

Appendix 3: Summary of Consultee Comments received on Draft Review Report and Delivery Agreement and Responses

Public consultation on the Draft Delivery Agreement and Review Report took place between 7th January and 4th February 2021. Whilst consultation was undertaken at a time when there were restrictions in place to limit the spread of Covid 19, which prohibited a number of methods of engagement a total of 382 consultees were notified and invited to make comments on the draft documents. These consultees included Community Councils, planning consultants, house builders, housing associations and other relevant external organisations. In addition all Members were informed of the consultation and the draft documents were advertised on the Council's website, together with details on how to comment.

A total of 34 responses were received during the public consultation period. A summary of the responses received is provided in the table below along with the Council's response and recommendations.

	Consultee Name	Consultee comment	Council Response	Council Recommendation
1	Cardiff Civic Society	<p>COMMUNITY INVOLVEMENT SCHEME</p> <ul style="list-style-type: none"> Appendix A appears to be out of date/ the way in which this list has been drawn up introduces biases and could exclude those who may have important views about the future of the city if they were asked. The prosperous suburbs in the north of the city are well represented (either through their Community Councils or recognised local groups) but the poorer inner city is not. The consultee list should be extended to ensure all parts of the city are represented, through inviting contributions from bodies (e.g. Local community centres) which do not usually comment on development matters. In addition, a councillor from each ward should be involved in LDP preparation. Recently formed groups could have important things to say about how the city should change to meet their concerns and priorities. As examples, Extinction Rebellion or Youth Climate Strike have much to say about environmental and climate change challenges, Black Lives Matter could offer a view from young black people. <p>The consultation process</p> <ul style="list-style-type: none"> Consultation questions should be open (e.g. "what would you like to see in your area?") Rather than expecting people to engage with daunting planning documentation The way of working needs to be collaborative, so that the LDP is "owned" by the majority of those involved in its preparation, which will involve the Council working across sectors and age groups to help reconcile differences. Unclear how residents will be engaged in building the Evidence Base. Developers and landowners will be asked to submit candidate sites, but will those be visible for public comment? Consultation is promised on the Integrated Sustainability Appraisal, but it is not explained how. Nothing is said about consulting on other elements of the evidence base. <p>TIMETABLE FOR PREPARING REPLACEMENT LDP</p> <ul style="list-style-type: none"> Point 5 of the Key Stage table allows 6 weeks for the Preferred Strategy Consultation but paragraph 2.21 states this will last 8 weeks.³³ <p>MONITORING AND REVIEW</p> <ul style="list-style-type: none"> Monitoring of the Delivery Agreement should include a mechanism through which residents could raise concerns if they feel they are not being consulted adequately or on time. The preparation of Annual Monitoring Reports should include resident consultation. <p>Replacement LDP preparation</p> <ul style="list-style-type: none"> The flowchart indicates more opportunities for consultation than those shown in the Key Stage timetable. That is welcome, but stakeholders (including residents and community groups) need to be clearly informed, ahead of time, of how and when they will be able to get involved, and where and when material will be published. <p>Involvement in Replacement LDP stages</p> <ul style="list-style-type: none"> As the evidence base aims at "a clear understanding of the dynamic social, environmental and economic characteristics and issues that exist within Cardiff", it is important – as argued above – that efforts are made to bring marginalised residents and groups into consultation. <p>Risk Management</p> <ul style="list-style-type: none"> The risk that "Replacement LDP fails test of soundness" is acknowledged. Mitigation should include "a robust evidence base with sustainability appraisal and well audited community and stakeholder engagement", but it also needs to ensure that stakeholder's views are taken account of, and that residents and community groups do not feel that their opinions have been given less weight than those of developers and landowners. Improving well-being and sustainability must be at the heart of the Replacement LDP. Keen on the principle of staying local and creating neighbourhoods/revitalising town centres should not mean only the city centre but also districts. Green infrastructure and ecological resilience should be priorities 	<p>The comments from the Cardiff Civic Trust are noted.</p> <p>To ensure the preparation of the new plan reaches a wide audience across the city the Council will engage through a wide range of methods. These include reaching out on social media platforms, implementation of a new user friendly website, use of short films to explain the Replacement LDP process and issues the plan needs to consider and user friendly documents and surveys reaching out to a wide audience including children and young people. These are in addition to the traditional methods of notifying consultees on the LDP database and engaging through a range of existing networks.</p> <p>Appendix A is not an exhaustive list. The process is open to any individual/group or organisation to take part. The Council maintains an LDP consultation list whereby any individual/group or organisation with an interest can request inclusion at any time in the process. In addition the Council will be utilising established Environmental, Community and Economic network to promote the LDP consultations.</p> <p>We would urge all stakeholders to support the process by promoting consultation stages to their members and interested contacts as widely as possible.</p> <p>Discrepancies and irregularities in the timetabling to be amended</p> <p>The content and structure of the replacement LDP will be in line with National Planning guidance.</p> <p>The Review Report is a factual review of the past performance of the current LDP highlighting areas for reconsideration. The comments raised are detailed issues which will be considered once the review of the LDP begins.</p> <p>The Review of the LDP will be based on updated evidence base including housing and employment. The Evidence base list to inform the preparation of the new plan is not intended to be exhaustive and consideration for the need for the additional studies suggested can be given as the plan progresses. The findings of some of the studies will be used to inform the consultation on strategic options in the autumn and a full list will be</p>	<p>Amend Delivery Agreement to provide further detail regarding the Council's commitment to inclusiveness through providing user friendly documentation and using user friendly consultation techniques in order to engage with the wider community, including children and young people.</p> <p>Amend the Delivery Agreement to provide further detail of who will be involved in plan preparation including using established Council Environmental/Community and Economic networks/social media platforms.</p> <p>Amend Delivery Agreement to provide further clarification that the evidence base work will help inform the strategic options stage which will be subject to consultation and engagement next winter.</p> <p>Amend Review Report to include reference to the latest position with One Planet Cardiff.</p>

Consultee Name	Consultee comment	Council Response	Council Recommendation
	<ul style="list-style-type: none"> • Include reference to One Planet Cardiff • Evidence Base on population and household numbers should be updated as the picture becomes clearer. • The Review Report does not mention the observation in the 3rd AMR that per head open functional space is declining • AMR3 reports that, “during the monitoring period all the relevant applications received on historic environment assets were considered to be policy compliant/policy compliant subject to conditions/recommendations placed on the permission”. Have such applications been monitored to confirm that conditions are subsequently met? • Requires a fundamental rethink of Cardiff’s strengths and weaknesses and the opportunities and threats that we face. • Should set a new direction for the city, ensuring that all residents share a better quality of life in future than they enjoy now, in line with the Well-being of Future Generations Act. CCS’s two key requirements are that the new LDP should be based on ‘15-minute’ neighbourhoods, and on a foundational, green, economy • As population growth is predicted to slow, there should be less need to build on greenfield sites. Regenerating brownfield wasteland should come first, along with empty buildings. • Strategic infrastructure (including health and transport) must be provided in advance of the development it is required to serve. • The Review Report ignores several sizeable developments for which permission has been granted without any affordable provision and with negligible, if any, s106 contribution. The 20/30% affordable housing obligation should be preserved, if not increased, and enforced • If developers are allowed to sidestep obligations through viability claims, enforcement of LDP obligations in areas like affordable housing or environment will be undermined • No mention of the quality of housing • Policy on Purpose-Built Student Accommodation should be reviewed • The foundational economy, providing local jobs to meet local needs, should play a growing role, as should facilities for those working at, or near, home. • Demand for city centre retail space could be expected to fall, but the Evidence Base should be expanded to take full account of the impact of new technologies. • Efforts to encourage the modal shift towards active and sustainable travel, and away from over-reliance on private cars, must continue, • A ‘15- minute city’, in which everyone can access daily requirements within an easy walk or cycle ride from their home, would both improve lives and reduce transport demand. • Policies sufficiently robust to meet the environmental challenges must be a priority for the Replacement LDP. Achieving a carbon neutral city by 2030, as will be required by One Planet Cardiff, requires review of all LDP policies, not only those that are classed as environmental today. • Flooding is a central concern • Policies to manage water should aim to reduce run-off as well as to capture this. • Biodiversity loss is now widely recognised as a global threat • Trees have a special contribution to make to both reaching carbon neutrality and supporting the wider environmental and well-being agendas • The Replacement LDP must treat identifying suitable locations for those trees, including urban forests seriously. CCS has begun to look at some options for this in its Canopy Cardiff work • Environmental obligations, including carbon neutrality and biodiversity, must be built into the LDP and supporting SPGs. • Policies must take a wide view of the environmental impact. This requires a full life-cycle view, including materials, construction, use (such as transport or other infrastructure demands) and demolition, with full compensation measures for any unavoidable damage. The highest energy efficiency standards should be required. • Well-being depends on the built as well as the natural environment. Not convinced that the monitoring reports accurately reflect the impact on historic buildings of planning decisions. • Masterplanning should be viewed from the Placemaking perspective, with community engagement and people having the opportunity to co-design the places they live, work and spend their time in the ideas and creativity of city residents (including our young people), rather than relying on big developers 	<p>published alongside consultation on the Preferred Strategy and Deposit Plan giving residents an opportunity to comment on the findings. These studies will need to consider the impacts of the pandemic and will need to be kept under review as more information on this comes available over the next year or so</p>	

