

Replacement Local Development Plan – Strategic and Delivery Options – Collated Evidence and Findings

Evidence	Source	Finding
Supporting rationale for the projected growth		
This piece of work looks at the current population estimates and projects that forward on a year-by-year age group. The element that may follow on from this work breaks that population characteristics down to then determine the type of housing need for each of those specific groups of people.	Andrew Fowler	The Inquiry heard detailed explanation of how the growth options had been developed but highlighted that this information was not made available as part of the consultation.
The POPGROUP model operates on a formula that considers the population by single year of age, therefore the ageing of the population and the need for housing for that cohort is a critical process in the modelling approach. Household composition has also been considered looking at the rate of household formation that is likely to take place in the future with that changing population. He continued to explain that when looked at from a demographic perspective, it is considering the Welsh government population projections as a baseline and looking at vacancy rates and the household membership rates to determine the number of households that are likely to form in the future, which then derives the household number.	Andrew Fowler	
Migration patterns are considered and the household composition is informed by projections looking at migration as well as life expectancy, birth and death rates etc. All of those provide high level assessments that are undertaken to give you the more robust information.	Simon Gilbert	
In developing the employment options two economic forecasts from two of the leading economic forecasters in the UK were commissioned. This work provided quite a wide range of options (wider than those being consulted on).	Stuart Hardisty	
The lowest of the range that was considered is not believed to be a realistic basis for Cardiff as a capital city of Wales to be planning. It is significantly lower than the levels of growth it has been achieving for the last 10 -20 years and	Stuart Hardisty	

Appendix G

Evidence	Source	Finding
<p>there would be no basis for an area that has been identified as the growth driver for this area within Welsh policy to operate at that level.</p>		
<p>Option A is very much the level that the Council has been operating at or above already; in the middle of the two forecasts, and so it has been agreed to plan on that basis as the minimum of what the Council should be considering. It was then explored what it would look like if you go above that, with Option C towards the upper end of the range, which allows for catch up and allows for Cardiff to continue to thrive and Option B somewhere in the middle.</p>	Stuart Hardisty	
<p>A wide range of evidence has been taken into account, looked at on a sector-by-sector basis and how that fits with what has happened in Cardiff. This was triangulated with consultations from a range of stakeholders across the Cardiff economy which led to these options emerging from that process.</p>	Stuart Hardisty	
<p>Aspects taken into account include:</p> <ul style="list-style-type: none"> • Cardiff, as the capital city of Wales is a key driver to the Cardiff Capital Region and it is important to understand its role within its wider locality. • The implications of the COVID-19 pandemic on the economy and the different ways that this might impact on sectors with the economy almost in a dip rather than at a peak – some of what happens might still be catching up with lost ground from the beginning of the pandemic. • There may need to be flexibility in the next stage of the work which is understanding how much land will be needed for economic uses. • It is very challenging to make concrete predictions in the midst of a pandemic of what was going to happen when we move out of it such as the changing views regarding home working and hybrid working. 	Stuart Hardisty	

Appendix G

Evidence	Source	Finding
<ul style="list-style-type: none"> The demographics and the way people are moving around the South East Wales and the Cardiff Capital Region <p>The investment in South Wales Metro and the investment in various schemes around Cardiff to consider what are realistic employment scenarios.</p>		
<p>As part of the modelling process there is a commuting ratio that is applied, looking at the balance between the level of employment and the number of resident workers within Cardiff. This modelling uses the commuting ratio from the 2011 Census. The commuting ratio, along with assumptions on unemployment and economic activity rates are used to determine the level of employment that can be supported by the population. In the employment-led scenario these assumptions are used to derive the level of population growth required to support the defined number of jobs. In terms of the actual number of jobs used in the model, you have the work that Stuart has undertaken in looking at the economic drivers for the type and actual number of jobs that are likely to be created in Cardiff. The POPGROUP model determines that if there aren't enough workers to meet the number of jobs that are likely to be created in the city, then these need to be filled from workers that will move into Cardiff.</p>	Andrew Fowler	
Strategic Options – Views on Growth Options		
<p>Difference between this Plan and previous one is there are a significant number of homes this time around with planning permission already agreed – around 20,000 homes with planning permission in the City.</p>	Simon Gilbert	<p>Concerns that these houses will not fall under the Carbon Neutral Target so the RLDP will not fit its own Vision to achieve this.</p>
<p>I understand the rationale. The consultation document allows me to make an informed choice.</p>	First Bus	<p>Corporate body organisations understand the rationale and it provides sufficient detail</p>
<p>We do consider that we understand the rationale behind the options, and that the information enables us to make informed comment. The historic environment sector would respond with the more focused responses at the</p>	Glamorgan-Gwent	

Appendix G

Evidence	Source	Finding
candidate site stage as to whether particular sites would have more of an impact, at this stage the options themselves are general.	Archaeological Trust (GGAT)	
We understand the rationale behind each of the options and it is our view that it does provide sufficient detail to enable an informed choice to be made, as there is clear rationale such as whether it is based on the WG population projections etc. However, as our role is a statutory sewerage undertaker it is not our place to advise which is appropriate.	Dwr Cymru	
Rationales for the options are poorly explained. We are told that growth options will meet Council's economic targets or aspirations but given no explanation of what those are or why they have been set.	Cardiff Civic Society	Other organisations representing the public view view the rationale of growth options as unclear and that there is a need for more information
Unclear rational on how the options were developed.	Cardiff Rivers Group	
Rationale for growth options is unclear and make it difficult to compare	Home Builders Federation	
Options presented do not have enough detailed information to be able to decide which one which should be progressed at this stage.	Home Builders Federation	
I do not fully understand the rationale, and would have benefitted from a list of the pro's and con's - laid out in a table- as a comparator against each, which would have been helpful Particularly for people who are less aware of the context and the background, it would be very difficult to do anything other than a more abstract, kind of, notional idea as to what is the best bid for the city, which could be perhaps helpful. It would be helpful to have things perhaps laid out before you so you could see what you were being asked to consider.	Cardiff Third Sector Council (C3SC)	
The focus is wrong. There is an urgent need to address the nature emergency along with the climate emergency. The dual nature and climate crises need to be addressed in tandem and reflected in all LDP documents.	RSPB	

