee touched upon the difference between Community Infrastructure Levies and Section 106 agreements to which Officers clarified that the former was a fixed landcharge. Members welcomed the offer to explore this in further detail at a future Scrutiny Committee.

Members referred back to a previous UK Government funded Eco3 Retrofit Scheme that the Council had decided a few years ago not to participate in. The Committee requested clarification on whether the Council would now be reconsidering taking part in this annual fund.

Following their discussion, the Committee agreed that they wished to progress Scrutiny of the next stages of the RLDP via a Task and Finish Group whereby there is cross-representation from all 5 Scrutiny Committees in order to ensure that all aspects affected by the RLDP are able to be considered.

Policy Review & Performance Scrutiny Committee

Members wish to thank you for the positive comments made regarding the Committee's discussion on this item and hope this reflects the overall value of Scrutiny within the RLDP decision-making process.

During our discussion, Members explored if sites currently approved will adequately address population projections and were informed that at present this is difficult to predict. Further, detailed analysis on the population projections and of the potential housing capacity of existing approved planning permissions for large sites will be conducted. When assessing population projections, Members wish to highlight that the impact of both Brexit and the Covid pandemic be recognised, along with the needs of vulnerable groups, such as those on the housing waiting list and those seeking affordable housing.

The Committee highlighted the constraints of online consultations and difficulties of certain groups in engaging with such methods. In addition, we also reiterated the importance of ensuring wide-ranging public awareness of a consultation to stimulate engagement. In line with this, and as a supplement to the recommendations already detailed in this letter, the Committee **recommend** that specific, targeted messaging is deployed during the consultation

process to both raise awareness and encourage engagement. This should include developing a young person focused consultation through social media and working more closely with schools and workplaces to disseminate information about the consultation. Further to this, hard copies detailing the RLDP should also be available within the city's libraries and hubs along with an accessible handout, presented in an engaging manner to stimulate public interest and engagement.

Members sought clarity on the scope of the candidate sites and were informed that it is currently too early in the process to advise. However, as highlighted at the meeting and welcomed by yourself and officers, Members **recommend** that prior to the potential candidate sites being launched, Councillors in affected wards are provided with a confidential high-level briefing to ensure they are pro-actively informed. It is also to note, the date cited at the meeting on when information on the potential candidate sites would be available was unclear to Members as both September and November were referenced. Members would welcome confirmation on the exact date this information will be known and in the public domain. We will also expect clarification, for each site, on whether it is brownfield, greenfield or mixed.

Members note and welcome the comments made regarding placemaking, housing design and quality being an essential objective for the Plan and note this will be reinforced through the development of an Infrastructure Plan. The Committee also sought assurance on the policy of zero carbon being applied to existing approvals and note that this is being applied in line with Welsh Government policy framework along with the Council's specific policy such as One Planet Cardiff. In line with this, Members **recommend** the LDP objectives be revised to include the importance of addressing embodied carbon, particularly in existing buildings and to acknowledge and give due consideration to carbon use when demolishing existing buildings.

The Committee highlighted and welcomed the policy to increase tree canopy cover and the subsequent difficulties in determining appropriate sites. We were assured that this will be mitigated through continued liaison with landowners and elected Members along with the implementation of schemes such as the Coed Caerdydd project.

Finally, Members highlighted the importance in maintaining and protecting buildings of historical value and sought assurance that affordability of such works has been considered and Members note and welcome the assurance and detail provided at the meeting on how this will continue to be managed.

Requests following this scrutiny

For ease of reference the requests contained in the letter are as follows.

- A copy of a detailed plan for engaging with children & young people during this process, which is currently being developed between Education and Planning;
- Further details on how the Council will engage with diverse groups and individuals, when available, and this be submitted to all Scrutiny Committees;
- Views and feedback on ensuring that schools are recognised as a priority for future planning and decision making for the city, to include assurances regarding environmental, social and economic factors. In addition, CYPSC Members would wish to receive further information on linking school curriculum development and careers advice to growth sectors, which they were unable to consider in detail at the meeting;
- Further details on how the LDP will be linked with other major plans and strategies; and
- Details/outputs from any review being undertaken on the current and replacement LDPs and shared with all Scrutiny Committees, to address the following:
 - Have current commitments been met?
 - Are there factors that connect the two?
 - What needs to be transferred from current to new plan?
- If further land needs to be sought in the RLDP following the overestimate of previous population projections.
- How the issue of viability amongst private housing developers will be addressed.
- Sight of the draft master plans regarding community infrastructure
- The date, information on public candidate sites will be shared with Members and be placed in the public domain.
- Clarification as to how people from BAME backgrounds or people with disabilities were consulted, how representatives were identified, and how many of the 1215 responses were from BAME backgrounds or from people with disabilities.
- Clarification on whether the Council would now be reconsidering taking part in this annual UK Government funded Eco3 Retrofit Scheme.

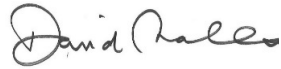
Recommendations to be monitored following this scrutiny

To summarise, the Scrutiny Committees makes 8 formal recommendations which are set out below. As part of the response to this letter we would be grateful if you could, for each recommendation, state whether the recommendation is accepted, partially accepted or not accepted and summarise the Cabinet's response. If the recommendation is accepted or partially accepted, I would also be grateful if you could identify the responsible officer and provide an action date. This will ensure that progress can be monitored as part of the approach agreed by Cabinet in December 2020.

Recommendation	Accepted, Partially Accepted or Not Accepted	Cabinet Response	Responsible Officer	Implementation Date
1. The draft RLDP vision be amended to ensure the objective, to provide exemplar houses and communities which are the best in the UK is included.				
2. The LDP objectives be revised to include the importance of addressing embodied carbon, particularly in existing buildings and to acknowledge and give due consideration to carbon use when demolishing existing buildings.				
3. Additional avenues for generating public awareness and encouraging engagement with the Plans future consultations is sought through the use of local radio and television stations, particularly if social distancing restrictions remain or increase, and, when restrictions allow, in-person consultation exercises or public drop-in sessions are conducted.				
4. Specific, targeted messaging is deployed during the consultation process to both raise awareness and encourage engagement. This should include developing a young person focused consultation through social media and working more closely with schools and workplaces to disseminate information about the consultation. Further to this, hard copies detailing the RLDP should also be available within the city's libraries and hubs along with an accessible handout, presented in an engaging manner to stimulate public interest and engagement.				
5. That future consultation look to engage with Council Members from BAME backgrounds and utilise their knowledge of these communities. Members expressed awareness of considerable engagement with BAME communities during the pandemic over Covid related issues, but simply via different and innovative approaches. The Committee proposed that these be explored to improve the Council's own engagement with these groups, particularly for the RLDP.				
6. That the Council also engage university students directly as the current response indicates that online engagement may not be as effective.				
7. Prior to the potential candidate sites being launched, Councillors in affected wards are provided with a confidential high-level briefing to ensure they are pro-actively informed.				

8. At an appropriate time, a square footage limit for properties be included in the Plan.				
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Regards,




Cllr R Patel
Chair,
Environmental
Scrutiny
Committee

Cllr D Walker
Chair,
Policy Review
and Performance
Scrutiny
Committee

Cllr N Howells
Chair,
Economy and
Culture Scrutiny
Committee

Cllr L Bridgeman
Chair,
Children and
Young People
scrutiny
Committee

Cllr S Jenkins
Chair
Community and
Adult Services
Scrutiny
Committee

Cc:

- Cardiff Council Cabinet Members
- Cabinet Office
- Members of Cardiff's Children & Young People Scrutiny Committee
- Members of Cardiff's Community & Adult Services Scrutiny Committee
- Members of Cardiff's Economy & Culture Scrutiny Committee
- Members of Cardiff's Environmental Scrutiny Committee
- Members of Cardiff's Policy, Review & Performance Scrutiny Committee
- Andrew Gregory, Director Planning & Transportation
- Simon Gilbert, Head of Planning
- Stuart Williams, OM Strategic Placemaking
- Tim Gordon, Head of Communications & External Relations

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Fy Nghyf / My Ref: CM46963
Eich Cyf / Your Ref: RDB/RP/CW/05.01.2021
Dyddiad / Date: 01 March 2022

Councillor Ramesh Patel
Chairperson
Environmental Scrutiny Committee
County Hall
Atlantic Wharf
Cardiff
CF10 4UW

Annwyl / Dear Councillor Patel,

**Cardiff Replacement Local Development Plan: Vision, Issues and Objectives
and Integrated Sustainability Appraisal Scoping Report**

Thank you for your letter dated 23 September 2021 in relation to the Environmental Scrutiny Committee held on 22 September 2021. Please see attached response to your recommendations, I apologise for the delay in responding.

Yn gywir / Yours sincerely,



Cynghorydd / Councillor Caro Wild
Aelod Cabinet dros Gynllunio Strategol a Thrafnidiaeth
Cabinet Member for Strategic Planning & Transport



Recommendation	Accepted, Partially Accepted or Not Accepted	Cabinet Response	Lead Cabinet Member	Responsible Officer	Implementation Date
1. The draft RLDP vision be amended to ensure the objective, to provide exemplar houses and communities which are the best in the UK is included	Accepted	The final version of the RLDP Vision and Objectives to be included within the Preferred Strategy will be considered by Cabinet and Council in September 2022 and this proposed amendment can be considered as part of this process. Scrutiny Members can also be updated on progress with this as part of the ongoing Task and Finish Group on the RLDP.		Simon Gilbert & Stuart Williams	September 2022
. 2. The LDP objectives be revised to include the importance of addressing embodied carbon, particularly in existing buildings and to acknowledge and give due consideration to carbon use when demolishing existing buildings.	Accepted	The final version of the RLDP Vision and Objectives to be included within the Preferred Strategy will be considered by Cabinet and Council in September 2022 and this proposed amendment can be considered as part of this process. Scrutiny Members can also be updated on progress with this as part of the ongoing Task and Finish Group on the RLDP.		Simon Gilbert & Stuart Williams	September 2022
3. Additional avenues for generating public awareness and encouraging engagement with the Plans future consultations is sought through the use of local radio and television stations, particularly if social distancing restrictions remain or increase, and, when restrictions allow, in-person consultation exercises or public drop-in sessions are conducted	Accepted	Such avenues will be explored fully for the forthcoming consultation on the Preferred Strategy. This is the first formal stage of consultation on the RLDP and is a key stage in the process.		Simon Gilbert & Stuart Williams	November 2022
4. Specific, targeted messaging is deployed during the consultation process to both raise awareness and encourage engagement. This should include developing a young person focused consultation through social media and working more closely with schools and workplaces to disseminate information about the consultation. Further to this, hard copies	Accepted	As part of a series of forthcoming focus groups designed to reach out to groups who do not normally engage in the LDP preparation process the Council is seeking to engage with children and young people. In addition, the current consultation on strategic options is accompanied by a comprehensive and		Simon Gilbert & Stuart Williams	November 2022

detailing the RLDP should also be available within the city's libraries and hubs along with an accessible handout, presented in an engaging manner to stimulate public interest and engagement.		targeted social media campaign and this will also be undertaken in parallel with the forthcoming consultation on the Preferred Strategy together with hard copies of accessible documents being made available in the city's libraries and hubs.			
5. That future consultation look to engage with Council Members from BAME backgrounds and utilise their knowledge of these communities. Members expressed awareness of considerable engagement with BAME communities during the pandemic over Covid related issues, but simply via different and innovative approaches. The Committee proposed that these be explored to improve the Council's own engagement with these groups, particularly for the RLDP	Accepted	As part of a forthcoming series of focus groups designed to reach out to groups who do not normally engage in the LDP preparation process the Council is seeking to engage with communities from BAME backgrounds. It will be important to draw on the knowledge of Council Members from BAME backgrounds to ensure the planned engagement on the RLDP is fully representative of these communities.		Simon Gilbert & Stuart Williams	November 2022
6. That the Council also engage university students directly as the current response indicates that online engagement may not be as effective.	Accepted	As part of a series of forthcoming focus groups designed to reach out to groups who do not normally engage in the LDP preparation process the Council is seeking to engage with university students.		Simon Gilbert & Stuart Williams	November 2022
7. Prior to the potential candidate sites being launched, Councillors in affected wards are provided with a confidential high-level briefing to ensure they are pro-actively informed	Accepted	Member briefing held on 24 th November 2021 and list of candidate site submissions circulated to Members ahead of the launch on 30 th November.		Simon Gilbert & Stuart Williams	November 2021
8. At an appropriate time, a square footage limit for properties be included in the Plan.	Accepted	This matter will be fully explored in the forthcoming preparation of the Replacement LDP taking into account Welsh Government Guidance and Best Practice from across the UK. Scrutiny Members will be updated on progress with this as part of the ongoing Task and Finish Group on the Replacement LDP.		Simon Gilbert & Stuart Williams	September 2022

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Replacement Local Development Plan – Consultation Process – Collated Evidence and Findings

Evidence	Source	Finding
Awareness of the Corporate RLDP Consultation		
Ten (10) organisations confirmed that they were already aware of the corporate RLDP consultation. The majority from this group (7) describe themselves as part of those who have been identified consultees to the corporate RLDP. They have been contacted directly by the Council’s Planning Directorate Team to provide their views on the on-going corporate consultation.	Cardiff Civic Society, First Bus Company, Glamorgan-Gwent Archaeological Trust (GGAT), Dwr Cymru, For Cardiff, Home Builders Federation, RSPB, Cardiff Community Housing Association, Anonymous (Anon)	The majority of those who were aware of the consultation are key consultees to the Corporate RLDP or already have connections with the Council.
Others from this 10 gained awareness via social media channels or through their connections within the Council.		
One stakeholder group representing the interest of the general public proactively seeks to be involved in various Council consultations.		
Six (6) organisations confirmed that they have not been made aware of the corporate consultation on the RLDP with three of these organisations expressing concern on this issue.	Play Wales, Cardiff Rivers Group, Cardiff Third Sector Council (C3SC), Anon, Cardiff People First, Anon	Concern that a number not aware of the consultation and some of these organisations viewed this as an issue. Missed opportunity of the Council to work collaboratively with a wide range of stakeholders

Evidence	Source	Finding
Not aware of the RLDP Consultation until contacted by Scrutiny	United Welsh Housing Association	Possibly too much reliance on social media
I personally was not aware of it until Scrutiny got in touch with our mailbox, our general email address and it was passed up to me. It is not something I had heard of until then. It is not something any supporters have made me aware of.	Alzheimer's Society	
<p>Given the central role the RLDP will play in shaping the community for both the short and longer term, the process will be strengthened by effective engagement and partnership working - including with the third sector - if it is to maximise the potential for the delivery of positive outcomes from the planning process shaped and informed by the community. Cardiff Third Sector Council and our membership work in close proximity with local communities and, as trusted providers within local communities, can provide an effective means of engagement alongside Councillors and other partners. Involving local people at this early stage will aid in future planning decisions, reducing the likelihood of conflict and increasing the prospect of inclusion and agreement.</p> <p>The third sector can provide effective routes to engagement for a wide range of local people to have their views heard as an individual or as part of a group or community.</p>	C3SC	
There are so many valuable things that can come out of inclusive engagements. In our organisation we are very happy to support that in every way possible.	C3SC	
There is something here about taking people along with you and making sure that they are aware. If you did a straw poll as to how many of the, say, ordinary people in the population understand the RLDP, and what it is going to drive towards, in terms of shaping how we structure the city to achieve the	C3SC	

Evidence	Source	Finding
<p>aspirations and ambitions, I wonder how many could identify that that is what it is all about, and therefore the importance of it?</p>		
<p>There is something here about how we can work together to make sure that people are on the page with that and for us reaching out to our members who, in turn then, will reach out to many, many within the population. A lot of those within the population are more vulnerable communities, and people who are less likely to access services or find services accessible. We are very happy to do what we can to support them.</p>	C3SC	
<p>We found really useful was working with partners like Cardiff Third Sector Council, who have a much better relationship with other organisations. So, that might be something that Cardiff could consider, is, for some of those harder-to-reach communities, doing quite targeted work with other partners who, maybe, do have a little bit more reach.</p>	NRW	
<p>It would appear that the Council is very dependent upon the use of social media in order to communicate with the residents of Cardiff. If not a user or signed up to such things as Twitter or Facebook then people will not necessarily know about consultations such as this. I was not aware that there was a consultation on strategic options until directly emailed which was very useful rather than having to try and find it. A whole range of ways to engage people obviously needs to be in place including social media but also face to face contact. Going out to where people are and talking to them in particular. Pop up stands in supermarkets, coming along to voluntary group events, leaflets in doctors' surgeries etc all need to be employed when we are allowed to.</p>	Cardiff Rivers Group	
<p>It does not appear to be immediately clear on the LDP website about how children and young people will be consulted/have been consulted about their views.</p>	Play Wales	<p>Unclear on how the Council intend to engage children and young people</p>

Evidence	Source	Finding
Planning Officers have been engaging over the Christmas period with Lee Patterson who is the Child Friendly City Officer and also a gentleman called Tim Gill who has published a book about developing places for children and focuses on child friendly design in places. Two workshops are being undertaken with children in the city centre and this isn't just a one off to tick a box in the planning process but this is a marker as a way of working that should be encouraged for all major projects throughout the city not just planning policy matters.	Simon Gilbert	The Inquiry heard that Officers were engaging young people via 2 workshops
There has been a video undertaken with young people very early on in the process, surveys online and now these meeting sessions that are coming up.	Cllr Caro Wild	
General Feedback		
Adequate and a variety of channels are being used to allow people access to the consultation	Cardiff Bus	Four consultees representing corporate interest were generally satisfied with the consultation and regard the Planning Directorate's consultation as 'clear, concise, works well'.
approach works well, and we are kept informed at all stages of the plan process. We have been involved in the current consultation approach and have had no adverse experience.	GGAT	
Clear and concise approach	Dwr Cymru	
Very good although the webinar I had attended was cut short by technical issues which was frustrating - a rescheduled meeting would have been useful but I don't believe was offered. We have been able to promote the consultation to a wider audience through the Cardiff Business Improvement District	For Cardiff	
Understand the implications due to Covid, and suggest that Council should renegotiate the Delivery Agreement with Welsh Government to extend this consultation period to allow for face-to-face engagement when the current Covid wave recedes.	Cardiff Civic Society	Four consultees who represent the interest of the general public welcomed the opportunity to engage with the ongoing corporate consultation and recognised the
With the current pandemic it is obviously very difficult to do face to face activities but must not be seen as an excuse to stop them in the future. In fact,	Cardiff Rivers Group	

Evidence	Source	Finding
should be the opposite and look for more ways to engage with people. The timing of the events needs to be considered i.e. evening and weekend events when people are available as well as during the day.		challenges posed by the current pandemic in reaching stakeholders.
With some of the restrictions associated with Covid I fear that some voices may not be heard	Cardiff Community Housing Association	Belief that the Directorate needs to review its consultation approach and timings in order to reach a wider audience.
The range of options for engagement - on-line, face to face etc. - is positive.	C3SC	
There are other options that could strengthen the approaches and methodologies by increasing the numbers of doorways people can go through for involvement, recognising there are people in the population who statutory services find hard to reach, many of whom will be more directly impacted and/or are traditionally less likely to engage.	C3SC	The need to effectively engage with diverse communities including those with protected characteristics, those whose first language is not English or Welsh, the hard-to-reach groups and those who are often less likely to respond to Cardiff Council consultations.
Deliberation and discussion is vital to engage people who would not usually complete online surveys. Seldom heard groups face many barriers to engagement - and there is a moral imperative to listen to all views. Those whose first language is neither Welsh nor English should also be encouraged to participate in the consultation process, through translation/interpretation services.	Cardiff Civic Society,	
Consultation with people who have a learning disability should be fully accessible and regularly carried out across all consultations.	Cardiff People First	
The current consultation is not advocating best fit, but consulting based on good evidence and intelligence on what might be a reasonable level of growth advocated through the development plan. There are low-medium-high levels of growth presented.	Officers – Simon Gilbert/Stuart Williams	
The purpose is to engage the community as early as possible in the process about what City they would like to see.	Officers – Simon Gilbert/Stuart Williams	

Evidence	Source	Finding
What the consultation is seeking to do is to try and tease out some of those aspects from partners and stakeholders so that the Council will have more information to write policies that can help support a lot of projects and initiatives.	Simon Gilbert	
Methods Used		
Consultation by email is fine, as our team can access this remotely working from home as well as in the office.	GGAT	The views provided by corporate bodies suggest that they were generally satisfied with the approach and methodology that has been adopted by the Directorates RLDP consultation.
Understandable and clear.	Dwr Cymru	
Excellent. In terms of accessibility to the electronic consultation, is obviously more prevalent for those that have got access to email and internet. There might be a few smaller businesses where perhaps they have not got that capability or the ability to do that in a work environment. In terms of publicising the consultation so that they can respond by other means, that has been there.	For Cardiff	
No comment	Adventure travel, Home Builders Fed. RSPB, First Bus, Anon, Anon, Anon, Cardiff People First	Several (8) of consultees did not provide any specific comments on the approach and the methodology used by the Directorate's RLDP consultation.
Effort has been made to enable online consultation, which is now essential but does not provide a full substitute for face-to-face engagement and can exclude those who have restricted online access or feel less comfortable with online tools. Consultation online is still based around documents designed to be read offline. Much more could be done to empower the process if documentation were designed to be read online and backed by hyperlinks to supporting information and glossaries for definitions of technical terms.	Cardiff Civic Society	Consultees who represent the interest of the general public highlighted the need to further strengthen the current approach and widen its reach with relevant stakeholders.

