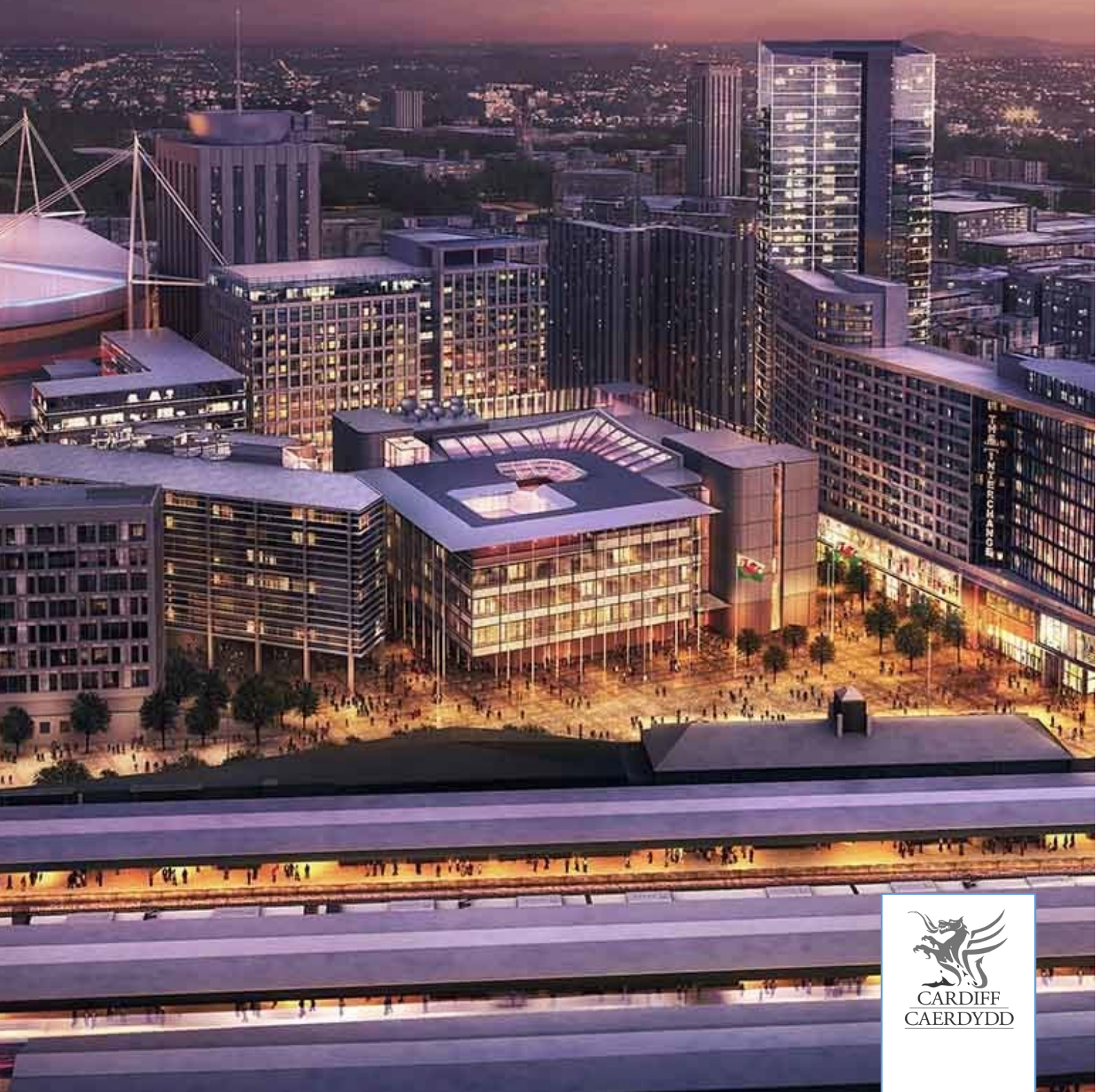


Cardiff LDP Draft Review Report

November 2019



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1. Introduction

Background

- 1.1. The Cardiff Local Development Plan (LDP) was adopted by the Council on 28th January 2016 and sets out the Council's planning framework for the development and use of land in Cardiff over the period 2006 to 2026.

