

Appendix 3 Part 2: Summary of Comments Received

Introduction

A total of 83 representations to the consultation were submitted to the LDP Inbox. The comments raised in these representations are summarised below against a number of themes. These were submitted by members of the public, Councillors, Senedd Members, land owners and the following organisations:

- ABP
- Cardiff and the Vale University Health Board
- Cardiff Conservatives
- Cardiff Cycle City
- Cardiff Cycling Campaign
- Cardiff Friends of the Earth
- Cardiff Green New Deal
- Cardiff Civic Society
- Climate Cymru
- Coal Authority
- CO-Hydro
- Glamorgan Gwent Archaeological Trust
- Gwent Wildlife Trust
- Liberal Democrats Cardiff
- Lisvane Community Council
- Llandaff Society
- Mineral Products Association
- Museums Wales
- Nant Fawr
- NE Cardiff Group
- Radyr Morganstown Association
- Radyr Morganstown Community Council
- South Wales Police
- St Fagans Community Council
- Watkin Jones Group
- Whitchurch Arts Library
- Whitchurch Tennis Club
- XR Cardiff

Theme - Draft Vision

- *Include a reference to **health** in the opening statement.*
- *'To create a fairer, healthier and more sustainable city'. Add moving around by **healthier** travel means.*
- *Add looking after the health of current populations as well as future.*
- *Support the vision to work closely with local communities to improve neighbourhoods from the outset.*
- *Add "more liveable" to "fairer and more sustainable" to the headline statement.*
- *Add "within a thriving region" after "city" in the headline statement.*
- *Remove "urgent" from the first bullet point.*
- *Replace "challenges of climate change" in the second bullet point with "climate and nature emergencies".*
- *Reorder so that the second bullet point comes first so reads:*

To create a fairer, more liveable and more sustainable city within a thriving region, by:

- *Positively tackling the challenges of climate change climate and nature emergencies, and post-pandemic recovery;*
- *Responding to urgent future expected needs for new homes, jobs and infrastructure;*
- *Creating a greener, more equal and healthier city which is easier to move around and enhances the wellbeing of future generations;*
- *Using a placemaking approach, working with local communities to improve neighbourhoods and deliver high quality design;*
- *Looking after our natural, historic and cultural assets.*
- *Strongly support the vision, particularly easier to move around the city, including keeping traffic flows moving.*
- *Commendable ambition but requires more detail to be seen as credible Climate or ecological impacts fall down the order of priorities.*
- *Need to go much further in establishing a well-being economy which puts the climate and ecological emergency at the centre of decision making, which is backed up by a planning system geared up to do this.*
- *Huge amount of commendable ambition broadly stated within the visioning document which we support but it lacks detail.*

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- *Agree with and support the draft vision set out by the Replacement LDP Consultation. Want to see a fairer, greener, healthier city in which ordinary people and communities have influence and power over shaping the future of their communities and city.*
- *Should set out a commitment and ambition to be a city **‘that does no harm’ rather than does little harm.***
- *Suggest adding a sixth bullet point: **‘Adopting a flexible approach that allows response and adjustment to changing circumstances.***
- *Planning rules need to be tightened so there is no wriggle room. Current rules to protect trees, green spaces and to promote affordable housing are too weak LDP vision gives no certainty this will be addressed. Need a new approach away from the current emphasis on high rises and facilities only accessible by car.*
- *Need a vision for a city which is proud to be a small liveable city, where historic buildings are protected and maintained.*
- *The vision of how Cardiff could function in 20 years’ time has to be a (relatively) traffic free (large) centre with streets taken over by the hospitality industry with transport heavily dominated by trams and ev taxis/ unscheduled small bus services. If we try to return to the status quo it will make this change more difficult. It’s time for a serious VISION, the current council statements are still dominated by yesterday’s thinking.*
- *Object to the Draft Vision and Objectives document, on the following ground :-*

Failure to address the environmental issue of the need for the protection and enhancement of the Wentloog Levels SSSI, and the need for a full SINC and brownfield survey from the point of view of the biodiversity value of Cardiff in pursuit of the formulation of the RLDP.

The deficient manner in which housing and demography are addressed in the document.

The failure to formulate the document in a manner which is in conformity with the requirements of the Welsh Government’s Development Plans Manual 2020.
- *Vision and objectives do not set out how the RLDP will address the “wicked” issues associated with delivering a sustainable city. The vision is more one of “motherhood and apple pie”, and could have been written about any medium-sized city in the UK. A further example of this is the matrices set out in appendices. They do not highlight any potential conflicts to be avoided through plan formulation in a manner in conformity with the Wellbeing of Future Generations (Wales) Act 2015, five Ways of Working.*
- *The local planning authority is reminded that paragraph 5.11 of the Development Plans Manual, in reference to setting a vision for the RLDP, states that :-*
 - ***“the vision should articulate how places are planned to be protected”***

In failing to set out the required very strong protective policy context, (ie that of ascribing an absolute constraint on development in all but wholly exceptional

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circumstances in or otherwise affecting the SSSI), the local planning authority is not acting in conformity with this requirement.

- *Furthermore, paragraph 5.11 states that the vision should :-*

- ***“be consistent with Area Statements”***

5.1.4 The document makes no reference whatsoever to the Area Statement which includes Cardiff, and for this reason we object to it.

- *5.1.5 Additionally, paragraph 5.11 states that the vision should be :-*

- ***“based on a clear understanding of the ... environmental issues”*** and that :-
- ***“focussed statements which seek to address the main environmental issues identified in the area”*** should be included in the objectives.

The document contains no reference whatsoever to one of the major environmental issues, viz the continued destruction of the Wentloog Levels SSSI by inter alia sites allocated in previous generations of development plans in Cardiff. Neither does it make any statements committing itself to ascribing an absolute constraint on developments on/affecting the SSSI, merely restricting itself to the question on page 28 :-

“what measures need to be put in place to protect and enhance biodiversity?”

This statement is so anodyne that, in the context of the requirements of the Development Plans Manual, it is meaningless.

- *The consultation document proposes a suite of 5 planning pillars under the goal of creating a fairer and more sustainable city – this is not a place based vision but a series of statements that would apply to most locations in the UK.*
- *There is a lack of reference to existing Council visions and ambitions and how these have informed the LDP Vision.*
- *LDP Vision fails to demonstrate how it flows from the Council’s overall priorities and does not clearly express a well-crafted vision for the LDP.*
- *Vision needs to set out an aspirational place based socio-economic and environmental vision for growth and change in the built environment.*
- *The use of the word ‘urgent’ in ‘Responding to the urgent future needs for new homes, jobs and infrastructure’ implies a key temporal issues in respect of housing land supply, not just over the plan period as a whole but immediately.*
- *Sustainability needs to be at the top of the Council’s priority list.*
- *Take a more realistic view of population growth. Figures for existing LDP grossly inaccurate. Greenfield sites which have not yet received planning permission should be released and development focused on brownfield.*
- *The Vision reflect ‘business as usual’ with a few politically correct ‘add-ons’.*

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- *The Vision Statement could refer to any city and needs to be improved and re-ordered to provide a context for a radically new spatial strategy. Suggest the following amendments:*
 - *To create a fairer and more sustainable city **Cardiff** by:*
 - *positively tackling climate change and post-pandemic recovery;*
 - *creating a greener, more equal and healthier city, easier to move around and*
 - *enhancing well-being;*
 - *using place-making, working with local communities to improve - **and increase the range of - local facilities, create 20 minute neighbourhoods, and to deliver high***
 - *quality design;*
 - *looking after the city's natural, historic and cultural assets; and*
 - *responding to ~~urgent~~ **future** needs for homes, jobs and infrastructure.*
- *Support the recognition of the need for new homes, jobs and infrastructure.*
- *A creative focus through the development of a cultural strategy should be added to this vision and objectives. Cardiff is unusual in lacking a strong strategy for culture and creativity.*
- *The vision should be redrafted to be more engaging and statement of what the actual outcome will be.*
- *What does 'creating a fairer' City actually mean in relation to land use planning?*
- *Suggest that '**resilience**' should be embodied in the Vision.*
- *The Vision could be anywhere – it does not reflect the nature and character of Cardiff – we need a vision that feels like one that Cardiff citizens recognize.*
- *Welcome aim of fairer and more sustainable city – in particular the placemaking approach.*
- *Support concept of a 15 min city. Look forward to working with the Council with immediate effect.*
- *Would like the Vision to include aim of making Cardiff a vibrant city.*
- *Support reference to protecting natural, historic and cultural assets.*
- *Encourage Council to demand high quality design. Some poor buildings have been granted in the past.*
- *Vision should include defending Cardiff's role as location for new key national developments.*

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- *Broadly support the Draft Vision – but many of residents’ concerns can only be addressed in the final LDP.*
- Welcome aim to create a ‘greener, more equal and healthier city’ – this would be realised by improving links to the city centre.
- Public transport links need to be inclusive and accessible in nature.
- Environmental impact of the construction process and fully occupied developments should be assessed.
- Welcome the placemaking approach, but the Council must ensure commitments made by developers are actually delivered.

Theme - Draft Objectives

- *Suggest rewording and re ordering of the objectives as follows:*

1) *Responding to our expected needs*

Objective 1: Provide more good value suitable homes in the right places, to address the expected housing needs of Cardiff’s diverse population

Objective 2: Provide more good jobs and optimise Cardiff’s role as an economic driver of South East Wales, to improve the prosperity of the region.

Objective 3: Ensure the adequate and timely provision of new infrastructure, to support communities and expected growth

2) *Creating a more sustainable and healthier city which enhances the wellbeing of future generations*

Objective 5: Make the city easier to move around with a focus on sustainable and active travel

Objective 6: Create healthier environments, reduce inequalities and enhance wellbeing

Objective 7: Support a vibrant mixed-use City Centre, within a City of Villages with thriving district and local centres at their heart, and optimise Cardiff Bay’s potential to provide core destinations for Cardiff and beyond

Objective 8: Ensure that the city positively adapts to the new challenges posed by the implications of the pandemic

Objective 9: Engage communities in participative placemaking to create sustainable places, improve neighbourhoods, optimise regeneration, enhance public spaces, effectively manage growth, and deliver developments of high quality design

3) *Looking after natural environment and our historic and cultural assets*

Objective 4: Respond to the climate emergency so Cardiff becomes a more resilient, carbon neutral city, and optimises opportunities for energy-efficient solutions

Objective 10: Respond to the nature emergency by protecting and enhancing Cardiff’s Green and Blue Infrastructure, its biodiversity and other natural assets

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Objective 11: Protect and enhance Cardiff's historic and cultural assets for community benefit together with supporting sustainable tourism and cultural sectors

- *Broadly agree with the objectives set out but an objective about making the planning system itself easier for people to understand, and to participate in, would be a valuable addition.*
- *Positively tackling climate change and post-pandemic recovery' should be at the forefront, followed by 'Creating a greener, more equal and healthier city, easier to move around and enhancing well-being.' Development must fit to these priorities, not the other way around as has happened in the past.*
- *Prioritise provision of new infrastructure, moving around the city, and supporting the role of the City Centre and Cardiff Bay.*
- *The objectives are also too vague – they should describe which urban places most need jobs and houses – we need Cardiff specific objectives.*
- *Support the council's vision to provide more dwellings within the council. We support the identified need for new homes and an increased target, which should be met through a combination of delivering the land bank in addition to new viable and deliverable sites that will be put forward through the Candidate Site Process.*
- *Amend -"Objective 1: Provide more homes to address future housing **needs and support economic growth in Cardiff and the wider region.**"*
- *Objective 1 should include 'current and future need'.*
- *The Council should be exploring more than just the plausibility of the latest trend based projections and whether they can be assessed as a sound basis for policy formulation for the Cardiff Capital Region given the city's fundamental role in the future of SE Wales and Wales as a whole.*
- *The trend based projections need to be evaluated for a policy-on perspective to assess whether planning for trends delivers suitable outcomes. Housing supply and economic growth have a close relationship and PPW advises that household projections are only a starting point for the assessment of housing requirements.*
- *The 2018 household projections are 'plausible' in the sense they have been quality assured. Projections are trend based and the outputs are neutral of any policy considerations. Trends in population growth feed household projections and demographic change is strongly linked to housing provision. Where housing delivery has been suppressed this will feed the trends to inform projections. 2014 based household projections still form the basis from which to assess housing needs in combination with an affordability factor for each LPA reflecting a recognition that housebuilding has systematically been lower than needed 'policy-on' approach to housing.*
- *Due consideration must be given to the link between homes and jobs when developing the evidence base. This is fundamental to ensure that the level of housing provision*

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does not undermine the realisation of economic ambitions. Cardiff is identified as part of a wider 'National Growth Area' in Future Wales, which provides the main focus for growth and investment in the South East region. Future Wales also recognises the importance of supporting Cardiff's status as an internationally competitive city and a core city in the UK stage. Delivering sufficient levels of housing will play an important role in achieving these ambitions.