Evidence	Source	Finding
Social media has its place but would prefer direct emailing and face to face discussion. Help people through the process but also find out what they really need in their communities.	Cardiff Rivers Group	Need to expand methods beyond online and social media
Expressed their concern in relying heavily on responses from online consultation as this can exclude those who have restricted online access or feel less comfortable with online tools. They believe that Planning directorate could also do more to make the online consultation more accessible and user friendly and suggested that online glossaries and hyperlinks could be included.	Cardiff Civic Society	<p>Consultation relies heavily on responses from online consultation which can exclude those who have restricted online access or feel less comfortable with online tools.</p> <p>More needs to be done to make the online consultation more accessible and user friendly.</p> <p>Suggestion that online glossaries and hyperlinks could be included.</p>
Broad range of methods used. It would be helpful to set out in the document the time plan and opportunities for engagement so that people can understand how their involvement has been planned to be as timely, effective and appropriate as possible, including how and when they can expect to receive feedback on their contribution and the differences that have been made as a result.	C3SC	<p>Suggestion that stakeholders should be made fully aware of the consultation timelines and ways that they can engage with the process.</p> <p>In line with best practice, stakeholders receive feedback on their contributions and the impact that these has made or achieved.</p>
Some very good contacts have been made with the Universities, contacting the Student Liaison Officer in Cardiff University and the Met University. A workshop was being set up with them to have a round table discussion with students and at the moment they were seeking who would be able and most suitable to	Stuart Williams	Contacts have been made with universities to engage students.

Evidence	Source	Finding
attend this as the best representatives of the numerous different groups within their population. There were some challenges of getting people to participate as apparently students like incentives to attend.		
Can't see a child/young person version of documents.	Play Wales	Child Friendly version is required
Suitability of Language Used		
		A number (5) of consultees (4 corporate bodies i.e., Adventure travel, Homebuilders Federation, RSPB, Cardiff Community Housing Association, and Anon) did not provide their views on the suitability of the language used in Planning Directorate's RLDP consultation document.
Appropriate for a range of stakeholders and not just aimed at Planning and Development professionals.	Dwr Cymru	Four (4) corporate bodies (For Cardiff, First Cardiff Bus, Dwr Cymru, Glamorgan Archaeological Trust)
appropriate to the level of consultation	GGAT	believe that the language used in the Directorates RLDP consultation is 'appropriate' for its target audience and commented that this was 'simple, easy to understand' and 'good'.
Simple and easy to understand content.	First Cardiff Bus	
Given that planning has a large technical dimension, some of the language is always going to be challenging. Even though effort has clearly been made to make language accessible, terms such as 'deposit plan' or 'windfall sites' are not immediately obvious to those who are not regularly involved with planning matters. Even terms that appear obvious at first sight, like the greenfield /	Cardiff Civic Society	Language used was quite 'technical and formal' and 'quite challenging' and not easily understandable to some stakeholders and the general public who are not familiar with

Evidence	Source	Finding
brownfield distinction, are not straightforward. This is where an online glossary could help.		<p>planning matters and vocabulary. They believe that this can put people off from responding to the consultation. They suggested that the consultation document should be mostly 'jargon free' and should have a glossary for the more technical terms that are presented in the consultation document.</p>
<p>The language used in the document is very formal and risks some people finding it impenetrable and difficult to understand. It would benefit from reducing the use of jargon, having a list of definitions of a number of the terms and having an easy read version available. It would also be helpful to have it clearly visible where and how to access the document in other languages and formats - community languages, disability accessible formats etc.</p> <p>Whilst a lot of text is needed to cover the scope of the issues, an easy read version would help to address the density of the text.</p>	C3SC	
<p>Some of the language was quite challenging and it would be good to see something an easy read version or a list of definitions, all those kinds of things that would, potentially, allow people who are less used to more formal language to be able to understand the documents and make a contribution as well.</p>		
<p>But the reality is the average person, who this really impacts on, will not understand that.</p> <p>The data that sits behind the consultation document, the consultation questions, - even for myself I might need to read it two or three times to understand what it is you are actually looking to try to do. So there must be more simplistic ways of doing that.</p> <p>When you look at government websites, you can see that they have adapted to simple use, in terms of communicating with people, which works well.</p>	United Welsh HA	

Evidence	Source	Finding
Very unclear, not sufficiently explained, too short notice and in an inaccessible format for people with a learning disability to make informed comments. Co-production is preferable to consultation.	Cardiff People First	Some of the terminologies used were ‘unclear’ and ‘not sufficiently explained’, was not child friendly and not accessible for those with learning disabilities.
Can't see a child/young person version of documents.	Play Wales	
For somebody in a position like me, who is used to doing these things day in day out, I think it would have been absolutely fine. However, for somebody living with dementia or affected by dementia I do not think it would have worked at all.	Alzheimer's Society	Not dementia friendly
Welsh Government produces 'easy read' versions of key documents, and there may be scope to learn from that.	Cardiff Civic Society	Recommendation that the consultation should be made available in an ‘easy read’ version or should use ‘plain English or Welsh’.
Plain English (Welsh). The documents are very technical and not easily digested which puts off people providing feedback	Anon	
A lot of issues experienced by people living with dementia involve processing, so hearing can be a big issue, as can understanding of words or misplacing or using the wrong words. We try and write everything in plain English, as clear as possible, following plain English guidelines. But there were sections of it where I found myself having to go off and Google bits of the actual consultation itself, because there were comments in there about what the council wished to do that I had no idea, quite honestly, where they had come from.	Alzheimer's Society	
A user friendly guide to the LDP is being produced to inform the stages of the consultation. It is the aim to release this during this consultation and whilst it might be late too late to capture all the information, this is a journey that is continuing throughout the rest of this year up to and beyond the preferred strategy and he assured that they would continue to do more to reach out to these groups.	Simon Gilbert	

Evidence	Source	Finding
It would also help to utilise that type of language and simplicity in the social media feeds that are being used in the consultation.		
Officers highlighted that as well as a user-friendly guide, a glossary of terms had been drafted and would be made available next week.	Stuart Williams	
he too was disappointed with some of the responses to the consultation regarding jargon and technical language. He stated that whilst it does have to contain some technical language, this does need to be explained better or at least seek to allow people to become interested in the LDP and they are presented with a too technical questionnaire straight away, it is very hard for people to want to be involved.	Simon Gilbert	
advocated a series of possibly 10 questions that the public may ask us starting at the very basic with what is town planning possibly and then explaining what this RLDP process is and why it is important to people and why they should be involved and asking the types of questions that came back as part of the consultation.	Simon Gilbert	
He also stated that the were aiming to ask more open questions and ask the public what they want to see. It is the hope that in doing so people will understand what the process is and it might also spark conversations that go beyond the Plan and help people work more collaboratively together.	Simon Gilbert	
Whilst some of the consultation that has been done may not have achieved the results wished, it is a very technical and very difficult process covered by a very strict guidance set out by Welsh Government. He explained that it is extremely complex and whilst they would want simple answers and the ability to explain it in simple ways, sometimes it does have to be undertaken in strict stages.	Cllr Caro Wild	
Format and Layout		
Clear and easy to read and follow.	GGAT	

Evidence	Source	Finding
The use of text and graphics makes the consultation document easy to follow and understand.	First Bus	<p>Four consultees representing corporate bodies provided positive feedback on the format and lay-out of corporate RLDP consultation. planning document. They regarded the format and lay-out as ‘clear, and easy to read and follow, easy to understand’, with one referring to it as ‘really good’. C3SC also stated that the format was ‘clear and straightforward’.</p>
Really good	For Cardiff	
Clear, well set-out and easily readable.	Dwr Cymru	
Lay-out is straight forward and clear overall	C3SC	
		<p>Several consultees (8) (Adventure travel, Home Builders Federation, RSPB, Cardiff Community Housing Association, Cardiff People First, 3Anon) did not provide any comment on this aspect of the consultation document.</p>
The documents have been produced to be printed off and read offline, rather than to be accessed online as most people will today. The heavy use of colour makes printing more expensive than it need be, so a simple text-only version should be available. PDFs can be hard to read on small screens (although the RLDP material is more accessible than the One Planet Cardiff Vision and Action Plan which are only easily read with an A3 printer). The document should be available in a format designed for online, including mobile use. This should also be borne in mind when the new LDP is published.	Cardiff Civic Society	<p>Consultees who represent the views of the general public and key stakeholders provided some critique and made suggestion on improvement that can be adopted in future consultations:</p> <p>The consultation covered a lot of text and having ‘easy to read version of the document’ using effective formats for presenting detailed and comparative information will help to</p>
Whilst a lot of text is needed to cover the scope of the issues, an easy read version would help to address the density of the text. Tables are helpful - however, it is important that the detail within the tables are set out clearly and appropriately so that they are easy to access and understand.	C3SC	

Evidence	Source	Finding
		<p>make these clear and easily understandable.</p> <p>A text only version as well as readable on-line format that can be readily accessed using mobile online technology was also suggested to save on expensive printing of documents that make use of a lot of graphics and colour.</p>
<p>Consultations are generally "here are the options we have decided upon, now rank them". Whereas what should be is "what do you, the residents, want to see happen?" Allow responses to be much more free text.</p> <p>Questions need to be open so residents can have their views heard and feel engaged - something I don't think they do at the moment</p>	Cardiff Rivers Group	<p>Suggestion that the consultation could use more open-ended questioning to allow stakeholders to elaborate on their views on the issues consulted on.</p>
I can't see a child/young person version of documents.	Play Wales	<p>Play Wales suggested that a child friendly format would enable more young people and children to engage with the consultation.</p>
Appropriateness of Methods Used		
Appears to be well thought out and engaging.	Dwr Cymru	<p>Four consultees representing corporate bodies gave positive comments.</p> <p>For Cardiff stated that this was excellent while Dwr Cymru thought that it was 'well thought out'. The two others believe that the 'appropriate' approach and method was used.</p>
Appropriate. There has to be a process to follow and a way of achieving this, and using the appropriate framework is clear and auditable.	GGAT	
I feel that these are appropriate.	First Bus	
Excellent	Dwr Cymru	
No response		<p>Seven (7) consultees did not give any further comments on this issue.</p>

Evidence	Source	Finding
Once through the pandemic need much more face to face engagement so that everyone feels included.	Cardiff Rivers Group	Some of the consultees acknowledged that covid restrictions will have affected the numbers of individuals and groups who engaged with the RLDP consultation. With consideration of this on-going challenge, a number of improvement areas were identified mostly by those who represent the interest of the general public and those representing selected stakeholders.
With some of the restrictions associated with Covid I fear that some voices may not be heard	Cardiff Community Housing Association	
Once through the pandemic need much more face-to-face engagement so that everyone feels included.	Cardiff Rivers Group	Current strategies could be further strengthened.
Too much reliance has probably been placed on survey results, which can provide a useful snapshot of views but always depend on how questions are phrased. They do not enable the dialogue that can change minds through listening to, and working through, the ideas and opinions of others. Mutual understanding would be increased through more engagement between planning officers or councillors and stakeholders. Submissions should have been published online to stimulate debate.	Cardiff Civic Society	<p>Increasing the number of face-to-face engagements with stakeholders and the public would bring favourable outcomes. This would enable better dialogue on the issues consulted, allow individuals to listen and work through understanding different ideas and opinions that will enable them to formulate more informed views, change their mind or identify areas where some consensus is achieved.</p> <p>Other effective methodologies and approaches should be explored, and</p>

Evidence	Source	Finding
		the consultation should not rely mainly on on-line methodologies.
The range of approaches is helpful. However, it is not clear how this will be extended to make it as easy as possible for as many people as possible to take part - for example, people accessing services in the third or other sectors.	C3SC	Suggestion that submission made should be published on-line so that this can further stimulate debate amongst stakeholders.
Submissions should have been published online to stimulate debate.	Cardiff Civic Society	
There are good examples of involving children in planning processes: https://www.rtpi.org.uk/practice/2021/july/children-and-town-planning-creating-places-to-grow/ https://www.zcdarchitects.co.uk/research-essays	Play Wales	Highlighted the importance of engaging with children and young people, with hard-to-reach groups and those who often do not generally engage with Council consultations.
Social media also certainly has its place as well especially with the younger generation so keeping pace with latest platforms also key.	Cardiff Rivers Group	
Build up a network of residents and resident groups that can be engaged with and views sought	Cardiff Rivers Group	Suggestion to set up a representative network of stakeholders who can be contacted for engagement purposes.
It is also not clear what the full timetable is so people can see how engagement will be planned and delivered and when they will receive feedback on the impacts of their contributions.	C3SC	In keeping with best practice all those who engage with the consultation should be made aware of the timescale involved in the process and informed of the findings and outcomes achieved by the consultation.
Consultation has been undertaken during a pandemic where face to face meetings are not allowed and so trying to engage with the public and spark their interests in local planning was difficult.	Cllr Caro Wild	

Evidence	Source	Finding
Involving Hard to Reach Groups		
No Comment		<p>A total of 8 consultees did not provide comments on the ability of the Planning Directorate's Consultation to effectively engage with hard-to reach groups e.g., as the gypsy and traveller communities, homeless people, refugees and asylum seekers, BAME groups etc. Of this group, 4 represented corporate bodies (Dwr Cymru, For Cardiff, Home Builders federation and the RSPB). Two others did not disclose their names or the organisations they represent and no comment.</p> <p>Although the Cardiff People First group provided a critique on the method and approach used, the did not provide any specific comment on this issue.</p>
We don't have relevant experience to comment on this aspect, but the Welsh Government Delivering Digital Inclusion programme may have undertaken research into the best way to reach out to various communities.	GGAT	Reference to the Welsh Government's Digital Inclusion Programme on how hard to reach groups can be effectively engaged with.
Whilst the consultation is available via social media. Hard to reach groups would potentially need letters delivered to their homes. They need to know what is in it for them	First Bus	The two transport providers suggested the consultation approach should go beyond making use of

Evidence	Source	Finding
Not just these groups but attracting interest from the majority of the residents will be difficult.	Adventure Travel	online methods including the use of social media and should explore effective ways of reaching and engaging with these groups. Highlighting the benefits and outcomes that the consultation will achieve could encourage better of these groups in the process.
Perhaps going through existing organisations who already engage with these groups is a starting point. Don't try and reinvent the wheel - use what is out there. Be seen as a partner.	Cardiff Rivers Group	Suggestion that working with organisations who are already supporting these could facilitate their involvement and contributions to local authority consultations.
It is also positive to see clear reference to housing people who are homeless. The reference in the Plan to the significant levels of inequality that exist within the southern arc is welcome.	C3SC	Pleased to see that the growth projections in RLDP consultation document have considered the housing needs of the homeless. The RLDP's acknowledgement of significant levels of inequalities in Cardiff's Southern Arch was also welcomed.
It is pleasing to see the reference to gypsy and traveller groups. We are pleased there is a positive duty under Part 3 of the Housing (Wales) Act 2014 to both assess (s101) and provide (s103) safe and secure pitches. However, there are currently no transit pitches in Wales.	C3SC	Pleased to see that the RLDP has made reference to the needs of Gypsy and traveller community and have also noted the statutory duty of local authority in positive under Part 3 of the Housing (Wales) Act 2014 to both assess (s101) and provide (s103) safe and secure pitches for this Group.