Purpose of this Report

- 1.2. The draft Review Report sets out the proposed extent of likely changes to the existing LDP (2006-2026) and seeks to confirm the revision procedure to be followed in preparing a replacement LDP. It is proposed that the Replacement LDP will cover a plan period up to 2035, which is the end of a 15 year plan period that will commence in 2020.

Structure of the Report

- 1.3. The draft Review Report is structured as recommended in national guidance and contains the following sections:
- 1.4. **Section 2** details the key legislative, national and local policy changes and evidence base that have occurred since the adoption of the LDP in 2016 which are important considerations to inform the review of the LDP and a summary of the main findings of the 2019 Annual Monitoring Report, taking into account the previous 2 AMR's and associated implications for review of the LDP.
- 1.5. **Section 3** provides an assessment of the current LDP and sets out the potential changes required in terms of the Vision and Objectives, Development Strategy and Policies to inform the review process.
- 1.6. **Section 4** considers the areas of evidence base that would need to be reviewed/updated in preparing a revised LDP
- 1.7. **Section 5** considers the potential options for review of the LDP and opportunities for collaboration.
- 1.8. **Section 6** provides a conclusion on the appropriate form of plan revision.

2. Information and Issues informing the LDP Review

Contextual Changes

- 2.1. A wide range of contextual material has been published since the adoption of the LDP and creates a more up-to-date evidence base to inform plan review. This includes national legislation and relevant plans, policies and strategies at the national, regional and local level. The most significant of these changes are set out below.

Legislative Changes

Planning (Wales) Act 2015

- 2.2. The Planning (Wales) Act received Royal Assent in July 2015 and came into force in stages between October 2015 and January 2016. It sets out a series of legislative changes to deliver reform of the planning system in Wales, to ensure that it is fair, resilient and enables development. The Act addresses 5 key objectives which includes strengthening the plan-led approach to planning. It introduces a legal basis for the preparation of a National Development Framework (NDF) and Strategic Development Plans (SDP). The NDF is a national land use plan which will set out Welsh Government's policies in relation to the development and use of land in Wales. It has currently reached the Consultation Draft stage with adoption anticipated in 2020 when the NDF is intended to replace the Wales Spatial Plan. SDPs are intended to address cross-boundary issues at a regional level such as housing, employment and waste and must be in general conformity with the NDF. The Regulations make reference to three strategic planning areas including South East Wales. It is anticipated that Cardiff will be part of this strategic planning area, in alignment with the emerging Cardiff Capital Region City Deal proposals. LDPs will continue to have a fundamental role in the plan-led system. The Act requires LDPs to be in general conformity with the NDF and any SDP which includes all or part of the area of the authority. SDPs must set the scene for the preparation of LDP 'Lites' by LPAs. These must be in general conformity with the SDP.

The Town and Country Planning (Local Development Plan) (Wales) (Amendment) Regulations 2015

- 2.3. Amendments to The Town and Country Planning (Local Development Plan) (Wales) Regulations 2005 were carried out in response to the outcome of the LDP Refinement Exercise and aim to simplify certain aspects of the local development plan process.
- 2.4. The amended Regulations:
- Remove the statutory requirement to advertise consultation stages in the local press;
 - Allow local planning authorities to make revisions to the local development plan where the issues involved are not of sufficient significance to warrant the full procedure, without going through the full revision process;

- Eliminate the need to call for and consult on alternative sites following the deposit consultation; and
- Make minor and consequential amendments.

2.5. The amended LDP Regulations came into force on 28 August 2015 and together with the related policy and guidance in Planning Policy Wales (PPW) and the revised LDP Manual aim to make the LDP process more efficient and effective (i.e. enabling swifter plan preparation and revision without imposing unnecessary prescription). The amended Regulations do not have any implications for the current LDP but will need to be considered in relation to any Plan review and will be given further consideration as necessary.

Well-being of Future Generations (Wales) Act 2015

2.6. The Well-being of Future Generations (Wales) Act gained Royal Assent in April 2015 and came into force on 1st April 2016. The Act strengthens existing governance arrangements for improving the well-being of Wales by ensuring that sustainable development is at the heart of government and public bodies. It aims to make a difference to the lives of people in Wales through setting objectives which maximise its contribution to achieving each of the seven wellbeing goals namely 'a globally responsible Wales', a prosperous Wales, a resilient Wales, a healthier Wales, a more equal Wales; a Wales of cohesive communities, and a Wales of vibrant culture and thriving Welsh Language.