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		<ul style="list-style-type: none"> Open space Covid has emphasised the importance of open space near where people live. Public green space in Cardiff has been estimated at just 8% of the city's area, well below that of many UK cities. The Replacement LDP must identify, protect, extend and enhance the city's network of green infrastructure. FUTURE EVIDENCE BASE REQUIREMENTS - agree that all the identified areas need further investigation to build the Evidence Base, but that list should not be seen as excluding others. Historic Legacy - Key features which make Cardiff such a different and distinctive City are its historic origins and its spatial development - The Evidence Base should identify these varying features as a valued inheritance for managed evolution, with new developments reflecting local character, The LDP should contribute to building a resilient city able to thrive even in difficult times. The current LDP is failing to deliver a sustainable city. As well as striving to become carbon- neutral, with clean air, within the lifespan of the Replacement LDP, we have to adapt to the consequences of climate warming, such as surface water flooding, rising sea levels, health issues, or shifting demand patterns. Areas subject to recent flooding should be mapped, and forecasts prepared of likely future occurrences with the increased intensity and volume of rainfall. Equality of access - Facilities in new suburbs on the edge of Cardiff are not being provided as promised. There is very uneven access to green spaces and to private outdoor space, which particularly affects those in less affluent inner suburbs and/or living in high rise apartments. Affordable housing is excluded from desirable areas. Demolition of older properties has decreased the number of affordable premises for business start-ups Neighbourhoods - Research should be commissioned into how urban neighbourhoods function, with particular emphasis on the concept of the '15-minute city', in which residents can meet their daily needs in their immediate vicinity, while still having easy access, preferably through active or sustainable travel, to central facilities. Ensure that Cardiff's LDP is aligned with those of neighbouring authorities and with the eventual SDP. Welcome Council's recognition that a full Replacement Review is needed, given the extensive contextual changes since the adoption of the current LDP in January 2016. We agree full revision is needed. The Replacement LDP should be no more than 100 pages in length, with a sharpened focus on how the city should develop Policies should be easily readable on devices (including mobiles) with hyperlinks to facilitate access. The LDP and supporting SPGs should be seen as documents for use by residents, not only by planners and developers. Language should be accessible, and jargon and acronyms avoided. Where technical terms have to be used, care should be taken to explain these. Understanding of the LDP would be improved through the use of images and graphics, including a Key Diagram, A single overarching policy should set common criteria that would then be reflected in each individual policy. Individual policies should be kept short and clear. Explanatory commentary on a policy should avoid undermining that policy by providing clauses that could be used to circumvent it. An SDP presents opportunities that could be beneficial to both Cardiff and other authorities, such as offering a wider range of brownfield sites for housing growth. The LDP should not adopt damaging land use policies if the SDP could open the way to better alternatives. 		
2	Cardiff Cycle City	<ul style="list-style-type: none"> Cardiff Cycle City is the largest cycle campaigning organisation in Cardiff regularly responding to the Council's consultations and have a number of representatives on the council's 'Cycling Advisory Group' and the Welsh Assembly 'Cross Party Group on the Active Travel Act'. Add to the list of General Consultation Bodies, please. 	<p>The comments from Cardiff Cycle City are noted.</p> <p>Welcome requests to be added to our Replacement LDP Consultee List</p>	Amend Delivery Agreement to include Cardiff Cycle City in the General Consultation Bodies List.
3	Cardiff Friends of the Earth	<ul style="list-style-type: none"> Heartened by Cardiff Council's recognition of the need for a complete overhaul of the current LDP which reflects the weight of new legislation, guidance and policy introduced since 2016. LDP will have a vital role in Cardiff Council achieving its One Planet strategy. Reservations around the accountability of an LDP intended to run until 2036 Concerned by the inflexibility of the current planning system in recognising the climate emergency and urgency of change required with an ability to adapt to rapidly developing scientific and economic evidence. Some key principles/ideas missing in the current review. 	<p>The comments from Cardiff Friends of the Earth are noted.</p> <p>To ensure the preparation of the new plan reaches a wide audience across the city the Council will engage through a wide range of methods. These include reaching out on social media platforms, implementation of a new user friendly website, use of</p>	Amend Delivery Agreement to provide further detail regarding the Council's commitment to inclusiveness through providing user friendly documentation and using user friendly consultation techniques in order to engage with the wider community, including children and young people.

	Consultee Name	Consultee comment	Council Response	Council Recommendation
		<ul style="list-style-type: none"> ○ Collaboration rather than consultation ○ Little detail provided on the form and scope of consultation. In particular, as highlighted in Appendix C, public consultation will be advertised “at least 6 weeks prior to the opening of the [independent] examination”, which is unlikely until March-September 2024. ○ Precedent set by consultations of this type leaves us with the expectation that any public consultation will be short, document-heavy, highly technical and inaccessible for the majority of Cardiff citizens to engage with. ○ To achieve public support for the LDP, a collaborative approach should be taken through deliberative democratic means such as citizens’ assemblies. ○ Any process taken forward should be resident-friendly with clearly laid out summaries, simplified versions of documentation and public engagement events allowing opportunities for residents to ask questions, share ideas and build consensus. ○ The climate emergency as material consideration should be enshrined in the LDP and evidence base; particularly when considering major energy projects which have conflicts with the climate emergency such as woody biomass and energy from waste where scientific consensus has changed and public policy is shifting. ○ This replacement LDP (in parallel with the One Planet strategy) offers a unique opportunity to take a longer view, challenging received thinking and re-evaluating the economics of local development. ○ Demands on cities such as Cardiff have changed dramatically and the value of biodiversity and the natural environment is more important than ever. There are innumerable opportunities for the LDP to be bold in promoting a regenerative city rather than an extractive one which favours local development and jobs. ○ Strongly advocate the integration of the Doughnut Economic Theory which is referenced in the One Planet Strategy and implemented by cities such as Amsterdam. ○ Robust and independent evidence base ● Concerned how outdated thinking and limited scope may end up being locked into a replacement LDP through to 2036. Particularly when it comes to renewable energy. ● Evidence base for the replacement LDP needs to reflect - and most importantly be able to adapt quickly - to modern technologies and changes in scientific evidence as it emerges. ● LDP needs to be more responsive than it has in the past to climate imperatives 	<p>short films to explain the Replacement LDP process and issues the plan needs to consider and user friendly documents and surveys reaching out to a wide audience including children and young people. These are in addition to the traditional methods of notifying consultees on the LDP database and engaging through a range of existing networks.</p> <p>The Review Report is a factual review of the past performance of the current LDP highlighting areas for reconsideration. The comments raised are detailed issues which will be considered once the review of the LDP begins.</p> <p>The Review of the LDP will be based on updated evidence base including housing and employment. The Evidence base list to inform the preparation of the new plan is not intended to be exhaustive and consideration for the need for the additional studies suggested can be given as the plan progresses. The findings of some of the studies will be used to inform the consultation on strategic options in the autumn and a full list will be published alongside consultation on the Preferred Strategy and Deposit Plan giving residents an opportunity to comment on the findings. These studies will need to consider the impacts of the pandemic and will need to be kept under review as more information on this comes available over the next year or so</p>	<p>Amend the Delivery Agreement to provide further detail of who will be involved in plan preparation including using established Council Environmental/Community and Economic networks/social media platforms.</p> <p>Amend Delivery Agreement to provide further clarification that the evidence base work will help inform the strategic options stage which will be subject to consultation and engagement next winter.</p> <p>Amend Review Report to include reference to the latest position with One Planet Cardiff.</p>
4	Cardiff Liberal Democrat Group	<ul style="list-style-type: none"> ● Welcome this opportunity to feed into this process ● New local development plan must form part of the city’s longer-term recovery efforts. An opportunity to innovate and build healthy, sustainable and resilient urban communities, and better lives for everyone. The needs of people, health and wellbeing, labour and human rights must be at the centre of planning and implementation of recovery efforts to rebuild resilient, sustainable communities. ● Encourage the administration to look to the thriving cities approach ● Ensure that the updated plan is subject to a health impact assessment. ● Both the transport 2030 vision and the one planet Cardiff strategy are working towards a goal of achieving objectives by 2030, whereas this proposed replacement LDP will cover 2024 – 2036. Hope to find some synergy between all of the plans, with additional assurances, tools, and mechanisms to ensure that necessary transport infrastructure and environmental adaptations on a cross-city level are in place before the new LDP is published. ● Replacement LDP provides an opportunity to mainstream climate commitments in wider planning and delivery, putting climate mitigation and enhancing biodiversity at the heart of Cardiff’s planning system. ● Ploughing ahead with the objectives of the current LDP could result in a surplus of housing, given that Welsh Government have revised down the estimates in household and population increase that the original LDP was based on. Mindful that the plan’s affordable housing targets are currently behind, which could result in not meeting the actual housing need in the city, particularly for those on low incomes or with experience of homelessness. This could also present as an opportunity to revisit the balance of new development on brownfield sites relative to greenfield. ● Wish to see a commitment to building more social homes for rent, by introducing larger targets for this kind of housing and greater developer contributions. Must recognise the need for more social housing as a result of the pandemic, Provision of social housing must align with wider homelessness policy on a local and national level. 	<p>The comments from the Cardiff Liberal Democrat Group are noted.</p> <p>The Review Report is a factual review of the past performance of the current LDP highlighting areas for reconsideration. The comments raised are detailed issues which will be considered once the review of the LDP begins.</p> <p>The Integrated Sustainability Appraisal will incorporate an assessment of the health impacts of the replacement plan.</p>	<p>No changes required to Delivery Agreement or Review Report.</p>