- *It is important that the Replacement LDP continues to support the phased delivery of the strategic allocations identified in the adopted plan. By their nature and scale, such sites are delivered on a phased basis over a number of years – often crossing plan periods. The Replacement LDP must ensure that the current landbank of sites is realised and the trend of a greater diversity of housing is continued.*
- *Objective 1: Providing a range and diverse mix of homes is appropriate.*
- *It is premature to say that there should be a preference for 'Brownfield First.'*
- *A fall in delivery rates up to 2018 is noted – this lends itself to allocation of more modest sites. To reduce delay – sites should be allocated rather than rely on windfalls.*
- *Objective 2: Good to see that employment objective is routed in need in terms of sector and location. Due to COVID-19 it is important to reflect/reset to ensure what we need in the right locations. Some of the protection policies in the City Centre/Bay Business areas require re-validation.*
- *Objective 3: the programming of infrastructure is a fundamental issues that needs exploring. A clear set of infrastructure actions aligned to the spatial strategy is required. Existing/upgraded and new community facilities should be part of the placemaking process to inform the spatial strategy.*
- *Objective 5: The programming of infrastructure should be woven into the LDP – important for growth of the city and wider region. Need to address the 80,000 car journeys into Cardiff.*
- *Objective 5 add **healthy** travel opportunities.*
- *Objective 6 '**create healthier environments, reduce inequalities and improve and enhance wellbeing**'.*
- *Objective 7: Close scrutiny is required to ensure that strategies and policies are tested.*
- *The tone and intent of the objective is welcomed but this should not turn into protectionist policies.*
- *No reference to the Council's wider ambition to be a child friendly city particularly in Objectives 6 and 8.*
- *Objective 8 – Ensure that the city positively adapts to the new challenges posed by the implications of the pandemic – post pandemic themes cannot justify a separate Objective. Where there may be a post pandemic response to other topics/objectives, this should be set out in relation to those other topics/objectives. Delete Objective 8.*

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- *Objective 9: As this key objective will be woven throughout the Plan should it not be in the Vision? High density mixed use development will not be possible in every instance.*
- *Objective 10: At the next stage of Plan consultation it is important for context and evidence for any Green Wedge designation. The matter of a Green Wedge should be considered in parallel to the Green Belt (NDF Policy 34).*
- *Objective 10: A key issue for the plan to address should be – can the city expand further into the countryside and if so, where are the more sustainable locations in landscape and other terms.*
- *Helpful to incorporate additional wording that also safeguards mineral infrastructure to accord with PPW11. All existing and potential new wharves and railheads should be identified for safeguarding within the LDP, to provide a full range of sustainable transport options (whether or not they are currently utilised).*
- *A revision to the extent of the Green Wedge would be justified if development would aid the achievement of the growth vision for Cardiff. The issue refers to the word 'form' and this requires further explanation for consultees to be able to comment. There is no reference to Green Belt in the consultation document - a tacit acknowledgement that Cardiff cannot unilaterally identify Green Belt boundaries outside the SDP process.*

Theme - New Houses and Homes

- *Need to review the future viability of developing strategic sites C, D and E reductions to these greenfield sites should be prioritised.*
- *Developers must include affordable housing in their developments, and Cardiff Council must implement its own policies to curb the activities of developers. The new LDP can address this inequality.*
- *The objective of 'more housing' does not address the fact that affordable and good quality housing is what is needed - the rental sector at the moment is heavily weighted in favour of landlords and letting agents, who are sometimes demanding a year's rent up front (in addition to rising rents and poorly maintained, damp, mouldy housing stock). Cardiff should have a much more ambitious vision for dealing with these issues, for example rent caps could be introduced.*
- *Needs to be a balance between building new homes and the infrastructure to support them.*
- *Need early consultation with the UHB for health care planning on planned population growth. Consultation needs to continue through to pre planning and planning application submission.*
- *Prioritise brownfield sites to enable use of existing infrastructure.*
- *Denser development which reduces the need for car use and can improve local community facilities and the use of local services. As population age's higher density*

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walkable neighbourhood are important for independent living and healthier communities.

- *The predicted noticeable increase in the over 65s and particularly the over 85s population will have an impact upon the health and social services. Need for lifetime homes and neighbourhood that support healthy travel and walking, with green spaces.*
- *Failure to curb developer greed, need to stop developers getting away without providing affordable housing.*
- *New homes need not always mean new builds. Far more could be done to release existing stock and to encourage conversions. This would have several advantages, including lower demand for land, reduced climate and ecological damage, and use of existing transport and other infrastructure.*
- *Conversion of larger properties subject to design and space standards, or conversion of commercial spaces.*
- *RLDP should promote good quality upgrading and reuse of existing properties as a policy priority rather than new build.*
- *Liveability of residential units that meet needs rather than just quantitate.*
- *Land within the city used for parking at out/edge of-town retail or office locations, or for car showrooms such as those along Penarth Road could via Planning and local taxation policies, plus compulsory purchase if necessary, could free up such sites for new homes, easing pressure on Greenfield sites.*
- *Greenfield should be seen as a last resort when other options have been exhausted. Council should use regulatory, tax and compulsory purchase powers that it already has to pursue this goal, and lobby Welsh Government for legislative change, within the devolved agenda, where necessary. We are now at a point where we cannot afford to lose more green land.*
- *In terms of growth the focus should be on jobs backed up by proper transport infrastructure. Need to work with neighbouring LDPS and SDPs.*
- *Growth should focus on brownfield recognising that there has already been a substantial greenfield release in the current LDP.*
- *Priorities for new homes should be in neighbourhoods with amenities, travel options, energy efficient and affordable to run.*
- *Consider houses that are physically and digitally secure.*
- *Cardiff's projected growth was hugely inflated in the previous LDP likely in part to a failure to engage.*
- *Question the make-up of the Citizens panel for consulting on the Cardiff Housing Market Assessment.*
- *Support the provision of necessary housing growth informed by Local Housing Market Assessments. Need to support the provision of suitable accommodation, including 1*

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and 2 bedroom properties to address stagnation of household formation and potential increase in the number of households facing homelessness as a result of the pandemic. As well as affordable housing need to make provision for a significant increase in social homes for rent, maximising s106 contributions. Need to be able to hold developers to account for their community contributions.

- *Need to .make reference to safe homes in terms of fire safety and the accessibility of housing stock beyond the mention of lifetime homes.*
- *Whilst some greenfield housing may be necessary need to draw clearer distinction's where sites are of significant environmental value or in areas at risk of flooding, provide natural sinks or access to green spaces for residents including areas like Whitchurch and Tongwynlais where there will be significant greenfield building and worsening flooding.*
- *Urgent need to boost the supply of market and affordable homes for people to live and to support economic recovery, resilience and growth.*
- *The need for new homes should be assessed using an aspirational, forward-looking approach that takes account of the role of Cardiff as a key driver of growth in the South East Wales region and in Wales as a whole and as a UK Core City, as identified in Future Wales.*
- *Provision of a sufficient supply of high quality housing will be crucial in order for Cardiff to achieve its potential in relation to these national policy designations, in order to support a suitably sized workforce and to attract and retain young and highly skilled workers to drive innovation and prosperity.*
- *The assessment does not place undue emphasis on the results of the latest Welsh Government household projections. The need to support a more balanced population age structure is recognised in Future Wales, which states that there is a need to “think about how we will retain and attract young people to all parts of Wales”. This is absolutely vital in order to sustain services as well as providing the needed labour force to support economic growth.*
- *The old-age dependency ratio is also expected to increase in Cardiff from 21.3% in 2020 to 26.0% in 2036. Unless this issue is addressed, Cardiff, along with the rest of Wales, will be faced with increasingly stretched social care budgets and a proportionately shrinking workforce to fund essential public services and drive the regional economy. This outcome would clearly be out-of-sync with the emerging LDP Vision for Cardiff, its role identified in Future Wales and the aims of the Cardiff Capital Region City Deal.*
- *The emerging LDP should provide policies promoting prosperity and wellbeing through alignment with positive economic and social objectives, including those within the Cardiff Capital Region City Deal. In particular, there is a need to attract and retain younger people and workers in order to boost the economy, provide skilled jobs and improve productivity. Furthermore, the focus on universities in Future Wales should also be reflected in the aim to retain graduates and skilled workers more generally, and particularly in Cardiff.*

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- *Larger, greenfield developments can play a particularly important role in the delivery of affordable housing and are often able to provide a higher level of affordable housing than brownfield sites due to less on-site constraints such as contamination.*
- *The difficulties in bringing forward development in Cardiff at pace prior to the recent uptick emphasises the importance of making available a sufficient land supply in order to provide multiple routes for development to come forward.*
- *Endorse the recognition that further sites will be needed in order to meet future need. With the allocated strategic sites in the adopted LDP now beginning to deliver at pace, there will soon be a need to start bringing forward new allocations to meet future need, taking into account the lead times for commencing development the emerging housing requirement for the Replacement LDP should take into account: 1 The need to attract and retain a suitably sized workforce to align with national, regional and local economic aspirations for Cardiff, including its role in the wider region and the UK and to support the Cardiff Capital Region City Deal; 2 The need to boost delivery of both market and affordable housing; and, 3 The need to attract and retain young people to balance the age profile of the population and address old age dependency ratios.*
- *Cardiff must not continue to chase a vision if it is clear that current problems are not being resolved.*
- *Affordable housing must be a priority if Cardiff is to solve its homeless problem.*
- *Purpose built student accommodation (PBSA). Policies should not seek to prioritise conventional housing over– this stock plays a significant role in freeing up traditional stock in the market for other households – policies should reflect this.*
- *No mention of Build to rent or co-living tenures – need to recognise the benefits and plan for their use.*
- *Ensure that any figures on population and numbers of households predicted until 2036 are as accurate as possible and reviewed regularly.*
- *Question where the people to buy and live in the new strategic sites are... Houses already built and for sale across the city are vacant.*
- *Question whether Cardiff needs any more high rise buildings/flatted developments building on every available space to the detriment of the historic centre.*
- *Need to do more on affordable housing/Council needs to be more ambitious in its building and maintenance plans. Failure to secure affordable housing need to stand up to landowners and developers and deliver for the people.*
- *Need to stop allowing car based estates unless they have good public transport and active travel facilities in place and facilities are planned to be built with the houses.*
- *Development needs to be sustainable - This means eco homes wherever possible - ensuring o retrofitting in the future.*

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- *It also means brown sites must be used and creative use of existing derelict buildings over the use of precious green space.*
- *Affordable housing: developers get away with building very little or no affordable housing. This needs addressing and leaves developers with the upper hand.*
- *Retro-fitting existing buildings meet Cardiff housing needs and improvements should be prioritised over new builds and developments.*
- *Development on greenfield sites must be avoided.*
- *Concerned about the way in which the document addresses the issues of housing and demography, because an unjustified level of pressure for housing would result in pressure to allocate land in environmentally damaging locations in Cardiff, including for example the Wentloog Levels SSSI.*
- *It is important to stress at the outset that, contrary to the impression given by the document, demography is not a policy-neutral factor in plan formulation. Cardiff appears to adhere to the theory of demographic agglomeration - that a higher level of population growth, far from being a challenge to the environmental fabric of the city, is actually a desired outcome. This is based on the contested and controversial theory that an artificially-inflated population will, of itself, drive economic development and thereby raise living standards for all. However, what Cardiff's RLDP plan formulators have failed to acknowledge is that neighbouring local authorities are also pursuing the same agenda. It is clearly not possible for Cardiff, Bristol Newport, Rhondda Cynon Taff and Blaenau Gwent for example to all increase their populations. Instead, we consider that the local planning authority should plan for a stable population.*
- *Object to statement that “**New homes... support the continued economic growth of the city**”. This is a reflection of the agglomeration theory of demography and housing, and should be removed from the document.*
- *ONS demographic projections are not predictions - they are based on a number of scenarios and assumptions. The document, in relying on the 2018 ONS/ Stats Wales projections, has failed to take into account two of the most important trends in demography in the UK emerging since 2018 - Brexit and the COVID-19 pandemic. Trend- based population projections from 2018 did not take account of very markedly falling numbers of in-migrants from the European Union as a result of Brexit. This trend is already manifesting itself. The COVID-19 pandemic has already resulted in a large move from urban to rural locations for housing, due to large and permanent increases in the levels in working from home, and this trend will continue and accelerate. The local planning authority is reminded that the Welsh Government has a long- term goal of 30% of workers working at or near home, as this will have a major impact on the population of Cardiff during the plan period.*
- *A very marked downturn in new births during the pandemic has also been observed, and the document fails to take this into consideration.*
- *The next ONS/States Wales projections will be published in 2022 therefore consider that no firm commitment can be given to levels of housing and employment land*

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provision at this stage in plan formulation. It seems very likely that, given that Cardiff's previous population growth was based mainly on in-migration rather than natural growth, and given the above trends, Cardiff's growth will, in common with all other local authorities in Wales, be far lower than hitherto expected, and the local planning authority must make provision for this in the RLDP, and could even be below zero. Whilst reference is made to this in the document, the main body of the text does not reflect this phenomenon at all.