Appendix G

Evidence	Source	Finding
<p>The RLDP consultation document and doesn't provide much detail and does not fully define what it means by growth. This could suggest that growth is identified with setting medium and long-term economic targets in terms of GDP and GDP per capita. NRW encourage Cardiff City Council to consider growth in terms of Welsh Government's commitment to a Well-being Economy.</p>	<p>Natural Resources Wales</p>	<p>Need for clarity on how RLDP Defines Growth</p>
<p>NRW cites the concept 'Inclusive growth' involves sharing the benefits of economic growth more equitably and mitigate societal problems such as inequality, job insecurity, low pay and poor productivity. They also cite that the Well-being of Future Generations goals provide a framework for encouraging inclusive Growth – which is defines 'A Prosperous Wales goal is defined as:</p> <p style="padding-left: 40px;">“An innovative, productive and low carbon society which recognises the limits of the global environment and therefore uses resources efficiently and proportionately (including acting on climate change); and which develops a skilled and well-educated population in an economy which generates wealth and provides employment opportunities, allowing people to take advantage of the wealth generated through securing decent work.”</p>	<p>Natural Resources Wales</p>	<p>Recommendation that the RLDP growth options need to be assessed or evaluated on how these contribute or mitigate the challenges posed climate and nature emergencies as identified in the WBFG Act</p>
<p>NRW recommends that the RLDP growth options need to be assessed or evaluated on how these contribute or mitigate the challenges posed climate and nature emergencies as identified in the WBFG Act.</p>	<p>Natural Resources Wales</p>	
<p>Clearly, Cardiff does need to create housing. I think that what we're saying is that it's important that you assess them in the right way and assess them... There might be difficult decisions to make, so it's important that we have the right criteria to make those assessments and consider those options such as impact on biodiversity, the sort of things we were talking about: the climate and nature emergency, wider well-being, inequality.</p>	<p>NRW</p>	

Appendix G

Evidence	Source	Finding
The underlying presumption that "growth is good" needs to be challenged. The benefit delivered by 'growth' need to acknowledge associated costs, such as lost green spaces or new infrastructure requirements.	Cardiff Civic Society	
The options for future levels of housing and jobs growth are based upon population projections. If population projection underpinning the options is reliant on the ONS 2018 projections, NRW draw attention to the fact that these are now out of date. (Natural Resources Wales)	Natural Resources Wales	The need to review Population Projections used in RLDP
The projections incorporated in the February 2021 guidance from Welsh Government, might be more reliable than the ONS 2018 projections. In this respect NRW would like to highlight to the Scrutiny committee that the Local Planning Authority have scope to reassess population projection figures (subject to sound evidence which will be tested at Examination stage by Inspector). (Natural Resources Wales)	Natural Resources Wales	
The Council has been seeing a 50% increase in housing completions per annum over last 2-3 years. This suggests that the likelihood for development rate would be beyond the current WG predictions which looks backwards rather than forwards	Simon Gilbert	
The statistics are based on what is known today – in a years' time they will have changed. There may be more sites with planning permission, there may be more construction activity, there may be less. It will all be informed by further analysis over the year as well as housing monitoring and assessment and more up to date census data.	Simon Gilbert	
The 2018 population data was used as a baseline as this is what the WG LDP manual tells us to do. The options will be updated once the new census comes out in March next year and there will be some implications rising out of that. Any new evidence that comes out before the preferred strategy is prepared will be used to inform it	Officers – Simon Gilbert/Stuart Williams	

Appendix G

Evidence	Source	Finding
<p>and likewise any further intelligence that will tell us the implications of pandemic will be accounted for in the figures. It is very much the legacy of the stage of the consultation process.</p>		
<p>Aspects such as the 2021 census, the Welsh government population data, will inform the levels of growth and feed into the plan as it progressed through stages. Houses and offices are being built, planning permissions are being issued that will all inform the level of growth and the need for additional land to accommodate that growth. This is being constantly monitored by officers, included in the evidence base for the RLDP as it evolves so that it will reflect the most up to date information. There were deliberately three options identified as low, medium and high levels of growth to inform this consultation.</p>	<p>Head of Planning</p>	
<p>Concern that RLDP consultation is suggesting that there are only three growth options that consultees can choose from.</p>	<p>Home Builders Federation</p>	<p>Concerns on limited number of growth options in consultation</p>
<p>The RLDP needs to present and consider greater number and range of options at this early stage in the process, as with other LAs.</p>	<p>Home Builders Federation</p>	
<p>Growth options needs to be flexible and be able to react to changes in circumstances which might occur over at least the next three years whilst the plan is proceeding through its adoption.</p>	<p>Home Builders Federation</p>	
<p>In other LAs a greater number and range of options have been considered at this early stage in the development of the LDP process.</p>	<p>Home Builders Federation</p>	
<p>These aren't the only growth options and that there were an infinite number. This is the reasonable assumption based on the evidence that is available of what would be a low, medium or high level of growth which was believed, on balance the right thing to do.</p>	<p>Simon Gilbert</p>	
<p>These 3 options were not set in stone. The growth options were there to show what those three growth options would require based on the evidence at the time and if it was undertaken again today those figures would have changed already.</p>	<p>Head of Planning</p>	