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		<ul style="list-style-type: none"> • Need a growth in public transport usage, not based on numbers during the pandemic, but before then, if we want to keep Cardiff moving while doing the least damage to the air, to the environment, and to the people. This means ensuring that the necessary transport and community services infrastructure is in place, in addition to giving greater priority to public transport and active travel. • Needs to be more tools at our disposal through the LDP and SPG to improve active travel infrastructure as default in new housing developments, rather than 'retro-fitting' active travel around vehicle-orientated infrastructure. • Town centre first' principle must be about enhancing the public realm, public resources, and access to services. The use of city and town centres, and high streets; they were already needing to move away from retail before the pandemic, and now it is even more vital that they become mixed use environments. City centres, high streets and towns need to meet a range of needs – including health, community, and other public services • Would welcome measures to help bolster and create thriving local and district shopping centres, including greater powers to deal with the cumulative impact of increasing numbers of a3 uses. Believe the same to be true of retail vacancy rates. Instead of measuring success through these narrow measures, perhaps targets should be focused on levels of poverty, health and wellbeing. The thriving cities approach would inform this approach. Has implications for the development of office accommodation, the use of which has the potential to radically change as a result of the coronavirus pandemic. • Note the intention by Welsh Government to strengthen regional planning through corporate joint committees, a regional approach is essential. This is important for transport and housing supply, but also for gypsy and traveller communities, for whom it is identified by welsh government as a necessary approach. Improved regional planning is essential to delivering transport infrastructure, sustainable development, and meeting housing need to create communities. • LDP provides an opportunity to better meet the needs of gypsy and traveller communities, who are poorly served by public policy. The overriding principle and purpose of a local development plan should be to provide housing for all who live in Cardiff. • Section 106 contributions must work on a more consistent footing that sets high expectations and standards for developers. These must be enforced. Reiterate calls for the council to reconsider the introduction of community infrastructure levies to strengthen our hand in ensuring that funding for community facilities and social housing are realised. • Ensure that at least 50% of housing on development sites be affordable, • SPG has an important role in realising the principle and approach of the LDP. The replacement LDP provides an opportunity to mainstream these guidance in the new LDP, providing an enhanced framework for planning and delivering on priorities – including around climate mitigation and environmental considerations. • Retail accommodation, and other buildings, provide an opportunity to provide new housing investment in community regeneration however poorly implemented, has the potential to displace existing communities. The effects of this would be contrary to that of the future generations and well-being act • Would welcome the concept of a 20 minute neighbourhood being threaded throughout the LDP and SPG in order to better enable the council to create coherent and sustainable communities, 		
5	Dwr Cymru Welsh Water	<ul style="list-style-type: none"> • No comments to make on the Review Report or Delivery Agreement. We look forward to working with you through the LDP2 process. 	The comments from Welsh Water are noted.	No changes required to Delivery Agreement or Review Report.
6	Glamorgan Gwent Archaeological Trust	<ul style="list-style-type: none"> • The Draft Delivery Agreement 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. • The historic environment is an important part of Cardiff Council's area, and includes statutorily designated historic assets of both areas and structures, as well as non-designated historic assets. These should not be seen as any constraint to development, but viewed with the Well-being of Future Generations (Wales) Act, contribute substantially to the well-being goals relating to culture and community, and by understanding and enhancement to the remaining goals. • Legislative changes have occurred since the last LDP, as noted in the Draft Review Report. 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, and a review of these polices will be undertaken to take account of the above changes. 	The comments from Glamorgan Gwent Archaeological Trust are noted.	No changes required to Delivery Agreement or Review Report.

	Consultee Name	Consultee comment	Council Response	Council Recommendation
		<ul style="list-style-type: none"> Should also be noted that the historic environment is not limited to <i>built</i> heritage, and includes buried remains, and remains surviving as low earthworks. 		
7	Home Builders Federation	<ul style="list-style-type: none"> Question is the need for more affordable homes an issue created by the pandemic? Accept there are some specific issues around housing homeless people but do not consider there is a wider direct link. Document overly references the impact of the current pandemic citing as the reason to review all areas of the plan. Requests that the link between housing growth requirements and the Covid-19 pandemic should be explained. Although we aware that there may be a link between the type/size/location of the housing people want in the future because of the pandemic. We are however not aware of any direct link between the pandemic and any likely housing growth requirements. As there is no longer a requirement for a five-year land supply - this data is not relevant to the plans review, so it is not necessary to include. Table 1 is not considered necessary. The viability/delivery of sites is now a far more important consideration in the early stages of plan preparation as identified in the Development Plans Manual 3, so will have to be dealt with earlier in the Plans preparation. Confirm which viability model will be used. Include a section on the impact of Cardiff's position in the NDF as a growth area and its role in the City Region as important factors to consider. Currently only referencing the reduced WG Growth stats, and suggest the plan will look to reduce growth in the future. 	<p>The comments from the Home Builders Federation are noted.</p> <p>The Review Report is a factual review of the past performance of the current LDP highlighting areas for reconsideration. The comments raised are detailed issues which will be considered once the review of the LDP begins.</p> <p>Growth levels, population and housing data including the need for affordable homes for the replacement LDP will be determined based on up to date evidence and will be consulted upon at a later stage.</p>	No changes required to Delivery Agreement or Review Report.
8	Hughes, Dr Kelvin	<ul style="list-style-type: none"> Wish there was a simple, easy to understand, in plain English 'executive summary' that would help the average lay person such as myself get to grips with what this lengthy document is actually saying. Question how this is going to be a fair, open and transparent consultation exercise, when we are in the middle of a pandemic? As far as I am aware, no notification of the existence of this consultation and timelines has gone out to the public. As libraries are effectively closed around Cardiff, the many residents without internet access, are unable to view documents relating to this next round of the LDP process. Based on the above, I cannot see how you can realistically conduct such an important review process at the present time and would urge the Council to reconsider the approach being taken and the timing. 	<p>The comments are noted.</p> <p>The current consultation on the draft Review Report and Delivery Agreement is taking place ahead of the formal process for LDP preparation and engagement in May 2021. There will be opportunities for engagement at key stages during the formal preparation process. These are listed in the summary provided on page 27 of the draft Delivery agreement.</p> <p>In terms of notification to wider consultees the current consultation has been uploaded on the Council's website and included on the Council's Live Consultation webpage. In addition, all those who have asked to be included on the LDP Consultation database have been notified of the consultation. This follows the approach undertaken at this stage for the previous LDP and also when the Council sought feedback at this time last year on the previous Review documents which have since been updated. Please also be aware that there is no statutory requirement to undertake more extensive arrangements at this stage and as set out above the Council is planning to engage through a range of means during the formal preparation process.</p>	No changes required to Delivery Agreement or Review Report.
9	Hussain, Atif	<ul style="list-style-type: none"> In light of the recent pandemic and the local to national lockdowns and the possibility that such lockdowns may still recur in the future, it is proving more important to sustain our local green spaces and miniature nature reserves and wildlife Suggest that brownfield sites should be redeveloped first taking priority over building on green field sites. Concerned with the massive business park planned next to Hendre Lake which would concrete over a large section of the existing farmland. As many buildings currently stand empty within Cardiff, it does not make sense to build more empty buildings. I can understand that other methods of transport need to be in place and rail is a much quicker mode of transport and greener. Support the building of commuter train stations in East Cardiff. Built from public funds rather than relying on private initiatives that would seek to destroy much needed green spaces. 	<p>The comments are noted.</p> <p>The Review Report is a factual review of the past performance of the current LDP highlighting areas for reconsideration. The comments raised are detailed issues which will be considered once the review of the LDP begins.</p>	No changes required to Delivery Agreement or Review Report.