- *Clarification is required in respect of bullet point 1 of section three of the housing chapter, which states: - “**delivering current landbank of circa 25,000 homes**”. It is not clear whether this means housing sites with extant planning permission but not yet constructed, or all housing allocations in the current LDP which have not been built out. If the latter, object to this, because it is bad planning practice to “roll forward” old allocations from previous development plans, a practice which skews LDP housing calculations, and adds pressure for housing in unsustainable locations.*
- *Cardiff needs more housing to meet demand. There is a desperate need for more social housing and affordable private housing. Many residents in Cardiff live in overcrowded, inadequate conditions and pay rents which are barely affordable. The plan should ensure that the pace of building social housing increases and that the diversity of the social housing stock matches the wide range of needs of residents. We believe that more affordable private housing should also be built, by which we mean housing that can be both bought and rented at reduced market rates.*
- *Affordable Housing requirements /policy needs to be supported/ strengthened to combat inequality.*
- *Homes need to be truly sustainable requiring the proper consideration of the raw materials required to develop them and where these raw materials will be derived. The new homes must also be developed in locations which avoids sterilising mineral resources and infrastructure.*
- *Why continue to use every available space for more housing?*
- *Vital that as a city Cardiff meets the housing needs of our population, however infrastructure should be in place before houses are built.*
- *Affordable housing must be of high quality design.*
- *Development must be sustainable – eco homes wherever possible. The use of brownfield sites and use of derelict buildings over green space.*
- *Current greenfield development are primarily for executive homes in suburbs. Need to provide sufficient homes for young families and older people who wish to downsize without leaving their communities. Halt the proliferation of blocks of flats.*
- *The forecast for housing requirements to 2036 needs to be reduced to reflect the fragility of the economy, affordability, housing types and tenure and the impact of student housing and under-occupied dwellings on supply.*
- *Access to cultural venues should be an key part of planning new housing areas*

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- *Improve access to cultural venues in local neighbourhoods and provide low cost spaces for people to use.*
- *Report that the need for housing was grossly exaggerated.*
- *Development in Cardiff has the appearance of being developer led.*
- *The design of new housing also needs to be reconsidered.*
- *Objective 3 refers to “future growth”. Why the obsession with growth, surely change is more appropriate?*
- *Bungalows, not high rise are especially needed for older people.*
- *Support need for Cardiff residents to have access to good housing at a range of prices.*
- *Hope that the large stock of existing land for housing will be taken account of – including impact of Brexit.*
- *Only 526 of 7,900 at Plasdwr have been built. Hope that the build rate will be taken into account and not allocate more land. We would object if land west of Pant Tawel lane was allocated for housing in the new LDP.*
- *Need to ensure proper drainage plans for housing sites.*
- *New housing sites should include adequate open spaces.*
- *Should provide for those in need of emergency housing – shelter for the homeless.*
- *The RMA would like to see robust and transparent evidence on any future housing needs/growth.*
- *There must be a recognition of the needs of working from home/hybrid working due to Covid-19.*
- *Cardiff’s role as a Capital City must not be at the detriment of the local residents. Need to see an improved efficiency of the highway network.*
- *Would like to see co-ordination between LDP’s across SE Wales region and analysis of data should look at the whole region not just Cardiff.*
- *The Ryan Family owns land at Henstaff Court in land identified for future expansion under Policy KP1 of the existing LDP. The land has previously been considered and found to be a sound addition in order to provide housing growth if needed. We support the Council’s desire to respond to urgent future need for new homes and Land at Henstaff Court is proposed to meet that need.*
- *The promotion of greenfield sites should be seen as a chance to provide for new homes across different locations.*
- *We question the reference to reduced growth assumptions – concerns for the implications on the LDP.*

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- *With regard to low build rates – more homes will still be needed looking forward to 2035 – which highlights the need for deliverable sites.*
- *Allocating Henstaff Court for development would address the under provision of affordable family housing.*
- *The growth in population and reducing household size over the new Plan period will require additional housing sites to be found – we are keen to promote land at Henstaff Court for future growth in relation to Strategic Site D in the new LDP.*
- *Stronger LDP policies on HMOs for eg 10% limit with 50m locality, policy mandating enhanced sound proofing/cycle storage.*
- *Based on the geographical and environmental constraints surrounding the city, there are limited options for Cardiff's growth. North West Cardiff represents the logical area for the next phase of growth. This location for development links with and will support the development of the South Wales Metro corridor.*
- *Object to proposed development between Pontprennau and Lisvane.*
- *Recognise there are limits to the concentration of HMOs that are permitted, based on a 50m radius from the proposal. However flat conversions are not included in this calculation, despite having a similar impact in local communities. This anomaly should be addressed.*
- *Opportunity for land at Mynachdy to be a candidate site for the development of low-cost housing suitable for elderly people.*
- *There is also the problem highlighted recently by a Wales Online report that the need for housing was grossly exaggerated.*

Theme - New Jobs and Economy

- *Need to maximise the effectiveness of the City Centre Land Use and Floorspace Survey... Identifying space that is currently occupied or vacant would enable planning committee to better scrutinise future applications based on current and likely future demand.*
- *The Port represents a significant asset to Cardiff, facilitating economic development and many direct and indirect benefits arising from its operations.*
- *LDP needs to provide a more positive and flexible policy approach to the Port to enable the best and most effective use of the Port. A port-specific related policy that provides the direction of travel within the area while excluding the Port from the more general employment land protection policies.*
- *Non Port uses are possible at some locations, with land available to anchor new investments in communities.*

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- *Need to broaden uses to include wider employment uses on port land not just port related uses. As well as industrial and logistical uses other uses such leisure, residential and mixed uses are possible.*
- *An important question for the RLDP is how land use policy could improve the quality, not just increase the quantity, of jobs within the city.*
- *Page 11 repeats the assumptions that have driven planning policy around jobs for many years: Cardiff is the economic driver of the city region; it has the fastest jobs growth of any UK core city; office space is in short supply; it has a well-qualified workforce but productivity lags other core cities with few HQ operations. These premises have provided the rationale for the “build it and they will come” approach to office construction in the Central and Bay Business Areas. City leaders have been keen on the advantages of agglomeration but less keen to acknowledge its disadvantages. A bigger city is viewed as inherently a better one.*

The Replacement LDP is a good time to review, rather than just repeat, these assumptions, particularly in the context of the climate and nature emergencies, post-pandemic challenges and rapid technological change.

- *RLDP should recognise the importance of employment at or close to where workers live. This offers potential benefits in reducing pressure on the environment and on transport networks.*
- *Growth should be placed on jobs – bringing businesses into the city.*
- *Priorities for workplaces of the future are city centre commercial and offices premises with a focus on public and active travel which could help protect older buildings where they merit retaining, jointly prioritise live work units and more remote/hybrid working, small employment hubs in accessible locations.*
- *Principle of facilitating the development of high value cluster of specialist sectors as part of creating long term employment opportunities should not be at the expense of indigenous business and operations. Investment and development should not price out established small businesses. No specific mention is made of those communities with largest populations of Black, Asian and Minority Ethnic communities, who experience disproportionate levels of unemployment and deprivation.*
- *Endorse draft Objective 2, which seeks to provide more jobs and recognises Cardiff’s key role as the economic driver of South East Wales. This policy objective should be linked with Objective 1 above in order to support a suitably sized workforce to drive increased prosperity.*
- *Cardiff’s economy is relatively small when compared to the other UK Core Cities, it has a lower representation in high tech sectors compared to the other Core City regions and productivity lags behind the Core City average. Its slow recovery following the 2008 recession has also shown that it is vulnerable to economic shocks. This indicates that the success of the region is not assured. In addition, Cardiff faces tough local competition for investment from its nearest Core City neighbour, Bristol, which ranks at*

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the top of the Core Cities group on numerous metrics. Hence, it is vital that Cardiff is supported to grow and prosper.

- *Emphasise the importance of planning for aspirational growth in Cardiff in order for the city to fulfil its potential as the economic driver of South East Wales. Hence, it is important to ensure that the labour force projections and econometric forecasts to be considered in the preparation of the emerging LDP are not constrained by past trends.*
- *Need a regional approach. Care needs to be taken before dedicating too much land to offices until there is greater understanding of the medium to long term impact of COVID-19. Developing remote working hubs, located in areas with good public transport and with potential for walking/cycling.*
- *Home working has risen but will recover, we need to work in teams for cross functional innovation. It might settle on a 3 or 4 day week at the desk though. Many jobs cannot be done at home, eg hospitality related and manufacturing, the focus on home working is a SE of England fixation.*
- *Prioritise the set-up and development of SMEs in Cardiff.*
- *When developing new employment sites, consideration of the raw materials required to develop them and where these raw materials will be derived is necessary. The new sites must also be developed in locations which avoids mineral resource and infrastructure sterilisation.*
- *Establish new jobs in the Valleys rather than greenfield locations to reduce commuting to the city and regenerate Valleys.*
- *New jobs in green technologies would benefit the poorer areas of the City Region and assist green targets.*
- *Need specific policies to support growth of the foundational economy, delivering jobs from the bottom up to ensure more distributed local employment opportunities and reduce need to travel by car.*
- *Employment Land Review should be accompanied by a reassessment of need for retail floorspace.*
- *A thriving culturally attractive city centre is important for Cardiff to compete as a place to live and work.*
- *National Museum Cardiff and St Fagans National Museum of History play a key part in the economy of Cardiff as an employer, it is important that for the city centre to thrive jobs are created and continued.*
- *The comment in the draft plan that office space is in short supply is surely outdated, given that significant numbers of employees are now working remotely, potentially for the long term.*
- *Rethink and reinvent, rather than slavishly trying to make work the existing commercial space.*

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- *Do NOT make St Mellons in East Cardiff the Car Park of South East Wales to service this venue and central Cardiff large scale, sporting, entertainment and business events.*
- *High density mixed use is a term used a lot in the consultation – high density does not sit comfortably with pandemics.*
- *Cardiff should be home to a wide range of jobs – manual, non manual, skilled and non skilled.*
- *The Council should press Welsh Government to introduce business friendly policies.*
- *Cardiff residents should be encouraged to become entrepreneurs.*
- *Barriers to business should be removed – support small local businesses.*
- *The arts sector has a key role to play in the economy and should be supported.*

Theme - New Infrastructure

- *Need to assess what infrastructure has been lost due to viability factors and put in place a viable framework to minimise loss in the future.*
- *A focus on wider infrastructure which creates healthy environments is crucial, green spaces, play areas, cycle and walking routes, community facilities are all important in creating a healthy environment.*
- *Crucial to liaise at an early stage in planning on current and future health care provision capacity.*
- *Important to recognise developing where appropriate public assets as shared multi-functional spaces to enable shared efficiencies and collaborative working across partner organisations to promote physical, mental and social well-being.*
- *Fears that promised improvements will not in fact occur have sometimes been realised. The plans originally approved can be modified after permission has been granted, and while 'Living Decision Notices' may need to be changed when circumstances do, they can also provide a mechanism for developers to renege on promises. Enforcement is not always as strict as it should be, and if a builder goes into liquidation (whether forced or by choice to avoid commitments) there is little that can be done, while Council, with other demands on its resources, is reluctant to step in and fill the gap.*
- *Adequate infrastructure is not just a question for brand-new developments but also for those within the built-up area of the city, where local facilities, such as health, education or parks, are often already stretched after over a decade of austerity.*
- *Transport improvements, should be installed first with new homes around that.*
- *Great scope for co-production between professionals and local residents in a Placemaking ethos of partnership and engagement for community infrastructure. -*

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Co-production could come in many forms, from restoration of buildings which have fallen into disuse, sometimes of historic value to new constructions, or improvements to open spaces. Resident involvement ensures that what is delivered meets local requirements, while professionals bring the skills to make this a success.