Appendix G

Evidence	Source	Finding
<p>Question is ‘what value do you get out of it?’ For example, if your housing need is 30,500 homes, and you are seeking to achieve your 30,500, then why wouldn’t you want to deliver option C, which provides that?</p> <p>That also then provides all of the other additional value that you would need to generate out of that such as affordable housing, the additional options for regeneration and mixed communities, different tenure types, different density deliveries and things like that.</p> <p>So if your housing need suggests that is what you need to deliver then, for me, that clearly needs to be your aspiration to deliver that.</p>	<p>United Welsh HA</p>	<p>The option depends on what your needs are for housing.</p>
<p>As an affordable housing provider, clearly my focus is going to be on delivering the number of properties that you need to deliver – that you deliver the appropriate number of affordable housing to meet the certain demand.</p>	<p>United Welsh HA</p>	<p>Affordable Housing needs should be a priority and will tell you the level of housing growth required</p>
<p>For option A, if you only deliver 19,000 units, then it is very unlikely we you are going to meet your affordable housing targets, because it makes no reference, in terms of the documents, around delivering affordable housing targets. It only really starts referring to that when you look at option B and Option C. That makes option A a nonstarter because we are not here just to provide single tenure homes for owner occupiers and perhaps people who want to do buy-to-let investments. The demand is much broader than that.</p>	<p>United Welsh HA</p>	
<p>Land availability is critical. There are lots of people who say, “Use brownfield land,” rather than greenfield and that is recognised, but when we talk about brownfield land we often talk about high density, and then all the challenges that come with high density.</p> <p>In Cardiff Bay, for example the statistics show that around 75% of those homes are in the private rented sector, and that is not a sustainable way to be developing. That is not meeting the needs of the whole of the city. I suspect it is about looking at that sustainable growth such as family evolution.</p>	<p>United Welsh HA</p>	<p>Different needs need to be considered for sustainable growth such as family evolution</p>

Appendix G

Evidence	Source	Finding
The range of options that are presented are loose precisely for that reason, so as not to lead anyone; to not provide the consequences of the options that might then influence people as Officers cannot advocate any one of these options at this time. It is more about understanding what is important to people in terms of how the city grows.	Officers – Simon Gilbert/Stuart Williams	Options presented are not detailed and precise so as not to be seen to be favouring any option and influence people’s views.
Appreciate that it is hard for people to consider these growth options without looking at it spatially in terms of what might be delivered beyond homes and jobs and what environment that would create and where.	Officers – Simon Gilbert/Stuart Williams	It is about understanding what is important to people in terms of how the city grows.
What the consultation is seeking to do is to try and tease out some of those aspects from partners and stakeholders so that the Council will have more information to write policies that can help support a lot of those projects and initiatives. ???	Officers – Simon Gilbert/Stuart Williams	
A report will be presented to Cabinet following more analysis and consideration of the options, that will include the Council's Preferred Strategy for the RLDP. This stage will incorporate a spatial masterplan as to what this would look like on the ground.	Officers – Simon Gilbert/Stuart Williams	The detail will be provided, including a spatial masterplan, at the next stage in the Preferred Strategy.
For this study, the POPGROUP model takes the whole population into account. He explained that this study could inform either a SHMA (Strategic Housing Market Assessment, or a LHNA (Local Housing Needs Assessment). Those types of studies are when items such as affordable homes, the housing needs of older people and people with disabilities and the need for student accommodation are taken into consideration. The POPGROUP model looks at the current structure of the population estimates, and produces population forecasts by single year of age and sex, based on births, deaths and migration (domestic and international) inputs and assumptions.	Andrew Fowler	It is at Preferred Strategy stage where all of the evidence, diligence and consideration will start come out in the public domain more.
The candidate sites that developers wanted to put forward have been listed or sites that people don't want developers to put forward. Part of that filter is to go through this at a very high level for the Preferred Strategy where if sites are	Simon Gilbert	

Appendix G

Evidence	Source	Finding
clearly not deliverable or appropriate then they will be identified. Is very much the Preferred Strategy where all of the evidence and diligence and consideration will start come out in the public domain more.		
The definition of new jobs created needs a caveat - if development permits an out of town retail park for example, the impact of new businesses locating there might be at the expense of an existing store closing in the city centre and the staff relocating or being made redundant.	For Cardiff	Impact of location of development on other areas – e.g. new retail jobs created out of town that could have an impact on the city centre
Looking for jobs that promote well-being, jobs that support the move to more sustainable ways of living and low carbon. Regenerative economy. Jobs that are less businesses are possibly less extractive in terms of the natural environment, but we're looking for sustainable management, essentially. You need to keep looking at the future generations, keep using that act. It's really good tool, a way, a lens to keep looking at everything.	NRW	Need jobs that promote well-being, jobs that support the move to more sustainable ways of living and low carbon. Regenerative economy
One of the ways for looking at growth is pure economic growth, but that does have perverse outcomes. It doesn't necessarily prevent inequalities, so we mentioned, perhaps, a move to more inclusive growth, the well-being economy. What we're advocating is to include other metrics, like impact on well-being, impact on carbon, impact on wider biodiversity and connectivity, the resilience of ecosystems.	NRW	
Very impressed with the fact that there were a large number of options being considered. Nothing was left behind. In terms of the mixture, perhaps an emphasis on brownfield sites, transport hubs, utilising the transport corridors. Fact that everything was on the table was a particular strength of the consultation.	For Cardiff	Good range of options
It was good to see the range of options that were available, and I felt that there were a fair number of options.	C3SC	
Other Additional Information that would have been useful		