Evidence	Source	Finding
<p>It is pleasing to see the reference to gypsy and traveller groups so clearly evident in the RLDP consultation document - particularly given the UK Government's proposal to criminalise trespass in Part 4 of the Police Bill. Risking people falling foul of the new legislation that may be brought in for stopping when there is no appropriate provision for them to station their trailers</p>	C3SC	<p>Concern over the absence of transit sites in Wales, as this puts this group at risk of being criminalised for stopping where there is no appropriate provision for them to station their trailers.</p>
<p>This very is a very sensitive subject that Planning is a part of in terms of identification of new sites and this is captured in the LDP. This wasn't just a Planning issue in the identification of sites and that consideration of sites, assessment of sites and engagement of the community and neighbouring communities is often a very difficult and sensitive area.</p> <p>The Council has to review the Gypsy and Traveller Accommodation every five years and this is why the new one has been undertaken. They have been interviewing Gypsy and Traveller families to assess the need and update these figures and the report has been finalised and considered by Scrutiny and Cabinet and has now been submitted to Welsh Government. Hopefully they will get back to the Council soon to approve document and this can be taken forward in the Preferred Strategy where the recommendations will be taken forward in terms of numbers in the autumn/winter this year to set out how the Council will deliver these sites. This will then form part of the consultation of the next stage.</p>	Simon Gilbert/Stuart Williams	
<p>In relation to the GTAA, this work involved often housing some of the most vulnerable people and underrepresented communities and suggested that it would be best to discuss this with Housing in the first instance. Planning's role is quite clear in terms of its consideration of any new sites through the management process and the LDP manual talks about identifying areas of land for all housing needs so it does come into Planning but it is fundamentally a Housing issue.</p>	Simon Gilbert	

Evidence	Source	Finding
<p>However, the document is largely silent on other protected characteristic groups, despite Cardiff's population being so diverse when compared to the rest of Wales - e.g. 15.9% of the population describing themselves as Black, Asian or Ethnic Minority compared with 4.9% of the Wales Population (Stats Wales - June 2021).</p>	C3SC	<p>Attention drawn to the needs of those with protected characteristics that should feature and be considered in developing the RLDP. The diversity of the Cardiff population is an issue as it is considerably more diverse compared to the rest of the population in Wales.</p>
<p>Whilst the Welsh Language is important and deserves to be highlighted, there is something about giving some priority as well to the fact that there are a range of other languages talked across the city. That is including disability languages as well, and how do we make sure that those are reflected in our approaches, but also in the questions that get asked? There is something about not seeing that reflected in those general consultation questions. So only one language (Welsh) being recognised.</p> <p>There is a bit of room for additional work there, to try to be as inclusive as possible.</p>	C3SC	<p>The proportion of individuals from BAME background in Wales is 15.9% and three times higher compared to overall figure for Wales which is 5%. For Cardiff the stats indicate 15% for Welsh speaking (reasonably well) and 16% for BAME communities.</p>
<p>There is little if any reference to this level of diversity within the Plan, including in the sections on new jobs and economy (pages 2 & 35), new homes (pages 8 & 34), health, wellbeing and equalities (page 19), post-pandemic recovery - particularly given the picture of the unequal impacts of the pandemic (page 23), historic and cultural assets (page 29), language, culture and heritage (page 42) and how the LA plans to work with people and families to meet their housing needs as part of the planning process.</p> <p>This exclusion significantly undermines the principles of inclusion and accessibility.</p> <p>It would also be welcome to see how the plans will help to tackle the levels of inequality - for example, how the development of the town centre, Red Dragon Centre, local business districts etc. will positively impact these communities.</p>	C3SC	<p>The RLDP should consider the needs of a more diverse population in planning for new jobs and housing, maintaining historical and cultural assets. The RLDP should also consider the unequal impacts of the pandemic on different groups in its developing its plans and should continue to and support the diversity of language, culture and heritage</p> <p>The RLDP should also be clear how the local authority will work with families</p>

Evidence	Source	Finding
		<p>and communities on how their housing needs will be met as part of its planning process. How the RLDP will help to tackle inequalities and how proposed developments in the city and neighbourhood centres impact these communities should also be specified.</p>
<p>This requires a conscious effort to seek out those who are not normally involved in the planning process and to convince them that Council really wants to hear their views, and will respond, rather than just going through the motions. The Council mindset has to shift from 'how do we involve groups in our process' to 'how do we make ourselves relevant to their lives'. Once again, Covid has made it harder to go out and meet people but more could be done at times of low restriction, even if those fall outside the formal consultation periods.</p>	Cardiff Civic Society	<p>Conscious effort required to seek out those who are not normally involved in the planning process and to convince them that the Council really wants to hear their views. Needs a shift in mindset of Council to make it explicitly relevant to individuals from hard-to-reach groups.</p>
<p>It would also be helpful to clearly explain the RLDP in the context of setting out the Council's vision, and that will inform the decisions made by planning services, which will need to align with the goals set out in the plan - it is therefore an important opportunity for people to engage to influence the delivery of positive outcomes from planning processes on the way their streets and neighbourhoods are developed and deliver positive outcomes for their communities.</p>	C3SC	
<p>Cardiff is a very multicultural, very diverse population centre, probably the most in Wales. From our own experience, getting, what I would call, down and dirty, actually meeting people face-to-face and getting into face-to-face conversations with people is the better way for trying to understand what actually motivates and drives people. Then you are able to respond to any of</p>	United Welsh HA	<p>Face-to-face meetings are much more effective than written surveys – is a better way to try to understand what actually motivates and drives people</p>

Evidence	Source	Finding
their specific demands, rather than, again, in our experience, trying to do surveys and things which comes with a very limited success.		so that you are able to respond to any of their specific demands
Have identified that community leaders can be enablers but can also be blockers in terms of how we gain some of that engagement.	United Welsh HA	Community Leaders can be enablers for engagement
Language barriersin terms of having either translators or people who speak the language within the organisation. To that end, we have committed to things like the Rooney Rule and to develop our own proportional representation within our own business to make sure that we reflect the communities that we work in as well.	United Welsh HA	Language barriers need to be taken into account.
Need multi-lingual people to visit community hubs such as mosques.	Cardiff Rivers Group	Suggestion for translators from the organisation to assist with engagement Suggestion for multi-lingual people to visit community hubs such as mosques.
It is hoped that the user-friendly document will be shared with local Members, picking up on the point of the Chair that engaging with local Members is one of the best conduits to local communities, particularly asking those Members from the ethnic communities to reach out and use this document as a template.	Simon Gilbert	
Other Comments and Suggested Improvements		
No comment		A total of 7 consultees did not provide any further views or suggestions on how the RLDP consultation can be improved.
Maybe worth considering local TV news channels, newspaper outlets, libraries and availability in all public council buildings. Local advertising within city centre.	First Bus	More can be done by the Directorate to raise public awareness of the RLDP consultation. The use of various media channels such as TV, newspapers, local advertising should be considered.

Evidence	Source	Finding
Interactive virtual sessions with a mix of stakeholders taking part have made for engaging and useful discussion with other LPAs. Specific sessions for housing, infrastructure etc would be beneficial.	Dwr Cymru	Suggestion that technological innovation could be used to enhance the consultation by making use of ‘interactive virtual’ systems to engage with different stakeholders as well as the use of various technological platforms to log and collate consultation responses. These consultees however did not provide any specific examples of the technological innovations or mechanisms they have mentioned.
We think the system is working well as it is. Improvements could really only occur where there are changes in technology, different platforms to receive consultation and information, comment on these, and have the responses logged and collated.	GGAT	
Pandemic restrictions permitting, 'town hall' style meetings should be held in every ward. Interaction between residents is vital if differing perspectives are to be understood, with some attempt made to accommodate various needs even if full consensus cannot be attained. We listen to each other more in face-to-face settings than on often toxic social media.	Cardiff Civic Society	When covid restrictions are eased, some of the consultees suggested that more open face to face engagement, and public ‘town hall’ type meetings could be held in different electoral wards. They believe that this approach would allow the Directorate to effectively engage and interact with residents and give them the opportunity to explore different ward-based views on development and planning priorities.
Rather than a big bang approach on consultations could a ward by ward approach be taken on a much more regular basis? Yes some things need a city wide view but building up an overall strategy for the city from the individual wards may give a greater insight into the priorities at the local level and see common themes. Targeting wards with specific issues, engage established groups and organisations to discuss what is needed within their sphere of operation.	Cardiff Rivers Group	
Planning Officers were always open to any meetings and had had several meetings with community councils which were open to all ward Members and if they have groups within their surgery's that this is often a good way to get	Simon Gilbert	

Evidence	Source	Finding
the message out. He stated that he would be happy to meet up on a ward-by-ward basis if this was requested.		
If circumstances permit, there would be value in a 'Citizens Assembly', in which city residents, supported by experts, could collectively consider options and priorities.	Cardiff Civic Society	Suggestion that a 'Citizens Assembly' could be set up wherein city residents, supported by experts, could collectively consider options and priorities.
As well as targeting wards with specific issues, engage established groups and organisations to discuss what is needed within their sphere of operation. Cardiff has homeless charities, environmental groups, Keep Cardiff Tidy groups who all have direct experience and ideas to improve things. Engage with them directly as partners and utilise their expertise. If they are engaged and feel as if valued then they will help and support in the delivery. If excluded and don't agree then wont!	Cardiff Rivers Group	Suggestion that the Planning Directorate should target well established groups or organisations such as homeless charities, environmental groups and seek their ideas, insights and expertise on improvements on what would be relevant to the RLDP.
Taking partnership approaches to effective dialogue and communication ensuring the plan for an area reflects the aspirations of the community and to optimise opportunities to develop a sense of shared ownership, and early and effective community engagement in discussions on plans and development proposals with a focus on achieving shared outcomes.	C3SC	The C3SC goes further in recommending that development of the RLDP could take on a partnership approach and ensure the plan for an area reflects the development aspirations of the community and consequently optimise the opportunities for residents to feel a sense of shared ownership of the outcomes that will achieved.

Evidence	Source	Finding
<p>It would be helpful to avoid coinciding the consultation timeline with holiday periods - which can otherwise have a detrimental impact on the time available to formulate a response and to realistically ask for and include the view of others</p>	C3SC	<p>The timing of consultation is important- early and effective engagement (with discussions) with different communities focusing on development plans and proposal was deemed important. The consultation timeline should not hamper the ability of stakeholders to effectively contribute and be involved in the process. Sufficient time should be provided to allow stakeholders and members of the public to fully consider options and formulate their responses. The timeline should also avoid holiday periods, and this could affect their ability to submit a response the consultation.</p>
<p>As so often with planning issues, 'consultation' starts from developers or planners making proposals for what should be done then asking what citizens think of it. This is inherently an unbalanced process in which it is extremely difficult to change course. This is evident in the current consultation, for which the document sets the question as 'possible ways to provide for growths' rather than, say, 'possible ways to improve the well-being of future generations'.</p>	Cardiff Civic Society	<p>A more participatory approach could be adopted by the Directorate when consulting for the RLDP. The current approach is quiet an 'unbalanced process' wherein the planners and developers formulate the proposal on what should be done and the public and stakeholders are then 'consulted' on what they think about these proposals</p>

Evidence	Source	Finding
		The current consultation focuses on 'growth and delivery options'. This should focus instead on 'possible ways to improve the well-being of future generations'.
The scope of the consultation has already been defined to direct responses down certain paths and to exclude others.	Cardiff Civic Society	Specifying the range of development and growth options, would pretty much limit the range of options that can be considered by stakeholders.
The Planning Directorate should gather views on what people want from their city and use that as the starting point for developing proposals. We need more questions on the lines of 'what would you like to see' rather than 'what do you think of this'. The latter question does of course have to be asked but the starting point should be open questions.	Cardiff Civic Society	Need to gather public's views on what they want in their city and use that as the starting point for developing proposals. Stakeholders and the public would be asked questions such as 'what would you like to see?' rather than 'what do you think of this?' and the consultation should make use of more open- ended questions.
When I have looked at consultations they do not ask me what is it that I want to see in my community but to simply rank in order what the Council deems I need. Would like to see you asking for ideas and innovative solutions especially from groups/organisations involved on the ground.	Cardiff Rivers Group	Need to gather public's views on what they want in their city and use that as the starting point for developing proposals. Stakeholders and the public would be asked questions such as 'what would you like to see?' rather than 'what do you think of this?' and the consultation should make use of more open- ended questions.
Our own research has identified the need for additional larger affordable properties throughout Cardiff. A further point for consideration - A non negotiable commitment to affordable housing in the planning process should suppress land values and give a clear signal to developers to pay reasonable land costs, ensuring scheme viability.	Cardiff Community Housing Association	Suggestion that consultation should also seek stakeholder's and the public's views on the types of housing provision that are needed in Cardiff.

Evidence	Source	Finding
<p>The whole process will involve engagement and partnership working in close consultation with the community in order to draw together the evidence the local authority has gathered to set out the strategic vision and policies, and the type of development required to achieve the vision.</p> <p>This will include more than structural opportunities and constraints - it will also require reflecting the aspirations the community has for their place of residence/work/study/recreation etc., and promoting and supporting behaviour change.</p> <p>There are benefits to the whole process therefore involving the Council/Councillors as leaders, working with partners, in effective ongoing discussions and engagement with residents in what they see as the barriers and opportunities, as well as what planning can do to create more inclusive, accessible and creative approaches for sustainably developing our streets and local neighbourhoods.</p> <p>There are many opportunities in Cardiff to work with local groups and organisations to increase understanding of what projects and initiatives local people are more likely to work with and the barriers and opportunities they present for different communities, which we will be happy to help to facilitate.</p>	C3SC	<p>The RLDP consultation should seek to reflect the community's aspirations for their place of residence, work, study and recreation.</p> <p>The consultation process should involve and be led by the Council and its Councillors working with its partners, and should effectively engage in dialogue with residents in Cardiff.</p> <p>The consultation should identify the development opportunities and challenges as well as define and determine how planning can create a more inclusive, accessible and more sustainable neighbourhoods and communities.</p>
<p>We understand that there are on-going discussions in line with Cardiff's Child-Friendly City programme and we welcome this. There are good signs that children's needs and preferences will be considered as part of the planning process. This is pleasing.</p>	Play Wales	<p>Children's needs and preferences need to be considered as a priority</p>

Replacement Local Development Plan – Strategic and Delivery Options – Collated Evidence and Findings

Evidence	Source	Finding
Supporting rationale for the projected growth		
This piece of work looks at the current population estimates and projects that forward on a year-by-year age group. The element that may follow on from this work breaks that population characteristics down to then determine the type of housing need for each of those specific groups of people.	Andrew Fowler	The Inquiry heard detailed explanation of how the growth options had been developed but highlighted that this information was not made available as part of the consultation.
The POPGROUP model operates on a formula that considers the population by single year of age, therefore the ageing of the population and the need for housing for that cohort is a critical process in the modelling approach. Household composition has also been considered looking at the rate of household formation that is likely to take place in the future with that changing population. He continued to explain that when looked at from a demographic perspective, it is considering the Welsh government population projections as a baseline and looking at vacancy rates and the household membership rates to determine the number of households that are likely to form in the future, which then derives the household number.	Andrew Fowler	
Migration patterns are considered and the household composition is informed by projections looking at migration as well as life expectancy, birth and death rates etc. All of those provide high level assessments that are undertaken to give you the more robust information.	Simon Gilbert	
In developing the employment options two economic forecasts from two of the leading economic forecasters in the UK were commissioned. This work provided quite a wide range of options (wider than those being consulted on).	Stuart Hardisty	
The lowest of the range that was considered is not believed to be a realistic basis for Cardiff as a capital city of Wales to be planning. It is significantly lower than the levels of growth it has been achieving for the last 10 -20 years and	Stuart Hardisty	

Evidence	Source	Finding
there would be no basis for an area that has been identified as the growth driver for this area within Welsh policy to operate at that level.		
Option A is very much the level that the Council has been operating at or above already; in the middle of the two forecasts, and so it has been agreed to plan on that basis as the minimum of what the Council should be considering. It was then explored what it would look like if you go above that, with Option C towards the upper end of the range, which allows for catch up and allows for Cardiff to continue to thrive and Option B somewhere in the middle.	Stuart Hardisty	
A wide range of evidence has been taken into account, looked at on a sector-by-sector basis and how that fits with what has happened in Cardiff. This was triangulated with consultations from a range of stakeholders across the Cardiff economy which led to these options emerging from that process.	Stuart Hardisty	
<p>Aspects taken into account include:</p> <ul style="list-style-type: none"> • Cardiff, as the capital city of Wales is a key driver to the Cardiff Capital Region and it is important to understand its role within its wider locality. • The implications of the COVID-19 pandemic on the economy and the different ways that this might impact on sectors with the economy almost in a dip rather than at a peak – some of what happens might still be catching up with lost ground from the beginning of the pandemic. • There may need to be flexibility in the next stage of the work which is understanding how much land will be needed for economic uses. • It is very challenging to make concrete predictions in the midst of a pandemic of what was going to happen when we move out of it such as the changing views regarding home working and hybrid working. 	Stuart Hardisty	

Evidence	Source	Finding
<ul style="list-style-type: none"> The demographics and the way people are moving around the South East Wales and the Cardiff Capital Region <p>The investment in South Wales Metro and the investment in various schemes around Cardiff to consider what are realistic employment scenarios.</p>		
<p>As part of the modelling process there is a commuting ratio that is applied, looking at the balance between the level of employment and the number of resident workers within Cardiff. This modelling uses the commuting ratio from the 2011 Census. The commuting ratio, along with assumptions on unemployment and economic activity rates are used to determine the level of employment that can be supported by the population. In the employment-led scenario these assumptions are used to derive the level of population growth required to support the defined number of jobs. In terms of the actual number of jobs used in the model, you have the work that Stuart has undertaken in looking at the economic drivers for the type and actual number of jobs that are likely to be created in Cardiff. The POPGROUP model determines that if there aren't enough workers to meet the number of jobs that are likely to be created in the city, then these need to be filled from workers that will move into Cardiff.</p>	Andrew Fowler	
Strategic Options – Views on Growth Options		
<p>Difference between this Plan and previous one is there are a significant number of homes this time around with planning permission already agreed – around 20,000 homes with planning permission in the City.</p>	Simon Gilbert	Concerns that these houses will not fall under the Carbon Neutral Target so the RLDP will not fit its own Vision to achieve this.
<p>I understand the rationale. The consultation document allows me to make an informed choice.</p>	First Bus	Corporate body organisations understand the rationale and it provides sufficient detail
<p>We do consider that we understand the rationale behind the options, and that the information enables us to make informed comment. The historic environment sector would respond with the more focused responses at the</p>	Glamorgan-Gwent	

Evidence	Source	Finding
candidate site stage as to whether particular sites would have more of an impact, at this stage the options themselves are general.	Archaeological Trust (GGAT)	
We understand the rationale behind each of the options and it is our view that it does provide sufficient detail to enable an informed choice to be made, as there is clear rationale such as whether it is based on the WG population projections etc. However, as our role is a statutory sewerage undertaker it is not our place to advise which is appropriate.	Dwr Cymru	
Rationales for the options are poorly explained. We are told that growth options will meet Council's economic targets or aspirations but given no explanation of what those are or why they have been set.	Cardiff Civic Society	Other organisations representing the public view view the rationale of growth options as unclear and that there is a need for more information
Unclear rational on how the options were developed.	Cardiff Rivers Group	
Rationale for growth options is unclear and make it difficult to compare	Home Builders Federation	
Options presented do not have enough detailed information to be able to decide which one which should be progressed at this stage.	Home Builders Federation	
I do not fully understand the rationale, and would have benefitted from a list of the pro's and con's - laid out in a table- as a comparator against each, which would have been helpful Particularly for people who are less aware of the context and the background, it would be very difficult to do anything other than a more abstract, kind of, notional idea as to what is the best bid for the city, which could be perhaps helpful. It would be helpful to have things perhaps laid out before you so you could see what you were being asked to consider.	Cardiff Third Sector Council (C3SC)	
The focus is wrong. There is an urgent need to address the nature emergency along with the climate emergency. The dual nature and climate crises need to be addressed in tandem and reflected in all LDP documents.	RSPB	

Evidence	Source	Finding
<p>The RLDP consultation document and doesn't provide much detail and does not fully define what it means by growth. This could suggest that growth is identified with setting medium and long-term economic targets in terms of GDP and GDP per capita. NRW encourage Cardiff City Council to consider growth in terms of Welsh Government's commitment to a Well-being Economy.</p>	<p>Natural Resources Wales</p>	<p>Need for clarity on how RLDP Defines Growth</p> <p>Recommendation that the RLDP growth options need to be assessed or evaluated on how these contribute or mitigate the challenges posed climate and nature emergencies as identified in the WBFG Act</p>
<p>NRW cites the concept 'Inclusive growth' involves sharing the benefits of economic growth more equitably and mitigate societal problems such as inequality, job insecurity, low pay and poor productivity. They also cite that the Well-being of Future Generations goals provide a framework for encouraging inclusive Growth – which is defines 'A Prosperous Wales goal is defined as:</p> <p style="padding-left: 40px;">“An innovative, productive and low carbon society which recognises the limits of the global environment and therefore uses resources efficiently and proportionately (including acting on climate change); and which develops a skilled and well-educated population in an economy which generates wealth and provides employment opportunities, allowing people to take advantage of the wealth generated through securing decent work.”</p>	<p>Natural Resources Wales</p>	
<p>NRW recommends that the RLDP growth options need to be assessed or evaluated on how these contribute or mitigate the challenges posed climate and nature emergencies as identified in the WBFG Act.</p>	<p>Natural Resources Wales</p>	
<p>Clearly, Cardiff does need to create housing. I think that what we're saying is that it's important that you assess them in the right way and assess them... There might be difficult decisions to make, so it's important that we have the right criteria to make those assessments and consider those options such as impact on biodiversity, the sort of things we were talking about: the climate and nature emergency, wider well-being, inequality.</p>	<p>NRW</p>	