- *RLDP should include policies to facilitate these, both by smoothing the way for planning applications around them, and by requiring community involvement in infrastructure provision in developments. As well as creating facilities of lasting value, well-run projects can themselves play a positive role in building community cohesion and strengthening links with public bodies.*
- *For any new developments it is critical to get infrastructure in place first. This includes transport, utilities, community facilities and communications but there are many more. Communications must be futureproofed – e.g. the installation of 5G masts on new estates before houses are constructed/occupied.*
- *Priority should be a high quality, fully accessible to people of all abilities, comprehensive walking and cycling network linking homes to key destinations.*
- *Cycle infrastructure should be on space taken from motor vehicles rather than pedestrians or green spaces. Where not feasible on a particular route convert equivalent areas of road space to green space in suitable alternative locations.*
- *Need strong commitment that active travel infrastructure is in place first.*
- *Need a commitment for the provision of secure cycle storage for new development and on street bike hangars and storage for existing properties. Need to set out maximising the use of cargo bikes and e bikes. Electric Charging facilities must not obstruct cycling or walkers or take space from them.*
- *Welcome the commitment to a 15 minute neighbourhood and the locality approach. Concerned lack of detail stands opposed to the approach of zoning of development across the city which will lead to facilities placed at a distance from many communities.*
- *Seek a policy that masterplans all brown field sites to ensure increased urban population is matched or outstripped by increased infrastructure transport/green space/schools/GPs etc and new retail and community development are fully integrated.*
- *Endorse the proposed objective to ensure the timely provision of new infrastructure in order to support wellbeing and to ensure the lack of infrastructure does not constrain future growth. This commitment to providing new and better infrastructure must be central to the LDP in order to reflect Cardiff's role as a capital city.*
- *Where possible, new development should make use of existing and planned infrastructure in Cardiff, thereby helping to support the continued maintenance of walking and cycling routes and the operation of public transport services. This will also support more efficient patterns of development and reduce the need for car based travel.*

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- *Large strategic sites will offer opportunities to support the coordinated delivery of other types of infrastructure, for example community services, schools and health services. Greenfield sites will often offer increased opportunities for these added benefits when compared to brownfield locations.*
- *Viability studies should be made public.*
- *Fundamental problem with the development on strategic sites that infrastructure is not being provided in a timely manner. City is not creating sustainable communities.*
- *Priority must be given to making a success existing sites. Distinction between essential and necessary helps developers avoid responsibilities.*
- *Planning policies need to be stronger.*
- *Cardiff has failed to introduce CIL losing many millions to the detriment of the City and its residents.*
- *Existing strategic sites have been created with no new facilities leading to car travel – no 20 minute neighbourhoods.*
- *Create outside and partly sheltered areas for young people to socialise in all communities.*
- *More bike parks, skateparks, green areas and play areas for older kids - areas that are free to use, convenient and have accessible toilets and facilities for public use.*
- *Protect and develop communal community areas and facilities, and support communities to manage their own assets.*
- *Helpful to assess the raw material requirements to deliver the infrastructure through an appropriate resource assessment and consider the supply chain options necessary to ensure the sustainable delivery of such.*
- *Should be a priority for a formal mechanism for making clearer the process by which Section 106 contributions from developers are allocated – and that developers should be held publicly accountable.*
- *Protect sports facilities and those provide in new development should be of an appropriate size and not squeezed into flood risk areas.*
- *Access to culture will be vital to Cardiff over the length of this plan. Museums and other cultural facilities should be considered alongside other community facilities.*
- *Post pandemic these will be important aspects for recovery.*
- *Transport links to St Fagans should be improved – in particular greener solutions such as rail.*
- *Need for more recycling centres.*
- *Need improved broadband and mobile phone servers.*
- *New infrastructure should cater for young people.*

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- *Maximum benefits should be obtained from future S106 agreements*
- *We support the use of electric cars.*

Theme – Climate Change

- *A Flood Consequences Assessment and a Renewable Energy Assessment isn't sufficient to respond to the global threat. Need to stimulate new ideas through creation of Citizens Assemblies.*
- *Need to rethink where buildings are located and how they are built.*
- *Repurpose buildings rather than demolish.*
- *Thousands of homes in Cardiff could be under water within three decades. No more building should happen on flood plains.*
- *Need bold and innovative ways of responding to the climate emergency. New homes should be carbon neutral, use sustainable materials and are environmentally friendly, support electric vehicle charging and able to store bicycles.*
- *Significant proportion of Cardiff residents want to be able to cycle and walk more (Cardiff Bike Life Survey).*
- *RLDP must respond to the defining challenge of climate change. Need drastic action against flooding.*
- *The vital ambition of carbon neutrality is missing from its proposed objectives. This must be integrated as a principle, in line with the One Planet progress report.*
- *Allow Prioritising determining applications for renewable energy, flood defences and other green initiatives.*
- *Need to encourage energy efficiency in development and how will be enforced.*
- *Reserve land for a potential Cardiff Lagoon.*
- *Bikes have zero emissions – bringing about a significant modal split from cars to bikes would be a major contribution to reducing the city's carbon footprint.*
- *No mention of the nature or biodiversity crises, which are separate to that of the climate crisis and the administrations One Planet Cardiff Strategy.*
- *LDP should set out a roadmap for the Council to sign up to a Green Building Council Zero Carbon Buildings framework.*
- *LDP should recognise the need for the Council to work collaboratively with the development industry to identify feasible ways for new development to contribute towards addressing climate change.*
- *There are many opportunities for new development to assist in addressing the threat of climate change. However, it is important for the Council to balance increased regulatory requirements with the need to ensure that much-needed sustainable development (with the benefits that it brings) remains viable and is not prevented from coming forward.*

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- *It is considered that, in general, proposals to increase requirements through the built fabric are best placed to be managed through the building regulations framework, rather than the planning system. This will help to ensure consistency in application and reduce uncertainty for the development industry.*
- *The City must adopt an effective requirement for handling rainfall events/flood defences.*
- *Buildings should not be permitted without energy efficiency measures.*
- *Construction is responsible for large amounts of greenhouse emissions – use of recycled materials will significantly reduce emissions. Ensure that existing buildings are developed where possible.*
- *Fail to mention carbon neutrality potentially diverging from the One Planet Strategy.*
- *Business as usual is not tenable. Replacement LDP must set the framework and decision making must reflect the framework.*
- *No mention of getting carbon emissions down to net 0 by 2030.*
- *Strategic Flood Risk Plan for Cardiff should be made a high priority.*
- *Climate change is accelerating, which means sea levels are rising rapidly. Many coastal and low-lying areas in and near Cardiff could be submerged by 2050. The Replacement LDP. Must ensure that flood risk and potential flood risk areas are identified and finances are made available for work to be carried out on the erosion of the coast and land identified as at risk of flooding. Need to prioritise funding, 18million set by Council for 2021 compared to 61 million for cycle routes and improvements to transport infrastructure and active travel routes.*
- *Aim for Carbon Neutral.*
- *Plan for climate change and consider its differential impact.*
- *Flooding: climate action needs to be at the heart of the LDP. It's the most important issue facing every area in the world, especially Cardiff prone to risk of flooding and being underwater w thin decades. Soil sealing is linked to this and is an urgent issue which needs to be factored into when developing over soil and green space. Can brown sites please be used as an alternative and sustainable drainage, to ensure areas aren't prone to flooding as a result?*
- *Overall, I urge Cardiff Council to put residents first and ensure the LDP is sustainable and puts climate friendly policies in place in the LDP. Climate change is the single biggest issue facing us all, so there's no time to waste in allowing poor development to affect our city further.*
- *The LDP needs to include One Planet Cardiff Strategy and its commitment to become carbon neutral by 2030.*
- *Cardiff One Planet aspires to a carbon neutral Cardiff by 2030.*
- *In order to achieve this, it will be necessary, when considering a proposal for development, to estimate how much carbon will be released by any demolition and development over the life cycle of the development.*
- *Each proposed scheme should be evaluated in this way.*

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- *There should be an option to reject the proposal if the damage caused by carbon output is not warranted by the benefits of the development.*
- *Cardiff is the 6th most at risk city in the world from climate induced flooding. City Council has a responsibility to treat their decisions with the utmost seriousness in the light of this and ensure that any plans embed mitigations for this.*
- *Plan needs to enshrine sustainability and zero emissions from the start and a carbon net zero deadline for 2030 at the latest.*
- *All new housing should also be equipped or readily adaptable to cater for foreseeable or likely future policy shifts such as a move away from natural gas for heating, micro energy generation leading low-carbon/carbon neutral homes, and increased electric vehicle ownership.*
- *The Climate Emergency should be central and foremost to every development.*
- *Must consider the raw material requirements of delivering green energy solutions from the foundations for wind turbines, to glass for solar panels and the elements required for energy storage. For flood alleviation schemes, the plan should examine the resource requirements and supply chain considerations for the raw materials for the “hard” schemes as well exploring any potential opportunities to develop “soft”, nature based schemes within mineral workings, from flood capacity to water management through appropriate planting.*
- *Short term proposals ignore climate change.*
- *Prioritise electric charging points for vehicles to help cut emissions.*
- *This LDP is the last chance for Cardiff to get on the map as a champion in the fight against climate change.*
- *Every decision should consider the climate crisis and target carbon zero.*
- *Use natural solutions to protect Cardiff from effects of flooding.*
- *Climate action needs to be at the heart of the LDP especially as Cardiff is prone to flooding.*
- *Soil sealing is also an urgent issue. Use brownfield sites and sustainable drainage.*
- *Planning decisions short sighted – lack of respect for green spaces especially with the climate emergency.*
- *Impact of climate change is of major importance with Cardiff being a coastal city it is extremely likely that flooding incidents will occur more frequently in future.*
- *There appears to be little sense of urgency tackling the Climate Emergency.*
- *The National Museum of Wales declared a climate emergency in 2019.*
- *The museums are committed to being sustainable in all of their operations.*
- *Cardiff is one of the world’s cities most at risk of flooding. It not only needs greater flood protection, but the LDP needs to prevent any further new build on flood risk sites.*
- *Cease all existing and prevent future biomass energy production.*
- *Renewable energy, produced on appropriate sites in appropriate locations – is the only way Wales should go.*

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- *There is no reference to the Council agreement to reach Zero carbon by 2025 – this a serious omission.*
- *Congestion charge should be considered.*
- *Cardiff Council and Welsh Government should decrease the amount of traffic entering the City.*
- *Welcomes this as a key Objective for the new LDP.*
- *Planning for new developments must not ignore the reality of car ownership in the 21st Century – must be sufficient parking provided.*
- *Support the idea to “promote an increase in tree canopy cover across the city” we would also like to see the maximised retention of existing green spaces and green infrastructure.*
- *Provide assurances that the climate and ecological emergency will be taken seriously in all planning decisions through to 2036, proportionate to the global climate crisis. The planning system must work in tandem with your own One Planet City strategy. Any proposed developments must meet strict climate neutral benchmarking tests set within the LDP and work in tandem with OPC.*