Appendix G

Evidence	Source	Finding
We would not have benefited from any other information, as we are aware of the legislation, policy, guidance and best practice documentation for Wales, for our sector and the Plan provision.	GGAT	Corporate bodies are more aware of the RLDP and how it relates to their organisation
Access to explanatory information via online hyperlinks. (Cardiff Civic Society)	Cardiff Civic Society	Explanatory information and more detail on the rationale for proposed options
Rationale for Council's target for economic growth and aspirations - models/assumptions for relations between growth, employment, population, migration	Cardiff Civic Society	
Background evidence that explains or support the growth figures proposed would have been helpful.	Home Builders Federation	
Information on numbers, types and location of housing developments. Rationale for high density housing e.g., South of the City.	Cardiff Rivers Group	Information on types of housing and jobs
Breakdown in provision of proposed housing. Type of land to be utilised. Type of potential housing - houses, flats, etc. associated services and facilities associated with developments.	No Name (NN)	Information on types of land and associated services and facilities
Need for clarity on the types of jobs that will be preferred on job options consulted on.	Adventure Travel	
Clarity on definitions of 'new jobs' would be useful.	For Cardiff	
Methodology used for developing the figures for growth options and when these were developed i.e., pre-pandemic or considered implications of the pandemic.	Cardiff Rivers Group	Information on the methodology in developing growth figures
Implications of technological use and travel to work i.e., WFH and reductions in traffic.	Cardiff Rivers Group	Impact of changes in work patterns on growth figures
The implications of strategic growth and site options on climate and nature emergencies.	Cardiff Civic Society	Implications of proposed strategic options on sustainable development

Appendix G

Evidence	Source	Finding
Implications on green infrastructure provision.	Cardiff Civic Society	
Implications to biodiversity on use of brownfield and greenfield sites	Cardiff Civic Society	
Information on the issues facing the neighbouring local authorities, its vision, objectives and issues and how this will impact on Cardiff's RLDP	Adventure Travel	Information on regional issues that could affect Cardiff's RLDP
Evidence the local authority is drawing on from consultation with residents and its needs and impact assessments would be helpful.	C3SC	Information on how the options are being assessed
Further options need to be considered to reflect that the type and tenure of housing may change - for example, the trend towards smaller families is not a consistent story across all demographic groups, a need for a closer alignment between jobs growth options and areas of social/economic disadvantage within the City in order that as many people as possible - particularly those from the areas with the highest levels of multiple deprivation - can benefit. Optimising alignment with existing aims and challenges would also be helpful - such as housing options with the plans to rejuvenate the city centre, and jobs growth with the plans to regenerate local communities.	C3SC	
Preferred Growth Option		
Not enough information with consultation document to make an informed choice	Cardiff Civic Society	Insufficient information available to make an informed choice on preferred option
Not enough information has been provided.	Adventure Travel	
No accessible information available to give views.	Cardiff People First	
Further detailed work is required to enable stakeholder to decide on which option is appropriate.	Home Builders Federation	

Appendix G

Evidence	Source	Finding
As our role is a statutory sewerage undertaker it is not our place to advise which growth option is the most appropriate	Dwr Cymru	No preference
Home Builder's Federation believes that figures between Option B and C perceived to be most likely to deliver the wider policy aims of the plan and National Planning Policy.	Home Builders Federation	Option B and C perceived to be most likely to deliver the wider policy aims of the plan and National Planning Policy.
Option B with an emphasis on social housing.	NN	Option B <ul style="list-style-type: none"> - with an emphasis on social housing. - as long as the S106 for Affordable housing is determined as per notes above
B - as long as the S106 for Affordable housing is determined as per notes above	NN	
Option C - in terms of economic growth - caveated with the need to build infrastructure to support such high growth	Cardiff Community Housing Association	Option C <ul style="list-style-type: none"> - in terms of economic growth - caveated with the need to build infrastructure to support such high growth - Fits with Cardiff as one of the fastest growing cities in the UK - reduce levels of homelessness by providing suitable accommodation - Metro needs to be in place, working efficiently, effectively and appropriately priced charging to help sustain such growth. - rationale behind what it brings to the city
<p>Option C.</p> <p>The city has prided itself on being one of the fastest growing cities in the UK and this should continue as it helps attract quality inward investment, helps retain graduates and draws the best people and businesses to the city because the opportunities are there. The Metro needs to be in place, working efficiently, effectively and appropriately priced charging to help sustain such growth.</p> <p>To reduce levels of homelessness by providing suitable accommodation is paramount to the success of a thriving city centre.</p>	For Cardiff	
Why wouldn't you look at option C? When you look at the rationale behind what it brings to the city, why would you not do that? Because of the investment that comes with it, the regeneration, the work that can be done in	United Welsh HA	

Appendix G

Evidence	Source	Finding
<p>brownfield, the way that we want to deliver homework arrangements, the sustainable transport that potentially comes with that.</p> <p>There is of course, the significant challenge of delivering that number of homes in terms of where do you put them?</p>		<ul style="list-style-type: none"> - 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.
<p>Undecided - option C would seem to meet the greatest level of need with future planning built in, but it's difficult to say without clarity of the pros and cons.</p>	C3SC	<p>Undecided without clarity of the pros and cons but option C would seem to meet the greatest level of need with future planning built in</p>
<p>Option A is the most suitable as this gives a higher return on jobs against the investment in housing and the environmental impact will be lower. The population is getting older and housing stock should increase.</p>	First Bus	<p>Option A</p> <ul style="list-style-type: none"> - gives a higher return on jobs against the investment in housing and the environmental impact will be lower. - The population is getting older and housing stock should increase.
<p>We have no expertise in responding to this, however, a greater level of expansion for both housing and jobs would be likely to have a greater impact on the archaeological resource, and have both a physical and setting impact on statutorily protected features and landscapes.</p>	GGAT	<p>A greater level of expansion for housing and jobs would be likely to have a greater impact on the archaeological resource and have both a physical and setting impact on statutorily protected features and landscapes.</p>
<p>Views on RLDP delivery options that should be considered</p>		
<p>There are potential issues obviously from brownfield development being much harder to secure section 106 agreements because the land is expensive.</p>	Stuart Hardisty	<p>The Inquiry heard early on that that there are various Options available,</p>