Evidence	Source	Finding
The underlying presumption that "growth is good" needs to be challenged. The benefit delivered by 'growth' need to acknowledge associated costs, such as lost green spaces or new infrastructure requirements.	Cardiff Civic Society	
The options for future levels of housing and jobs growth are based upon population projections. If population projection underpinning the options is reliant on the ONS 2018 projections, NRW draw attention to the fact that these are now out of date. (Natural Resources Wales)	Natural Resources Wales	The need to review Population Projections used in RLDP
The projections incorporated in the February 2021 guidance from Welsh Government, might be more reliable than the ONS 2018 projections. In this respect NRW would like to highlight to the Scrutiny committee that the Local Planning Authority have scope to reassess population projection figures (subject to sound evidence which will be tested at Examination stage by Inspector). (Natural Resources Wales)	Natural Resources Wales	
The Council has been seeing a 50% increase in housing completions per annum over last 2-3 years. This suggests that the likelihood for development rate would be beyond the current WG predictions which looks backwards rather than forwards	Simon Gilbert	
The statistics are based on what is known today – in a years' time they will have changed. There may be more sites with planning permission, there may be more construction activity, there may be less. It will all be informed by further analysis over the year as well as housing monitoring and assessment and more up to date census data.	Simon Gilbert	
The 2018 population data was used as a baseline as this is what the WG LDP manual tells us to do. The options will be updated once the new census comes out in March next year and there will be some implications rising out of that. Any new evidence that comes out before the preferred strategy is prepared will be used to inform it	Officers – Simon Gilbert/Stuart Williams	

Evidence	Source	Finding
and likewise any further intelligence that will tell us the implications of pandemic will be accounted for in the figures. It is very much the legacy of the stage of the consultation process.		
Aspects such as the 2021 census, the Welsh government population data, will inform the levels of growth and feed into the plan as it progressed through stages. Houses and offices are being built, planning permissions are being issued that will all inform the level of growth and the need for additional land to accommodate that growth. This is being constantly monitored by officers, included in the evidence base for the RLDP as it evolves so that it will reflect the most up to date information. There were deliberately three options identified as low, medium and high levels of growth to inform this consultation.	Head of Planning	
Concern that RLDP consultation is suggesting that there are only three growth options that consultees can choose from.	Home Builders Federation	Concerns on limited number of growth options in consultation
The RLDP needs to present and consider greater number and range of options at this early stage in the process, as with other LAs.	Home Builders Federation	
Growth options needs to be flexible and be able to react to changes in circumstances which might occur over at least the next three years whilst the plan is proceeding through its adoption.	Home Builders Federation	
In other LAs a greater number and range of options have been considered at this early stage in the development of the LDP process.	Home Builders Federation	
These aren't the only growth options and that there were an infinite number. This is the reasonable assumption based on the evidence that is available of what would be a low, medium or high level of growth which was believed, on balance the right thing to do.	Simon Gilbert	
These 3 options were not set in stone. The growth options were there to show what those three growth options would require based on the evidence at the time and if it was undertaken again today those figures would have changed already.	Head of Planning	

Evidence	Source	Finding
<p>Question is ‘what value do you get out of it?’ For example, if your housing need is 30,500 homes, and you are seeking to achieve your 30,500, then why wouldn’t you want to deliver option C, which provides that?</p> <p>That also then provides all of the other additional value that you would need to generate out of that such as affordable housing, the additional options for regeneration and mixed communities, different tenure types, different density deliveries and things like that.</p> <p>So if your housing need suggests that is what you need to deliver then, for me, that clearly needs to be your aspiration to deliver that.</p>	United Welsh HA	The option depends on what your needs are for housing.
<p>As an affordable housing provider, clearly my focus is going to be on delivering the number of properties that you need to deliver – that you deliver the appropriate number of affordable housing to meet the certain demand.</p>	United Welsh HA	Affordable Housing needs should be a priority and will tell you the level of housing growth required
<p>For option A, if you only deliver 19,000 units, then it is very unlikely we you are going to meet your affordable housing targets, because it makes no reference, in terms of the documents, around delivering affordable housing targets. It only really starts referring to that when you look at option B and Option C. That makes option A a nonstarter because we are not here just to provide single tenure homes for owner occupiers and perhaps people who want to do buy-to-let investments. The demand is much broader than that.</p>	United Welsh HA	
<p>Land availability is critical. There are lots of people who say, “Use brownfield land,” rather than greenfield and that is recognised, but when we talk about brownfield land we often talk about high density, and then all the challenges that come with high density.</p> <p>In Cardiff Bay, for example the statistics show that around 75% of those homes are in the private rented sector, and that is not a sustainable way to be developing. That is not meeting the needs of the whole of the city. I suspect it is about looking at that sustainable growth such as family evolution.</p>	United Welsh HA	Different needs need to be considered for sustainable growth such as family evolution

Evidence	Source	Finding
The range of options that are presented are loose precisely for that reason, so as not to lead anyone; to not provide the consequences of the options that might then influence people as Officers cannot advocate any one of these options at this time. It is more about understanding what is important to people in terms of how the city grows.	Officers – Simon Gilbert/Stuart Williams	Options presented are not detailed and precise so as not to be seen to be favouring any option and influence people’s views.
Appreciate that it is hard for people to consider these growth options without looking at it spatially in terms of what might be delivered beyond homes and jobs and what environment that would create and where.	Officers – Simon Gilbert/Stuart Williams	It is about understanding what is important to people in terms of how the city grows.
What the consultation is seeking to do is to try and tease out some of those aspects from partners and stakeholders so that the Council will have more information to write policies that can help support a lot of those projects and initiatives. ???	Officers – Simon Gilbert/Stuart Williams	
A report will be presented to Cabinet following more analysis and consideration of the options, that will include the Council's Preferred Strategy for the RLDP. This stage will incorporate a spatial masterplan as to what this would look like on the ground.	Officers – Simon Gilbert/Stuart Williams	The detail will be provided, including a spatial masterplan, at the next stage in the Preferred Strategy.
For this study, the POPGROUP model takes the whole population into account. He explained that this study could inform either a SHMA (Strategic Housing Market Assessment, or a LHNA (Local Housing Needs Assessment). Those types of studies are when items such as affordable homes, the housing needs of older people and people with disabilities and the need for student accommodation are taken into consideration. The POPGROUP model looks at the current structure of the population estimates, and produces population forecasts by single year of age and sex, based on births, deaths and migration (domestic and international) inputs and assumptions.	Andrew Fowler	It is at Preferred Strategy stage where all of the evidence, diligence and consideration will start come out in the public domain more.
The candidate sites that developers wanted to put forward have been listed or sites that people don't want developers to put forward. Part of that filter is to go through this at a very high level for the Preferred Strategy where if sites are	Simon Gilbert	

Evidence	Source	Finding
clearly not deliverable or appropriate then they will be identified. Is very much the Preferred Strategy where all of the evidence and diligence and consideration will start come out in the public domain more.		
The definition of new jobs created needs a caveat - if development permits an out of town retail park for example, the impact of new businesses locating there might be at the expense of an existing store closing in the city centre and the staff relocating or being made redundant.	For Cardiff	Impact of location of development on other areas – e.g. new retail jobs created out of town that could have an impact on the city centre
Looking for jobs that promote well-being, jobs that support the move to more sustainable ways of living and low carbon. Regenerative economy. Jobs that are less businesses are possibly less extractive in terms of the natural environment, but we're looking for sustainable management, essentially. You need to keep looking at the future generations, keep using that act. It's really good tool, a way, a lens to keep looking at everything.	NRW	Need jobs that promote well-being, jobs that support the move to more sustainable ways of living and low carbon. Regenerative economy
One of the ways for looking at growth is pure economic growth, but that does have perverse outcomes. It doesn't necessarily prevent inequalities, so we mentioned, perhaps, a move to more inclusive growth, the well-being economy. What we're advocating is to include other metrics, like impact on well-being, impact on carbon, impact on wider biodiversity and connectivity, the resilience of ecosystems.	NRW	
Very impressed with the fact that there were a large number of options being considered. Nothing was left behind. In terms of the mixture, perhaps an emphasis on brownfield sites, transport hubs, utilising the transport corridors. Fact that everything was on the table was a particular strength of the consultation.	For Cardiff	Good range of options
It was good to see the range of options that were available, and I felt that there were a fair number of options.	C3SC	
Other Additional Information that would have been useful		

Evidence	Source	Finding
We would not have benefited from any other information, as we are aware of the legislation, policy, guidance and best practice documentation for Wales, for our sector and the Plan provision.	GGAT	Corporate bodies are more aware of the RLDP and how it relates to their organisation
Access to explanatory information via online hyperlinks. (Cardiff Civic Society)	Cardiff Civic Society	Explanatory information and more detail on the rationale for proposed options
Rationale for Council's target for economic growth and aspirations - models/assumptions for relations between growth, employment, population, migration	Cardiff Civic Society	
Background evidence that explains or support the growth figures proposed would have been helpful.	Home Builders Federation	
Information on numbers, types and location of housing developments. Rationale for high density housing e.g., South of the City.	Cardiff Rivers Group	Information on types of housing and jobs
Breakdown in provision of proposed housing. Type of land to be utilised. Type of potential housing - houses, flats, etc. associated services and facilities associated with developments.	No Name (NN)	Information on types of land and associated services and facilities
Need for clarity on the types of jobs that will be preferred on job options consulted on.	Adventure Travel	
Clarity on definitions of 'new jobs' would be useful.	For Cardiff	
Methodology used for developing the figures for growth options and when these were developed i.e., pre-pandemic or considered implications of the pandemic.	Cardiff Rivers Group	Information on the methodology in developing growth figures
Implications of technological use and travel to work i.e., WFH and reductions in traffic.	Cardiff Rivers Group	Impact of changes in work patterns on growth figures
The implications of strategic growth and site options on climate and nature emergencies.	Cardiff Civic Society	Implications of proposed strategic options on sustainable development

Evidence	Source	Finding
Implications on green infrastructure provision.	Cardiff Civic Society	
Implications to biodiversity on use of brownfield and greenfield sites	Cardiff Civic Society	
Information on the issues facing the neighbouring local authorities, its vision, objectives and issues and how this will impact on Cardiff's RLDP	Adventure Travel	Information on regional issues that could affect Cardiff's RLDP
Evidence the local authority is drawing on from consultation with residents and its needs and impact assessments would be helpful.	C3SC	Information on how the options are being assessed
Further options need to be considered to reflect that the type and tenure of housing may change - for example, the trend towards smaller families is not a consistent story across all demographic groups, a need for a closer alignment between jobs growth options and areas of social/economic disadvantage within the City in order that as many people as possible - particularly those from the areas with the highest levels of multiple deprivation - can benefit. Optimising alignment with existing aims and challenges would also be helpful - such as housing options with the plans to rejuvenate the city centre, and jobs growth with the plans to regenerate local communities.	C3SC	
Preferred Growth Option		
Not enough information with consultation document to make an informed choice	Cardiff Civic Society	Insufficient information available to make an informed choice on preferred option
Not enough information has been provided.	Adventure Travel	
No accessible information available to give views.	Cardiff People First	
Further detailed work is required to enable stakeholder to decide on which option is appropriate.	Home Builders Federation	

Evidence	Source	Finding
As our role is a statutory sewerage undertaker it is not our place to advise which growth option is the most appropriate	Dwr Cymru	No preference
Home Builder's Federation believes that figures between Option B and C perceived to be most likely to deliver the wider policy aims of the plan and National Planning Policy.	Home Builders Federation	Option B and C perceived to be most likely to deliver the wider policy aims of the plan and National Planning Policy.
Option B with an emphasis on social housing.	NN	Option B <ul style="list-style-type: none"> - with an emphasis on social housing. - as long as the S106 for Affordable housing is determined as per notes above
B - as long as the S106 for Affordable housing is determined as per notes above	NN	
Option C - in terms of economic growth - caveated with the need to build infrastructure to support such high growth	Cardiff Community Housing Association	Option C <ul style="list-style-type: none"> - in terms of economic growth - caveated with the need to build infrastructure to support such high growth - Fits with Cardiff as one of the fastest growing cities in the UK - reduce levels of homelessness by providing suitable accommodation - Metro needs to be in place, working efficiently, effectively and appropriately priced charging to help sustain such growth. - rationale behind what it brings to the city
<p>Option C.</p> <p>The city has prided itself on being one of the fastest growing cities in the UK and this should continue as it helps attract quality inward investment, helps retain graduates and draws the best people and businesses to the city because the opportunities are there. The Metro needs to be in place, working efficiently, effectively and appropriately priced charging to help sustain such growth.</p> <p>To reduce levels of homelessness by providing suitable accommodation is paramount to the success of a thriving city centre.</p>	For Cardiff	
Why wouldn't you look at option C? When you look at the rationale behind what it brings to the city, why would you not do that? Because of the investment that comes with it, the regeneration, the work that can be done in	United Welsh HA	

Evidence	Source	Finding
<p>brownfield, the way that we want to deliver homework arrangements, the sustainable transport that potentially comes with that.</p> <p>There is of course, the significant challenge of delivering that number of homes in terms of where do you put them?</p>		<ul style="list-style-type: none"> - the investment that comes with it, the regeneration, the work that can be done in brownfield, the way that we want to deliver homework arrangements, the sustainable transport that potentially comes with that.
<p>Undecided - option C would seem to meet the greatest level of need with future planning built in, but it's difficult to say without clarity of the pros and cons.</p>	C3SC	<p>Undecided without clarity of the pros and cons but option C would seem to meet the greatest level of need with future planning built in</p>
<p>Option A is the most suitable as this gives a higher return on jobs against the investment in housing and the environmental impact will be lower. The population is getting older and housing stock should increase.</p>	First Bus	<p>Option A</p> <ul style="list-style-type: none"> - gives a higher return on jobs against the investment in housing and the environmental impact will be lower. - The population is getting older and housing stock should increase.
<p>We have no expertise in responding to this, however, a greater level of expansion for both housing and jobs would be likely to have a greater impact on the archaeological resource, and have both a physical and setting impact on statutorily protected features and landscapes.</p>	GGAT	<p>A greater level of expansion for housing and jobs would be likely to have a greater impact on the archaeological resource and have both a physical and setting impact on statutorily protected features and landscapes.</p>
<p>Views on RLDP delivery options that should be considered</p>		
<p>There are potential issues obviously from brownfield development being much harder to secure section 106 agreements because the land is expensive.</p>	Stuart Hardisty	<p>The Inquiry heard early on that that there are various Options available,</p>

Evidence	Source	Finding
The question that is key is if Cardiff is to grow; how much can it grow and should it be utilising existing previously developed sites and brownfield sites to ensure that minimum or reduced impact in terms of Greenfield development and the environment. That is the conversation that is being had through this consultation and how that translates spatially across the city.	Stuart Hardisty	and this is the conversation that is being had through this consultation and how that translates spatially across the city.
There's a nuance within brownfield development to say should that be focused around the city centre, in existing communities, should the priority be inward investment and development in the more deprived locations, or should development be scattered around the city so that the impacts aren't so dramatic on any given community.	Stuart Hardisty	
Other options are to look at corridors, whether that be transport corridors, rail corridors, or station development to produce high density development in these locations.	Stuart Hardisty	
Understanding where people think the city should grow, whether there should be more development in the City centre or more houses built on Greenfield sites because they might appeal to more family accommodation - these are the questions that are hoping to be addressed through this consultation.	Stuart Hardisty	
Widening strategic housing sites at the regional level, rather than just within the city boundary	Cardiff Civic Society	Strategic Housing sites not limited to Cardiff and should also support growth in Southeast.
Cited that Future Wales recognises that Cardiff should not be the only growth point within the Southeast Wales region	Cardiff Civic Society	
Housing provision could be better met at a location outside the city but with good local facilities and good public transport The preference to live in an area where there is easy access to employment or services in the city should not be confused with a wish to live within an administrative boundary.	Cardiff Civic Society	
Spreading out strategic housing sites would allow for the use of suitable brownfield sites or those near transport nodes, with potential to spread the	Cardiff Civic Society	

Evidence	Source	Finding
benefits of growth more widely across the region, reduce commuter traffic, and to ease the pressure on land use within Cardiff itself		
Strategic sites should not all be identified now for the next 15 years. Instead, we should start by identifying sites needed to meet minimum growth then add to those during the life of the LDP as and when it becomes apparent that higher growth should be accommodated.	Cardiff Civic Society	
The decision on strategic options need to consider the implications of the accelerated shift in working/shopping/living as a result of the pandemic. The RLDP should consider the implications of the pandemic on the type/location of desired housing, the use of brownfield sites and the repurposing of buildings.	Cardiff Civic Society	Need to consider impact of pandemic on location and types of housing
Encouraging the modal shift from private car use (which Council should take steps to encourage) has implications for housing location. This could increase the value of transport nodes but also by potentially freeing land today used for cars, e.g., retail parks, car showrooms.	Cardiff Civic Society	Development sites should be less car dependent
Need to review the development of sites that are car dependent, where public transport an afterthought which may never happen.	Cardiff Civic Society	Need to review the development of sites that are car dependent.
Key to locating new housing developments is avoiding locking people into car dependency. There is a wide body of evidence which shows that concentrating housing development in urban areas (including brownfield sites) and building at appropriate but higher densities is effective in reducing the need for car travel and the distances travelled.	Sustrans	Public Transport infrastructure should be embedded into all housing developments and area plans
High-quality walking, cycling, and public transport infrastructure should be embedded in all housing developments and area plans. This must be combined with reduced parking space availability, and other measures to manage demand for private cars and make it more attractive to use sustainable modes. More people are likely to walk, wheel and cycle for more of their journeys if the quality of the spaces they travel through are attractive and inviting for people to live, work, socialise and play. People attract people and can, in turn, increase the sense of social safety. Good urban planning can ensure towns and cities	Sustrans	Out of town retail parks require use of cars – should be a City Centre first approach

Evidence	Source	Finding
can become truly liveable places for everyone, at every stage of life. This has been successful in many cities, for example, Freiburg in Germany.		The development of the Metro, if delivered well is key to future development.
Option 5 should be used as this gives an opportunity to develop public transport and use brown field sites, reducing the impact on traffic pollution, congestion, encouraging active travel and ideally more car free neighbourhoods, which improve health and reduce the impact on the health service.	First Bus	Location of housing estates and transport hubs is key from a sustainability aspect in terms of the need to reduce car travel.
Would prefer a city centre first approach but recognising that there needs to be hubs around the city. What we are against, really, is the failing of planning policies of the past, is the prevalence of out-of-town retail parks, and the fact that they are most easily accessed by car.	For Cardiff	
The development of the metro system is a huge opportunity, if delivered well, on time, is well publicised and used, and the price points are right, and acknowledgment that there needs to be new development around those transport hubs as well. Locating a big housing estate, on a greenfield site, away from the transport hubs, from a sustainability point of view, is as far as we want to get from.	For Cardiff	
Recognise that the 8 ways of delivering growth are designed to stimulate debate to develop the preferred strategy, however it would have been useful to see how the delivery options align with the vision of the RLDP which include: Cardiff as a key driver for growth as part of a Strategic Growth Areas as set out in Future Wales. Focus on sustainable development and the place making principles Alignment with the One Planet Cardiff approach – to decarbonise the city and become a Carbon Neutral City by 2030, whilst creating economic opportunities and promoting social well-being.	Natural Resources Wales	Need for clarity on how the various delivery options align with the RLDP vision

