

17 March 2022

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



Dear Cllr Wild,

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

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

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

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

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

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

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

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

### **Initial Findings and Recommendations on Consultation**

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

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

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

### **Further Findings**

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

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

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

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

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

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

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

### **Consultation – Further Key Findings**

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

Views were sought from stakeholders on the following aspects:

- Awareness of the Corporate consultation

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

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

### **Awareness, Methods, Language and Layout**

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

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

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

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

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

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

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

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

### **Involving Hard to Reach Groups**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

### **Other Comments or Suggestions**

Further comments and suggestions were provided by stakeholders including:

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

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

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

### **Future Consultation**

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

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

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

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

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

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

### **Strategic and Delivery Options – Key Findings**

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

Views were sought from stakeholders on the following aspects:

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

## **Strategic Options – Views on Growth Options**

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

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

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

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

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

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

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

### **Additional Information that would have been useful**

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

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

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

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

### **Preferred Growth Option**

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

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

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

### **Views on RLDP Delivery options that should be considered**

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

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

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

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

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

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

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

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

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

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

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

Further key findings based on the evidence are highlighted below:

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

## **Other Views on the Scope of the Growth and Delivery Options**

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

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

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

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

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

## **Accessibility, Inclusivity and Environmental Sustainability – Key Findings**

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

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

### **Views on Factors Affecting the RLDP**

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

### **Addressing Stakeholders’ Needs**

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

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

### **Views on Factors Affecting the RLDP**

#### **Biodiversity**

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

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

### **CO2 Emissions**

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

### **Climate Emergency**

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

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

### **Transport and Mobility**

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

### **Public Health**

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

## **New Working Patterns**

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

## **Historical and Cultural Assets**

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

## **Addressing Stakeholders' Needs**

### **Improving Access and Mobility**

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

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

### **Supporting Child Friendly City Programme**

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

### **Dementia Friendly Developments**

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

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

**Diversity of Community - Supporting community cohesion and integration of communities**

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

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

### **Supporting the Welsh Language**

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

### **Further findings, observations, and future Scrutiny**

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

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

## **Policy Framework and Preferred Strategy**

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

## **Future Scrutiny Involvement**

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

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

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

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

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

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

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

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

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

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

**Recommendation to be monitored following this scrutiny:**

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

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

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

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

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

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

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

Regards,



Councillor Ramesh Patel

Chairperson Environmental Scrutiny Committee

Cc:

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

Appendices Attached:

*App A – Inquiry Terms of Reference*

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

*App C – Response from Cllr Wild to App B letter*

*App D – Letter from Scrutiny Chairs – Sept 2021*

*App E – Response from Cllr Wild to App D letter*

*App F – evidence matrix – consultation*

*App G – evidence matrix – Strategic Options and Delivery*

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

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