Appendix G

Evidence	Source	Finding
<p>The question that is key is if Cardiff is to grow; how much can it grow and should it be utilising existing previously developed sites and brownfield sites to ensure that minimum or reduced impact in terms of Greenfield development and the environment. That is the conversation that is being had through this consultation and how that translates spatially across the city.</p>	<p>Stuart Hardisty</p>	<p>and this is the conversation that is being had through this consultation and how that translates spatially across the city.</p>
<p>There's a nuance within brownfield development to say should that be focused around the city centre, in existing communities, should the priority be inward investment and development in the more deprived locations, or should development be scattered around the city so that the impacts aren't so dramatic on any given community.</p>	<p>Stuart Hardisty</p>	
<p>Other options are to look at corridors, whether that be transport corridors, rail corridors, or station development to produce high density development in these locations.</p>	<p>Stuart Hardisty</p>	
<p>Understanding where people think the city should grow, whether there should be more development in the City centre or more houses built on Greenfield sites because they might appeal to more family accommodation - these are the questions that are hoping to be addressed through this consultation.</p>	<p>Stuart Hardisty</p>	
<p>Widening strategic housing sites at the regional level, rather than just within the city boundary</p>	<p>Cardiff Civic Society</p>	<p>Strategic Housing sites not limited to Cardiff and should also support growth in Southeast.</p>
<p>Cited that Future Wales recognises that Cardiff should not be the only growth point within the Southeast Wales region</p>	<p>Cardiff Civic Society</p>	
<p>Housing provision could be better met at a location outside the city but with good local facilities and good public transport The preference to live in an area where there is easy access to employment or services in the city should not be confused with a wish to live within an administrative boundary.</p>	<p>Cardiff Civic Society</p>	
<p>Spreading out strategic housing sites would allow for the use of suitable brownfield sites or those near transport nodes, with potential to spread the</p>	<p>Cardiff Civic Society</p>	

Appendix G

Evidence	Source	Finding
benefits of growth more widely across the region, reduce commuter traffic, and to ease the pressure on land use within Cardiff itself		
Strategic sites should not all be identified now for the next 15 years. Instead, we should start by identifying sites needed to meet minimum growth then add to those during the life of the LDP as and when it becomes apparent that higher growth should be accommodated.	Cardiff Civic Society	
The decision on strategic options need to consider the implications of the accelerated shift in working/shopping/living as a result of the pandemic. The RLDP should consider the implications of the pandemic on the type/location of desired housing, the use of brownfield sites and the repurposing of buildings.	Cardiff Civic Society	Need to consider impact of pandemic on location and types of housing
Encouraging the modal shift from private car use (which Council should take steps to encourage) has implications for housing location. This could increase the value of transport nodes but also by potentially freeing land today used for cars, e.g., retail parks, car showrooms.	Cardiff Civic Society	Development sites should be less car dependent
Need to review the development of sites that are car dependent, where public transport an afterthought which may never happen.	Cardiff Civic Society	Need to review the development of sites that are car dependent.
Key to locating new housing developments is avoiding locking people into car dependency. There is a wide body of evidence which shows that concentrating housing development in urban areas (including brownfield sites) and building at appropriate but higher densities is effective in reducing the need for car travel and the distances travelled.	Sustrans	Public Transport infrastructure should be embedded into all housing developments and area plans
High-quality walking, cycling, and public transport infrastructure should be embedded in all housing developments and area plans. This must be combined with reduced parking space availability, and other measures to manage demand for private cars and make it more attractive to use sustainable modes. More people are likely to walk, wheel and cycle for more of their journeys if the quality of the spaces they travel through are attractive and inviting for people to live, work, socialise and play. People attract people and can, in turn, increase the sense of social safety. Good urban planning can ensure towns and cities	Sustrans	Out of town retail parks require use of cars – should be a City Centre first approach

Appendix G

Evidence	Source	Finding
<p>can become truly liveable places for everyone, at every stage of life. This has been successful in many cities, for example, Freiburg in Germany.</p>		<p>The development of the Metro, if delivered well is key to future development.</p>
<p>Option 5 should be used as this gives an opportunity to develop public transport and use brown field sites, reducing the impact on traffic pollution, congestion, encouraging active travel and ideally more car free neighbourhoods, which improve health and reduce the impact on the health service.</p>	<p>First Bus</p>	<p>Location of housing estates and transport hubs is key from a sustainability aspect in terms of the need to reduce car travel.</p>
<p>Would prefer a city centre first approach but recognising that there needs to be hubs around the city. What we are against, really, is the failing of planning policies of the past, is the prevalence of out-of-town retail parks, and the fact that they are most easily accessed by car.</p>	<p>For Cardiff</p>	
<p>The development of the metro system is a huge opportunity, if delivered well, on time, is well publicised and used, and the price points are right, and acknowledgment that there needs to be new development around those transport hubs as well. Locating a big housing estate, on a greenfield site, away from the transport hubs, from a sustainability point of view, is as far as we want to get from.</p>	<p>For Cardiff</p>	
<p>Recognise that the 8 ways of delivering growth are designed to stimulate debate to develop the preferred strategy, however it would have been useful to see how the delivery options align with the vision of the RLDP which include: Cardiff as a key driver for growth as part of a Strategic Growth Areas as set out in Future Wales. Focus on sustainable development and the place making principles Alignment with the One Planet Cardiff approach – to decarbonise the city and become a Carbon Neutral City by 2030, whilst creating economic opportunities and promoting social well-being.</p>	<p>Natural Resources Wales</p>	<p>Need for clarity on how the various delivery options align with the RLDP vision</p>