Evidence	Source	Finding
The consultation on strategic options should have related this to Vision and explained how the options would address matters such as racial or social inequality or the pronounced differences in life expectancy across the city.	Cardiff Civic Society	
The Welsh Government (June 2021) and Cardiff City Council (Nov 2021) have declared Nature Emergencies in addition to Climate emergencies declared in 2019. NRW recommends that the discussion and decision around the preferred strategy should take into account the impact of each option scenario on the nature and climate emergencies.	Natural Resources Wales	Need to consider options vis a vis the Council's commitments relating to climate and nature emergencies
Need to consider the implications of the climate and nature emergencies, behavioural shifts in response to technology and the pandemic, as well as persistent geographical inequality across the region.	Cardiff Civic Society	
The delivery options need to consider and account for land required for Coed Caerdydd or other projects to enhance biodiversity, the need for land for flood defences, water absorption and other measures to build resilience to climate change.	Cardiff Civic Society	
Need to have clarity on how One Planet Cardiff it has driven the delivery options, e.g., the only costs considered appear to be financial not environmental.	Cardiff Civic Society	
In considering delivery options, not to simply assume that brownfield sites are associated with higher costs and thus less likely to deliver affordable housing. However, should be recognised, that not all previously developed land is suitable for development. This may be, for example, because of its unsustainable location, the presence of protected species or valuable habitats or industrial heritage, or because it is highly contaminated. It should be noted that many brownfield sites are extremely biodiverse, and some have huge value for quiet recreation. Whereas some greenfield sites might have few natural features and are less biodiverse. The decision for land allocation must be based upon robust evidence to transition to, and where necessary create new,	Natural Resources Wales	

Evidence	Source	Finding
sustainable communities (meeting local need within environmental constraints).		
NRW noted that the RLDP options paper suggest that the trade-off is made between brownfield and less affordable housing, and greenfield and the potential for more affordable housing. NRW cites that PPW that there are options for LPAs to consider in delivering housing developments (including compulsory purchase orders and ability to incentivise) the appropriate re-use of previously developed land, planning authorities should take a lead by considering and identifying the specific interventions from the public and/or private sector necessary to assist in its delivery.	Natural Resources Wales	
Review assumption that brownfield sites are more expensive than greenfield sites. Developments need to consider the response to the nature emergency, the loss of biodiversity of land vis a vis use of brown and green field sites.	Cardiff Civic Society	
Do not agree that it is going to deliver less affordable housing to meet the needs of families, on the basis that the cost of remediating brownfield sites is prohibitive. Affordable housing can act as a catalyst for regeneration on brownfield sites.	United Welsh HA	
HAs can access Welsh Government funding, private developers cannot. We can work alongside local authorities on regeneration funding. The Social Housing Grant Programme is one big pot, we have seen a huge uplift in investment there which we can bring to the table. We can also support private developers in that. Not talking about HAs coming in and leading on these things, albeit we can do that. But when you are looking at planning applications, and when you are looking at the viability modelling in that, 99.999% of the time early engagement with an RSL can unlock those regeneration opportunities.	United Welsh HA	

Evidence	Source	Finding
<p>For me the options are presented as a decision between greenfield and brownfield, linking greenfield to affordable housing.</p> <p>So, I think it's a reasonable question that the Scrutiny Committee could ask, is, "Have you considered...? Is that a true connection? Do we only get affordable housing through greenfield? What other options have you considered, or are there other options to provide affordable housing which may be in different parts of Cardiff?" There might be parts of Cardiff that need more affordable housing than others.</p>	NRW	
<p>Urban intensification based on brownfield sites should be the starting point for both jobs and housing development. By placing jobs close to housing it should reduce the additional stresses that additional development will bring to the transport network.</p>	Cardiff Civic Society	<p>Prioritise use of brownfield sites</p>
<p>Fully support the principle of building on brown field sites and oppose any future green field sites in Cardiff being built on</p>	Cardiff Rivers Group	
<p>No new building on green public open space should be considered.</p>	Adventure Travel	
<p>A very good range of options which all have benefits but also less favourable outcomes. I would prefer a brownfield only option which utilises the transport network on the assumption that all the Metro options are delivered on time and to the extent that they are envisaged.</p>	For Cardiff	<p>Brownfield site preferred which utilises the transport network</p>
<p>In reality you cannot have one option. You are going to need to undertake some greenfield... If we come to the conclusion that you need the option C numbers,then you are going to need a balance of greenfield development and a balance of brownfield redevelopment.</p>	United Welsh HA	<p>Need a balance of brownfield and greenfield</p>
<p>I suppose it comes down to option eight where you talk about dispersed combination of brownfield and greenfield. When we have seen local authorities develop a policy that is prescriptive, it actually hamstrings and ringfences them when it actually comes to discussing on an individual site basis about what is appropriate for that site.</p>	United Welsh HA	<p>A dispersed combination of brownfield and greenfield sites.</p> <p>Need a range of tenures on homes, whether that be shared ownership,</p>

Evidence	Source	Finding
<p>In your historic supplementary planning guidance, you talk about tenures of either being private market, low cost of ownership, or social rent. When you start creating definitions like that, I appreciate it helps when it comes to negotiating planning gain and alike, but what it does is it confines you to having only a one-track approach to the way that you deliver homes.</p> <p>One of the things that COVID is telling us is that we are going to need a range of tenures on homes, whether that shared ownership, low cost of ownership, whether it is going to be older person schemes... How all of this integrates into a broader planning policy and how you apply that is going to need you to open up your definitions, in terms of what that looks like.</p> <p>Need to just try to leave it as open as you can.</p> <p>..... just be really careful and clear what it is that you specifically want on those sites.</p>		<p>low cost of ownership, whether it is going to be older person schemes... How all of this integrates into a broader planning policy and how this applied is going to need require a broadening of definitions, in terms of what that looks like. Need to leave it as open possible.</p>
<p>Any option should take into account the impact on statutorily protected areas such as the Gwent levels, the physical change to which in the case of larger scale development would be permanent.</p> <p>Options to redevelop brown field sites should also take into account the fact that these are likely to have archaeological remains relating to earlier, often complex industrial use. Remediation would need to take into account excavation and recording of these.</p> <p>Development of greenfield sites is likely to require archaeological assessment, geophysical survey and potentially evaluation or excavation to record archaeological features which have been undisturbed previously.</p>	GGAT	<p>Archaeological implications of brownfield and greenfield – excavation and recording of this needs to be taken into account</p>
<p>As our role is a statutory sewerage undertaker it is not our place to advise which delivery option is the most appropriate. What we would say is that a brownfield approach is likely to result in less water and network infrastructure reinforcement works</p>	Dwr Cymru	<p>Brownfield approach is likely to result in less water and network infrastructure reinforcement works</p>

Evidence	Source	Finding
Stop the continual building of student flats and large office blocks in the city centre. Use that space for social housing and perhaps look to repurpose what is there and not being utilised.	Cardiff Rivers Group	Repurposing and re-use of existing buildings
Highlight the need to maximise opportunities to reuse land and buildings and protect land with high ecological value.	Cardiff Civic Society	Stop building student flats and large office blocks in the city centre and use space for social housing and repurpose what is there and not being utilised.
From a sustainability point of view, the option to use existing buildings, that might be long term empty in the city centre for repurposing, for mixed use, is something that should be encouraged, and obviously making use of the huge investment in the transport infrastructure as well.	For Cardiff	
Wish to see a supercharged town centre first approach and bring public services into vacant central properties as a means of leading from the front and maximising the benefits that this brings.	For Cardiff	Maximise opportunities to reuse land and buildings and protect land with high ecological value.
<p>There is an opportunity. Need to be mindful or have more relaxed planning policies that allow for mixed use, where appropriate. There has been a desire in the past to try and look at residential above shops, for example. It is not easy to do, and that has generally been found out across the UK - trying to separate a retail unit and a first floor residential is not always as easy as it might seem.</p> <p>There is, and will continue to, be spaces, long-term vacant units, for example the likes of Debenhams, which is a large unit and there are not the large players now who will take that on, so a more innovative approach needs to be taken to repurpose that site.</p> <p>A more innovative approach to planning policy, change of use, needs to be adopted.</p> <p>Flexible working space in terms of people coming in just to hire a desk,</p>	For Cardiff	<p>Repurposing long term empty buildings in the city centre, for mixed use</p> <p>Need to have relaxed planning policies that allow for mixed use, and innovative approaches, where appropriate</p> <p>Flexible working space for people to hire a desk</p>
Support for city villages and would like to see more done to support and enhance those.	Cardiff Civic Society	Support the development of city villages

Evidence	Source	Finding
Building near transport nodes and corridors makes sense to achieve a modal shift in transport patterns	Cardiff Civic Society	Building near transport nodes
Growth based around transport nodes and in particular Strategic Public Transport growth corridors should be considered, but not with rail-based options as the lead time and cost of these are prohibitive, whereas a bus strategy using dedicated guided bus in place of rail and bus priority on the existing network would lead to a much more cost-effective approach.	Adventure Travel	
The consultation offers a good range of options, however in reality the HBF suggests the most appropriated option should include a mix of several of the options proposed.	Home Builders Federation	Growth delivered using a mix of various delivery strategies
Our own research has identified the need for additional larger affordable properties throughout Cardiff. A further point for consideration - A non-negotiable commitment to affordable housing in the planning process should suppress land values and give a clear signal to developers to pay reasonable land costs, ensuring scheme viability.	Cardiff Community Housing Association	A strong commitment to affordable housing is required in the RLDP that is non-negotiable for developers Need to stop taking commuted sums and ensure that for every development, developers agree to a certain percentage of affordable housing
It would be helpful to have the viability information for S106. Cardiff has been woeful in delivering on site housing - accepting flawed evidence from viability models and taking commuted sums rather than on site provision. Neighbouring Authorities such as the VOG have successfully delivered 40% AH	NN	
The principle of taking commuted sums on development has to stop, because the challenge for us is about securing land and getting affordable housing development. I am not aware of many other local authorities that take commuted sums. The biggest challenge for us is land, and in taking a commuted sum you effectively give away the opportunity to develop that land. The great thing about affordable housing, particularly in the context of the new development standards that will feed into your supplementary planning guidance, is they set	United Welsh HA	Council needs to set target for Affordable Housing in the RLDP and stick to it and stop the reduction in delivery around section 106

Evidence	Source	Finding
a minimum standard. So what it does is it sets a marker to the private developers about what good design and good spatial design looks like.		
Ensuring that the PLCs deliver the affordable housing requirements on site is really, really important because it gets them and encourages them to think about spatial design and what that means for people. But what it does mean is it has an impact on land values.	United Welsh HA	
When the Council receives a commuted sum it has to use that commuted sum to deliver affordable housing, which then supplements your own development programme....But you do not need the commuted sums to do that. You can access social housing grants, you can deliver in that way... Losing the opportunity of the land, it is really, really critical that we do not do that.	United Welsh HA	
We have seen now with Welsh Government, the Land Release Protocol from Health and you are buying land in and around for developing your own council properties... it is important that we work as a partnership, in terms of how we bring that forward.	United Welsh HA	
VoG was doing its Emerging Local Development Plan and it set a really aspirational target of 40% on site development. So the framework on an emerging development plan is not adopted, but any landowner that wanted to ensure that their land was included in the development plan had to commit to 40%.	United Welsh HA	
(in response to whether Cardiff should set a target for affordable housing on every development) you need to truly understand land values, then try and get an appropriate figure in your mind, draw a line in the sand and say, "No." Have the fruition to say to landowners and developers, "No, we are agreeing planning to your development on the grounds that the contributions that you are making in planning gain..."	United Welsh HA	

Evidence	Source	Finding
<p>Developers argue on affordable housing, because it can be a grey area, and there is a history of local authorities capitulating.</p>		
<p>Section 106s are a big part of the Affordable Housing Delivery Programme and we are seeing them fall off a cliff. They are not coming forward. It is difficult enough for us, as an affordable housing provider, to secure land without competing in the market for it as well. But we are seeing a significant reduction in our delivery around section 106 at the moment. So it is really important.</p>	<p>United Welsh HA</p>	
<p>Your data will tell you what it is that you need. So if the data says that we are going to build 10,000 homes and we need 2,500 affordable homes, then that is your 25%, that is what you need to deliver. By negotiating 106s down, you will not deliver the 2,500.</p>	<p>United Welsh HA</p>	
<p>if you are being challenged around feasibility on section 106s, my advice would be to bring the RSL in at a very early stage, because there are different mechanisms to fund it. What is important is that you secure the percentage of affordable housing.</p> <p>If there are real challenges around viability we can get under the skin of it, we have up to date accurate construction costs, land costs and everything else to challenge some of the information that has been presented by the developers.</p> <p>But equally then, when the evidence base does suggest that maybe only 5% or 10% of affordable housing is deliverable, then we can come up with other solutions and ways that we can do that. We can put social housing grants into it, we can look at different affordable tenures. Don't ringfence your planning guidance, just for general needs and low cost of ownership- have it broader and let us include older persons' accommodation and supported accommodation in your planning gain because we have got huge needs to deliver.</p>	<p>United Welsh HA</p>	<p>Bring in RSL at a very early stage to assist with any challenges</p> <p>Don't ringfence planning guidance - have it broader to allow for inclusion of such things as older persons' accommodation and supported accommodation.</p>

Evidence	Source	Finding
<p>When we are looking at the R&D around different M&E systems and reducing people's energy bills, we can bring a significant weight into the development there as well. So just that early engagement is something we would really, really ask for.</p>	<p>United Welsh HA</p>	
<p>If you were to advocate the strategy to maximise affordable housing, the best way to do that is to build more houses generally because there is a clear relationship between private housing and affordable housing.</p> <p>Likewise, to protect the environment, you can make the city more resilient to climate change by new investment, new innovation, new technology and new sea defences.</p> <p>It is difficult to know what the best fit is in terms of brownfield and greenfield. There is the view for preference towards density in the right location so that lends itself to more brownfield, but there is also a need for more family homes or homes with bigger gardens and these can't be built in the middle of the city centre. It is a balance and what the LDP should do is advocate a level of growth which is sustainable and deliverable and ensures that it has the maximum benefit for both the existing communities and any new communities.</p>	<p>Officers – Simon Gilbert/Stuart Williams</p>	<p>Various needs suit different delivery options – The LDP needs to balance this to advocate a level of growth which is sustainable and deliverable and ensures that it has the maximum benefit for both the existing communities and any new communities.</p>
<p>It needs to be a blend of all. We know that high density development does not meet home ownership aspirations (WG quote that 75% of flatted development in Cardiff is in the PRS sector). We need good quality urban design which aligns with the WG aspirations which have a moderate density and decent GFA; high energy efficiency (as delivered through WDQR</p>	<p>NN</p>	<p>Need good quality urban design which aligns with the WG aspirations, have a moderate density and decent GFA; high energy efficiency</p>
<p>SuDS and SAB - It is a nightmare to work through. But the intention and the impact of it is going to be really, really positive.</p> <p>It means you have lower density, you have much, much better development design, you have more greenery, more sustainable transport, and it triggers and</p>	<p>United Welsh HA</p>	<p>SuDS and SAB are complicated to work through, but they create the potential for much better development design, more greenery, more sustainable transport and places that are going to last longer.</p>

Evidence	Source	Finding
drives that. It is really, really important that we stick to our guns on things like this, that we design places that we are going to be proud of in 20 to 30 years.		
Re. jobs growth options, a City Centre First policy should be adopted in writing to utilise the empty units and brownfield sites within the commercial core first before utilising any out or edge of town space. The use of brownfield sites also provides a greater mix of types of housing which can lead to better, more subtle community cohesion. Public services should be brought into the city centre as well when any considerations are made or the need is there to (re)locate.	For Cardiff	A City Centre First Approach to utilise the empty units and brownfield sites within the commercial core first before utilising any out or edge of town space with Public services brought into the city centre.
Other Views on the Scope of the Growth and Delivery Options		
The RLDP consultation has a narrow a perspective by focusing solely on growth options for homes in Cardiff. Insufficient attention is given to employment sites or to infrastructure. Decisions on the best locations for housing cannot be taken without considering the implications of home/local working, the modal shift, or prospects for expanding public transport.	Cardiff Civic Society	<p>Focus of options is solely on homes. Insufficient attention is given to employment sites or to infrastructure.</p> <p>Implications of home/local working, the modal shift, or prospects for expanding public transport are critical to decisions around location for housing</p>
As with the previous options, it would be good to see all measured against a consistent set of pro's and con's. Sustainable development principles would require consideration of ensuring that biodiversity is maintained, which would limit the greenfield options. It would be helpful to mention building on flood plains and how this will be limited, and steps taken to reduce the impacts of flood damage. The recognised lack of attractiveness of public transport as a key mode of transport would limit the effect of building around transport nodes - with the potential for the need to address the public transport infrastructure to	C3SC	<p>Should be assessed against a consistent set of pros and cons</p> <p>No mention of flood plains and whether this will be limited or addressed to reduce the impact of flood damage</p>

Evidence	Source	Finding
make public transport the easy, accessible, affordable choice also impacting on delivery timescales and costs.		Need to address the public transport infrastructure to make public transport the easy, accessible, affordable choice also impacting on delivery timescales and costs.
Would have liked to see greater visibility on how the plans will help to increase levels of social and community capital and tackle the levels of inequality within the City.	C3SC	Need for greater visibility on how the future development will help to increase levels of social and community capital and tackle the levels of inequality within the City.
The scope seems wide enough, but the cynical concern is that the Council already has preferred options before the Consultation even begins.	Adventure Travel	Scope seems wide enough, but the cynical concern is that the Council already has preferred options before the Consultation even begins.
Ensure that options meet the infrastructure and services required by the population e.g., doctor's surgeries.	Adventure Travel	Ensure that options meet the infrastructure and services required by the population.