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		<ul style="list-style-type: none"> Risk of flooding is increasing yearly - maintaining the reens and the Gwent levels will ensure the risks of flooding in East Cardiff remain low. Developing on these greenfield sites will increase water run off to the reens and overwhelm them at a time when they are already full. All 'Protect and enhance' countryside land be protected and further expanded in the LDP recognizing the need for this key habitat and green space. Assume that no further developments will be allowed on this 		
10	Kearsley, Dr R	<ul style="list-style-type: none"> Much of this document is vague and aspirational, making specific comment difficult. More needed about large grassy spaces contributing to slowing climate change and proving invaluable to environment, habitat, essential species and community health 	<p>The comments are noted.</p> <p>The Review Report is a factual review of the past performance of the current LDP highlighting areas for reconsideration. The comments raised are detailed issues which will be considered once the review of the LDP begins.</p>	No changes required to Delivery Agreement or Review Report.
11	Lightwood Planning /Wyndham Lewis Trust	<ul style="list-style-type: none"> Lightwood Planning and The Wyndham Lewis Trust are promoting a strategic development and green infrastructure opportunity to the north of Cardiff at Capel Gwilym Road and Thornhill Road. Cardiff LDP Draft Delivery Agreement is being consulted on in a time of flux in the Welsh planning system. DDA is very much a creature of the current planning system. The DDA does not (or cannot yet) fully engage with how the wider context affecting Cardiff's own LDP preview process. The shelf life of the DDA, as a project management tool, would appear to be limited, pending the firming up of the strategic context throughout 2021 and into 2022 Delivery Agreement should explain preparation of the Strategic Development Plan (SDP) and how the preparation of the Replacement LDP and SDP will proceed in parallel; The proposed plan period should align with the National Development Framework (NDF) and forthcoming SDP and run to 2040; The way that the issue of Green Belt is to be dealt with will impact on an essential future update of the DDA. It is important that the mechanics between the forthcoming SDP and the Cardiff LDP review are fully thought out and communicated to landowners. Cardiff cannot unilaterally identify Green Belt. Policy 34 of Future Wales 2040 expects the boundaries of Green Belt to be established in the SDP itself. The SDP will also have a competency in the identification of strategic sites. The demarcation of Green Belt boundaries will also require the identification of strategic sites to be inset to cater for growth. It may also be the case that suitable non-strategic sites are suitable for in-setting. It seems illogical for a new Green Belt to be reviewed and amended, to any degree, immediately. Matters of Housing Need and Supply - in our assessment, the best-case scenario for housing delivery in Cardiff 2006-26 is around 30,000 homes (against the requirement for 40,000+) and we suggest that the City should not seek to dampen its development programme to a lower level for 2020-2040. Future plan-making for Cardiff should also be exploring the continuation of, at least, the delivery performance of the current LDP (2006-2026). The key point is that the evidence base informing the South East Wales SDP and Cardiff LDP should not rely solely on data that projects forward past under delivery. Paragraph 3.14 of the DDA advises that the Council "will commission expert consultants to provide advice on the most appropriate level of growth for a Plan period beyond the end date of the existing LDP". It is essential that plan-making tests and evaluates alternative futures to ensure Cardiff and South East Wales at least maintains, or better, enhances its competitiveness and prosperity vis-a-vis other core British city regions, including the West of England Combined Authority area. Achieving a synergy between economic development (jobs growth) prospects and housing growth is a key consideration, as is the relative growth roles for Cardiff and Newport. 	<p>The comments from Lightwood Planning/Wyndham Lewis Trust are noted.</p> <p>The requirement to review LDPs every 4 years is set out in National Planning Guidance</p> <p>In terms of the relationship with the preparation of the SDP at this stage it is difficult to comment as the Corporate Joint Committees (CJCs) responsible for preparing the SDP have yet to be established and given this procedures and processes are not yet in place for the preparation of the SDP. However, given the likely timescales for preparation of the SDP it is clear the LDP will progress in advance of this process rather than in parallel and will thereby inform the emerging SDP.</p> <p>Welsh Government guidance states that LDPs should have a plan period of 15 years and given this it would not be appropriate to have a 20 year plan period to 2040</p> <p>The Review Report is a factual review of the past performance of the current LDP highlighting areas for reconsideration. The comments raised are detailed issues which will be considered once the review of the LDP begins.</p> <p>Growth levels for the replacement LDP will be determined based on up to date evidence and will be consulted upon at a later stage.</p>	No changes required to Delivery Agreement or Review Report.
12	Lisvane Community Council	<ul style="list-style-type: none"> Very troubled by the disparity in the population figures used in the adopted LDP and latest estimates. Population growth is a key driver for maintaining a robust LDP but the enormity of the variance (i.e. more than 30,000 people) casts doubt on the integrity of the adopted LDP and reinforces the need for correct figures to be used in the review. Number of households are 10% fewer than originally predicted with only 16,521 houses completed between 2006 and 2019 against a target of 45,000. The Report asks for more candidate sites to be brought forward to cover the period to 2036 but given the shortfall in achievement it would seem unnecessary. 	<p>The comments from Lisvane Community Council are noted.</p> <p>The Review Report is a factual review of the past performance of the current LDP highlighting areas for reconsideration. The comments raised are detailed</p>	No changes required to Delivery Agreement or Review Report.

	Consultee Name	Consultee comment	Council Response	Council Recommendation
		<ul style="list-style-type: none"> 7,500 student flats have been built since 2014 – some are converted commercial/office buildings but the reality is that many of the flats remain empty. Other ways of utilising redundant buildings should be examined. Some of the proposals under the recovery strategy conflict with existing LDP aims e.g the requirement to provide more buses when people will be happier travelling in their own vehicles which will require more and better car parking. Until there is more clarity about the impact of COVID it probably will not be possible to fully identify what measures are appropriate. LCC is committed to the protection of the Green Wedge this review is a key opportunity for Cardiff Council to reaffirm its commitment to the Green Wedge and Settlement Boundary and to ensure that inappropriate developments are not permitted. The Report expects that the current LDP will deliver a modal split of 50:50 by 2026. Given the marginal changes to date that seems unlikely LCC is concerned that any introduction of CIL would result in a reduced level of funds available for local communities. Any adoption of CIL by Cardiff Council should only happen after robust consultation with Community Councils to include assurances as to how funds will be spent as compared with the existing S106 arrangements. The older people housing strategy is welcomed Given the shift in market forces away from retail and towards online sales LCC is wondering whether there needs to be an appraisal of retail needs and whether such space might otherwise be used for new homes. Question whether the Plan needs to take account of European legislation and directives as UK as now left EU; 	<p>issues which will be considered once the review of the LDP begins.</p> <p>Growth levels for the replacement LDP will be determined based on up to date evidence and will be consulted upon at a later stage.</p> <p>The review of existing allocations will be an issue for the LDP Review alongside the call for candidate sites. However, it should be noted that the LDP will remain the Development Plan until 2026. Thus existing allocations can still be brought forward in line with the LDP.</p> <p>A call for Candidate Sites is the first formal stage of the LDP preparation process as set out in guidance, following the approval of the Delivery Agreement.</p> <p>The relevance of EU legislation and directives, Under the Withdrawal Act, EU-derived domestic legislation such as existing environmental regulations that implement EU Directives which were in force immediately prior to the end of the transition period will continue to form part of UK domestic law after 31 December 2020 until amended by new legislation. Given this they remain relevant to the LDP preparation process.</p>	
13	Llandaff Society	<ul style="list-style-type: none"> Request the Llandaff Conservation group is added to list of general consultees in DA. Consensus building is welcomed The RLDP needs to be shorter and sharper, with an improved focus on priorities The evidence base should include the elements of place and heritage which make Cardiff, and areas within it including Llandaff, unique. Much more attention needs to be given to health and well-being in the RLDP, starting with air quality. Impact of Covid and BREXIT on our economy and work patterns means it will be important to ensure a heightened focus on sustainability. With the use and re-use of buildings, spaces and neighbourhoods. The consequences of decline (eg in the City Centre) and regeneration without destroying Cardiff's distinctive character, heritage and spirit of place need to be managed. The strategy underpinning the RLDP needs a complete readjustment. <ul style="list-style-type: none"> Be more citizen-focussed To reflect the heritage of Cardiff To be far more attuned to the need to deal with the climate change To state clearly the design and landscaping standards required inside and outside Conservation Areas and Ensure transport and land-use planning go hand-in-hand and each is more carefully phased to support the Council's policy of moving to sustainable communities, and dominance of sustainable transport modes. <p>Review Report</p> <ul style="list-style-type: none"> Increased priority must be given to historic environment policy to recognise that it is irreplaceable. It is vital that our listed buildings, Conservation Areas and their settings (i.e. KP17 and EN9) are given a higher priority if we are to ensure that Cardiff remains an amalgam of distinctive 'places', 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 urgently need a tram-train to Creigiau, linked to a public transport system for the region fit for the 21st Century. LDP will need to tackle congestion 	<p>The comments from the Llandaff Society are noted.</p> <p>To ensure the preparation of the new plan reaches a wide audience across the city the Council will engage through a wide range of methods. These include reaching out on social media platforms, implementation of a new user friendly website, use of short films to explain the Replacement LDP process and issues the plan needs to consider and user friendly documents and surveys reaching out to a wide audience including children and young people. These are in addition to the traditional methods of notifying consultees on the LDP database and engaging through a range of existing networks.</p> <p>The Evidence base list to inform the preparation of the new plan is not intended to be exhaustive and consideration for the need for the additional studies suggested can be given as the plan progresses. The findings of some of the studies will be used to inform the consultation on strategic options in the autumn and a full list will be published alongside consultation on the Preferred Strategy and Deposit Plan giving residents an opportunity to comment on the findings. These studies will need to consider the impacts of the pandemic and will need to be kept under review as more information on this comes available over the next year or so.</p>	<p>Amend Delivery Agreement to include Llandaff Conservation Group to the General Consultation Bodies List.</p> <p>Amend Delivery Agreement to provide further detail regarding the Council's commitment to inclusiveness through providing user friendly documentation and using user friendly consultation techniques in order to engage with the wider community, including children and young people.</p> <p>Amend the Delivery Agreement to provide further detail of who will be involved in plan preparation including using established Council Environmental/Community and Economic networks/social media platforms.</p> <p>Amend Delivery Agreement to provide further clarification that the evidence base work will help inform the strategic options stage which will be subject to consultation and engagement next winter.</p>