Theme – Movement and Active Travel

- *Need an assessment of public transport cost and frequency in Cardiff compared to other UK cities where public transport network is integrated and had led to a dramatic modal shift.*
- *15min city concept should be adopted so people don't have to travel and end out of town development.*
- *Need to accelerate the shift away from private cars to reduce emissions.*
- *Need to take strong action to prioritise active and green travel. Disincentivise private car use making some car owners unhappy is the only way to encourage other forms of travel, alongside better public transport, pedestrian and cycle infrastructure.*
- *Emphasise the benefits to physical and mental health, through active travel, as well as to congestion and air quality.*
- *Be specific about active travel and public transport being inclusive, for people of all ages, genders, abilities and disabilities.*
- *Infrastructure and services need to avoid marginalising people unintentionally. Very few people can't undertake active travel with proper facilities.*
- *Add specific ambitions for walking for eg regular benches/rest areas, consistent wayfinding.*
- *Any development to the port needs to recognise the impacts of maritime air pollution, emissions from shipping can be substantial.*

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- *Reducing private car use is essential to protect the environment, to reduce congestion, and to improve health and wellbeing. But this must be done in ways that do not worsen life for those who today depend on a car for essential tasks, such as going to work or accessing services.*
- *To deter car use must go hand-in-hand with improved alternatives, especially for those living in places currently badly served by public transport, or with inadequate local facilities. This demands a regional perspective on transport policy and provision, given how many people from outside the city depend on it for work or services.*
- *Road charging should be applied to everyone.*
- *Parking policy needs to change allowing too much for out of centre retail which needs to be halted and reversed. Introduction of a workplace parking levy should be considered.*
- *Cycleways should be created out of roadspace and not tarmac cycleways through parks.*
- *More attention needed for pedestrians.*
- *Moving rapidly away from fossil fuels for transportation is vital, but we still need to find ways to reduce the use of cars.*
- *Should prioritise investing resources for trains and buses.*
- *No mention of trams or trams/trains.*
- *Need to protect potential transport routes from development. Vital transport hubs link up.*
- *Provision of high quality active travel infrastructure is key.*
- *Modal shift could be achieved quicker if the use of the car is made less attractive, need to see more roads and streets restricting access to cars, development of low traffic neighbourhoods, changes to parking policies to achieve the changes, introduction of fair road charging and a workplace levy.*
- *Need to promote active travel particularly in schools and work places. Need a comprehensive signage system to indicate time to cycle to key destinations.*
- *Accurate assessment of effectiveness of measures is needed and need to set targets. Consider Council should aim for 20% if all journeys to be made by bike by 2030.*
- *Need to expand the Nextbike Scheme. Working with neighbouring authorities to develop similar schemes for the Metro/rail station. Need to make electric assisted bikes available for outlying areas.*
- *Important to encourage alternative modes of transport to the car and cycling should play an important part together with better public transport and opportunities to walk however designating the trail to the south of the Llanishen and Lisvane reservoirs is inconsistent with objectives, adverse impact on walkers, the SSSI and ecosystems.*

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- *Lack of walking strategy integrated with the Council's modal shift and transport strategy leaves pedestrians disadvantaged. LDP must prioritise the public transport network.*
- *Need to set out clearly how the 20 minute neighbourhood are to be achieved, going beyond transport infrastructure.*
- *With any interventions should have before and after data so there is a bench mark. Make use of experts at the local universities.*
- *Support cycle lanes on repurposed road space but not through parks. Floodlight cycle lanes through parks changes the dynamic to the detriment of one user over another resulting in serious equality issues and very bad for wildlife.*
- *Propose all new properties conversions have installed or will be easily adaptable for on street electric vehicle charging, submit an active travel plan for number of residents they expect and offer a voucher for buying a bike, pay a contribution to active travel and public transport in the locality.*
- *Need for the Council to continue to work collaboratively with the development industry to identify feasible ways for new development to support sustainable and active travel. Larger greenfield developments in particular provide opportunities for master planning to create sustainable neighbourhoods that include walking and cycling networks and support bus or Metro links.*
- *Reducing the length of commuting distances or the need for commuting entirely, through enabling home working, should also form part of the approach to improving ease of movement across Cardiff.*
- *Meeting the need for housing in Cardiff will provide a wealth of opportunities to support ease of movement and active travel, through providing links to existing and new walking, cycling, bus and Metro networks.*
- *Too much focus on bus improvements which are failing to reduce car usage. The City and the Region need a rapid transit system (metro).*
- *People need to feel safe when cycling and walking. Cycle and footpaths should not be combined and should be well maintained.*
- *Support safe segregated well lit well maintained cycle pathways using road space as cyclists need a safer environment and the population needs to embrace active travel more. Against shared use pathways and the use of the Nant Fawr and Rhydypenau Wood Trails as the cost to the environment and the detriment to walkers are too much - the route takes from nature / other active travel not from roads. Safe Cycle routes should be segregated/well lit take road space not walking routes/trails.*
- *Council is focused on leisure routes or direct commutes to the city centre which don't access the local facilities which disadvantages women, kids and older people. Little regard for elderly, disabled and women. Segregated routes past houses on well-lit routes are much safer than going through parks and woodland trails. Use of*

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walking/trails are unsuitable for cycling pathways/superhighways nor for significant numbers of bikes.

- *The National Museums have committed to Cardiff's Healthy Travel Charter. The museums are supportive of healthy travel choices and hybrid working allowed less journeys into the office.*
- *Congestion charge should be considered.*
- *Cardiff Council and Welsh Government should decrease the amount of traffic entering the City.*
- *Need for all forms of public transport to be better integrated and link with active travel.*
- *Supports the creation of more and better active travel routes and usable Public Transport routes through and across the City as a driver to reduced use of personal car journeys.*
- *Develop safe cycle ways on existing road routes instead of tarmacking walkways in green areas- and presenting those developments as viable and credible in public consultations.*
- *Consider the needs of children in developing safe cycleways for everyday travel (not just leisure).*
- *Make Cardiff a 15 minute City.*
- *Need to promote affordable public transport and active travel/take road space from cars. Bike lanes should not be built in parks/prevent any further development only reached by car/taxi parking.*
- *Dates for EV only production are being announced for 2028-2030 well before the ban on new petrol and diesel sale. This suggests a rapid switch of the population of cars not a slow change starting in 2030/35. Charging capacity will be an issue, for the grid as well as for forecourts - just about the time period for the LDP so we need to look beyond the status quo.*
- *Rush hour will fade as work times will vary and smart travel widens. Travel patterns will be more variable/spread out.*
- *Buses are not popular but are still essential in the absence of a light tram system, ie they are a short term need.*
- *Cycling use has risen but not by as much as expected (London data) so do not expect miracles.*
- *There are more cars than ever, and car use is still the preferred option and will rise unless an alternative is better.*
- *The pollution issues are broadly the same for EV as for other cars. EV autonomous vehicles threaten to increase journeys like taxis mainly used by one passenger.*

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- *The plan for traffic in the city needs a thorough review is correct. Castle St reopening - understand the issues but will not get this is an opportunity again.*
- *It is not acceptable just to reroute traffic through existing residential areas, but with the road pattern in Cardiff as it is this is the only way but must be accompanied by a serious reduction in traffic, ie public transport and exterior P&R.*
- *How should travellers into Cardiff be routed - favour redirection down to the Bay with a big P&R by the docks with enhanced Metro.*
- *Cycle friendly city and prioritising people over cars: development must prioritise walking and cycling but this means a proper transport system for Cardiff - metro, tram lines, cycle lanes, and a proper public transport system. The council shouldn't agree for development to happen and allow congestion to increase without sufficient Public transport in place first. Developers have the upper hand and all they care about is making money - not the impact on existing services such as healthcare and education and congestion. This is where the Council comes in through sufficient protection for residents and a sustainable LDP.*
- *The public transport infrastructure proposals are so vague. Without an effective, efficient public transport system accessible to all areas of the city, our future development will be undermined. Can you work this up more to reassure citizens you also think it is important?*
- ***Object** to reference at page of the document to the need for the Eastern Bay Link. One option for this proposed new highway would impact on the site integrity of the Severn Estuary Special Protection Area.*
- *The plan must clearly integrate the Council and Welsh Government policies aiming at increasing the number of residents using public transport and active travel.*
- *Concern over more and more congestion.*
- *Prioritise sustainable development by making sure there are public transport links and walking and cycling infrastructure.*
- *In favour of proposal to build a cycle route from Cardiff High School beside the reservoirs to Lisvane but it cannot be a continuation of the existing gravel track between the high school and Rhydypenau Rd.*
- *Reduce car traffic, increase public transport and cycle ways and make affordable for all.*
- *Do not invest in big cycle highways which mean cutting trees down in parks.*
- *Prioritise people over cars.*
- *Prioritise walking, cycling and public transport.*
- *Improve public transport. Bus services to outlying areas are infrequent.*
- *RLDP must include proposals to tackle the current sustainable infrastructure deficit and deliver on this before further land releases.*

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- *Poor air quality a key concern – all buses need to be electric and powered from renewable resources as soon as possible.*
- *The National Museums have committed to Cardiff's Healthy Travel Charter. The museums are supported of healthy travel choices and hybrid working allowed less journeys into the office.*
- *Needs more explicit support for cycling as a central element in the city's future development.*
- *Due to increase in traffic congestion on Heol Pontprennau and resultant decrease in air quality. Access to the site should be via a new junction on the A4232 via St Mellons Road and speed limit on M4 between Junction 30 and 32 should also be reduced to 50 mph. Provision of new schools should also be looked at given it took 20 years to happen for Pontprennau.*
- *Outstanding problems with the present LDP:*
 1. *The lack of evidence of any success to date in achieving the modal split target.*
 2. *In North West Cardiff the development of Plasdwr where there are numerous new houses and highway alterations, but there is no sign of the provision of any of the necessary infrastructure or of the parkland suggested by the "garden city" name given to the development.*
 3. *The total lack of any regional plan beyond the boundaries of Cardiff.*
- *There is also considerable need to improve the efficiency of Cardiff's highway network for the benefit of all its users and for all forms of transportation.*
- *Concerns regarding parking - Cardiff needs to rethink its requirements of developers to provide adequate levels of off street parking and greater road widths to address this. Consequently Cardiff needs to start thinking differently, not just carrying on with the same policies.*

Theme – Health and Wellbeing and Equalities

- *Need a commitment to the installation of more permanent air quality monitoring stations in known high pollution areas to track the problem in real time rather than sporadic data as with current Air Quality Management Systems.*
- *Vital the LDP addresses inequalities in opportunities, employment and health status, access to green open space.*
- *The LDP must address diverse needs: there is no mention of race equality, despite all the evidence that this is significant for housing or health.*
- *Stress the importance of the Health Impact Assessment of the LDP and major developments...*

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- *Obesity is a key issue in Cardiff – environment play a key role in how active people are and the food they eat.*
- *Need to consider fat food takeaways and how they can be managed and restricted particularly around schools.*
- *Reference the Cardiff Wellbeing Assessment as a source of existing evidence.*
- *RLDP needs to set clear policies which have health and well-being for all at their heart.*
- *Must address diverse needs. For example, there is no mention of race equality, despite all the evidence that this is significant for housing or health.*
- *Inequality of green space. It's a myth that Cardiff is a green city. Many areas of the city have well below UK average access to green space. This inequality was highlighted by the pandemic.*
- *Appreciation of inequalities and of how Cardiff residents have diverse needs which must be taken account of in planning policy.*
- *A well-planned city must be inclusive for all. An important part of delivering this will be breaking down unnecessary physical barriers and exclusions imposed on disabled people by poor design of buildings and places.*
- *No mention the question of race equality.*
- *The proposed Vision for the RLDP has fairness at its heart and so must consider how the development of our city can promote race equality.*
- *Local Housing Market Assessment only refers to the needs of different age groups should be extended to cover all groups with specific housing needs, including needs of key groups (Black, Asian and minority ethnic people, disabled people, homeless people, older people, those with mental health conditions, ethnic minority women, etc.).*
- *Priorities should be feeling safe, access to green space and equality of access to education, jobs and training.*
- *Increase the provision of land for biodiversity – not just green space.*
- *Modal shift away from the private car will help address issues of air quality and noise pollution, employment and services more accessible to those on lower incomes who can't afford a car but can a bike and result in increasing levels of physical activity.*
- *Significant inequalities and disparities across Cardiff must inform the way in which Cardiff grows, including the provision of homes, access to green space, public transport, and employment infrastructure. The LDP documents make no reference to race equality, despite implications across housing, employment, health, access to the natural environment, and pollution for Black, Asian and Ethnic communities in Cardiff.*
- *LDP must consider the impact of development on affordability and the existing culture of communities. Whilst development and re-development bring investment into the infrastructure of communities – including housing supply, employment, and transport – it also has the potential to increase property and rental prices and displace*

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communities. This has the unintended consequence of displacing existing communities, predominantly low-income households.