Replacement Local Development Plan – Accessibility, Inclusivity and Environmental Sustainability – Collated Evidence and Findings

Views on factors affecting RLDP		
Biodiversity		
<p>The RLDP need to address the requirement relating to biodiversity and ecosystem resilience as prescribed by the Environment (Wales) Act (2016) which introduced a duty to maintain and enhance biodiversity and promote the resilience of ecosystems and also in: A resilient Wales: Well-being goal 2 of the Well-being of Future Generations (Wales) Act 2015.</p>	<p>Natural Resources Wales</p>	<p>Future developments and planning should consider its impact on biodiversity</p>
<p>The 2019 State of Nature report found that 1 in 6 species are at risk of extinction in Wales. Welsh government declared a nature emergency in June 2021 and in November 2021 Cardiff Council declared a city-wide nature emergency. This highlights the commitment of Cardiff City Council to put biodiversity (it’s section 6 duty) and climate change at the forefront of decision making and highlights the importance of the nature emergency in Wales. All future development and spatial planning in Cardiff should be considered on its impact to biodiversity and ecosystem resilience.</p>	<p>Natural Resources Wales</p>	<p>Need to recognise the importance of spaces being able to perform multiple functions as these areas provide access to natural green space to people</p> <p>Essential the RLDP delivers robust Green Infrastructure to help protect nature conservation.</p>
<p>There are 18 Special Scientific Interest (SSSI) protected conservation sites in Cardiff, the Severn Estuary Special Area of Conservation (SAC), Special Protection Area (SPA) and Ramsar Site, and Cardiff Beech Woods SAC. It is noted that certain parts of the Plan area, such as the eastern coastal part of the city is heavily industrialised with high volumes of traffic related to the existing land use. This is results in aerial pollution affecting particularly sensitive habitats such as the Atlantic Saltmeadow/Saltmarsh and, mudflats and sandflats. From recent planning applications we have learnt that there is limited capacity in this area to accommodate increases in certain aerial pollutants. The indirect impact of development on these key nature / green infrastructure sites must be considered when considering options.</p>	<p>Natural Resources Wales</p>	<p>Creating spaces where the public can walk and enjoy biodiversity improves health.</p>

Population growth and new housing are likely to create increasing pressure on nature conservation sites in and around Cardiff. There is a need to recognise the importance of spaces being able to perform multiple functions as these areas provide access to natural green space to people. Balance is required to ensure the sites are kept in favourable condition. It is essential the RLDP delivers robust Green Infrastructure to help protect nature conservation.	Natural Resources Wales	
Critical in creating a sustainable environment. Without it there can be significant environmental impacts. Creating spaces where the public can walk and enjoy biodiversity improves health.	First Bus	
Strategies that reduce biodiversity by building on green field sites, or parks, or cutting down healthy trees has to be avoided.	Cardiff Rivers Group	Biodiversity should be a major priority
There should be no new development on green public open spaces.	Adventure Travel	From a land use perspective particular attention must be given to wildlife corridors, which should be identified and protected.
From a land use perspective particular attention must be given to wildlife corridors, which should be identified and protected.	Cardiff Civic Society	
Biodiversity should be a major priority for Cardiff Council. We have a climate emergency and the Council have launched the One Planet Strategy, along with several projects to increase biodiversity including a huge tree planting project.	Cardiff Rivers Group	Urgent need to address the nature emergency along with the climate emergency
Biodiversity should be a central consideration in planning policy in line with Cardiff Council declaring a nature emergency in November 2021.	Cardiff Civic Society	
Alignment with One Planet Cardiff must be made central to the new LDP.	Cardiff Civic Society	need to provide the framework to ensure that there is no further loss of nature and that there is a commitment to working with others to reverse the decline.
The PPW requirement that any loss of biodiversity through development should be at least fully compensated must be enforced and not sacrificed to viability claims.	Cardiff Civic Society	
There is an urgent need to address the nature emergency along with the climate emergency. This needs to be undertaken in a manner that seeks to halt biodiversity loss and begin to reverse the decline. The Replacement LPD and	RSPB	Commitment required from the Council protect, enhance and deliver new environmentally supportive

Strategic and Delivery Options need to provide the framework to ensure that there is no further loss of nature and that there is a commitment to working with others to reverse the decline. Future Wales encourages Local Planning Authorities to work with Stakeholders, including NRW to develop policies for the nine National Natural Resource Areas within Future Wales.		policies that address, with urgency the way in which we need to change our practices and policies.
The Sustainability Appraisal needs to ensure that in assessing the key objectives set out halting and reversing biodiversity decline is delivered. A commitment from the Council is required at the heart of the plan to protect, enhance and deliver new environmentally supportive policies that address, with urgency the way in which we need to change our practices and policies.	RSPB	
It is no longer good enough to just refer to the creation of 'sustainable communities', new policies require us to adapt our priorities and deliver in them in a more wholistic manner.	RSPB	
In June 2021, IPBES & IPCC published a joint report concluding that neither climate change nor biodiversity loss can be successfully resolved without tackling both together. It highlighted the potential for narrowly-focused action on climate to be damaging for nature, and vice versa. This underlines the need for nature recovery, as well as climate, to be taken into account indecision making at all scales. We therefore request that the nature emergency is also addressed within this report with the same level of commitment given to climate	RSPB	
Biodiversity is requirement of national planning policy so must be a consideration for the plan if it is to be found sound at inquiry.	Home Builders Federation	
In the UK we are facing a climate and ecological emergency. Principally due to habitat loss, habitat fragmentation, climate change and changes to agricultural practices. The survival of many species is threatened by an ever-shrinking amount of space for plants and animals to live and thrive in. There's also a perilous lack of safe routes connecting habitats, causing wildlife populations to	Sustrans	

become isolated. However, the linear geography of off road walking, wheeling and cycling routes offers the potential to create exemplary habitats, with spaces and routes for wildlife to both live and travel. It is important that in the creation of new housing that opportunities to improve the local environment are taken at every step.		
Biodiversity is an important factor and the current loss of habitats and species a major concern.	GGAT	
Very important factor as well as the future of our planet depending on it, and evidence indicating how this impacts on levels of wellbeing, this is an existing asset within Cardiff that should be maintained and built on.	Cardiff Third Sector Council (C3SC)	
CO2 Emissions		
Reducing CO2 emissions is an important factor and decarbonisation constitutes a key component of the new Planning Policy Wales and National Development Framework, and local planning decisions. It is essential however, to ensure local decisions for new housing and infrastructure not only reflect reducing carbon emissions but reflect the entirety of responding to the climate and nature emergencies.	Natural Resources Wales	Reduction of CO2 emission in response to climate emergency should be a key consideration in planning
Reducing greenhouse gas emissions (not just carbon) must be central to the response to the climate emergency, but we also have to respond to global warming which is now happening.	Cardiff Civic Society	
Reducing CO2 emissions is critical to reduce the impact on the environment to protect the city from the adverse effects of global warming.	First Bus	
Important to address as part of the climate emergency.	GGAT	
Reducing CO2 emissions is of very high importance - as well as the detrimental impact this has on health, wellbeing and the environment, this goes to the heart of developing sustainably.	C3SC	
No information has been made available on the carbon implications of delivery options, whether through transport, operation or full-life emissions.	Cardiff Civic Society	

<p>RLDP needs to consider reducing travel, thus putting new jobs and new housing together, or at least new jobs close to existing housing, rather than separating the land uses. The statutory reductions in use of petrol and diesel vehicles will necessarily reduce CO2 emissions.</p>	<p>Adventure Travel</p>	<p>Reducing car travel</p>
<p>Reducing the number of people who need to travel into the city particularly for work will immediately reduce the amount of CO2 through reducing the number of cars on the road. Encouraging working from home or locally to where they live should be paramount.</p>	<p>Cardiff Rivers Group</p>	<p>Need to locate jobs and housing together rather than separating the land uses.</p>
<p>Encouraging WFH and provision of hot desking facilities across the city and further afield, superfast public broadband etc should be looked at. Where people do need to travel make it easy to walk, cycle or use public transport.</p>	<p>Cardiff Rivers Group</p>	<p>Encourage working from home, locally or create hot desking facilities across Cardiff.</p>
<p>The Plan looks at future development which can be designed in a way to help reduce / minimise further CO2 emissions. However, the HBF suggests that this issue should be dealt with at a national policy level as it affects all of Wales and wider not just Cardiff.</p>	<p>Home Builders Federation</p>	<p>Where travel is necessary, make it easier to walk, cycle or use public transport.</p>
<p>For the UK to meet our obligations in the Climate Change Act and help tackle the climate emergency we need to stop building new, or widening existing, roads. As evidence shows that road-building increases traffic by up to 47%, over and above background traffic growth. Wales has already taken steps to achieve this, in freezing the construction of new roads while it conducts a review. New roads are often built to new, edge of town, housing developments. However, Sustrans believes that any new housing developments that require a new or wider road outside of the development should also be reviewed and relocated to more appropriate areas. We believe instead new developments should be built within or adjoining existing urban areas to ensure many everyday destinations are walkable from people’s homes and sustainable transport is viable, following a 20-minute neighbourhood approach. This will reduce the</p>	<p>Sustrans</p>	<p>Create 20-minute neighbourhoods building new developments within or adjoining existing urban areas where everyday destinations are walkable from people’s homes and sustainable transport is viable.</p> <p>Reducing Car dependency should be heavily weighted into any housing development with the appropriate facilities built in to allow active travel.</p>

quantity of CO2 generated from journeys that may previously have been made by car.		
Climate change needs to be taken very seriously and reducing car dependency for trips less than 2km should be heavily weighted into any housing development with the appropriate facilities built in to allow active travel.	First Bus	
Need to seek more green energy solutions across the city	Anonymous (Anon)	Seek more green energy solutions across the city
Climate Emergency		
Options for growth should be considered with respect to the nature and climate change declarations. These include: the State of Natural Resources Report 2020 (SoNaRR) identifies that, in order to tackle the Climate and Nature Emergencies, Wales needs to change the way we live. The Welsh Government’s climate emergency declarations in 2019 highlights the challenge of climate change, which threatens health, economy, infrastructure and our natural environment. The Future Generations Commissioner’s Office considers Climate change to be the greatest threat facing future generations.	Natural Resources Wales	Consider the implications of RLDP growth options on nature and climate emergency commitments
In 2019, the UK Committee on Climate Change recommend that Wales should achieve 95% emission reduction target by 2050 as part of the UK commitment to net zero by that date, but in February 2021 the Welsh Government set itself a more ambitious target of net zero by 2050 or earlier if possible. Working towards meeting these targets will reduce risks to biodiversity, ecosystems, food systems, water and human wellbeing.	Natural Resources Wales	
Future Wales highlights the planning system in Wales plays a key role in facilitating decarbonisation, as well as increasing resilience to the effects of climate change. Achieving our strategic decarbonisation goals is highlighted as a key driver, which all development plans must support. Planning Policy Wales (PPW) provides the policies to do this with decarbonisation as a central pillar.	Natural Resources Wales	

<p>PPW puts emphasis on people and places and ensures developments built today leave a legacy of well-designed, sustainable places which improve lives.</p>		
<p>No reference to Nature or Climate Emergencies as declared by the Senedd. The dual nature and climate crises need to be addressed in tandem and reflected in all LDP documents</p>	<p>RSPB</p>	
<p>The integrated Sustainability Assessments highlights that many properties in Cardiff are currently at risk of flooding. Of the 33 areas in Wales identified at most risk from flooding, 5 are within Cardiff: St. Mellons, Roath, Grangetown, Canton, Riverside. Climate change associated impacts will increase the number of properties, infrastructure and key services at risk of flooding from all sources. Places not previously at risk could become vulnerable and many currently at risk could be of greater risk. It is expected that severe events such as the 2020 storms will become more common with increased severity and frequency of flooding. Climate change impacts will also increase the risk to flood defence assets and the costs to maintain them to acceptable standards. Some of Cardiff’s defences are likely to require significant improvements.</p>	<p>Natural Resources Wales</p>	<p>RLDP site allocations and settlement strategies needs to take into account the flooding risks and improvements in flood defences</p>
<p>It will not be possible to prevent all flooding; there is therefore a need to use a range of adaptive approaches. However, the rate of adaptation action needs to quicken in order to keep pace with the increasing effects of climate change. The Flood Map for Planning referred to in the new Technical Advice Note 15 takes account of future flood risk by incorporating an allowance for climate change. The maps show some significant increases in the extent of the highest risk flood zones including in some of our city and town centres. Welsh Government (Climate Change, Energy and Planning Group) has written to local authorities explaining how flood risk considerations that feed into the settlement strategy and site allocations must be in accordance with the new TAN 15 and the Flood Map for Planning.</p>	<p>Natural Resources Wales</p>	

Expert advice on flooding risks must be recognised, not dismissed if it has undesired implications for development plans, as seems to have happened over TAN15.	Cardiff Civic Society	Importance of green infrastructure in absorbing floodwater, should be considered in identifying strategic sites.
Recognise the importance of green infrastructure in absorbing floodwater, which should be considered in identifying strategic sites. We should avoid over-development creating heat islands and make space for pocket parks well provided with shade.	Cardiff Civic Society	
Addressing the climate emergency needs to be at the forefront of Council policy particularly as we are a coastal city and vulnerable to flooding already let alone when sea levels rise which they will.	Cardiff Rivers Group	
Climate emergency relates to all aspects of development, and the impact on the historic environment is under consideration as part of the sector adaptation plan, which should also be considered as part of the LDP process.	GGAT	Consider impact on the historic environment
There was risk of flooding from rivers and from seas and they were all captured differently and assessed differently.	Simon Gilbert	
LDP's have to undertake a Strategic Flood Consequences Assessment that looks at flood risk across the whole City. The Council was collaborating with the nine other Authorities across South East Wales with this. This was halfway through the process and will be completed by this time next year. It will inform the LDP and the identification of sites and will also inform the wider conversation about those areas that are defended and therefore less vulnerable to flooding and therefore can accommodate new development.	Simon Gilbert	
Numerous projects that colleagues in Highways were leading on, as the Flood Authority, to introduce more coastal and river defences within the City. There was also a very large scheme in south east Cardiff to protect the River Rhymney and funding from WG government was available to prioritise sea defences and flood defences generally.	Simon Gilbert	

It is work in progress that has been prioritised for a number of reasons and mainly to accommodate a wider range of flood risks now as we have to assume that there will be more incidences of heavy rainfall and flooding with climate change so it has to be more robust than it would have been five years ago.	Simon Gilbert	
Maintaining green spaces, maintaining and ideally increasing flood plains, increasing the number of trees, measures to reduce CO2, etc need to be included.	Cardiff Rivers Group	
Future developments could be designed in a way to help reduce / minimise the impact of climate change. However, this issue should be dealt with at a national policy level as it affects all of Wales and wider not just Cardiff.	Home Builders Federation	Reducing impact of climate change should be dealt with at a national policy level
Transport and Mobility		
New strategic housing sites should ensure that these will be adequately provided with active and public travel infrastructure so that residents living there will be able to easily and comfortably meet modal shift targets.	Cardiff Civic Society	Improving travel infrastructure New strategic housing sites should ensure adequate active and public travel infrastructure to achieve modal shift targets Electric charging infrastructure
Provision must also be made for electric charging infrastructure.	Cardiff Civic Society	
Cycleways can encourage active travel but should not be built through parks nor any other green space - cycleways need to go on roads, and priority given to bicycles over cars.	Cardiff Civic Society	
The transport system has an impact on ecosystems and health. Urban transport contributes to carbon emissions, air and water pollution, noise pollution and the social and economic effects of congestion or lack of transport opportunities. The planning system can be used to change the way we think about the functioning of 'urban ecosystems', designing out the dominance of the car and reducing the length of journeys, whilst also considering lifestyle and the local economy (The European environment – state and outlook 2020).	Natural Resources Wales	Reducing car use Utilise planning system to change the way we think about the functioning of 'urban ecosystems', designing out the dominance of the car and reducing the length of journeys.
Further develop SUSTRANS with USABLE walking and cycling routes	Anon	

<p>New developments should be built within or adjoining existing urban areas to ensure many everyday destinations are walkable from people's homes and sustainable transport is viable, following a 20-minute neighbourhood or City of Villages approach. New developments should be connected to employment, education, retail and other local services directly through high-quality cycling, walking and wheeling routes and networks, so that active travel is a convenient and attractive option. Where possible these routes should be connected to the National Cycle Network to enable people to more easily access the outdoors and to reach public transport hubs for longer distance journeys. Additionally new homes should be designed to include secure, accessible parking for cycles, including adapted cycles and cargo bikes. If high quality active and sustainable transport links are planned for before, or at least alongside, developments, then people moving into an area can plan their journeys based on the infrastructure available, reducing or eliminating the need for cars.</p>	Sustrans	<p>Further develop SUSTRANS with USABLE walking and cycling routes</p> <p>Develop 20-minute neighbourhoods</p> <p>Connect new developments to employment, education, retail and other local services directly through high-quality cycling, walking and wheeling routes and networks, so that active travel is a convenient and attractive option.</p> <p>Designed new homes to include secure, accessible parking for cycles, including adapted cycles and cargo bikes.</p>
<p>Will need to encourage people not to commute into the city if really want to reduce car use. Why do they commute? What is stopping them working closer to home? Work with others to then address those issues.</p>	Cardiff Rivers Group	
<p>Public transport needs to be a key priority to allow people to reduce car dependency. More priority needs to be considered and it needs to be made more difficult to use private vehicles</p>	First Bus	
<p>It is imperative that a well-considered transport network which is integrated between types of transport (such as ticketing) is in place in not just existing, planned sites but also where any new, sizable developments will take place. This relates to train bus and bike transport.</p>	For Cardiff	<p>Develop a transport network which is integrated between types of transport</p>
<p>Effective transport systems that are inclusive would be a benefit, the impact on the historic environment of creating them should also be considered.</p>	GGAT	<p>Develop inclusive transport systems</p>

<p>Very important as this feeds in to so many positive outcomes, including positive impacts on the environment and on active travel choices and, in turn, health and wellbeing</p>	<p>C3SC</p>	
<p>The 20-minute neighbourhood concept is about designing an urban society in such a way that residents can meet most of their daily needs within a short walk from home. Safe cycling and local transport options are key to this, as well as high quality public spaces, community services and housing densities that make the provision of local services and transport viable. The 20-minute neighbourhood was pioneered in Melbourne, Australia as a way of guiding the city’s development and transformation to 2050. Watch/listen to the YouTube link to find out more.</p>	<p>Natural Resources Wales</p>	<p>Developing 20-minute neighbourhoods or city villages</p> <p>Planning permission should be refused for new or extended commercial developments (e.g., retail) that rely on car access.</p>
<p>Increased housing density should form part of mixed-use developments, where everyday services are on the doorstep. Ideally, these developments should be located near where people already live, work, go to school and socialise. These homes must be attractive to everyone, including affordable housing, and homes designed for families and older people. Increasing housing density can support attractive and liveable places, including green spaces, whilst creating greater demand for better local services, including public transport use and revitalised local high streets.</p>	<p>Sustrans</p>	
<p>Essentially everyone should be thinking about living sustainable lifestyles, not commuting so often, wanting to source things more locally, making our homes more energy efficient because bills are going up etc. All sorts of things are changing at the moment, and these are valid aspects to consider in terms of the need for a range of choice of accommodation to suit the needs of the community.</p>	<p>Officers – Simon Gilbert/Stuart Williams</p>	

<p>Officers confirmed that that there is scope to look at spatial distribution and prioritising investment for certain communities and facilities where these are known deficiencies or need. This will fall into the 20-minute city concept in terms of making sure there is not just development in communities but also the right facilities such as local centres shops, schools, community buildings, car parks and recreational spaces. Most importantly here will also be good access by a range of transportation options. Officers reported that these are all part of a wider placemaking approach which is embedded in planning policy and wider corporate policy agendas in terms of meeting the requirements of the Wellbeing of Future Generations Act.</p>	<p>Officers – Simon Gilbert/Stuart Williams</p>	
<p>Planning permission should be refused for new or extended commercial developments (e.g., retail) that rely on car access. It needs to recognise and built into planning policy that people will not give up cars without good alternatives.</p>	<p>Cardiff Civic Society</p>	
<p>Support the development of city villages as they reduce the need for travel.</p>	<p>Cardiff Civic Society</p>	
<p>Encouraging people to shop and work locally so they can walk or cycle there. Local hubs where you can work will all help reduce travelling.</p>	<p>Cardiff Rivers Group</p>	
<p>Concept is making sure that there are good choices for people in new developments so that they don't have to drive everywhere, they might want to walk or catch a bus.</p>	<p>Simon Gilbert</p>	
<p>There is science behind the 20-minute city concept, where to look at, how walkable areas are, how accessible and consider and assess movement patterns, but it is more about hearts and minds and considering the location of development and whether it is equal and helpful for people. If it is miles away from any bus stop it is not going to help people get out of their cars and if you can't afford a car you won't want to live there so it is divisive. It is therefore a movement towards more inclusive communities and that logically suggests that</p>	<p>Simon Gilbert</p>	

they should be in more sustainable locations like centres, district centres, local centres where there is generally a doctors surgery, bus stop, local shop etc.		
Provision must also be made for electric charging infrastructure. Cycleways can encourage active travel but should not be built through parks nor any other green space - cycleways need to go on roads, and priority given to bicycles over cars.	Cardiff Civic Society	Improving sustainable/green transport infrastructure
Bus use should be at the core of new developments which should be designed to provide direct access, rather than circuitous clockwise & anticlockwise road access	Adventure Travel	Supporting bus services
Balance needs to be made with promoting sustainable travel and the use of public transport. The reprovisioning of road space in the city centre adding further delays to already slow bus journey times by introducing some fairly lowly used cycle lanes e.g., Newport Road & Dumfries Place.	Adventure Travel	
Further improve bus services in Cardiff. Make all trips on a bus £1. Trial for 6 months and assess impact and outcomes. Introduce more park and rides during the week - e.g., Leckwith stadium.	Cardiff Rivers Group	
Planning should but take account of the wider travel patterns cross boundary	Home Builders Federation	
Public Health		
Healthy living, working and playing are all enhanced by access to good quality natural environments. Easy access to open green space has been shown to be beneficial to physical and mental wellbeing. Resilient ecosystems are needed to achieve healthy lives. More needs to be done to make sure that there are healthy places for people, protected from environmental risk across Wales. This is particularly the case in the more deprived communities.	Natural Resources Wales	RLDP should improve access to good quality natural environments
The South-Central Area Statement identifies the importance of the natural environment in people's health and the link between the green infrastructure and other nature-based solutions that can be delivered through local development plans.	Natural Resources Wales	

