

23rd Sep 2021

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



Dear Councillor Wild,

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

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

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

**Children & Young People Scrutiny Committee**

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

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

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

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

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

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

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

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

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

### **Community & Adult Services Scrutiny Committee**

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

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

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

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

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

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

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

### **Economy & Culture Scrutiny Committee**

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

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

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

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

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

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

### **Environmental Scrutiny Committee**

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

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

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

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

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

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

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

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

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

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

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

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

### **Policy Review & Performance Scrutiny Committee**

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

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

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

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

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

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

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

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

#### **Requests following this scrutiny**

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

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

**Recommendations to be monitored following this scrutiny**

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

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

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

Regards,



**Cllr R Patel**  
Chair,  
Environmental  
Scrutiny  
Committee



**Cllr D Walker**  
Chair,  
Policy Review  
and Performance  
Scrutiny  
Committee



**Cllr N Howells**  
Chair,  
Economy and  
Culture Scrutiny  
Committee



**Cllr L Bridgeman**  
Chair,  
Children and  
Young People  
scrutiny  
Committee



**Cllr S Jenkins**  
Chair  
Community and  
Adult Services  
Scrutiny  
Committee

Cc:

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