- *Need to reference to the Authorities statutory obligations under the Crime and Disorder Act 1988 to prevent crime and the creating of safer and of more sustainable development through the consideration of Crime Prevention through Environmental Design. Such strategic references have played a key part in making many developments and communities safer and more secure.*
- *New development can make an important contribution through the delivery of mixed communities that include a range of housing tenures and sizes, with a focus on green infrastructure, public amenities and active travel opportunities.*
- *New greenfield sites are also able to deliver new health facilities.*
- *Objective linked to movement and active travel. Improved air quality needs people to get out of their cars – need a viable alternative to the car – a rapid transit system is needed and the adoption of policies that do not make the situation worse such as ribbon development along the A4119 causing bottlenecks and poor air quality worse.*
- *Small industrial/manufacturing workshops on sites around the city are important to reduce inequalities.*
- *Need to ensure that improving people’s health is a key consideration of development proposals. Make greater use of the Wellbeing of Future Generations act for clear policy to reject proposals that do not meet the City’s standard.*
- *Whitchurch Tennis Club is a premier tennis facility, a community asset used by a number of schools, with holiday camps, use of the outdoor space as a result of covid for wheelchair tennis clubs, netball clubs, Pilates and fitness clubs.*
- *Seek protection afforded by planning policy to protect and preserve existing sporting and community assets.*
- *Improve the air quality in Cardiff - disrupt the growth of car use by creating great alternatives*
- *Adhere to the principles of the Wellbeing of Future Generations Act and the Socio Economic duty.*
- *Protection of trees is important for health and well-being.*
- *Strongly support the development of a railway station at Mynachdy as soon as possible as part of the Metro programme.*
- *No reference to race or children.*
- *The role of museums and cultural facilities will play a key role here.*
- *Amgueddfa Cymru exists to help people and communities in Wales to have a better and culturally richer life.*
- *There should be more, local swimming pools, public and private, gyms, fitness studios, teen playgrounds and community gardens.*

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- *More outdoor leisure facilities including reinforcing and investing in the many neglected public footpaths for walking and cycling should be provided.*
- *The Council should allocate more money to fund children's parks and playgrounds.*
- *Crime is mentioned but anti-social behaviour should be dealt with.*
- *More farmers markets should be supported.*

Theme – City Centre and Cardiff Bay

- *Agree that a mixed use City centre will be key to regeneration but need the right balance not over reliance on offices and reduction in leisure as in recent years.*
- *Need a dedicated city centre regeneration strategy with extensive public engagement.*
- *The Port should be excluded from a Cardiff Bay Business Area which would duplicate matters and may restrict the flexibility sought in the Port area.*
- *Focus is on the city centre with little said about the poorer wards who have long been deprived the things that would make '20-minute neighbourhoods' a reality - e.g. thriving local high streets with a wide choice of small independent businesses, shops, cafes et; a range of public and community spaces for people and community groups to operate from.*
- *Important to have mixed uses for a range of ages and keeping control over the number and size of licensed premises.*
- *Need to repurpose the city centre and empty shops and offices post covid.*
- *For Cardiff City Centre to thrive, then out/edge of-town shopping will have to be discouraged, which will also help the modal shift from private cars This implies that the Replacement LDP should go further than the Adopted LDP and seek not only to halt the growth of retail parks but, over time, to shrink or close some.*
- *City Centre is going to be far more mixed use, supports tourism. Operates as a transport hub, role of universities in supporting students and city centre student facilities, helps retain students after graduation, supports museums, links with Cardiff Bay and the suburbs.*
- *Too much focus on the City Centre and the Bay need to consider. Need to create well connected, vibrant district shopping and employment centre.*
- *LDP should outline how it will balance development whilst meeting the needs of communities in an affordable way, for example through mixed tenure of housing and provision of community buildings.*
- *Concern that the City is determined to continue a high risk strategy of chasing signature projects. Question whether there is any point protecting the retail role of the*

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- city centre which were struggling before the pandemic. Question the objective to establish the Bay as a leading UK urban destination – need to offer a variety of attractions including St Fagans Museum.*
- *Change the city centre into a more social and green area where nature and the arts dominate.*
- *Why demolish Queen’s Arcade to replace it with something similar?*
- *Why house a Military Museum in the Bay on the only green site available?*
- *The proposals for an indoor arena in the Bay are unnecessary.*
- *National Museum Cardiff plays a key role for the centre of Cardiff and will continue to attract visitors and facilitate wider benefit for the area.*
- *It is vital that the “cultural quarter” around National Museum Cardiff is physically and psychologically far more accessible from Queen Street.*
- *Protecting and developing city centre is of key importance – as retail moves online and Covid changes how we work.*
- *Agree that district and local centres need to be supported. Station Road area as a local centre and wish to protect and develop its role.*
- *These developments are supported but will only be of benefit to Radyr residents if the infrastructure is in place for them.*
- *Do not want through travel of visitors from beyond the city to have a detrimental impact on local residents.*
- *Support the development of local centres.*
- *Footfall in the high street will need to be managed back if retail is to survive, like the idea of more outside eating and experiences creating a non-stop party atmosphere. Towns need people to use them and people need a reason to be there.*

Theme – Post Pandemic Recovery

- *Need to consider the future of the city centre for eg re purposing parts of the city centre to create parks.*
- *Importance of access to green space for exercise and mental well-being continues to be a priority.*
- *Travel changes to cycling and walking should be sustained and enhance.*
- *Seen an increases in home working if this trend continues homes should be designed for this or the creation of local work hubs.*
- *Priorities post pandemic active travel, staying local and revitalising the city centre, district and local centres.*

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- *Increase in walking and cycling has meant that shared paths no longer function effectively due to the numbers using them. Need separate walking and cycling infrastructure.*
- *Consider that people who cycle or walk spend more locally than people driving cars therefore investing in cycling and walking infrastructure will aid viability of district and local centres.*
- *Leisure cycling can assist in reviving tourism. Need to ensure the infrastructure is in place to support this.*
- *Would like to see a greater detail around place making, including on how communities shape the priorities for their communities. We would welcome consideration of how the council and LDP can enable local people to protect the things they value in their neighbourhood through community land trusts.*
- *The trend towards increased working from home will require the provision of a range of housing types and sizes at a range of densities, including attractive, larger homes with spare bedrooms to support home working. The provision of attractive work hubs in neighbourhood centres, together with access to local green spaces and facilities in well-designed neighbourhoods will also be important in supporting wellbeing and can be easily incorporated in planned developments.*
- *The inclusion of a policy focus on reawakening Wales' cultural sectors is also welcomed. The achievement of this aim will require attracting and maintaining younger people through provision of a sufficient supply and range of high-quality housing.*
- *The inclusion of a policy focus on reawakening Wales' cultural sectors is also welcomed. The achievement of this aim will require attracting and maintaining younger people through provision of a sufficient supply and range of high-quality housing.*
- *Prioritise new working and meeting hubs throughout the city rather than focusing on the city centre as a high density major financial and service sector The 20 minute neighbourhood needs to become the standard.*
- *Pandemic showed that people need easy access to open spaces, more green space and trees.*
- *Role of culture should be factored into the thinking in respect of these plans.*
- *Council needs to understand how Covid will affect work and travel patterns.*
- *Support residents working from home, developing spaces they could use locally.*
- *The post pandemic world brings opportunity to develop new services and more co working spaces.*
- *Increased trend of working from home will mean increased use of broadband etc.*
- *Local services should be provided to avoid travel into the City Centre.*

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- *Working practices and travel patterns will have changed and this provides an opportunity for change.*

Theme – Placemaking Approach and High Quality Design

- *Concern at a lack of new evidence being sought.*
- *Need to maximise community involvement.*
- *The LDP should help local people to protect the things they cherish in their neighbourhood with the creation of community land trusts.*
- *We need to move towards twenty minute neighbourhoods where all the facilities citizens need are within a 20-minute walk.*
- *The council must work with community - a much more collaborative and helpful approach, and that was not evident in the LDP.*
- *The 20 minute neighbourhood or 15 minute city concepts create healthy and sustainable communities where services and amenities are within a 15-20 minute walk or a short cycle ride.*
- *Placemaking approach enables consideration to be given to the environmental impact of a development, the impact on health and how well it integrated into the existing neighbourhood.*
- *Involvement of local communities in the planning and development of their local area is important.*
- *Involving the local community in developing proposals is the first principle of the Placemaking Wales Charter and must be at the heart of the Placemaking objective. It is not just a matter for new communities but also for existing ones, which are impacted by developments in their area or nearby.*
- *Communities – whether established or newly forming – should be involved from the outset in Master planning.*
- *Community Asset Transfers can empower local groups to protect the things they cherish in their neighbourhood but must not become a means of Council cutting budgets or avoiding ongoing support.*
- *Create 20 minute neighbourhoods where all facilities are within a 20 minute walk.*
- *Support placemaking approach.*
- *Need explicit commitment to creating more 20 minute neighbourhood with key services within easy walking and cycling distances.*
- *Missed opportunity to define 'Liveable Neighbourhoods'*
- *Give more consideration to the concept of City of Villages.*
- *Lack of planning in Cardiff, no thought as to how constituent parts fit together.*

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- *Refer to Policy 2 in Future Wales sets out that the growth and regeneration of towns and cities should be based on the following strategic placemaking principles. Large strategic sites (such as an extension to Plasdŵr to the north or west) will offer opportunities to provide master planned communities incorporating work hubs and local services in neighbourhood centres, access to green spaces and a range of housing types and densities, whilst linking with walking, cycling and public transport networks.*
- *Commitment to supporting development in the most sustainable locations sometimes these are greenfield.*
- *Endorse the proposed place-making approach and commitment to high quality design, to ensure that future growth can be effectively managed.*
- *Focuses on taking steps to create sustainable places whilst supporting growth is welcomed. This represents positive planning.*
- *Master planning process can establish design principles and manage capacity for change.*
- *Support the intention of 'working with local communities to improve neighbourhoods.*
- *Need to increase the range of local facilities in line with the 20-minute city providing a resident's daily and weekly needs within a 10 minute walk.*
- *Success of this objective rests with the Council.*
- *Move to brownfield site development as a priority/stop allowing trees to be cut down/upfront delivery of infrastructure and facilities/have energy standards for all new development.*
- *The use of appropriate materials is integral to placemaking. PPW recognises that suitable building stone is important for the restoration of historic buildings and may be available from small operations in specific locations to supply local markets. Further, dimension stone is used in new buildings where it is important to maintain local building character. It may be necessary to obtain dimension stone from geological formations which are restricted in occurrence in order to obtain a particular colour. Use of local materials may play a significant role in creating sustainable places, maximising regeneration opportunities, enhancing public spaces and delivering new developments of high quality design.*
- *Utilise existing buildings instead of greenfield sites and repurpose the city centre and empty buildings.*
- *Give communities ownership of their areas.*
- *Develop the 20 minute neighbourhood.*
- *Museums are not mentioned specifically in the list provided but consideration must be given to existing key locations in Cardiff as well as planned into future developments.*
- *Agree that placemaking can be an important tool to develop safe, vibrant and attractive communities.*

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- *Request Station Road area is made a more attractive community destination eg. A community square.*
- *Request that the 7,000 homes near Radyr be built to a high quality.*
- *Request a retail site near our community.*
- *Would like to see safer cycling across Plasdwr.*
- *We want the promised amount of green space to be kept without any loss to housing.*
- *All of the promises community facilities must be delivered.*
- *Welcomes the proposed protection and enhancements to the key natural assets, particularly the river Taff.*
- *Developments should protect existing green infrastructure.*
- *Re-develop brownfield rather than greenfield sites.*