<p>Developments should provide easy access to open green space has been shown to be beneficial to physical and mental wellbeing.</p>	<p>Cardiff Civic Society</p>	
<p>Importance of local green infrastructure more evident during Covid lockdowns. Important that local facilities can be accessed within 15-20 minutes on foot or bike.</p>	<p>Cardiff Civic Society</p>	
<p>Studies support that investment in green space and the public realm can improve the social, mental and physical health of communities and improve economic vibrancy.</p>	<p>Sustrans</p>	
<p>The location of housing developments, and importantly the ability to walk, wheel and cycle to many everyday destinations from home has the ability to improve our health. Research shows that keeping physically active can reduce the risk of heart and circulatory disease by as much as 35% and risk of early death by as much as 30%. By enabling people to swap short car journeys with walking, wheeling or cycling, we can easily build exercise into our days and experience the health benefits. More widely, enabling people to leave the car at home can improve local air quality. In turn this benefits the health of all of those who live in the area and can breathe in cleaner air. Public Health Wales estimates that the equivalent of over 220 deaths each year among people aged 30 and over, in the Cardiff and Vale Health Board area, can be attributed to nitrogen dioxide pollution with many more citizens suffering ill health as a consequence of poor air quality.</p>	<p>Sustrans</p>	
<p>There needs to be some consideration to the effects of the current pandemic on peoples health and the need to ensure that there are open spaces for people</p>	<p>First Bus</p>	
<p>Importance of RLDP on public health - high extent - this will continue to have an impact on the choices people can and will make - including willingness to move to public rather than private transport, working from home, access to care/childcare, work-life balance</p>	<p>C3SC</p>	

Housing developments should consider the need for affordable larger homes. People living in overcrowded homes and its public health/wellbeing impact of this needs to be considered. Unclear how many larger homes would be built under any of the growth options – another example of the detail/thinking that is needed if inequalities and acute housing need is to be addressed effectively.	Cardiff Civic Society	Need for affordable larger homes as part of growth options - living in overcrowded homes has public health/wellbeing impact
Concern raised on whether to sufficient GP surgeries are planned for in response to increased population.	Adventure Travel	
The RLDP should have the flexibility to address the medium to long term impact of the pandemic in relation housing and job developments.	Home Builders Federation	
Additional housing and an increase in the population, needs to ensure that statutory health and social care provisions are appropriately uplifted in funding to meet the increased demand there will be placed on all statutory services as a result	Anon	Statutory health and social care provisions are appropriately uplifted in funding to meet the increased demand
There is a lot of work undertaken with the Health Boards and regular meetings with primary and secondary Health providers, to consider assets, facilities and capacity within regional clusters for primary care. The Planning department work really closely with colleagues in Health and have produced Supplementary Planning Guidance with Health that looks at healthy places as well as physical aspects of doctors and GP surgeries.	Simon Gilbert	There is a close working relationship with Health where assets, facilities and capacity is being considered.
As part of the RLDP process there will be an Infrastructure Plan produced that will look at whatever level of growth and development that is being advocated and what would be needed to facilitate that development, be it transportation, affordable housing, health provision, community facilities. This will be an integral part of the evidence base as the Plan progresses.	Simon Gilbert	The Infrastructure Plan will consider the level of growth and what will be needed to facilitate that development, be it transportation, affordable housing, health provision, community facilities.
It is about ensuring that new developments have the opportunity to accommodate that floor space that GPs and dentists can then occupy. This is what will come out through the policy frameworks and ultimately through development decisions on sites.	Simon Gilbert	Important that policies on Section 106 ensure that developers are putting in community facilities that are big enough to have an impact.

<p>It is important that this is included in policies on section 106 agreements so that developers are putting community facilities that are big enough to have an impact.</p>		
<p>New Working Patterns</p>		
<p>Consider opportunities to repurpose buildings for housing and/or community use where there is a surplus of office space. Growth of on-line shopping and its implications on use of commercial space should also be considered.</p>	<p>Cardiff Civic Society</p>	<p>Implications of pandemic on working patterns need to be considered</p>
<p>Changes in working patterns e.g., part time working, working from home, compressed hours etc. need to be reflected in implementing new developments for the RLDP.</p>	<p>Cardiff Rivers Group</p>	<p>Consider opportunities to repurpose buildings for housing and/or community use where there is a surplus of office space.</p>
<p>The implications of increased working from home on house size could result in lower density developments. This could highlight issues relating to affordability and viability of housing development and would need to be considered and monitored over the next few years.</p>	<p>Home Builders Federation</p>	<p>Growth of on-line shopping and its implications on use of commercial space</p>
<p>This also needs to be a consideration and must allow for good telecommunications to allow people to home work and also reduce car usage</p>	<p>First Bus</p>	<p>part time working, working from home, compressed hours etc.</p>
<p>The rapid change in the percentage of people working in hybrid working patterns is a concern in that it makes predicting the future demand for office space in particular difficult to judge.</p> <p>We feel that the Welsh Government's policy of wanting 30% of workers to work from home is to the detriment of Cardiff city centre and its businesses who rely on trade from workers and have based their investments on them being in the centre. This will change permanently in that fewer office workers will return in such numbers. The extent and speed of this is unknown and so caution should be provided in allocating long term planning policies for encouraging or otherwise new developments if the supply of such uses is already plentiful. This</p>	<p>For Cardiff</p>	<p>Implications of WG's policy for 30% of workers to work from home</p> <p>Impact on City Centre Businesses</p> <p>Downscaling of office space</p> <p>Hybrid and home working may lead to changes in the use of historic buildings</p>

<p>period of this development plan doesn't allow for such flexibility so a degree of flexibility should be considered where policy could change within the period under review to ensure trends in this area are more accurately considered upon.</p> <p>This is based on mainly anecdotal evidence from large and small businesses and it does depend on the sector and whether they are dependent, or the degree of dependency, on workers helping their trading levels.</p>		
<p>Impact on the city centre businesses has been huge, and will continue to be huge, in terms of existing businesses not being able to sustain the level of footfall that they are getting, or will get when restrictions are eased but there is still hybrid working</p>	<p>For Cardiff</p>	
<p>Demand on office space - we have already seen large businesses in all types of quality office space look to downscale.</p>	<p>For Cardiff</p>	
<p>The desire to work from home, from conversations we are having with businesses, the novelty has very much worn away. The lockdown restriction where people are being forced to work from home, has exacerbated that thought possibly. People will possibly want to come back more than they have ever done before. Whether just after a week they might be sick of it and want to work from home again - we need to keep an eye on it.</p>	<p>For Cardiff</p>	
<p>All indicators are that the trend brought on by the pandemic is set to continue and it would therefore be helpful for plans to reflect these changes in working patterns.</p>	<p>C3SC</p>	
<p>The Council can plan for certain types of homes, whether they are smaller accommodation or homes with outside amenity space because people are spending more time inside their homes, they might want to have more amenity space. These types of standards can be reflected in planning policy and there are a number of positive factors within the post Covid recovery that will drive</p>	<p>Officers – Simon Gilbert/Stuart Williams</p>	

the Council to do things better and provide people with better standards of living as well as more opportunities for people to access good quality employment opportunities.		
Hybrid and home working may lead to changes in the use of historic buildings.	GGAT	
Historic and Cultural Assets		
The need to preserve and enhance the city's character, both as regards specific buildings of historic or cultural value and the distinctiveness of the city's districts was raised.	Cardiff Civic Society	Preservation of the city's character and historic and cultural value of buildings
The vast majority of what has been built in recent decades is of little architectural or design value, or distinctiveness. Too much of the city has been destroyed to make way for bland developments.	Cardiff Civic Society	
Whilst it would be nice to always protect Heritage assets as we move down the hierarchy to grade one listed building to two etc, as a regulatory planner, it is harder to protect all of those assets in an environment where they are not all Council owned or maybe in an area that it attractive to new developments.	Simon Gilbert	There are policies that 'recognise' Heritage Assets but it is difficult to 'protect' them and write robust policy for this. There are sometimes other options that can be considered such as local designations.
Options for looking at protecting heritage Assets: <ul style="list-style-type: none"> • Through a policy framework - there are policies that recognise heritage assets but not policies that directly seek to protect or encourage the protection of cultural assets. • Looking at local designations, using certain legal powers outside of the LDP like article 4 directions to take away rights of people to do things to structures or buildings, however, that would be subject to consultation and needed to be balanced against the needs of the individuals in the communities. 	Simon Gilbert	
LDP can have recognition of the importance of a place, recognising the place, the locality, the culture, however, it is very hard to write a robust policy on this.	Simon Gilbert	
Addressing Stakeholders' Needs		
Improving access and mobility		

Ensure access to public transport for everyone. Measures restricting car use and parking should not inadvertently discriminate against disabled drivers. Making pavements broader and less cluttered would be of general benefit.	Cardiff Civic Society	<p>Encouraging use of public transport</p> <p>Access to public transport for everyone.</p> <p>Measures restricting car use and parking should not inadvertently discriminate against disabled drivers</p> <p>Frequent, reliable, cheap, comfortable public transport, supported by services such as park and ride to reduce car use.</p> <p>Active travel needs to be encouraged for shorter commutes.</p> <p>Integrated public transport tickets.</p> <p>Concerns with shared paths for cycling and commuters accessing public transport</p> <p>New developments should have cycle paths</p> <p>Importance of cycle lanes in new developments</p> <p>Traffic free residential streets</p>
Frequent, reliable, cheap, comfortable public transport, supported by services such as park and ride to reduce car use. Active travel needs to be encouraged for shorter commutes.	Cardiff Civic Society	
More priority given to public transport, especially bus services. The Bus services needs to be seen as the backbone of the transport network to support improvements in accessibility for all.	Adventure Travel	
Increase the availability and affordability of public transport. Make it available when people need it and at a price all can afford	Cardiff Rivers Group	
Integrated public transport tickets. Attractive (free) fares to use public transport. Attractive and useful public transport facilities which provide an easily accessible system. Options to include buses, trains, trams and taxis	Anon	
Improved transport routes and options. Green energy used for transport. More park and rides	Anon	
Concerns raise over forcing passengers to cross cycle lanes to get on or off buses. Shared use pathways can be disconcerting, even dangerous, to disabled or elderly people, as well as to small children.	Cardiff Civic Society	
New builds should have cycle paths and decent width paths as a prerequisite	Cardiff Rivers Group	
Any new significant build which involves new roads should automatically consider the appropriateness of installing a cycle lane into the development i.e make provision for a wider highway.	For Cardiff	
Remove motorcycle barriers from cycle ways to allow people with adapted bikes to access key cycle routes. Traffic free residential streets to allow children to play	First Bus	

Transport and mobility is vital to the development of accessible homes and employment opportunities. Need locally sourced, equally accessible jobs, not more service industry	Anon	Need to consider transport and mobility for accessible homes as well as local and equally accessible jobs.
The most effective way to ensure accessibility for different groups is to use community-led design methods. When local people have led and been part of the creative process they will not only 'own' the design but are much more likely to support and use the final design.	Sustrans	Need community-led design - involve the community in the design process so that they 'own' and support it.
In relation to cycling in particular, Sustrans has co-authored Cycling for Everyone, a guide to support people in local government and the transport sector to make cycling a more inclusive activity for everyone. Many people are currently excluded from cycling. Despite a large appetite from different demographic groups to start cycling, 85% of people aged over 65, 78% of disabled people, 76% of women, 75% of people at risk of deprivation and 74% of people from ethnic minority groups never cycle. Cycling can help people access the things they need: work, education, food, health services and recreation. Cycling can benefit physical and mental wellbeing and help reduce social and economic inequity. Therefore understanding how to improve provision for cycling can have a big impact on improving access around Cardiff.	Sustrans	Cycling can improve accessibility
Employ an expert with a learning disability to lead consultation and lead co-production of services. Take on board decades of comments, advice and reports from Cardiff People First to make services accessible.	Cardiff People First	Need to make services accessible for those with disabilities and listen to advice from representatives and those with experience on how this can be achieved.
To improve access and mobility, there is a need for commitments to effective community engagement - giving real chances for the people with lived experience to share views and influence policies and approaches from the earliest stage	C3SC	
Identify sites for older persons accommodation and accommodation with disabled individuals and children	Cardiff Community	Identify sites in RLDP for older persons accommodation and for disabled individuals and children

	Housing Association	
Groups such as ACE https://www.aceplace.org/ may be able to feed into this. Groups which operate a holistic view and understanding of the city (and include the historic environment) are vital.	GGAT	
Impact of accessibility and inclusion needs to be considered, such as the location of new school builds for example with associated transport as well as various other aspects that goes along with such a development. Likewise, healthcare in the current climate with access to good quality health providers, whether primary care through GP practises or secondary care through hospitals and treatments - this need to be part of the narrative also.	Officers – Simon Gilbert/Stuart Williams	Need to consider the impact of accessibility and inclusion such as the location of new school buildings, associated transport, access to primary and secondary healthcare.
Support Child Friendly City Programme		
Planning Directorate should continue to engage with the Cardiff Child Friendly City Programme and remain mindful of the needs of children of all ages.	Play Wales	Providing safe access to play, open spaces, interaction with nature, active travel etc. Support the development of child-friendly public realm Design developments that encourages communities to interact such in playing fields, playgrounds, basketball courts, 5-side pitches, skateboard parks etc, that are safe from traffic as well as antisocial behaviour Sports and other facilities should be close to where children and young people live, rather than concentrated
Support the development of child-friendly public realm that will support children’s ability to move round safely and freely (requiring thoughtful traffic measures and priority to pedestrians) and will offer children opportunities for playing and hanging out. Time, space and permission are key features of a playable public space, together with other children.	Play Wales	
Create conditions that support playing out in the ways that space and time are organised. Understanding children’s right to play as a matter of spatial justice is important as prescribed by the Play Sufficiency Duty.	Play Wales	
Recommended that any phrasing about play in the LDP should discuss ‘opportunities to play’ (rather than ‘play opportunities’). This would help reinforce the legitimate presence and visibility of children in the public realm.	Play Wales	
Many areas in Cardiff lacks easy access to local green and play spaces. Need for safer streets including areas for children to play and giving parents confidence that children could make their own way to/from school instead of the 'school run'.	Cardiff Civic Society	

The design of developments that encourage communities to interact such in playing fields, playgrounds, basketball courts, 5-side pitches, skateboard parks etc, that are safe from traffic as well as antisocial behaviour.	Adventure Travel	in a 'sports village' or an 'entertainment zone'
Sports and other facilities should be close to where children and young people live, rather than concentrated in a 'sports village' or an 'entertainment zone' in locations which are too costly in both time and money for many to get to	Cardiff Civic Society	
City villages have much to offer from to children if they contain adequate facilities to meet their needs. Active travel and cheap/free public transport would both provide immediate value and help educate children to live without private cars.	Cardiff Civic Society	
Increase the number open spaces within developments to allow children to play safely	First Bus	
Green spaces, parks and recreation facilities. Community hubs/children's centres	Anon	
Attractive public transport combined with plentiful and accessible educational facilities	Anon	
Children and young people need to be consulted on what they want in term of provision for play. Engage with them in the parks, the pitches etc and ask what they want - what works, what doesn't.	Cardiff Rivers Group	Consulting children and young people on what they want
To ensure that developments meet the needs of children and young people, the consultation process should actively engage children and young people in their designs. Research has shown that access to education and training opportunities, out-of-school social activities and employment opportunities are important for young people. Transport will play a particularly important role in enabling this access, as well as developing self-worth, autonomy, increased self-esteem and physical and mental wellbeing. Therefore any consultation with young people	Sustrans	

should consider both the end needs and requirements of children and young people and how they will travel to access them.		
Commitment to effective community engagement - giving real chances for people and families to share views and influence policies and approaches from the earliest stage	C3SC	
Ensuring that developments have open space, if appropriate information panels and walking / activity trails. Previous developments with archaeological and historical features include areas preserved as open space, and heritage trails. These can inspire young people and create a sense of community.	GGAT	Open space, information panels and walking/activity/heritage trails.
Any new housing developments of a certain size should consider provision for a community facility which allows the use of childcare for working parents. Robust and well considered play equipment outside next to it should be in place.	For Cardiff	New developments should consider community facility which allows the use of childcare for working parents
Dementia Friendly Developments		
1.24% of the population of Cardiff are currently living with Dementia	Alzheimer's Society	
Quite often from diagnosis and contacting DVLA, this will result in the removal of a driving licence, despite the person being competent to drive, which means that people living with dementia are reliant on public transport and access to public transport. So having access to public transport from their housing is absolutely critical.	Alzheimer's Society	Local public transport is critical to people living with Dementia
People living with dementia have told us that when they do try and access public transport, they need them to be within walking distance.... the more steps you often put into a journey the more complicated it becomes, and the more difficult it can be for somebody living with dementia to make and manage that journey on their own.	Alzheimer's Society	Good access to transport can reduce social isolation and loneliness which is significantly important as a third of people living with dementia live on their own.
Having good access to transport can reduce social isolation and loneliness. For somebody living with dementia, they will often lose friends or family members	Alzheimer's Society	

<p>through a diagnosis, people just will not want to talk to them or engage with them anymore. So having transport that is close to where they are living, that can take them to an activity, a centre, somewhere they can meet people and engage with people, is absolutely vital in order to reduce that social isolation. A third of people living with dementia live on their own, so reducing that social isolation is something that is incredibly key.</p>		
<p>Other things people living with dementia have told us are key are accessing community hubs via public transport, so things like regular high streets, things like doctors' offices, things like hospitals, and things like support networks. We are often told that where routes are available, they are often circuitous, or they take the long route around. They are not direct to the places that people living with dementia need and want to go to.... recently, that can be disorienting for somebody living with dementia and can cause issues.</p>	<p>Alzheimer's Society</p>	<p>Local public transport routes need to be direct to community hubs and facilities like high streets, GP surgery, hospital as well as support networks and respite services</p>
<p>People living with dementia like to often stick to a routine – if a bus takes a circuitous route or has changed route</p>	<p>Alzheimer's Society</p>	
<p>Carers have told us an awful lot, that access to respite services via public transport and in the local area is absolutely vital to them.</p>	<p>Alzheimer's Society</p>	
<p>On personal support networks.... when we engage with people living with dementia and their carers they tell us that being enabled is more important than having things done for them. ..they can feel like a burden, particularly when they are accessing services that are potentially slightly more expensive or slightly more in-depth than just day centres.</p> <p>Housing should be a key part of this. We need to enable people living with dementia to stay in their communities, be that in a care home or outside of a care home, close to family members and friends who can provide unpaid care for them.</p>	<p>Alzheimer's Society</p>	<p>Need to enable people living with dementia to stay in their communities – be that in a care home or close to family members and friends</p> <p>Having properties that are adaptable or housing solutions that are adaptable for people living with dementia is vital such as intergenerational properties.</p>