	Consultee Name	Consultee comment	Council Response	Council Recommendation
		<ul style="list-style-type: none"> We urge the Council to introduce charges for workplace parking in Cardiff Delivery Agreement <ul style="list-style-type: none"> Llandaff Society urges the Council to ensure that the evidence base is robust, the assessments (SEA/SA) honest and the Preferred Strategy demonstrably reflects the views of communities. 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>The Review Report is a factual review of the past performance of the current LDP highlighting areas for reconsideration. The comments raised are detailed issues which will be considered once the review of the LDP begins.</p>	
14	McEvoy, Cllr	<ul style="list-style-type: none"> As MS on Cardiff's LDP and that of the Propel Cardiff Council Group is that it should be revoked. There should be no further green field development. Measures should be put in place to protect green field sites from being developed. 	<p>The comments from Cllr McEvoy are noted.</p> <p>The Review Report is a factual review of the past performance of the current LDP highlighting areas for reconsideration. The comments raised are detailed issues which will be considered once the review of the LDP begins.</p> <p>There will be opportunities for engagement at key stages during the formal preparation process. These are listed in the summary provided on page 27 of the draft Delivery agreement.</p> <p>Growth levels for the replacement LDP will be determined based on up to date evidence and will be consulted upon at a later stage.</p>	No changes required to Delivery Agreement or Review Report.
15	Mineral Products Association	<ul style="list-style-type: none"> The Mineral Products Association (MPA) is the trade association for the aggregates, asphalt, cement, concrete, dimension stone, lime, mortar and silica sand industries. We welcome the inclusion of the MPA in the list of consultees Appendix A and will contribute to the process in due course. The 2nd Review of the Regional Technical Statement should form part of the evidence base and be included in the list. 	<p>The comments from the Mineral Products Association are noted.</p>	Add the 2 nd Review of the South Wales Regional Technical Statement for Aggregates to the evidence base list in the Delivery Agreement and Review Report
16	Network Rail	<ul style="list-style-type: none"> Support the approach, and welcome the continued consultee status of Network Rail and look forward to future consultations to Network Rail. Core Valley Lines have now been transferred to Transport for Wales, and therefore they will have increased interests in the development of the LDP. We would therefore request that any consultations impacting the CVL should be directed to tfw directly. 	<p>The comments from Network Rail are noted and support welcomed.</p>	No changes required to Delivery Agreement or Review Report.
17	Newport City Council	<ul style="list-style-type: none"> Due to the Covid-19 pandemic Cardiff's RLDP is now on a similar timescale as Newport. The review report notes that there are not sufficient synergies between the Authorities to warrant the preparation of a Joint LDP (RR paragraph 2.5 & 5.1) which we have also concluded. Each authority has unique factors to consider within their own plan that would not benefit from a strict joint approach. We note the examples of across boundary working already taking place between authorities (RR paragraph 2.24, 2.26, 5.2 & 5.3) and that the "ongoing dialogue with other Local Authorities will help maximise efficiencies and consistency with regard to gathering/sharing evidence and agreeing methodologies where possible" (RR paragraph 4.2). This joint approach towards the evidence base is welcomed. 	<p>The comments from Newport City Council are noted and support welcomed.</p>	No changes required to Delivery Agreement or Review Report.
18	North West Cardiff Group	<ul style="list-style-type: none"> Welcome the opportunity to comment on the proposal to prepare a Replacement LDP - Cardiff's Replacement LDP (RLDP) should take account of the regional context. The Council should confirm the origin of statistics used in plan preparation, to help consultees assess the basis for the policies proposed. The Council must make a judgement based on the latest population and household projections and other relevant factors to produce a new LDP that helps create a more live-able and sustainable City taking into account the current very large housing land bank (24k - para 3.19). The new plan must encourage a wider range of house types and tenures, all with much better energy efficiency, Pleased to note (para 3.59) that renewable energy will get higher priority in the RLDP. Question the optimism of figures relating to job creation since 2006 Question the optimism that housing completions will increase significantly from current levels 	<p>The comments from the North West Cardiff Group are noted.</p> <p>The Review Report is a factual review of the past performance of the current LDP highlighting areas for reconsideration. The comments raised are detailed issues which will be considered once the review of the LDP begins.</p> <p>There will be opportunities for engagement at key stages during the formal preparation process. These</p>	No changes required to Delivery Agreement or Review Report.

	Consultee Name	Consultee comment	Council Response	Council Recommendation
		<ul style="list-style-type: none"> • Congestion may have reduced in 2020/21 due to COVID-19 impact on travel and work and shopping, but we suggest that the longer term trend is uncertain. • To need to invest in new cleaner public transport; • The imperative for action in the light of the Climate Emergency, as well as the need to tackle the obesity crisis, make it vital that the Replacement LDP takes a fresh approach. It needs to phase better public transport and much improved provision for cycling before release of any more housing land. • The huge uplift in land values accruing to owners of any greenfield allocations in the RLDP must be subject to a substantial rate of CIL in order to deliver the strategic City-wide infrastructure needed for developing a sustainable City, including Metro. • 50/50 modal split policy is not working now, and sustainable transport infrastructure is not being delivered quickly enough to deliver it in future. This must be addressed in the RLDP. • Welcomes the acknowledgement of the importance to health and well-being of open space, but is dismayed to see the amount that is no longer “public” as its maintenance is to be paid for by new residents and its use is thus semi-private. We suggest that this practice should stop. • Para 2.67 lists the COVID-19 impacts that will need to be considered. The list includes “Need to deliver “critical infrastructure” in a consistent and joined up manner.” This should be essential for any strategic development, not something to be considered as a pandemic impact. The list does not include the impact on housing demand. This is a serious omission. • Para 3.12 talks about ‘revised dwelling needs’ and requirement for new sites. There seems to be an inbuilt assumption that more sites will be required. Yet para 3.19 shows that there is an overall landbank of over 24,000. If dwelling need continues to reduce (WG household projections are 10% lower now than they were when the LDP was adopted) additional sites will not be required if production on the existing strategic sites is speeded up. 	<p>are listed in the summary provided on page 27 of the draft Delivery agreement.</p> <p>Growth levels for the replacement LDP will be determined based on up to date evidence and will be consulted upon at a later stage.</p>	
19	O Shea, Karen	<ul style="list-style-type: none"> • Some parts of the proposal go into great detail, whilst others are too sparse on detail to be meaningful • Not enough protection is afforded to: • Greenfield sites – all developments should first be made to explore fully brownfield regeneration opportunities and the opportunities to utilise vacant space, before any new previously undeveloped land is considered. Location/proximity should not be used as an excuse for not taking these options – sustainable and creative transport solutions should be found. • Residential areas from developments which drive mass inward commuting – examples would include proposals for or extensions of park and ride and parkway style developments; • Greenspaces which are rapidly dwindling due to recent planning development approvals. These are of critical importance for wildlife, biodiversity, amenity, and both physical and mental well-being; • Previously undeveloped land, eg. Woodlands, wetlands, meadows, and waterways which provide important natural habitats for rare and dwindling species; • Biodiversity and promotion of wildlife habitats (not simply protection) • Light pollution • The physical characteristics of areas, to ensure that any schemes proposed are appropriate and in keeping, visually as well as in function and • Flood risk in all areas, in particular lower-lying areas. • Clean air quality – be it from vehicle pollution, industry or waste recycling activities – no microforest references at all; • Public safety – ensuring well designed neighbourhoods, access and lighting schemes, plus protection from antisocial behaviour, neighbourhood crime and danger from activities such as criminal damage, pollution and fly-tipping; • Public footpaths which are vital for people to access outdoor areas and greenspaces • Ensuring that proposals are sufficiently and actively promoted, not simply so that people have the awareness, opportunity and time to respond, but also the digital and physical means and skills to engage in proposals which could affect them, voice their concerns and have them addressed– the process as is too heavily weighted in favour of developers. Feeling one has not been adequately engaged in a process before it is too late can have a serious mental health impact on communities, and of course potentially long term negative impact if inappropriate schemes are granted approval – it is therefore strongly in the area’s interests to engage fully with all those affected • Ensuring that amenities for children, youth, the elderly and those with health issues and disabilities are key parts of all development schemes and that they are actually delivered by developers. Residential 	<p>The comments are noted.</p> <p>The Review Report is a factual review of the past performance of the current LDP highlighting areas for reconsideration. The comments raised are detailed issues which will be considered once the review of the LDP begins.</p> <p>Growth levels for the replacement LDP will be determined based on up to date evidence and will be consulted upon at a later stage.</p> <p>To ensure the preparation of the new plan reaches a wide audience across the city the Council will engage through a wide range of methods. These include reaching out on social media platforms, implementation of a new user friendly website, use of short films to explain the Replacement LDP process and issues the plan needs to consider and user friendly documents and surveys reaching out to a wide audience including children and young people. These are in addition to the traditional methods of notifying consultees on the LDP database and engaging through a range of existing networks.</p>	<p>Amend Delivery Agreement to provide further detail regarding the Council's commitment to inclusiveness through providing user friendly documentation and using user friendly consultation techniques in order to engage with the wider community, including children and young people.</p> <p>Amend the Delivery Agreement to provide further detail of who will be involved in plan preparation including using established Council Environmental/Community and Economic networks/social media platforms.</p> <p>Amend Delivery Agreement to provide further clarification that the evidence base work will help inform the strategic options stage which will be subject to consultation and engagement next winter.</p>