2.7. The Act established a Public Service Board for each local authority area in Wales who must improve the economic, social environmental and cultural well-being of its area by working to achieve the well-being goals. The Cardiff PS are responsible for preparing and publishing a Local Well Being Plan (LWBP) which sets out its objectives and the steps it will take to meet them. The four statutory members of the PSB are the Local Authority, Local Health Board, Fire and Rescue Authority and Natural Resources Wales; other organisations are also invited. As part of its responsibility the PSB has produced a well-being assessment which assesses the state of economic, social, environmental and cultural well-being in Cardiff. The PSB LWBP was agreed in May 2018 and sets out a 5 year plan (2018-2023) to respond to the issues raised. The objectives are set out below and will inform the vision and objectives for the replacement LDP:

- Objective 1 A Capital City that Works for Wales;
- Objective 2 Cardiff grows in a resilient way;
- Objective 3 Safe, Confident and Empowered Communities;
- Objective 4 Cardiff is a great place to grow up;
- Objective 5 Supporting people out of poverty
- Objective 6 Cardiff is a great place to grow older; and
- Objective 7 Modernising and Integrating Our Public Services

- 2.8. Given that sustainable development is the core underlying principle of the LDP (and SEA) there are clear associations between the aspirations of both the LDP and Act/Local Well-being Plans. It is important that the Plan review process recognises the importance of responding to this agenda and consequent WG guidance as captured in the revised Planning Policy Wales (Edition 10) also referenced in this section.

Environment (Wales) Act 2016

- 2.9. This Act received Royal Assent in March 2016 and came into force on 21st May 2016 and sits alongside the Planning (Wales) Act 2015 and the Well-being of Future Generations (Wales) Act 2015 in promoting sustainable use, management and development of Welsh resources. The Environment (Wales) Act introduces new legislation for the environment and provides an iterative framework which ensures that managing Wales' natural resources sustainably will be a core consideration in decision-making. It requires Natural Resources Wales (NRW) to prepare a State of Natural Resources Report that provides an assessment of natural resources and considers the extent to which they are being sustainably managed. The Act also requires Welsh Government to produce a National Natural Resources Policy that sets out the priorities, risks and opportunities for managing Wales' natural resources sustainably. NRW will also produce a local evidence base (Area Statements) to help implement the priorities, risks and opportunities identified in the National Policy and set out how these will be addressed.

Historic Environment (Wales) Act 2016

- 2.10. The Historic Environment (Wales) Act 2016 received Royal Assent in March 2016. The Act makes important changes to the two main UK laws that provide the legislative framework for the protection and management of the historic environment: the Ancient Monuments and Archaeological Areas Act 1979 and the Planning (Listed Buildings and Conservation Areas) Act 1990. The Act will give more effective protection to listed buildings and scheduled ancient monuments; improve the sustainable management of the historic environment; and introduce greater transparency and accountability into decisions taken on the historic environment. While some of the Act's measures came into force in May 2016, the majority will require further secondary legislation or other preparations before they are brought into effect later in 2017 or in 2018.

Public Health (Wales) Act 2017

- 2.11. The Public Health (Wales) Act 2017 received Royal Assent in July 2017. The Act makes changes to the law in Wales to improve health and prevent avoidable health harms. Some of the relevant changes in the Act include the production of a national strategy on preventing and reducing obesity and a requirement to undertake Health Impact Assessment (HIA) on key decisions.

National Planning Policy Amendments

Planning Policy Wales and Technical Advice Notes

2.12. Since the LDP was adopted in January 2016 Welsh Government have issued a completely revised version of Planning Policy Wales (Edition 10) in December 2018. This has been re-drafted so that the seven well-being goals and five ways of working of the Well Being of Future Generations Act 2015 is fully integrated into policy. It also puts the concept of placemaking into the heart of national planning policy in order to ensure that planning decisions consider all aspects of well-being and deliver new development which is sustainable and provides for the needs of all people. In addition the following new or amended Technical Advice Notes have been issued since the LDP was adopted in January 2016:-

- TAN 4: Retail and Commercial Development (November 2016)
- TAN12: Design (March 2016)
- TAN 20: Planning and the Welsh Language (October 2017)
- TAN21: Waste (February 2017)
- New TAN 24: The Historic Environment (May 2017)