Theme – Green Infrastructure and Natural Assets

- *Biodiversity emergency is an afterthought. Whilst the Green Infrastructure Assessment and Settlement Boundary review provide some value need more. Suggest mechanisms like the Citizens Assemblies would be beneficial.*
- *ABP recognise the presence of two “Sand Wharf Protection Areas” within the Port. ABP recognise the value of the wharves but request flexibility to relocate across the Port in accordance with commercial demand, including consolidation, re-provision or loss in line with the long-term strategy for the Port.*
- *Imperative that current biodiverse areas are properly protected, including mature trees, new development is nature friendly and integrated into developments, urban biodiversity mustn't be an add on.*
- *Nature in crisis We need to protect habitat and create new habitat; provision of wildlife corridors in existing streets and new builds, hedgehog highways, bird and bat nesting and roosting boxes, wildlife friendly planting and less mowing. The LDP should protect and create green space, for the health: cities such as Birmingham and Nottingham have twice as much per capita public open space as Cardiff – and they are being imaginative in creating more parks and wildlife areas, by eg turning a disused shopping centre into a park and wetland.*
- *Many areas of the city have well below UK average access to green space. This inequality was highlighted by the pandemic.*
- *More priority should be given to existing over developers to buy land and community voices should carry more weight in planning decisions.*
- *Biodiversity has never been more threatened.*

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- *An essential part of the Evidence Base for the RLDP must be a comprehensive survey and inventory of biodiversity in the city. We cannot protect and enhance habitats if we do not know what exists today.*
- *Need to protect habitats, provide wildlife corridors in existing streets and new builds, hedgehog highways, bird and bat nesting and roosting boxes, wildlife friendly planting and mowing*
- *Protection of green space, and creation of green space, for the health and well-being of all. Cities such as Birmingham and Nottingham have twice as much per capita public open space as Cardiff – and they are being imaginative in creating more parks and wildlife areas. Turning a disused shopping centre into a park and wetland for example.*
- *Need to address open green space deficits in central/southern Cardiff.*
- *The protection and creation of green space is essential for the health and well-being of residents. Cities such as Birmingham and Nottingham have twice as much per capita public open space as Cardiff – and they are being imaginative in creating more parks and wildlife areas. Many areas of Cardiff have well below UK average access to green space, an inequality was highlighted by the pandemic. The LDP must do more to drive forward urban greening.*
- *Open space is under pressure from development but the consultation does not draw a correlation with how development should or shouldn't take place, for example to protect urban sinks or watercourses and urban sinks. We welcome efforts to make Cardiff's blue spaces more accessible.*
- *Loss of mature trees eg Suffolk House, The Rise. Urge the Council to adopt a methodology such as Capital Asset Valuation of Amenity Trees (CAVAT) for developments. with the principle that that for eg all development have to be CAVAT neutral within 5 years.*
- *Within the Cardiff City Council area there are recorded risks from past coal mining activity at surface and shallow depth. The recorded features include; mine entries, shallow workings and reported surface hazards.*
- *Need to maintain /increase access to green space – identify sites that can be repurposed to green spaces, raise the bar for building on green space, every development needs to demonstrate a net gain of trees. Presumption against the loss of mature trees unless it meets a high bar of public interest.*
- *It is important to emphasise the value of the master planning process in the design of high quality neighbourhoods that promote ecological connectivity and support biodiversity net gain.*
- *Cardiff has relatively little open spaces compared to other cities, with many areas of the city well below UK averages – need to address this inequality.*
- *A Green Belt is essential to protect the green backdrop.*

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- *City should support local groups tree planting/creating wildlife areas/meadows/allowing them a level of responsibility for the management of local green areas. Need programmes to protect the rivers from pollution and waste to achieve clean rivers.*
- *The Green Wedge is an important land feature for the city and should remain so for future generations.*
- *40% tree cover.*
- *A biodiversity action plan.*
- *Protection for green areas and biodiverse areas- a map for the public to know what is protected from development.*
- *Protection of the river corridors and further joining up of riverside and green areas.*
- *Wanted to stress the vital importance of having clean places to swim around Cardiff. Can the water quality of our rivers and sea be taken seriously so that improvements enable residents to enjoy swimming in and around fresh water and sea?*
- *The creation of new green spaces and wetland. Other cities such as Nottingham are now creating new green spaces in their city centres.*
- *No substantial development should take place on or otherwise adversely impacting upon the Wentloog Levels SSSI, object to the fact that the RLDP does not contain a commitment to this effect.*
- *The local planning authority is reminded that the Wentloog Levels (as part of the wider Gwent Levels) has been designated pursuant to Policy 9 of the National Development Framework (“Future Wales”) as one of only nine National Natural Resource Management Areas (NNRMAs) in the whole of Wales. The document fails to refer to this important designation, and impact it should have on development plan formulation, and for this reason, we object to it.*
- *Object to the way in which the natural environment is addressed in the RLDP. The natural environment section is almost purely descriptive, and sets out no actual commitments, unlike other sections of the document which set out definite commitments, for example the Arena project. We consider that the environment section should be the subject of a fundamental re-write, with concrete commitments, chief amongst which should be a commitment to an effective absolute constraint on development on or otherwise affecting the Wentloog Levels SSSI.*
- *The section entitled “New Evidence Requirements to Help Address Issues” is wholly deficient, and objects to it. We are firmly of the opinion that a full brownfield survey from the point of view of biodiversity (not merely development potential), and a full potential SINC site survey, covering the entire land surface of the local planning authority area should be included in the list of new required evidence.*

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- *Land left for nature is of paramount importance. Biodiversity and ways to help it flourish within the city boundaries should also be embedded in the LDP and consulted on with residents of the city.*
- *Support the principle of including a Green Belt or Green Wedge and would want such a policy to be operated to the maximum in order to protect our rural communities.*
- *The greening of the centre should be serious as in Singapore or Nottingham.*
- *Every mature tree in Cardiff should be precious that developers need to work around, not destroy.*
- *Concern over loss of trees.*
- *Preservation of mature trees and green space needs to take greater prominence in the LDP. Too many are being lost. Mitigating by planting new trees is not always sufficient.*
- *Refers to Wrexham County Borough Tree and Woodland Strategy 2016 – 2026 as a good practice initiative.*
- *Cardiff should be doing all it can to protect and enhance natural green spaces, creating green, natural corridors throughout the city and protecting all existing green infrastructure.*
- *Protect green corridors and green spaces. Green Wedge should be legally protected and development sprawl refused.*
- *Disappointed there is more detail on Green Infrastructure in Appendix than main text.*
- *Integration of Green Infrastructure, Heritage and Culture vital to create a distinctive future for City.*
- *Maximise the use of green spaces for the sustainable growing of food for our local communities.*
- *The wellbeing value of the protection of greenspaces cannot be underestimated.*
- *Should rule out development on the Wentloog SSSI and every scrap of the Wentloog Levels should be protected as a Community Green Infrastructure.*
- *Prevent plastic pollution to enter the River Taff.*
- *Council should make better use of the Taff – increase leisure use.*
- *Housing site at De Braose Close should not be permitted – should be part of green corridor.*
- *Fields west of Pant Tawel lane should be kept.*
- *Develop strategy for Hermit Woods.*
- *Transport for Wales's compounds should be returned to green spaces.*

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- *Welcome the proposed protection and enhancements to the key natural assets, particularly the river Taff.*
- *Developments should protect existing green infrastructure.*
- *Re-develop brownfield rather than greenfield sites.*
- *Dismayed to see such large areas of green land being built upon when we are trying to conserve nature, biodiversity and good air quality. Live in Pontprennau peace and tranquillity sorely missed in more compact built up areas. It seems that what has been nurtured in our area is being destroyed. Worry for the local wildlife. Appreciate steps are being taken to minimise impact on local residents but fear that these are being overridden by greedy developers and lack of care for the landscape, local residents, nature and wildlife. Request that our local protect our local environment for the future of our community.*
- *Similar encouragement and support should be given around preservation or creation of green spaces or the reuse of buildings for community purposes.*
- *Most of Adamsdown ward is an SOA of deprivation. The Integrated Sustainability Appraisal needs to take account of shortage of green space in the area.*
- *The existing LDP has failed to protect the small amount of green space the ward has.*
- *The Integrated Sustainability Appraisal needs to protect all of Adamsdown's green spaces from being built on.*
- *Any future development of existing buildings in Adamsdown should be required to show how it would increase the amount of green space in the community.*

Theme – Historic and Cultural Assets

- *Consider successive administrations have resulted in the loss of cultural heritage. Need to look to lessons from Liverpool's removal from the UNESCO World Heritage Site. Need to identify what remains and development likely to have a negative impact.*
- *Iconic buildings such as the neglected Coal Exchange, and much-loved local landmarks that tend to fall to development, such as Guildford Terrace, where only the facades remain, need to be valued in the new LDP.*
- *Suggest that a series of story boards be incorporated into the plans to highlight our lost historic sites like the Greyfriars Monastery and the Cory Hall as well as our remaining historic buildings.*
- *Cardiff has a proud history and a bright future. It is important that our children and grand children see visible signs of our heritage around the capital so that they can be proud of how far we have come.*
- *Cardiff Council can do much more to protect and enhance the built heritage of our city. To do this, it has to show real commitment to achieving this to protect local distinctiveness requires local communities to be engaged.*

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- *Iconic buildings such as the neglected Coal Exchange, and much-loved local landmarks that tend to fall to development, such as Guildford Terrace, where only the facades remain, need to be valued in the new LDP.*
- *Need to clearly demonstrate how the enforcement of the existing protections/legislations will be implemented.*
- *Increasing pedestrianisation and restricting vehicle access protects historic assets by reducing damaging pollutants, maximises the cities attractiveness for tourism and the night-time economy.*
- *Must include assets of community value, not just assets of a particular historical or cultural significance, for example the Paddle Steamer, Guildford Crescent, Mynachdy Institute, and the Coal Exchange.*
- *Welsh Language should have greater prominence in everyday life - All new development if named should be welsh or bilingual, all parks, streets cycle paths , footpaths bus and train stations developed by public bodies have a welsh name.*
- *Consider that little attention has been given to this to date.*
- *Old Whitchurch Hospital – Grade 2 Listed Structure with lots of space to be used for well-being services. Would like to see space such as the theatre used for community performance groups. Hope the plan would include provision for improvement and renovation of the theatre.*
- *Council's approach to the city's heritage is pitiful. Want to live in a capital which has some pride in its history as a multi ethnic Welsh city.*
- *Prioritise cultural heritage and community cohesion in respecting communities (Bute Town) and communities of interest/ identity (LGBTQIA bars, allotment owners, small music venues, Muslim community etc).*
- *Historical and Cultural Assets includes the recognition of the range of historic assets, both designated (protected as Scheduled Monuments or Listed Buildings) and non-designated, and the need to both protect and preserve these as part of Cardiff's heritage Understanding these as a resource will contribute to a better appreciation, both from a development management viewpoint and as keyed in with the well-being goals.*
- *It should also be noted that Legislative and Policy changes have occurred since the last LDP and these include the Historic Environment (Wales) Act 2016, mentioned in the Sustainability Report; and the legislative cascade includes TAN24: The Historic Environment 2017, and Planning Policy Wales 2021 Edition 11. Further Best Practice guidance on managing change in the historic environment is provided by Cadw.*
- *When considering cultural assets must be first and foremost about people rather than money and profit.*
- *The objectives of the Council and the Welsh Government to increase the number of Welsh speakers need to be embedded in LA planning policy. Suggestions include ensuring that all new schools are Welsh medium, widening access to existing Welsh-*

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medium schools and ensuring that all new developments – streets, footpaths, parks, buildings – have Welsh names.