	Consultee Name	Consultee comment	Council Response	Council Recommendation
		<p>schemes in particular are too cramped, roads and pavements too narrow and too lacking in parking provision,</p> <ul style="list-style-type: none"> • Preserving and enhancing the area's historical, archaeological and cultural assets, and those of neighbouring areas which can be directly impacted by Cardiff authority's actions, plans and policies. • Sites of special scientific interest; historic landscapes, archaeologically sensitive areas; sites of importance for nature conservation; conservation areas; Special areas of conservation and Special protection areas; and Scheduled Ancient Monuments. These should be cherished, safeguarded (perhaps even enhanced if appropriate), • Insufficient emphasis is placed on not simply protecting greenspaces and wildlife habitats, but also promoting and planting new woodlands, wildflower meadows, and trees which encourage pollinators and which can provide sustainable healthy food sources • The Capital city should be exemplar in ensuring proactive and timely engagement with members of the public on proposals, putting mechanisms in place to ensure that all people, regardless of age, ability, digital capability/access, wealth, language, etc. Can understand and voice concerns on proposals. • Too little emphasis is placed on digital • The vision for learning, opportunity, culture and sport does not go far enough – education assets should be spaces for the wider community, to promote greater engagement, sustainability and achieve greater community coherence, connectivity and pride. • As a creative capital, creativity does not feature enough in the plan – apart from being important for problem solving and innovation, creativity can give people a voice – in particular those who find themselves in disadvantaged circumstances, . Creativity is critically important • Cultural enrichment does not play enough of a role in the LDP; Not enough emphasis on helping narrow the gap for those in poverty or for those experiencing mental health challenges. There should be greater provision for ensuring banking and access to cash facilities. • Use of acronyms throughout the document. Documents such as this should be free from jargon and accessible to all. 		
20	Price, Michael	<ul style="list-style-type: none"> • Questions how the RLDP will reduce deprivation and provide for more jobs in Cardiff East; increase active travel and; protect open space. 	<p>The comments are noted.</p> <p>The Review Report is a factual review of the past performance of the current LDP highlighting areas for reconsideration. The comments raised are detailed issues which will be considered once the review of the LDP begins.</p>	No changes required to Delivery Agreement or Review Report.
21	Public Health Wales	<ul style="list-style-type: none"> • Would have liked to see a stronger reference in the document to the importance of the LDP in protecting and improving the health and wellbeing of the population. • Page 4 there could be an aim that says something like: <ul style="list-style-type: none"> ○ 'guide development which positively impacts health and wellbeing', or possibly include a statement somewhere in the document which reflects this important part of the LDP if it isn't one of the clear aims in itself. I think this is a really good opportunity for Cardiff to do some great work around making the links stronger between health and planning policies and having it upfront in the review aims would give it the importance it needs to ensure as Mark says the policies are core rather than in SPGs. • Page 8, paragraph 1.25 refers to the Wellbeing Plan being produced, but as it has been produced, the wording should say 'this plan looks at' rather than 'this plan will look at'. Though the current plan ends in 2023, which is obviously before the LDP will be published. • https://www.Cardiff.gov.uk/ENG/Your-Council/Strategies-plans-and-policies/Local-Wellbeing-Assessment/Draft-Local-Well-being-Plan/Pages/default.aspx 	The comments from Public Health Wales are noted.	Suggested references added to final version of the Delivery Agreement and paragraph 1.25 amended as suggested.
22	Radyr & Morganstown Association	<ul style="list-style-type: none"> • The RMA is pleased to be listed as a General Consultation Body in Annex Please note that the formal name of our group should be listed as Radyr & Morganstown Association (RMA) and not the current Radyr and Morganstown Community Association. • Concerned that consultation is limited to "the relevant stages" and not "at all stages" as is stated for other categories within this Annex. 	<p>The comments from Radyr and Morganstown Association are noted.</p> <p>The review period and consultation stages are matters governed by Welsh Government guidance relating to the preparation of the LDP. This guidance requires</p>	Amend Delivery Agreement to amend reference from Radyr and Morganstown Community Association to the now Radyr & Morganstown Association (RMA) in the General Consultation Bodies List.

	Consultee Name	Consultee comment	Council Response	Council Recommendation
		<ul style="list-style-type: none"> Disappointing that so little time has been allowed in a four year plan for active consultation with representatives of the people of Cardiff. In particular, that the Preferred Strategy Consultation and Deposit Plan Consultation are only open for the minimum six weeks statutory consultation period. Such a tight time-limit places limitations on representative groups such as ourselves The assertion at this very early stage that such an important strategic document as the LDP only has a small team of officers available to work on it is concerning both to the level of consideration that the LDP will have internally and the level of support that groups like ours might be able to access when attempting to engage with the LDP revision process effectively. The commitment in the existing LDP is that it is to be reviewed after four years. The current timetable sees an LDP that is due to expire in 2021 not being in a position to be replaced until late 2024, three years after a strategic document on which Council decisions are made should have been reviewed and potentially replaced. Whilst we understand the time it takes for such a document to undergo effective review we must register our disappointment that this process is starting so late and inevitably prolonging the life of the current LDP for decision making without opportunity for short term amendment whilst the full review is undertaken. 	plans to be reviewed at 4 year intervals and sets out a detailed process for LDP preparation, including the number of consultation stages required	
23	Radyr and Morganstown Community Council	<ul style="list-style-type: none"> .Radyr & Morganstown Community Council is pleased to be included as one of the specific consultation bodies. Members are keen to know how Cardiff Council intends to respond to any key issues that are raised by the Community Council during the LDP consultation process. Requests that Cardiff Council agrees to provide specific responses to any key issues that are submitted by R&MCC during the consultation. We would be pleased to discuss with you how such a robust system of feedback could best work 	<p>The comments from Radyr and Morganstown Community Council are noted.</p> <p>In terms of feedback on comments made by consultees a report will be prepared at Preferred Strategy and Deposit stages setting out a response to all comments made at these stages.</p>	No changes required to Delivery Agreement or Review Report.
24	Rees, Cllr Dianne	<ul style="list-style-type: none"> Consider the Town and Country Planning Act (LDP) Amendment Regulations 2015 are out of date. Raise concerns regarding the requirements of the 2015 Act as being subjective and possibly dangerous. The statutory requirement to advertise consultation stages should be re-instated in local press and media platforms. Population and household forecasts are critical to inform the Replacement LDP to determine the number of houses which will be needed up to 2036. <p>DRAFT DELIVERY AGREEMENT.</p> <ul style="list-style-type: none"> Why does the Draft Delivery Agreement have to take into account European legislation, policies and other initiatives at European level? We left the European Union at the end of January 2021. Is this necessary? EVIDENCE BASED ASSESSMENTS. Population and Household forecasts must be better Local Housing Needs Assessment. We should wait until the Pandemic is over to study and understand the needs of individuals and communities of the future. Similarly for Gypsy and Traveller Accommodation Assessment. We have no data as yet to understand the effect of the Pandemic on this community. The Draft Delivery Report does not reflect post EU membership and how society will be in Cardiff when the coronavirus Pandemic has retreated. It is too soon to commence a new LDP. 	<p>The comments from Cllr Rees are noted.</p> <p>The need for press adverts is a matter governed by Welsh Government guidance relating to the preparation of the LDP. This guidance no longer requires press notices to be published at key stages.</p> <p>Growth levels for the replacement LDP will be determined based on up to date evidence and will be consulted upon at a later stage.</p> <p>In terms of the relevance of EU legislation and directives, Under the Withdrawal Act, EU-derived domestic legislation such as existing environmental regulations that implement EU Directives which were in force immediately prior to the end of the transition period will continue to form part of UK domestic law after 31 December 2020 until amended by new legislation. Given this they remain relevant to the LDP preparation process.</p> <p>The review period are matters governed by Welsh Government guidance relating to the preparation of the LDP. This guidance requires plans to be reviewed at 4 year intervals, meaning the plan is now due for review.</p>	Amend Review report to correct the spelling error highlighted by Cllr Rees and update Capital Ambition reference in document.
25	Robson, Cllr Adrian	<ul style="list-style-type: none"> Broadly support the proposal to form a new LDP and the proposed timetable. Pleased to see that rather than reviewing it, a new plan is to be introduced. Appendix D – need to mention risk of resources (particularly staff and finance) being diverted should they be needed to tackle the Coronavirus efforts Seek confirmation that it is recognised that all consultee groups should have a role to play in Cardiff life. 	<p>The comments from Cllr Robson are noted and welcome the support for the proposed approach.</p> <p>To ensure the preparation of the new plan reaches a wide audience across the city the Council will engage through a wide range of methods. These are in addition to the traditional methods of notifying</p>	<p>Amend Delivery Agreement to include Rhiwbina Garden Village Residents Association on the General Consultation Bodies List.</p> <p>Amend Delivery Agreement to provide further detail regarding the Council's</p>

