

Appendix 3: Summary of comments received on Draft Review Report and Delivery Agreement and Council Responses

Consultee	Summary of comments	Response
Natural Resources Wales	Support proposed full review of the LDP and the proposed timetable set out in Delivery Agreement	Noted
Cadw	I can confirm that the historic environment is adequately covered within the plan. However, we recommend that the Cardiff Replacement LDP Delivery Agreement should also include an evidence base assessment for the historic environment as there may be impacts on it from the other topic areas. I should also mention that we are currently in consultation with the owners of all registered historic parks and gardens following a review of their boundaries in advance of producing a statutory Register. Given the number of historic parks and gardens within Cardiff we would recommend a SPG. Finally, I can confirm that we have put in place arrangements for the Glamorgan Gwent Archaeological Trust to represent our interests at any future LDP meetings.	Noted. The issues raised will be considered as part of the preparation of the Replacement LDP.
Glamorgan Gwent Archaeological Trust	<p>The Draft Review Report notes the legislative changes which have occurred since the last LDP, and these include the Historic Environment (Wales) Act 2016 (paragraph 2.10). The paragraph does describe part of the measures of the Act, although it does not note there are statutory responsibilities placed on the local authorities as a result, one of which is to contribute to the maintenance of the Historic Environment Record (Sections 35, 36 and particularly 37 of the Act). Further detail regarding this responsibility is detailed in the Welsh Government Statutory Guidance: <i>Historic Environment Records in Wales: Compilation and Use 2017</i>.</p> <p>Policies KP17 and EN9 relating to the built environment are noted (paragraph 3.61) and are considered from three AMRs to be compliant and effective. It should be noted that the historic environment is not limited to <i>built</i> heritage, and includes buried remains, and remains surviving as low earthworks.</p>	Comments noted.

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	<p>The Draft Delivery Document is helpful and the charts for key stages allow us to be aware of upcoming consultations, and we note that Glamorgan Gwent Archaeological Trust are on the list of consultees.</p>	
The Coal Authority	No specific comments at this time.	Noted
St Fagans Community Council	<p>St Fagans Community Council is a member of the North West Cardiff Group (NWCG) and fully supports the comments made by the Group.</p> <p>We do not find that a case has been made for a replacement LDP rather than a comprehensive review of the current LDP. The main argument for a replacement appears to be avoidance of an examination of what is happening with the LDP and why it is failing to deliver the promised results. We question whether a meaningful Replacement LDP can be prepared without a thorough review of the current LDP – progress, issues, performance against expectations etc.</p> <p>Paragraph 2.35 of the Review Report states that the latest available projections suggest household formations by 2026 will be 5% less than envisaged when the LDP was prepared. New projections will be available shortly. A fall in new household numbers will impact demand for houses and result in lower sales of new properties. The new LDP must be sufficiently flexible to allow for a fall in demand without leaving the City littered with partially completed housing Developments/unattractive building sites.</p> <p>Paragraph 2.42 takes an optimistic view of the future, asserting that completions will increase significantly. What is the basis for this optimism? Cardiff was optimistic at the LDP hearings: that optimism was misplaced. There are many factors that can effect economic confidence and create uncertainty. As stated by NWCG in their response, a reduction in housing completions/occupations cannot be allowed to justify further land releases without a clear plan to develop communities (which the LDP was supposed to do). Developers will always argue that all air quality further deteriorating. Cardiff has some of the poorest air quality in the U.K. The new developments they need is land to build on.</p>	<p>The Review Report explains how the LDP strategy and policies have already been reviewed as part of the Full Review process. It should also be noted that the formal Annual Monitoring process (AMR) on the performance of the existing LDP will continue until after the Replacement LDP has been adopted.</p> <p>In addition the issues raised in this response will be considered as part of the preparation of the Replacement LDP.</p>