- *The use of appropriate materials will be necessary to protect and enhance Cardiff's historic and cultural assets together with supporting sustainable tourism and cultural sectors.*
- *Protect community heritage.*
- *Disappointed there is more detail on Heritage and Culture in Appendix than main text.*
- *Integration of Green Infrastructure, Heritage and Culture vital to create a distinctive future for City.*
- *Important that the LDP provides enhanced protection for Cardiff's historic and cultural assets. This protection needs to exist at both macro and micro levels.*
- *Cardiff Council should avoid loss of built heritage.*
- *Poor buildings in City Centre should be replaced with better quality buildings.*
- *Work with Welsh Language Commissioner to operate with Promotion Standards.*
- *Work with Council and Cadw to develop management strategy for Mound and Cooking Mound in Radyr woods.*
- *The East of Cardiff lacks any kind of arts centre currently and there should be one as the nearest is otherwise Canton or Newport Riverside.*
-

Theme – Regional Planning

- *Need to take a wider view across the region.*
- *Need to work in partnership with neighbouring Councils – decisions such as flooding issues need a river catchment solution and not be made in isolation as do transport, employment and housing issues.*
- *Cardiff's future cannot be determined without taking a wider view across the region, which opens up options for responding to matters like flooding, housing and transport. This is barely mentioned in the LDP consultation paper.*
- *Need better alignment between the LDP and the SDP. Cardiff's future cannot be determined without taking a wider view across the region, which opens up options for responding to matters like flooding, housing and transport. The issues around employment land and retail locations cannot be resolved purely from a Cardiff perspective. They are inherently regional, as people cross authority boundaries to work or shop. Until an SDP is available, Cardiff Council should strive for a common approach with neighbouring authorities. This is barely mentioned in the RLDP consultation paper.*

Theme – Consultation Process

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- *Consult communities in a meaningful way not just a box-ticking exercise.*
- *Consultation inaccessible – particularly for disadvantaged groups who have the most need to be involved. Need to stop consultation until able to engage with all sectors of society and create a consultation that represents the needs and opinions of the whole of Cardiff.*
- *Consultation process flawed as no face to face events held.*
- *Consultation document not easy to read and a barrier for many people.*
- *Welsh language treated less favourably than English.*
- *Consultations should not be purely by digital means, there needs to be a combination of methods, as some simply can't.*
- *Developing the RLDP requires intensive work across all sectors and with communities.*
- *Take into account the impossibility of respondents judging priorities for land use without more detailed information.*
- *Continue to engage communities in coming to a view on the optimum balance of types of land use in the light of the limited capacity of the City to absorb new development.*
- *Difficulty filling in online consultation. Consultation deadline should be extended. Suggest community engagement in each ward (officer presence).*
- *Document is insular, lacking in substance and unable to decide between moving forward with new ideas or staying in the past. The paper at times appears to acknowledge past and current issues (such as delays in providing the necessary infrastructure) but at other times seems content to continue down the very path that has led to these difficulties.*
- *Disappointed in the online survey. More information is needed for a meaningful response on many issues. It is also questionable for responders to when all of the choices will be needed. The consultation seems designed to achieve the answers that Cardiff wants to receive, rather than to gain a genuine understanding of what people and communities want to see.*
- *To really work with local communities the Council must understand what people want and what they value; please do not assume that the Council, it's officers or developers know what people value the Council must listen, not lecture; not claim to listen and then continue on a pre-decided route. There will be many different voices, with different views, but that does not justify the Council and its officers, ignoring residents as has happened previously.*
- *Engagement needs to build in resources and expertise to engage fully with citizens.*
- *Concern that the document is inaccessible and the lack of consultation in particular the Virtual Consultation Room.*
- *Halt the LDP process until a public engagement programme is provided which sets out the plans for citizen engagement.*

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- *Carry out further consultation and public engagement in addition to this initial consultation.*
- *Consultation questions too binary.*
- *Many groups will be underrepresented in this consultation and request the consultation process is stopped until such time that assurance can be provided regarding engaging with diverse groups.*
- *Consultation needs to be more inclusive. Those in need of social housing and are currently homeless will not be able to take part in the online consultation.*
- *I also I request that the consultation deadline for this phase of 23rd be July be extended. Developers have until end of August to submit candidate sites so there would be a logic in that or a later date applying for citizens as well. This would also allow time for Cardiff Council to engage in public meetings and events to discuss and explain the LDP and consultation process in more effective ways than the on-line survey which is not appropriate for this type of consultation.*
- *I would like to strongly request that at this time, the Council halts the LDP process until it is in a position to provide a public engagement programme which sets out Cardiff Council's plans for comprehensive citizen engagement going forward.*
- *The council must “provide opportunities for the whole community (different age groups, local community groups, hard to reach groups and protected characteristic groups) including businesses, to engage at appropriate stages in the process.” Until the above can be delivered, please pause the LDP process.*
- *If the Council is serious about consultation and involving residents need to broaden approach Process not user friendly and not publicised widely enough and made accessible enough. Online consultation not user friendly need to use libraries and community centres.*
- *Listen and take into account the views of residents*
- *if we are to have any hope of coping with the climate and nature emergency, we have to move beyond the politics that have so far held us back, and into listening, dialogue and towards unity and action.*
- *We therefore believe citizens should be empowered to hold the power.*
- *Inadequate arrangements/shamelessly hidden behind the excuse of covid restrictions. Digital exclusion particularly affects the poorer and older groups discriminating against them. Extend the consultation to hold meetings especially in deprived multi ethnic wards.*
- *Lack of public discussion and engagement and the LDP should not be rushed through.*
- *Language used throughout isn't consistently everyday language and may create barriers to engagement.*
- *Online platform whilst engaging and interactive will be difficult for some to access.*

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- *LDP should emphasise not only the need to positively engage with local communities but also highlight the Council's commitment to work together with stakeholders, including developers in order to deliver high quality sustainable neighbourhoods.*
- *Level of engagement disappointing. Use my privilege to ask that consultation is stopped until proper engagement with diverse groups is assured.*
- *Limitations of the consultation process being a managed online exercise which excludes citizens. Virtual room only contains uploaded documents difficult to print of, room not supported by a chat function or interactive, focus is on a guided online survey which can exacerbate the balance of power where individuals are reduced to numbers and percentages.*
- *Town halls meetings enable citizens to listen to the views of others and challenge those with power and citizens assemblies.*
- *Approach of identifying strategic sites for housing development should be reconsidered. LDP should identify potential sites of varying sizes, for which rapid approval could be given, if and when the need arises, but which should not be assumed to be required until expected growth is more certain. A Placemaking approach (see 3.9.1) should encourage local residents or community groups to suggest locations that might be suitable for housing in their area. Such proposals should not be expected to be of the same standard as the Candidate Site Submission Guidance.*
- *Serious misgivings with the finalised delivery agreement, and the depth and scope of public engagement. Public engagement at this stage has been severely lacking even with consideration for the Coronavirus pandemic. Want this stage extended and present to public in community hubs, Councillors, walk in public meetings and citizens assemblies. Need assurances of a commitment to improved community consultation, including under represented voices. Demand implementation of citizen's assemblies, town hall meetings for the remaining stages of the LDP Review. Would like an Independent Commissioner for planning and a dedicated team to empower the public to challenge planning decisions.*
- *Demand that the replacement LDP process is halted until such a time that clear plans for authentic engagement are published prioritising the public and those least likely to have their voices heard particularly young people instead of favouring the usual suspects and the developers.*
- *Need to make engaging easy and advertise it everywhere.*
- *Online consultation very confusing.*
- *Level of engagement with citizens not enough.*
- *Put the needs of the people and the planet first and declare your accountability to citizens, not developers.*
- *Some of the groups who will be most impacted by planning decisions in the future are excluded from your consultation methodology to date.*

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- *Ask Cardiff Council to pause this consultation and provide communities with a further three weeks to respond to this current stage and publish a programme of engagement for the rest of the consultation which better befits the development of this important plan by mid-August.*
- *Stop the LDP process until you're able to provide a public engagement programme.*
- *Take note of local groups like Cardiff FoE, Green New Deal, Cardiff Civic Society, Cardiff Extinction Rebellion and Reclaim Cardiff.*
- *Survey very time consuming and not fit for purpose.*
- *Organise real engagement events and relaunch the process.*
- *Suspend consultation and provide a public engagement programme for meaningful public engagement.*
- *The current consultation does not allow for valid representation of public views. We are being pushed into making artificial choices which don't truly reflect how we feel.*
- *Please could you halt the current consultation until you have plans for proper citizen engagement, through a public engagement programme?*
- *There is a disconnect between policy and decision making. Becoming a fairer and more sustainable city needs to underpin every policy in the LDP including all SPG and all decisions and services.*
- *A fairer city means involving those affected by decisions in decision making. Relying solely on online consultation excluded many people from the process. Diversity of the city is unlikely to be represented in the responses. Need a robust plan for citizen's engagement including children and young people.*
- *Need a change in direction in how the Council interacts with citizens and makes its decisions.*
- *There will need to be local people's assemblies and citizens assemblies set up in all local areas with facilitated forums to discuss the issues.*
- *This needs to include fair representation for diverse groups and child care facilities.*
- *Use data mapping (passive existing data and active data made with citizens) as part of the consultation process.*
- *We await with interest the results of this exercise.*
- *Would like to see the highest possible standards in terms of notification to residents of new developments, ease for residents to submit comments and increasing the opportunities to speak to officers and decision makers.*
-

Theme – Candidate Site Process

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- *Convinced that asking for development sites before declaring the future vision is back to front particularly as it is not acceptable to just reroute traffic through existing residential areas. The constraints map is not forward looking enough.*
- *Note the call for Candidate Sites as currently issued, we are concerned that this means the new LDP will again be led by what Developers are seeking.*
- *We would like to see the option for communities to propose Candidate Sites rather than proposals having to come from owners or potential developers of sites.*

Other Comments

- *Council should promote creation of community land trusts to allow people to buy buildings and green spaces in their neighbourhood they value.*
- *Need to create community land trusts to enable local people to protect what they cherish.*
- *More important than ever that assumptions the LDP is based on are thoroughly researched and reviewed by experts.*
- *LDP needs to be focussed, perhaps shorter, and easier to access.*
- *LDP constraints map designates the trail to the south of the Llanishen and Lisvane Reservoirs as a recreational route and a cycle way. Inconsistent with Objectives 4 and 10 and appendix C of the adopted LDP and the Rights of Way Improvement Plan which shows this as a designated walking route only.*
- *Concern of core cycle routes crossing through 2 woodlands.*
- *Could the existing HMRC site in Ty Glas, Llanishen be considered as a possible site for the new Velindre Cancer Centre and avoid the need for development for the Northern Meadows 'greenfield' site.*
- *The area with which we are concerned includes the Sites of Importance for Nature Conservation 113 Nant Fawr (northern section), 114 Nant Fawr Community Woodlands, 115 Nant Fawr Meadows and 144 Rhyd-y-Pennau Complex. These sites are related to the SSSI 10 Lisvane Reservoir and Site of Importance for Nature Conservation 96 Llanishen reservoir.*

We write with respect to two features in the region we specify above: The Strategic Recreation Route (blue solid line) and the Cycleway (dotted green line) in the Nant Fawr Corridor.

The Strategic Recreation Route appears to be the Nant Fawr footpath which we personally know very well. This is a well-used footpath in a semi-rural setting, offering us and many other people calm, refreshment and recreation within an urban area. We trust that this footpath will be retained for the health and wellbeing of everyone. The

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proposed Dwr Cymru Welsh Water Visitor Centre and paths around Llanishen and Lisvane reservoirs will be valuable additions.

The Cycleway however appears to be a new feature which Cardiff Council is proposing for this Development Plan. We are extremely concerned about the effects of a cycleway in this area for nature conservation.

We believe a cycleway here will have a serious effect on nature conservation. We ask you to reroute the cycleway outside the Sites of Importance for Nature Conservation 113, 114, 115 and 144.

- *The uplift in the value of all land due to planning needs to be subject to CIL which should be levied on the landowners, not developers.*
- *Document contains only one reference to agricultural land and few to allotments. Need to protect agricultural land, allotments and large gardens from development and allocate new areas for allotments in RLDP.*
- *Need to protect the Northern Meadow and reconsider building the hospital. Need to consider brownfield sites to protect this green space.*
- *Development in Cardiff has the appearance of being developer led.*
- *The Covid pandemic has changed the way people work and where they do it.*
- *The design of new housing also needs to be reconsidered.*
- *The other problem faced by the city centre arises from climate change.*
- *Buildings should be designed to be low level not high rise.*
- *Need to compensate for nursery, after school and youth provision lost by redeveloping Howard Gardens.*
- *The area around City Road and Newport Road needs further greening.*
- *The new LDP needs to address the HMO issue in Cathays.*
- *Any future proposals in Cathays should have to demonstrate how they will increase green space.*
- *Llanedeyrn and Pentwyn – well-designed streets offer opportunities for walking and cycling. Green spaces should be used for more fruit trees.*
- *Pentwyn has no town centre and declining amenities – further thought needs to be given to how it could be made a more coherent community with new leisure centre and new shops.*