Appendix G

Evidence	Source	Finding
The consultation on strategic options should have related this to Vision and explained how the options would address matters such as racial or social inequality or the pronounced differences in life expectancy across the city.	Cardiff Civic Society	
The Welsh Government (June 2021) and Cardiff City Council (Nov 2021) have declared Nature Emergencies in addition to Climate emergencies declared in 2019. NRW recommends that the discussion and decision around the preferred strategy should take into account the impact of each option scenario on the nature and climate emergencies.	Natural Resources Wales	Need to consider options vis a vis the Council’s commitments relating to climate and nature emergencies
Need to consider the implications of the climate and nature emergencies, behavioural shifts in response to technology and the pandemic, as well as persistent geographical inequality across the region.	Cardiff Civic Society	
The delivery options need to consider and account for land required for Coed Caerdydd or other projects to enhance biodiversity, the need for land for flood defences, water absorption and other measures to build resilience to climate change.	Cardiff Civic Society	
Need to have clarity on how One Planet Cardiff it has driven the delivery options, e.g., the only costs considered appear to be financial not environmental.	Cardiff Civic Society	
In considering delivery options, not to simply assume that brownfield sites are associated with higher costs and thus less likely to deliver affordable housing. However, should be recognised, that not all previously developed land is suitable for development. This may be, for example, because of its unsustainable location, the presence of protected species or valuable habitats or industrial heritage, or because it is highly contaminated. It should be noted 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. The decision for land allocation must be based upon robust evidence to transition to, and where necessary create new,	Natural Resources Wales	

Appendix G

Evidence	Source	Finding
sustainable communities (meeting local need within environmental constraints).		
NRW noted that the RLDP options paper suggest that the trade-off is made between brownfield and less affordable housing, and greenfield and the potential for more affordable housing. NRW cites that PPW that there are options for LPAs to consider in delivering housing developments (including compulsory purchase orders and ability to incentivise) the appropriate re-use of previously developed land, planning authorities should take a lead by considering and identifying the specific interventions from the public and/or private sector necessary to assist in its delivery.	Natural Resources Wales	
Review assumption that brownfield sites are more expensive than greenfield sites. Developments need to consider the response to the nature emergency, the loss of biodiversity of land vis a vis use of brown and green field sites.	Cardiff Civic Society	
Do not agree that it is going to deliver less affordable housing to meet the needs of families, on the basis that the cost of remediating brownfield sites is prohibitive. Affordable housing can act as a catalyst for regeneration on brownfield sites.	United Welsh HA	
HAs can access Welsh Government funding, private developers cannot. We can work alongside local authorities on regeneration funding. The Social Housing Grant Programme is one big pot, we have seen a huge uplift in investment there which we can bring to the table. We can also support private developers in that. Not talking about HAs coming in and leading on these things, albeit we can do that. But when you are looking at planning applications, and when you are looking at the viability modelling in that, 99.999% of the time early engagement with an RSL can unlock those regeneration opportunities.	United Welsh HA	

Appendix G

Evidence	Source	Finding
<p>For me the options are presented as a decision between greenfield and brownfield, linking greenfield to affordable housing.</p> <p>So, I think it's a reasonable question that the Scrutiny Committee could ask, is, "Have you considered...? Is that a true connection? Do we only get affordable housing through greenfield? What other options have you considered, or are there other options to provide affordable housing which may be in different parts of Cardiff?" There might be parts of Cardiff that need more affordable housing than others.</p>	NRW	
<p>Urban intensification based on brownfield sites should be the starting point for both jobs and housing development. By placing jobs close to housing it should reduce the additional stresses that additional development will bring to the transport network.</p>	Cardiff Civic Society	<p>Prioritise use of brownfield sites</p>
<p>Fully support the principle of building on brown field sites and oppose any future green field sites in Cardiff being built on</p>	Cardiff Rivers Group	
<p>No new building on green public open space should be considered.</p>	Adventure Travel	
<p>A very good range of options which all have benefits but also less favourable outcomes. I would prefer a brownfield only option which utilises the transport network on the assumption that all the Metro options are delivered on time and to the extent that they are envisaged.</p>	For Cardiff	<p>Brownfield site preferred which utilises the transport network</p>
<p>In reality you cannot have one option. You are going to need to undertake some greenfield... If we come to the conclusion that you need the option C numbers,then you are going to need a balance of greenfield development and a balance of brownfield redevelopment.</p>	United Welsh HA	<p>Need a balance of brownfield and greenfield</p>
<p>I suppose it comes down to option eight where you talk about dispersed combination of brownfield and greenfield. When we have seen local authorities develop a policy that is prescriptive, it actually hamstrings and ringfences them when it actually comes to discussing on an individual site basis about what is appropriate for that site.</p>	United Welsh HA	<p>A dispersed combination of brownfield and greenfield sites.</p> <p>Need a range of tenures on homes, whether that be shared ownership,</p>

Appendix G

Evidence	Source	Finding
<p>In your historic supplementary planning guidance, you talk about tenures of either being private market, low cost of ownership, or social rent. When you start creating definitions like that, I appreciate it helps when it comes to negotiating planning gain and alike, but what it does is it confines you to having only a one-track approach to the way that you deliver homes.</p> <p>One of the things that COVID is telling us is that we are going to need a range of tenures on homes, whether that shared ownership, low cost of ownership, whether it is going to be older person schemes... How all of this integrates into a broader planning policy and how you apply that is going to need you to open up your definitions, in terms of what that looks like.</p> <p>Need to just try to leave it as open as you can.</p> <p>..... just be really careful and clear what it is that you specifically want on those sites.</p>		<p>low cost of ownership, whether it is going to be older person schemes... How all of this integrates into a broader planning policy and how this applied is going to need require a broadening of definitions, in terms of what that looks like. Need to leave it as open possible.</p>
<p>Any option should take into account the impact on statutorily protected areas such as the Gwent levels, the physical change to which in the case of larger scale development would be permanent.</p> <p>Options to redevelop brown field sites should also take into account the fact that these are likely to have archaeological remains relating to earlier, often complex industrial use. Remediation would need to take into account excavation and recording of these.</p> <p>Development of greenfield sites is likely to require archaeological assessment, geophysical survey and potentially evaluation or excavation to record archaeological features which have been undisturbed previously.</p>	GGAT	<p>Archaeological implications of brownfield and greenfield – excavation and recording of this needs to be taken into account</p>
<p>As our role is a statutory sewerage undertaker it is not our place to advise which delivery option is the most appropriate. What we would say is that a brownfield approach is likely to result in less water and network infrastructure reinforcement works</p>	Dwr Cymru	<p>Brownfield approach is likely to result in less water and network infrastructure reinforcement works</p>