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	<p>Congestion in Cardiff is increasing with along Llantrisant Road do not provide any facilities, leaving residents with no option but to travel by car. The increase in congestion effects bus reliability. There is no evidence of any real plan to reverse the situation. It is disappointing that an authority that claims to want to improve bus usage is providing a 'new' bus service to Rhydlafer along Llantrisant Road by taking one bus an hour from the Radyr and Morganstown service.</p> <p>Paragraph 3.65 claims that £164m has been raised from S106. Some of this was raised before the LDP was adopted so is not technically related to the LDP. The sum is for the whole of Cardiff. The amount is embarrassingly small given the profits that are being made by landowners and developers. This sum is wholly inadequate given the scale needed in infrastructure - schools, transport, medical facilities and drainage and sewerage infrastructure - across the City. This makes it all the more disappointing that Cardiff has failed to collect all the S106 monies due.</p> <p>We fully support the comments made by NWCG on the Community Infrastructure Levy (CIL) and believe that Cardiff is 'short-changing' city residents by failing to apply this to strategic sites. We believe that Cardiff is misguided in treating S106 and CIL as an 'either or' choice when they were intended to be used together albeit for different issues arising from a development.</p>	
Llandaff Society	<p>1. Review Report</p> <p>1.1 The two major concerns of Llandaff Society (LS) are (i) the importance of "preserving and enhancing" the historic environment in decision-making to ensure successful place-making; and (ii) the need for urgent action to sort out sustainable transport for the City.</p> <p>1.2 LS supports current LDP policy on the historic environment, but wants the priority given to it increased to recognise that it is irreplaceable. It is vital that our listed buildings, Conservation Areas and their settings (ie KP17 and EN9) are given a higher priority if we are to</p>	<p>Noted. The issues raised will be considered as part of the preparation of the Replacement LDP.</p> <p>Agree that Llandaff Conservation Advisory Group be added to the list of consultees in the Delivery Agreement</p>

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	<p>ensure that Cardiff remains an amalgam of distinctive 'places', valued by residents and visitors alike.</p> <p>1.3 LS is also concerned that not enough emphasis is being given to the urgent need to provide more sustainable modes of transport. The need for action in the light of the Climate Emergency, as well as to tackle the obesity crisis, make it vital that the Replacement LDP takes a fresh approach. In particular, the development pattern set in the current LDP - including the allocation of Strategic Sites on either side of Llantrisant Road including Plasdwr, Goitre Fach and Waterhall - perpetuates car-based transport and is having a negative impact on air quality in Llandaff. Cardiff is the 4th most polluted city for its size in the UK! We urgently need a tram-train to Creigiau, linked to a public transport system for the region fit for the 21st Century.</p> <p>1.4 Para 3.39 says that the Strategic Allocations (including those along Llantrisant Road) are not delivering any employment land. They are not delivering any other facilities either, which means that new residents have to travel to and from them daily, mainly by car, reducing the quality of life for residents of Llandaff. Continuation of this type of ugly, unsustainable, developer-led expansion of Cardiff will create nothing like the 'Garden City' model it claims to replicate.</p> <p>1.5 Paras 2.45-47 refer to a reduction in car use for journeys to work with an encouraging increase in cycle use, but an increase in car use for journeys to education and leisure. The LDP will need to tackle this and the linked increase in congestion levels. Congestion increased by +1 % from 2017-8 (p 62, Annual Monitoring Report March 2019), has a negative impact on bus reliability and has reduced air quality including in Llandaff's AQMA. To tackle this we urge the Council to introduce charges for workplace parking in Cardiff, as was done with great success in Nottingham in 2012.</p> <p>2. Delivery Agreement</p> <p>2.1 Llandaff Society urges the Council to ensure that the evidence base is robust, the</p>	