	Consultee Name	Consultee comment	Council Response	Council Recommendation
		<ul style="list-style-type: none"> Request that Rhiwbina Garden Village Residents Association is added to the general consultation bodies list? 	<p>consultees on the LDP database and engaging through a range of existing networks.</p>	<p>commitment to inclusiveness through providing user friendly documentation and using user friendly consultation techniques in order to engage with the wider community, including children and young people.</p> <p>Amend the Delivery Agreement to provide further detail of who will be involved in plan preparation including using established Council Environmental/Community and Economic networks/social media platforms.</p> <p>Amend Appendix D of Delivery Agreement to include reference to risk of resources being diverted should they be needed to tackle Coronavirus efforts.</p>
26	St Fagans Community Council	<p>Comments on Replacement LDP Delivery Agreement</p> <ul style="list-style-type: none"> It is crucial that we and our community have a voice and are listened to. Whilst understand that there are different interests and views; a considered balance needs to be struck. But too often we and the people that we represent feel that the balance is missing, or is weighted heavily in favour of developers. <p>Evidence base</p> <ul style="list-style-type: none"> A critical piece of evidence is whether the current LDP is delivering the councils objectives - is it genuinely perceived to be delivering quality, sustainable communities that promote sustainable transport? Greater consideration must be given to surface water management issues and underground conditions when considering where to build. Underground springs and watercourses should be factored in. Air quality is a serious issue, with road traffic a major contributing factor. We request that Cardiff engages in maximum publicity and consultation. This is the way to gain the support and confidence of residents. Delivery agreement mentions that there are 'resource limitations to the extent of engagement that is possible'. We appreciate this but have 2 comments: Resource must be used in an equitable manner; one group should not receive undue preference. Community councils and other bodies can act as a link between the council and its residents; we can help to make up the resource shortfall, Question why the invitation to submit candidate sites is given prominence, or takes place early in the process. There are major sites still under development from the existing LDP, in many cases development has not yet started, and will certainly not be completed until well into the replacement plan. We are in a very different situation from that when the LDP was approved; demographics and the economy have changed beyond what anyone could have imagined. The replacement plan need to be prepared in the context the WG intention to introduce strategic development plans the issue is not about whether new housing is required, but where it is needed, and what type of housing is needed. . Would like to see more emphasis given to the needs of local businesses. The evidence base includes green infrastructure 'identify relevant data regarding Cardiff's natural environment'. We believe this needs clarification and expansion Cardiff's heritage is missing from the evidence base, yet it is important not just for its residents but as a means to attract visitors and income through tourism. St Fagans Community Council is a member of the NWCG and supports the comments made by the group. <p>Comments on Cardiff Replacement LDP Review Report</p> <ul style="list-style-type: none"> St Fagans CC is a member of the NWCG and we support the comments made by the group. 	<p>The comments from St Fagans Community Council are noted.</p> <p>Comments related to the evidence base. This is not intended to be exhaustive and consideration for the need for the additional studies suggested can be given as the plan progresses. The findings of some of the studies will be used to inform the consultation on strategic options in the autumn and a full list will be published alongside consultation on the Preferred Strategy and Deposit Plan giving residents an opportunity to comment on the findings. These studies will need to consider the impacts of the pandemic and will need to be kept under review as more information on this comes available over the next year or so.</p> <p>The comments regarding maximising publicity and consultation are noted. In order to ensure the preparation of the new plan reaches a wide audience across the city the Council will engage through a wide range of methods. These include reaching out on social media platforms, implementation of a new user friendly website, use of short films to explain the Replacement LDP process and issues the plan needs to consider and user friendly documents and surveys reaching out to a wide audience including children and young people. These are in addition to the traditional methods of notifying consultees on the LDP database and engaging through a range of existing networks.</p> <p>In relation to the timing of the invitation to submit candidate sites. This stage is required at the beginning of the process to build up the evidence base for the plan and is a requirement Welsh Government guidance on the preparation of LDPs.</p> <p>In terms of the relationship with the preparation of the SDP at this stage it is difficult to comment as the Corporate Joint Committees (CJCs) responsible for</p>	<p>Provide further clarification that the evidence base work will help inform the strategic options stage which will be subject to consultation and engagement next winter (para 1.23)</p> <p>Provide further detail regarding the Council's commitment to inclusiveness through providing user friendly documentation and using user friendly consultation techniques in order to engage with the wider community, including children and young people (para 2.3)</p>

	Consultee Name	Consultee comment	Council Response	Council Recommendation
		<ul style="list-style-type: none"> • Vital that the replacement LDP (RLDP) takes account of the regional context. Until the strategic development plan (SDP) is produced LDPs across the region need to be coordinated. • Request that the council provides the origin of all statistics and data used in plan preparation. This will assist consultees to understand and assess the basis for the policies proposed. • Latest household and population projections are 8% lower for population and 10% lower for household formation than in the LDP. These are significant changes equally important will be the type of residences required, and where they are required. • There is a need for more energy efficient housing. so we were pleased to note (para 3.59) that renewable energy will get higher priority in the RLDP. • Question the optimism.of employment is showing 'a continuing strong performance'; para lists covid-19 issues to be considered: impact on the economy and rising unemployment are top of the list. • Strategic allocations are not delivering any facilities which means that new residents have to travel to and from them mainly by car unsustainable and is embedding poor travel choices. • Question the optimism of 'housing completions will increase significantly from current levels'. Suggest this optimism is not justified given the continuing economic uncertainty and potential increasing unemployment due to the impact of covid-19. A reduction in housing completions should not be used to justify further land releases in advance of a clear plan that develops communities rather than housing estates. • Compliance with legal levels of NO2 by the end of 2021. This year is unlikely to be representative in terms of traffic, and consequently, air quality levels. Question whether meeting the target in 2021 will be meaningful, • With interest rates at a historic low it makes sense to invest in new cleaner public transport; we've waited too long and support the plans to do so. • The RLDP must ensure improved public transport and much improved provision for cycling and walking before release of any more housing land. • The huge uplift in land values accruing to owners of any greenfield allocations in the RLDP must be subject to a substantial rate of CIL in order to deliver the strategic city-wide infrastructure needed for developing a sustainable city, including metro. • 50/50 modal split clear to us that that policy is not working now, and sustainable transport infrastructure is not being delivered quickly enough to deliver it in future. This must be addressed in the RLDP. • Covid-19 impacts. The list includes "need to deliver "critical infrastructure" in a consistent and joined up manner." This should be essential for any strategic development. List does not include the impact on overall housing demand. This is a serious omission. • There seems to be an inbuilt assumption that more sites will be required if dwelling need continues to reduce (WG household projections are 10% lower now than they were when the LDP was adopted) additional sites will not be required if production on the existing strategic sites is speeded up and actually completed together with appropriate facilities. • Welcome the statement that there will be a review of the links between climate change and flood risk this is essential because we cannot agree with the statement at 3.54 that climate change policies are working effectively. 	<p>preparing the SDP have yet to be established and given this procedures and processes are not yet in place for the preparation of the SDP. However, given the likely timescales for preparation of the SDP it is clear the LDP will progress in advance of this process rather than in parallel and will thereby inform the emerging SDP.</p> <p>Comments are noted. The Review Report is factual looking at the past performance of the current LDP and highlighting areas for reconsideration. The comments raised are detailed issues which will be considered once the review of the LDP begins.</p>	
27	Stephen, S	<ul style="list-style-type: none"> • The Climate Emergency, and its multiple impacts, does not appear to be as prominent as an emergency of this scale merits. Ecological dimensions of this emergency are lacking. • Other cities are working on initiatives to increase and facilitate citizen participation in these processes. I would also like to see greater attention to depending our democratic processes. • Please add me to any relevant mailing lists 	<p>The comments are noted.</p> <p>The Review Report is a factual review of the past performance of the current LDP highlighting areas for reconsideration. The comments raised are detailed issues which will be considered once the review of the LDP begins.</p> <p>There will be opportunities for engagement at key stages during the formal preparation process. These are listed in the summary provided on page 27 of the draft Delivery agreement.</p> <p>To ensure the preparation of the new plan reaches a wide audience across the city the Council will engage</p>	<p>Consultee added to LDP Consultation database.</p> <p>Amend Delivery Agreement to provide further detail regarding the Council's commitment to inclusiveness through providing user friendly documentation and using user friendly consultation techniques in order to engage with the wider community, including children and young people.</p> <p>Amend the Delivery Agreement to provide further detail of who will be involved in plan preparation including using established</p>