<p>Having properties that are adaptable or housing solutions that are adaptable for people living with dementia is vital.</p>	<p>Alzheimer's Society</p>	
<p>Intergenerational properties. Allowing them to live with carers, to live with other family members, who may not be a husband or wife, they may be sons or daughters, to allow that care to be provided, to allow that community to develop, is absolutely key. There is scope for any housing provider, be they housing association, local authority, or private sector, to build these types of properties and to build these features into these types of properties.</p>	<p>Alzheimer's Society</p>	
<p>It is about raising that awareness in the designing and developing in the next stages of the plan, so that these features, these adaptations and these types of housing, are built into everything the council does.... you have then got reasoning, you have got personal experience from people living with dementia to tell you why these things are important and to provide that reasoning and evidence to those providers and developers.</p>	<p>Alzheimer's Society</p>	<p>Raising awareness in the work of the Council and ensuring this is followed through with developers.</p>
<p>The concept of homes for life is something we are pushing quite strongly.. People living with dementia want to stay at home. Mandating good design through planning guidance. The downstairs cloakroom that can be easily adapted into a wet room is a prime example of that. They are easy enough to build in private houses and in general. If you are looking at converting city centre buildings into flats, for example, or converting old buildings into flats and apartments, it is probably not something easy to do there. But there are other things you can do within that building, within that piece of design, to make it accessible.</p>	<p>Alzheimer's Society</p>	<p>Home for Life Concept – so that people living with dementia can stay in their homes.</p> <p>Mandating good design through planning guidance</p> <p>This won't work for all types of properties such as converting city centre or old buildings into flats - there are other things you can do in these designs, to make it accessible.</p>

<p>RLDP should adopt best practice on how developments can be dementia friendly. This should be incorporated into RLDP policy and provision of advice for those intending to make planning applications. The Residential Design SPG should have provisions making developments about dementia friendly.</p>	Cardiff Civic Society	<p>Adopt best practice on how developments can be dementia friendly.</p>
<p>Where these developments are put together, they are designed sensitively and they are designed carefully to enable people to engage with their community, to travel into and out of the city centre, if that is something they want to do, to travel to a local high street or have access to support networks, such as doctors and such as day centres, within their communities.</p>	Alzheimer's Society	
<p>Sustrans project, Age Friendly Tyburn, was an initiative which investigated how the physical environment of Tyburn contributes to or exacerbates the social isolation of older people. By working closely with the community the project was able to make 10 recommendations to create age-friendly neighbourhoods. They are: 1. Install Low Traffic Neighbourhoods. 2. Reduce wait times at crossings and increase green person crossing time. 3. Ban pavement parking combined with regular enforcement. 4. Reduce speed limits to 20mph in residential areas, 30mph for arterial roads and increase the number of pedestrian and cycle crossing points. 5. Develop indoor and outdoor spaces and support and maintain community venues. 6. Install public seating to support people to make more independent journeys by foot, cycle, wheelchair and mobility scooter. 7. Develop a community toilet scheme. 8. Put in wayfinding signage to enable people to connect to their local spaces to travel further distances. 9. Improve local and regional public transport links. 10. Install truly protected, safe cycle infrastructure. Further information can be found in the report: https://www.sustrans.org.uk/our-blog/news/2021/march/new-report-shows-how-to-create-a-successful-age-friendly-neighbourhood/</p>	Sustrans	<p>Suggestions for future development:</p> <p>Traffic calming measures</p> <p>Develop Indoor and outdoor spaces for older people as well as community facilities</p> <p>Improved accessibility in areas for people to make independent journeys using a variety of methods including walking, cycling, wheelchair and mobility scooter.</p> <p>Develop Community Toilet Scheme</p> <p>Wayfinding signage</p> <p>Improved local and regional transport links</p>

		Protected, safe cycle infrastructure
The ACE Group have been working with dementia / elderly residents regarding the history of the area, and this (from my reading) has had a beneficial effect. Creating developments that foster community, that have areas with places for meeting, visiting and events, that are not on a large scale may help.	GGAT	Developments that foster community, that have areas with places for meeting, visiting and events, that are not on a large scale
Take full account of needs of society. Involve full consultation with specialist groups when locating and designing housing facilities in terms of location, design, integration into the community, safe spaces.	Anon	Consult with representative groups effectively
Commitment to effective community engagement - giving real chances for people and carers to share views and experiences to influence policies and approaches from the earliest stage	C3SC	
Alzheimer's Society Cymru uses a pithy little phrase, which is, "If you get it right for people living with dementia, you get it right for everyone." The needs of people living with dementia are so diverse and change depending on what your diagnosis is. There are over 100 different types of dementia and it is vital that people living with dementia have their needs taken into account.	Alzheimer's Society	Vital that the needs of people living with Dementia are taken into account, and this can also assist in meeting other people's needs also.
There is, unfortunately, a severe lack of awareness of dementia across Wales. It is not just staff in frontline advice services, who are providing advice to people living with dementia and their carers about housing, it is those behind the scenes in planning and developing housing properties and housing projects, and projects like the Replacement Local Development Plan. These staff members need to be aware of what dementia is as a condition, how it affects people	Alzheimer's Society	Increase awareness of Dementia, how it affects people - with all staff, including those in planning
<ul style="list-style-type: none"> • Dementia Friendly Housing Charter, which contains evidence on the difference suitable housing can make, including how to instigate change. • Dementia Friendly Housing Guide, which provides advice on supporting staff, residents and customers affected by dementia. Following on from the 	Alzheimer's Society	Council needs to seek this evidence and take into account in developing RLDP

Dementia Friendly Housing Charter, again, it focuses on people, process, and place.		
Diversity of Community - Supporting community cohesion and integration of communities		
As part of the Placemaking Charter, more should be done to engage with residents and communities from an early stage, particularly on major new or regeneration projects.	Cardiff Civic Society	More should be done to engage with residents and communities
Contact local groups, diversity is a strength and histories of families, nations, and migration and settlement are vital in promoting understanding, oral histories and publicity can contribute to this.	GGAT	
Commitment to effective community engagement - giving real chances for the people with lived experience to share views and influence policies and approaches from the earliest stages.	C3SC	
The RLDP needs to acknowledge differences in how people live e.g., multi-generational housing. Affordable housing units of varying sizes are required across the city.	Cardiff Civic Society	
Larger affordable homes explicit within the Section 106 process	Cardiff Community Housing Association	Also recognise the changes that are needed at different stages of life
New homes built in urban areas need to better reflect local housing need. This means increasing the proportion of affordable and social housing, and homes that better reflect the different stages of life.	Sustrans	
Provide varied housing types rather than clear blocks of housing type and effective ghettos	Anon	
It seems to reflect more traditional projections around the makeup of families, and changes in the makeup of families rather than reflecting the diversity	C3SC	

<p>across the population. There is a real opportunity there to make sure that, in taking forward the plans, it reflects the broader scope of needs, as opposed to them focusing quite specifically on the mainstream population and the kinds of makeup of families that tend to exist there.</p> <p>There are chances here to actually inform a culture as to how we want families and groups, etc., to respond to the range of needs that the plan articulates.</p>		
<p>Individuals should also be able to access a range of jobs and services that meet the needs of the diverse community living in the development.</p>	Sustrans	Access to range of jobs and services that meet the needs of the diverse community living there.
<p>Support the distribution of development across the City in proportionate ways that support the aim of developing the City and diverse communities inclusively; ensuring the offer - including heritage, culture and recreational - reflect, support and promote the diversity within the City</p>	C3SC	Distribution of development across the City should be proportionate that supports the aim of developing the City and diverse communities inclusively
<p>In terms of looking at individual needs of different groups within the community, this evidence base work has been commissioned and it is currently being prepared at the moment and will be available in the new year to inform the preferred strategy. It will look at specific needs in the community and will inform the preferred strategy going forward.</p>	Officers	
<p>The pattern for approving residential developments without affordable units, on windfall sites in and near the City Centre, is excluding those who cannot afford high market rents from living there, reducing social integration and undermining community cohesion.</p>	Cardiff Civic Society	Affordable housing units of varying sizes are required across the city
<p>All strategic sites should incorporate social infrastructure e.g. places to meet to encourage cohesion into a local community. Will not occur unless there are offsite rather than onsite S106 provision means less mixing of different social groupings. Space for social mixing is vital – space for learning and creating together – rather than spaces which people need to pay to access.</p>	Cardiff Civic Society	Incorporate social infrastructure such as places to meet to encourage cohesion into a local community Space for social mixing is vital

Design of developments that encourage communities to interact such a playing field, playgrounds, basketball courts, 5-side pitches, skateboard parks etc, that are safe from traffic as well as antisocial behaviour.	Adventure Travel	
This is more challenging as different social groups tend to stay together. The focus should be on community projects, such gardens where the community can take ownership. These types of projects tend to break down barriers between people as they get to know each other.	First Bus	
A review of planning policy, particularly how the Council prioritise and quantify planning obligations on the back of any new development is a vital part of community cohesion as well as tackling some of the issues that the city faces at the moment such as an ageing population. Also looking at how the Council can hopefully put more investment into those areas that are more in need; where there's more deprivation, less opportunity for people to access good quality employment; planning policy can play a significant part in that if it is done properly.	Officers – Simon Gilbert/Stuart Williams	
In terms of looking at individual needs of different groups within the community, this evidence base work has been commissioned and it is currently being prepared at the moment and will be available in the new year to inform the preferred strategy. It will look at specific needs in the community and will inform the preferred strategy going forward.	Officers – Simon Gilbert/Stuart Williams	Work on individual needs of different groups and communities has been commissioned and will inform the Preferred Strategy.
Supporting the Welsh Language		
The RLDP community involvement scheme should provide specific opportunities "to seek community views on how Welsh language and culture interact with RLDP policies and proposals".	Cardiff Civic Society	RLDP provide specific opportunities to seek community views on how Welsh language and culture interact with RLDP policies
Council should respond positively to community requests for the expansion of Welsh medium primary and secondary education especially in deprived and multi ethnic wards. Welsh language educational provision is offered and	Cardiff Civic Society	RLDP should align closely with the statutory Welsh Medium Education Plan.

encouraged in all parts of the city. The RLDP should also align closely with the statutory Welsh Medium Education Plan.		
Simplistically using Welsh names (not bilingual) and integration of language into all aspects of the new developments.	Anon	Simplistic use of Welsh language that is integrated into all aspects of new development
A theme in naming the new streets with Welsh language considerations first above those of English but continue to sign them as now	For Cardiff	
I feel that the promoting and support of the Welsh language is already really well covered and there is an increasing amount of available content for all.	First Bus	Promoting and support of the Welsh language is already really well covered
Promoting use of bilingual place names, road and street names; bilingual information boards and publicity. Promoting learning the language, fostering a cohesive feeling via this and supporting developments that have learning centres.	GGAT	Promoting use of bilingual place names, road and street names, bilingual information boards and publicity. Promoting learning the language, fostering a cohesive feeling via this and supporting developments that have learning centres.
Is good to see the goals towards promoting and supporting the use of the Welsh language in Cardiff; it would be a positive step to also allow this to inform best practice around how we support and promote the diverse range of languages spoken in the City	C3SC	Also need to promote the diverse range of language spoken in the City

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Replacement Local Development Plan – Further findings, Observations and Future Scrutiny – Collated Evidence and Findings

Regional Planning		
There is now a legal mandate in Wales from Welsh government for the 10 LAs in South Wales to prepare an SDP.	Officers – Simon Gilbert/Stuart Williams	Vitally important to get this RLDP correct in terms of levels of job and housing growth and requirements as will have significant implications in the development of the Regional Plan.
The intention is that the establishment of the governance arrangement around the region will be in place by early next year which will include the joint committees that will essentially be the decision-making body for the region.	Officers – Simon Gilbert/Stuart Williams	
It will likely be very similar to that undertaken for the LDP, with preparing a delivery agreement that explains the time scale for the preparation of the SDP that will get signed off by Welsh Government. There will also be very similar consultations undertaken.	Officers – Simon Gilbert/Stuart Williams	
Officers stated that whatever is advocated through this planning process will probably be more important in terms of how that will influence the policy arena for the region given that Cardiff is both the highest densely populated area in the region and accommodates the largest number of jobs. It is also the economic driver not just SE Wales but for the wider area. The onus on Cardiff having a strong LDP plan so that it can inform the regional development plan is paramount.	Officers – Simon Gilbert/Stuart Williams	
Once the regional development plan is in place it will capture a lot of the demographic requirements for the region so things like housing allocations, job opportunities on a more strategic level and growth areas will be captured in the SDP.	Officers – Simon Gilbert/Stuart Williams	
Any SDP would have to have regard to what is in an adopted LDP. Essentially this RLDP is likely to be far advanced before the discussions around the SDP happen and will go a large way in terms of identifying the needs of the wider region as Cardiff is at the centre of that regional hierarchy.	Officers – Simon Gilbert/Stuart Williams	

<p>Following the creation of a regional development plan it will then be reviewed from time to time and will contain housing allocations, transportation priorities and employment priorities. As the Local Planning Authority, reviews will be produced of our LDP without that process. Essentially, there will be LDP LITES where such things as housing allocations and strategic employment areas will be determined through the SDP process and our LDP will have more qualitative policies or regulatory policies to do with planning applications or local issues in terms of local allocations of land or protections of land whereas the more strategic housing allocations will be done at a regional level once the SDP is in place.</p>	<p>Officers – Simon Gilbert/Stuart Williams</p>	
<p>Policy Framework and the Preferred Strategy</p>		
<p>The Preferred Strategy will contain more information of what the level of growth might yield in terms of infrastructure and the spatial location of the growth. This is really important as it's not just about advocating a level of growth but rather highlighting where that should be located in the City and what benefits or potential dis-benefits this might have in the absence of a policy framework.</p>	<p>Officers – Simon Gilbert/Stuart Williams</p>	<p>Really important how the policy framework considers the spatial location of growth in the City based on its rationale and the benefits it provides to the surrounding communities</p>
<p>The Council is wedded to making sure that all development advocated through the development plan is in the right location and maximises on the community betterment.</p>	<p>Officers – Simon Gilbert/Stuart Williams</p>	
<p>In terms of models for community needs and community infrastructure, this is a subject that links back to section 106 agreements that are sought to secure from new planning applications and that is very much enshrined in policy. When in a position where new policies are being written with regard to section 106, there are two policies in the LDP that refer to what developers are expected to deliver on the back of new developments.</p>	<p>Officers – Simon Gilbert/Stuart Williams</p>	<p>A strong master planning approach and policy framework is vital to ensure community needs are met.</p>
<p>Having a strong commitment to planning and master planning and identifying what the ask is, in terms of community infrastructure, is where an LDP can achieve a lot and have strong policies in place.</p>	<p>Officers – Simon Gilbert/Stuart Williams</p>	

<p>A local development plan needs to be local and shouldn't just reiterate Welsh government policy. It needs to have strong commitment to localism, to promoting communities and neighbourhoods and if the Council gets it right, it can secure a great amount of public and community infrastructure because you have established it in the Plan. If this isn't done, then the market might dictate prices and you will be left with less.</p>	<p>Officers – Simon Gilbert/Stuart Williams</p>	
<p>Instances of a strong master planning approach on strategic sites where an absolute requirement was embedded in the plan. This meant that when people acquired those sites, they knew exactly what was expected of them, the land value was reflected in that and then the council can secure more for the community.</p>	<p>Officers – Simon Gilbert/Stuart Williams</p>	
<p>A review of planning policy, particularly how the Council prioritise and quantify planning obligations on the back of any new development is a vital part of community cohesion as well as tackling some of the issues that the city faces at the moment such as an ageing population. Also looking at how the Council can hopefully put more investment into those areas that are more in need; where there's more deprivation, less opportunity for people to access good quality employment; planning policy can play a significant part in that if it is done properly.</p>	<p>Officers – Simon Gilbert/Stuart Williams</p>	
<p>The next stage will be an extensive period of consultation and evidence gathering for 12 months at least and essentially it is a Preferred Strategy not a definitive strategy. It is right that we need to convey the narrative about how we have reached those conclusions and is not just economic and environmental but we need to balance the needs.</p>	<p>Simon Gilbert</p>	<p>Agreement that there needs to be clear criteria for assessing the Preferred Strategy and that it is made accessible and not too technical, for all to understand the process clearly.</p>
<p>The Preferred Strategy will be assessed against the Integrated Sustainability Appraisal by consultants. It will look at the impact for the Preferred Strategy in terms of Sustainability, Equalities, Health and the Welsh language. Within the Sustainability Appraisal there are a whole range of indicators relating to public transport and the other aspects identified above -12 indicators in total that cover loss of Agricultural land, Biodiversity, public transport use, Air Quality and</p>	<p>Stuart Williams</p>	

<p>numerous other environmental and social issues. The first strategy will be taken away and assessed and the report will be published alongside the Preferred strategy so you'll be able to see how the Preferred Strategy performs against the Integrated Sustainability Appraisal.</p>		
<p>it is quite technical and we need to think about messaging so that we don't bombard people with too much science. We are keen to make this as accessible as possible and there's a danger if we aren't careful it can be too technical.</p>	Simon Gilbert	
Future Scrutiny Involvement		
<p>It would be useful for scrutiny to continue its involvement and consider the evidence base such as the new census information, the housing needs assessments and more information on housing completion schemes in the city. It will be good opportunity to share what the trends are with scrutiny to show what the best options are for planning.</p>	Officers – Simon Gilbert/Stuart Williams	
<p>Officers expressed the wish to explore the master planning approach and policy framework further with Scrutiny in terms of what are the components of a good master planning approach through a policy framework, to ensure that the good principles are picked up on.</p>	Officers – Simon Gilbert/Stuart Williams	
<p>It would be important for Cardiff to consider the new census update. If you look historically at 2011 there was quite a readjustment made to the Cardiff population - the UPC element. There could possibly be the same trend appearing in the 2021 census and it was important to keep a look out for it and what it tells us about Cardiff in the future.</p>	Andrew Fowler	
<p>Summarising some questions that one might ask of the RLDP process:</p> <ul style="list-style-type: none"> • How does the RLDP deliver for the well-being of present and future generations? • In the light of Cardiff has declared the climate emergency, how do those options address the needs for immediate action to prevent the city from locking itself into a high-carbon future? 	Natural Resources Wales	

<ul style="list-style-type: none"> • How do the growth options deliver Cardiff’s ambition and ambitious target to decarbonise by 2030? • In light of the nature emergency, how do the options impact on protected sites and ecosystem resilience? That's ecosystem resilience across the board. • How do the options consider benefits to people by nature-based solutions? • Cardiff’s role in terms of the wider region. How do you assess the relative contribution of the options to the wider opportunities that Cardiff present to the wider region? <p>You’ve got to keep asking: does your preferred option get you to the vision? The objectives then that sit below the vision - might be your criteria where you're looking at, “Are we achieving the objectives with each of these options?”</p>		
<p>We'd encourage you (Scrutiny) to ask questions about the climate emergency and the nature emergency. (That’s not just because we’re NRW.) We know that poorer communities are harder hit by the climate and nature emergency. It goes to the heart of well-being, and it goes to the heart of equality as well.</p>	<p>Natural Resources Wales</p>	

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