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	<p>assessments (SEA/SA) honest and the Preferred Strategy demonstrably reflects the views of communities.</p> <p>2.2 We welcome the commitment of the Council for the Llandaff Conservation Area Appraisal to become SPG, and suggest that the Llandaff Conservation Advisory Group (the only one still operating in Cardiff) is added to the consultation list and invited to the Stakeholder Conference.</p> <p>3. Conclusion</p> <p>3.1 Llandaff Society looks to the new LDP to set clear priorities that encourage sustainable place-making, respects the views of local communities, and sets a new direction towards reversing adverse climate impacts and protecting natural and historic assets.</p>	
David Locke Associates on behalf of Taylor Wimpey Ltd and the North East Cardiff Landowners' Consortium	A full revision procedure is the most appropriate form of review and a replacement LDP should be prepared for the period to 2035. It is considered that the LDP Vision and LDP Objectives outlined within the Draft Review Report are appropriate and aligned to the opportunities presented by the Strategic Site F allocation which will ensure the timely delivery of sustainable development within well-planned, well-serviced, high quality liveable neighbourhoods. Taylor Wimpey Ltd and the North East Cardiff Landowners' Consortium welcome the opportunity to engage as appropriate in connection with future stages of the LDP review.	Noted.
WYG on behalf of Ryan family	We have read the Draft Review Report and agree that the Plan period should be extended to 2035 and the evidence base updated to reflect the needs of the City over this extended period, particularly in respect of population and household forecasts. Furthermore, we support the recommendation of the report that a full revision is the most appropriate form of review as a short form review procedure could not appropriately address the strategic issues which will arise.	Noted
Cardiff Cycling Campaign	1) Delivery Agreement arrangements Consultation - we would urge that development & engagement on vision / objectives and	The Delivery Agreement includes engagement

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	<p>alternative strategies and options gives the widest possible engagement to interested groups (including those listed in your schedule, which needs revision) pre-Deposit, and provisionally in May - July when the Candidate Site consultation is scheduled. We think that it's really important that the City is able to examine the evidence base and the future options in response to the challenges of climate change and air pollution in particular, which Cardiff Council has recognised.</p> <p>2) LDP Evidence Base Requirements</p> <p>We would argue for specific reference to the Active Travel Act 2013 and last year's Planning Guidance that developers should follow the requirement to develop in accordance with Active Travel declared routes and design guidance.</p> <p>With reference to Transport Assessment (2.45 - 2.47), we feel that the Annual Monitoring Report key findings are very complacent with regard to both progress with the modal split target (of 50% / 50%) - before the significant roll out of new houses in the north west and north east of Cardiff - and with regard to the application of s.106 agreements with the main housing developers, taking into account the City's Transport Strategy 2016 to favour modal change. In practice, we believe that sectoral monitoring and targets should be adopted for each transport mode (including Metro developments), and that their spatial requirements should be recognised.</p> <p>As we said at the Inquiry into the LDP 2006 - 2026, the planned housing developments are particularly challenging to the modal split target, and site specific s.106 agreements do not address the need for continuous cycling and walking routes to destinations and transport hubs; that Community Infrastructure Levy (CIL) should be considered at the earliest stage of the LDP review. From what we seen already of these developments, they have been permitted to be fairly low-density and encouraging of car ownership and use, but discouraging use of public passenger transport and cycling & walking. It seems, too, that the provision of local facilities such as shops, schools, pubs, and</p>	<p>opportunities to provide feedback and build consensus at the vision and objectives and alternative strategic options stages ahead of preparation of the Preferred Strategy. Other issues raised will be considered as part of the preparation of the Replacement LDP.</p>

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	<p>community centres will be less than required, meaning residents will have to travel to access them.</p> <p>We ask for full surveying / monitoring of travel modes for all communities in Cardiff to be carried out as part of the evidence to inform the current Local Development Plan performance and to prepare for the new Local Development Plan.</p>	
Friends of Heath Park Woodland	<p>The review needs to address the greater protection of parks in Cardiff. Piecemeal erosion is happening more and more with Council sell offs The following policy is therefore proposed...</p> <p>"No development shall take place in parks unless all of the following criteria are satisfied:-</p> <ol style="list-style-type: none"> 1.No open space including grassland and woodland should be built on 2.The use of existing hard surfaces for new mixed use should not be detrimental to the character of the park 3 No temp uses should be permitted unless they are for on off events 4.The design of any new structures should be compatible with the character of the park and use natural resources 5.Development which adversely effects the character of the park by destroying environmental diversity shall not be permitted" 	This is a matter the Replacement LDP will consider during the future preparation of the plan.