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			through a wide range of methods. These include reaching out on social media platforms, implementation of a new user friendly website, use of short films to explain the Replacement LDP process and issues the plan needs to consider and user friendly documents and surveys reaching out to a wide audience including children and young people. These are in addition to the traditional methods of notifying consultees on the LDP database and engaging through a range of existing networks.	Council Environmental/Community and Economic networks/social media platforms
28	Taylor Wimpey/North East Cardiff Landowners Consortium	<ul style="list-style-type: none"> • Taylor Wimpey Ltd and the North East Cardiff Landowner's Consortium, developer/landowners for a substantial part of Strategic Site F (SSF), which is a strategic allocation in the adopted Cardiff Local Plan. • Need to ensure the timely delivery of SSF is aligned to the national, regional and local context identified for the LDP Review. • TW and NECLC support the commitment identified to the continued delivery of the SSF as a significant part of the Council's land supply, a short form revision procedure is not appropriate for a Plan for a replacement LDP for Cardiff. • 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 SSF allocation • Important that the Welsh Government growth projections are supported and informed by robust evidence that includes a revised Local Housing Market Assessment • Note that Cardiff is still projected to experience significant growth over future years and therefore the deliverability of land supply to meet the housing requirement proposed is critical. • Having regard to previous delivery rates which have fallen short in previous years, the LDP review is an opportunity to review the effectiveness of development management policies insofar as they support the delivery of development, in particular strategic sites which comprise a significant part of the Council's committed supply. , it is critical that the policy framework established through the Replacement Plan promotes and protects the timely delivery of strategic site allocations in the interests of addressing established housing need requirements for Cardiff over the short term and to 2035. • The LDP review must consider the effectiveness of policies that guide the planning of strategic sites, where phased implementation is critical, as is striking the right balance of ensuring appropriate and proportionate site wide design and implementation strategies but not frustrating delivery of development through tiers of prescriptive pre-commencement requirements. • Appropriate to review existing SPG as part of the LDP review process. Where elements of SPG are overlapping or out of date, there will be scope for these to be rationalised and bring these up to date to reflect and align with current practice and to help provide certainty to support the effective and timely delivery of the strategic site allocations (e.g. Planning Obligations). • In order to ensure continuity, and an ongoing basis for the delivery of the new homes for Cardiff, it is important that the review process is progressed and brought forward in line with the programme outlined within the Replacement LDP Delivery Agreement. • A full revision procedure is the most appropriate form of review and a replacement LDP should be prepared for the period to 2035. 	<p>The comments from Taylor Wimpey/North East Cardiff Landowners Consortium are noted and support for the approach of a full plan review welcomed</p> <p>The Review Report is a factual review of the past performance of the current LDP highlighting areas for reconsideration. The comments raised are detailed issues which will be considered once the review of the LDP begins.</p> <p>Growth levels for the replacement LDP will be determined based on up to date evidence and will be consulted upon at a later stage.</p> <p>The Plan period covers a 15 year period 2021 to 2036.</p>	No changes required to Delivery Agreement or Review Report.
29	The Coal Authority	<ul style="list-style-type: none"> • Note that the conclusion of the draft review is that the full revision procedure is considered the most appropriate form of review and that a Replacement LDP should be prepared for the period 2021 to 2036. • The Coal Authority has no specific comments to make at this time. 	The comments from the Coal Authority are noted.	No changes required to Delivery Agreement or Review Report.
30	Urban Habitats	<ul style="list-style-type: none"> • Didn't see any reference to public health involvement and wondered how this would best be brought into the LDP review as beyond this current stage it would be valuable to consider how wellbeing and public health are brought into the core policies as much as possible rather than in lower status supplementary guidance. 	<p>The comments from Urban Habitats are noted.</p> <p>The Council will work closely with Public Health Wales on the preparation of the replacement plan.</p>	No changes required to Delivery Agreement or Review Report.

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			The Integrated Sustainability Appraisal will incorporate an assessment of the health impacts of the replacement plan.	
31	Waite, T	<ul style="list-style-type: none"> Assume the new LDP will recognise the changing waste streams given the drive for a circular economy and the building of an incinerator since the last LDP was completed. This incinerator has capacity to cope with the cities current and future waste and this should be recognised in the plan. Assume that no further developments will be allowed on the Wentloog levels SSSI land hope all 'Protect and enhance' countryside land will be protected further expanded in the LDP recognizing the need for this key habitat and green space. Traffic is a growing area and adequate plans should be made to address this. Air pollution is a growing trend and nothing should be done which knowingly adds to emissions within the city in a significant way. Carbon emissions reductions and drive to neutrality should be a relevant topic in any developments. The Mor Hafren proposal is currently going through the DNS Process. This site is currently on 'Protect and enhance' land in the current LDP. Assume there will be no movement of the boundary in the next LDP. Moving this boundary mid process by a key stakeholder could create a clear conflict of interest and legal challenge to the process. 	<p>The comments are noted.</p> <p>The Review Report is a factual review of the past performance of the current LDP highlighting areas for reconsideration. The comments raised are detailed issues which will be considered once the review of the LDP begins.</p>	No changes required to Delivery Agreement or Review Report.
32	Wentlooge Community Council	<ul style="list-style-type: none"> In general the logic is clear but there seems to be some areas such as green space and protection of biodiversity without substance and clarity. This is of significant concern, as over recent year's development applications on the protected sites of environmental and historical landscape around the city has increased with more of these areas being eaten away. Any changes to an LDP should take a bold step in the current climate conditions to protect and enhance the green space. It is now proven that the smallest of wildlife needs protection as it has a place within the eco system and without these the chain. Breaks down. Community gardens are not an answer to the problems of open space for wellbeing or wildlife. To downplay employment sites we see as short sighted, especially when there is a need for economic recovery after COVID and a need for the country to be a player on the world stage after Brexit. We see the future as having a need for a hybrid workplace, with an element of working from home but also with people needing a place to work and identify with. This also brings with it face to face interactions that can only be good for wellbeing. 	<p>The comments from Wentlooge Community Council are noted.</p> <p>The Review Report is a factual review of the past performance of the current LDP highlighting areas for reconsideration. The comments raised are detailed issues which will be considered once the review of the LDP begins.</p>	No changes required to Delivery Agreement or Review Report.
33	Williams, Cllr Joel	<ul style="list-style-type: none"> Endorse and echo the comments made by Cllr Rees in her submissions 	The comments from Cllr Williams are noted.	No changes required to Delivery Agreement or Review Report.
34	Williams, E	<ul style="list-style-type: none"> UK retail industry suffered some major collapses throughout 2020. There were 177,000 jobs lost in what was a punishing year for the high street, with a string of household names succumbing to administration during Covid-19. Evidence suggests that there is far more to come in 2021 and beyond. This therefore is just the beginning of a painful restructuring of an industry that is a major employer but where fewer and fewer physical stores are going to needed to serve shoppers in the internet age. How does the Rightacres Property Company, in collaboration with Cardiff Council, intend to move forward with their plans for the so-called Central Quay? Surely now is not only the time for a major rethink in terms of their proposed masterplan vis-à-vis retail space but, more importantly, an opportunity for city planners and developers alike to lead the way in green design concepts Many young people come here to study and then stay because they see that Cardiff is different; they discover that Cardiff has a small and accessible heart and a beautiful civic centre, with the river Taff and Bute Park right on their doorstep. Sadly, developments, such as Central Square, now make Cardiff look more and more like Anytown UK. Build for tomorrow. A few more roof gardens and far fewer retail outlets 	<p>The comments are noted.</p> <p>The Review Report is a factual review of the past performance of the current LDP highlighting areas for reconsideration. The comments raised are detailed issues which will be considered once the review of the LDP begins.</p>	No changes required to Delivery Agreement or Review Report.