Appendix G

Evidence	Source	Finding
Stop the continual building of student flats and large office blocks in the city centre. Use that space for social housing and perhaps look to repurpose what is there and not being utilised.	Cardiff Rivers Group	Repurposing and re-use of existing buildings
Highlight the need to maximise opportunities to reuse land and buildings and protect land with high ecological value.	Cardiff Civic Society	Stop building student flats and large office blocks in the city centre and use space for social housing and repurpose what is there and not being utilised.
From a sustainability point of view, the option to use existing buildings, that might be long term empty in the city centre for repurposing, for mixed use, is something that should be encouraged, and obviously making use of the huge investment in the transport infrastructure as well.	For Cardiff	Maximise opportunities to reuse land and buildings and protect land with high ecological value.
Wish to see a supercharged town centre first approach and bring public services into vacant central properties as a means of leading from the front and maximising the benefits that this brings.	For Cardiff	Repurposing long term empty buildings in the city centre, for mixed use
<p>There is an opportunity. Need to be mindful or have more relaxed planning policies that allow for mixed use, where appropriate. There has been a desire in the past to try and look at residential above shops, for example. It is not easy to do, and that has generally been found out across the UK - trying to separate a retail unit and a first floor residential is not always as easy as it might seem.</p> <p>There is, and will continue to, be spaces, long-term vacant units, for example the likes of Debenhams, which is a large unit and there are not the large players now who will take that on, so a more innovative approach needs to be taken to repurpose that site.</p> <p>A more innovative approach to planning policy, change of use, needs to be adopted.</p> <p>Flexible working space in terms of people coming in just to hire a desk,</p>	For Cardiff	<p>Need to have relaxed planning policies that allow for mixed use, and innovative approaches, where appropriate</p> <p>Flexible working space for people to hire a desk</p>
Support for city villages and would like to see more done to support and enhance those.	Cardiff Civic Society	Support the development of city villages

Appendix G

Evidence	Source	Finding
Building near transport nodes and corridors makes sense to achieve a modal shift in transport patterns	Cardiff Civic Society	Building near transport nodes
Growth based around transport nodes and in particular Strategic Public Transport growth corridors should be considered, but not with rail-based options as the lead time and cost of these are prohibitive, whereas a bus strategy using dedicated guided bus in place of rail and bus priority on the existing network would lead to a much more cost-effective approach.	Adventure Travel	
The consultation offers a good range of options, however in reality the HBF suggests the most appropriated option should include a mix of several of the options proposed.	Home Builders Federation	Growth delivered using a mix of various delivery strategies
Our own research has identified the need for additional larger affordable properties throughout Cardiff. A further point for consideration - A non-negotiable commitment to affordable housing in the planning process should suppress land values and give a clear signal to developers to pay reasonable land costs, ensuring scheme viability.	Cardiff Community Housing Association	A strong commitment to affordable housing is required in the RLDP that is non-negotiable for developers Need to stop taking commuted sums and ensure that for every development, developers agree to a certain percentage of affordable housing
It would be helpful to have the viability information for S106. Cardiff has been woeful in delivering on site housing - accepting flawed evidence from viability models and taking commuted sums rather than on site provision. Neighbouring Authorities such as the VOG have successfully delivered 40% AH	NN	
<p>The principle of taking commuted sums on development has to stop, because the challenge for us is about securing land and getting affordable housing development.</p> <p>I am not aware of many other local authorities that take commuted sums. The biggest challenge for us is land, and in taking a commuted sum you effectively give away the opportunity to develop that land. The great thing about affordable housing, particularly in the context of the new development standards that will feed into your supplementary planning guidance, is they set</p>	United Welsh HA	Council needs to set target for Affordable Housing in the RLDP and stick to it and stop the reduction in delivery around section 106

Appendix G

Evidence	Source	Finding
a minimum standard. So what it does is it sets a marker to the private developers about what good design and good spatial design looks like.		
Ensuring that the PLCs deliver the affordable housing requirements on site is really, really important because it gets them and encourages them to think about spatial design and what that means for people. But what it does mean is it has an impact on land values.	United Welsh HA	
When the Council receives a commuted sum it has to use that commuted sum to deliver affordable housing, which then supplements your own development programme....But you do not need the commuted sums to do that. You can access social housing grants, you can deliver in that way... Losing the opportunity of the land, it is really, really critical that we do not do that.	United Welsh HA	
We have seen now with Welsh Government, the Land Release Protocol from Health and you are buying land in and around for developing your own council properties... it is important that we work as a partnership, in terms of how we bring that forward.	United Welsh HA	
VoG was doing its Emerging Local Development Plan and it set a really aspirational target of 40% on site development. So the framework on an emerging development plan is not adopted, but any landowner that wanted to ensure that their land was included in the development plan had to commit to 40%.	United Welsh HA	
(in response to whether Cardiff should set a target for affordable housing on every development) you need to truly understand land values, then try and get an appropriate figure in your mind, draw a line in the sand and say, "No." Have the fruition to say to landowners and developers, "No, we are agreeing planning to your development on the grounds that the contributions that you are making in planning gain..."	United Welsh HA	

Appendix G

Evidence	Source	Finding
<p>Developers argue on affordable housing, because it can be a grey area, and there is a history of local authorities capitulating.</p>		
<p>Section 106s are a big part of the Affordable Housing Delivery Programme and we are seeing them fall off a cliff. They are not coming forward. It is difficult enough for us, as an affordable housing provider, to secure land without competing in the market for it as well. But we are seeing a significant reduction in our delivery around section 106 at the moment. So it is really important.</p>	<p>United Welsh HA</p>	
<p>Your data will tell you what it is that you need. So if the data says that we are going to build 10,000 homes and we need 2,500 affordable homes, then that is your 25%, that is what you need to deliver. By negotiating 106s down, you will not deliver the 2,500.</p>	<p>United Welsh HA</p>	
<p>if you are being challenged around feasibility on section 106s, my advice would be to bring the RSL in at a very early stage, because there are different mechanisms to fund it. What is important is that you secure the percentage of affordable housing.</p> <p>If there are real challenges around viability we can get under the skin of it, we have up to date accurate construction costs, land costs and everything else to challenge some of the information that has been presented by the developers.</p> <p>But equally then, when the evidence base does suggest that maybe only 5% or 10% of affordable housing is deliverable, then we can come up with other solutions and ways that we can do that. We can put social housing grants into it, we can look at different affordable tenures. Don't ringfence your planning guidance, just for general needs and low cost of ownership- have it broader and let us include older persons' accommodation and supported accommodation in your planning gain because we have got huge needs to deliver.</p>	<p>United Welsh HA</p>	<p>Bring in RSL at a very early stage to assist with any challenges</p> <p>Don't ringfence planning guidance - have it broader to allow for inclusion of such things as older persons' accommodation and supported accommodation.</p>

Appendix G

Evidence	Source	Finding
<p>When we are looking at the R&D around different M&E systems and reducing people's energy bills, we can bring a significant weight into the development there as well. So just that early engagement is something we would really, really ask for.</p>	<p>United Welsh HA</p>	
<p>If you were to advocate the strategy to maximise affordable housing, the best way to do that is to build more houses generally because there is a clear relationship between private housing and affordable housing.</p> <p>Likewise, to protect the environment, you can make the city more resilient to climate change by new investment, new innovation, new technology and new sea defences.</p> <p>It is difficult to know what the best fit is in terms of brownfield and greenfield. There is the view for preference towards density in the right location so that lends itself to more brownfield, but there is also a need for more family homes or homes with bigger gardens and these can't be built in the middle of the city centre. It is a balance and what the LDP should do is advocate a level of growth which is sustainable and deliverable and ensures that it has the maximum benefit for both the existing communities and any new communities.</p>	<p>Officers – Simon Gilbert/Stuart Williams</p>	<p>Various needs suit different delivery options – The LDP needs to balance this to advocate a level of growth which is sustainable and deliverable and ensures that it has the maximum benefit for both the existing communities and any new communities.</p>
<p>It needs to be a blend of all. We know that high density development does not meet home ownership aspirations (WG quote that 75% of flatted development in Cardiff is in the PRS sector). We need good quality urban design which aligns with the WG aspirations which have a moderate density and decent GFA; high energy efficiency (as delivered through WDQR</p>	<p>NN</p>	<p>Need good quality urban design which aligns with the WG aspirations, have a moderate density and decent GFA; high energy efficiency</p>
<p>SuDS and SAB - It is a nightmare to work through. But the intention and the impact of it is going to be really, really positive.</p> <p>It means you have lower density, you have much, much better development design, you have more greenery, more sustainable transport, and it triggers and</p>	<p>United Welsh HA</p>	<p>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.</p>

Appendix G

Evidence	Source	Finding
<p>drives that. It is really, really important that we stick to our guns on things like this, that we design places that we are going to be proud of in 20 to 30 years.</p>		
<p>Re. jobs growth options, a City Centre First policy should be adopted in writing to utilise the empty units and brownfield sites within the commercial core first before utilising any out or edge of town space. The use of brownfield sites also provides a greater mix of types of housing which can lead to better, more subtle community cohesion. Public services should be brought into the city centre as well when any considerations are made or the need is there to (re)locate.</p>	<p>For Cardiff</p>	<p>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.</p>
<p>Other Views on the Scope of the Growth and Delivery Options</p>		
<p>The RLDP consultation has a narrow a perspective by focusing solely on growth options for homes in Cardiff. Insufficient attention is given to employment sites or to infrastructure. Decisions on the best locations for housing cannot be taken without considering the implications of home/local working, the modal shift, or prospects for expanding public transport.</p>	<p>Cardiff Civic Society</p>	<p>Focus of options is solely on homes. Insufficient attention is given to employment sites or to infrastructure.</p> <p>Implications of home/local working, the modal shift, or prospects for expanding public transport are critical to decisions around location for housing</p>
<p>As with the previous options, it would be good to see all measured against a consistent set of pro's and con's. Sustainable development principles would require consideration of ensuring that biodiversity is maintained, which would limit the greenfield options. It would be helpful to mention building on flood plains and how this will be limited, and steps taken to reduce the impacts of flood damage. The recognised lack of attractiveness of public transport as a key mode of transport would limit the effect of building around transport nodes - with the potential for the need to address the public transport infrastructure to</p>	<p>C3SC</p>	<p>Should be assessed against a consistent set of pros and cons</p> <p>No mention of flood plains and whether this will be limited or addressed to reduce the impact of flood damage</p>

Appendix G

Evidence	Source	Finding
make public transport the easy, accessible, affordable choice also impacting on delivery timescales and costs.		Need to address the public transport infrastructure to make public transport the easy, accessible, affordable choice also impacting on delivery timescales and costs.
Would have liked to see greater visibility on how the plans will help to increase levels of social and community capital and tackle the levels of inequality within the City.	C3SC	Need for greater visibility on how the future development will help to increase levels of social and community capital and tackle the levels of inequality within the City.
The scope seems wide enough, but the cynical concern is that the Council already has preferred options before the Consultation even begins.	Adventure Travel	Scope seems wide enough, but the cynical concern is that the Council already has preferred options before the Consultation even begins.
Ensure that options meet the infrastructure and services required by the population e.g., doctor's surgeries.	Adventure Travel	Ensure that options meet the infrastructure and services required by the population.