Natural Resources Policy

2.13. In line with the Environment (Wales) Act 2015 the Welsh Government produced a Natural Resources Policy (NRP) in August 2017. The focus of the NRP is the sustainable management of Wales' natural resources, to maximise their contribution to achieving goals within the Well-being of Future Generations Act. The NRP sets out three National Priorities: delivering nature-based solutions, increasing renewable energy and resource efficiency, and, taking a place-based approach. The NRP also sets the context for Area Statements, which will be produced by Natural Resources Wales, ensuring that the national priorities for sustainable management of natural resources inform the approach to local delivery. Local Planning Authorities must have regard to the relevant area statement in Local Development Plans. The implications of the NRP and the relevant Area Statement, which is due to be finalised in 2019, for the LDP will be considered through the revision process.

National Development Framework

2.14. The Welsh Government has commenced work on the production of a National Development Framework (NDF) which will replace the Wales Spatial Plan. The NDF will set out the 20 year spatial framework for land use in Wales, providing a context for the provision of new infrastructure/growth. It will concentrate on development and land use issues of national significance which the planning system is able to influence and deliver. WG undertook a Call for Evidence and Projects between December 2016 and March 2017, consulted on Issues and Options in April 2018 and a draft NDF in August 2019. Any resultant implications of the NDF will be considered through the LDP revision process.

Overview

2.15. Overall, there has been significant and strategic changes to the national legislative and policy framework which are considered to be of direct relevance to land use planning. Collectively, the new legislative policy and guidance represents a significant departure from the evidence base informing the existing LDP and supports the need to respond to this new contextual framework.

Regional Context

Cardiff Capital Region and City Deal

2.16. South-East Wales is identified as a new city-region in Wales, covering Cardiff and South-East Wales Local Authorities. As set out in the report 'Powering the Welsh Economy'¹, the Cardiff Capital Region is intended to encourage the ten local authorities and other key partners in its boundaries to work together and collaborate on projects and plans for the area. The Authorities forming the Capital Region are continuing to work on a City Deal bid to fund projects aimed at boosting the competitiveness of the region over the next 20 years. Of note, the City Deal document was signed by the 10 local authority leaders, Secretary of State for Wales, Chief Secretary to the Treasury and First Minister in March 2016. The progress of the Cardiff Capital Region agenda, City Deal Bid and any subsequent implications for the LDP will be given further consideration in subsequent AMRs where appropriate.

Neighboring LDPS

2.17. The **Vale of Glamorgan LDP** was adopted by the Council on 28th June 2017 and provides the local planning framework to 2026. The Council must commence a review of its LDP before June 2021.

2.18. **Rhondda Cynon Taff LDP** was adopted by the Council on 2nd March 2011 and provides the local planning policy framework up until 2021. RCT have commenced a review of their LDP covering the period 2020 to 2030 and a draft Review Report and Draft Delivery Agreement were agreed by their Cabinet on 17th October 2019.

2.19. The **Newport LDP** was adopted by the Council on 27th January 2015 and covers the plan period 2011 – 2026. A Full Review has not been commenced to date with the 4th AMR (October 2019) concluding that the Council is of the view that the LDP is performing well and enabling growth in sustainable locations. The AMR also recommends that consideration be given to triggering a review of the LDP prior to the fifth anniversary of the plan in January 2020 dependant on the outcome of discussions with Senior Managers and Members, Welsh Government, the development industry, neighbouring Authorities and progress with the Strategic Development Plan.

2.20. The **Caerphilly LDP** was adopted on 23rd November 2010 and covers the period 2006 – 2021. On the 8th October 2013, the Council considered the findings of the second AMR and resolved to commence work on the Review of the Plan in order to update the LDP to cover the Plan period up to 2031. The Council consulted on the Deposit

Replacement LDP between 11th February and 22nd April 2016. However, on 11th October 2016, following receipt of objections from the Welsh Government to the Deposit Replacement LDP consultation, the Council resolved to withdraw the Replacement LDP. Recently Caerphilly agreed at their Council meeting on 23rd October 2019 to commence work on a full revision of their adopted LDP.

Local Context

2.21. A number of local policy documents and strategies have been prepared or revised since the adoption of the LDP.

Capital Ambition (2017 to 2022)

2.22. This sets out the Administration's five-year policy agenda for the city. The plan focuses on four main areas: Working for Cardiff - making sure everyone who lives and works here can contribute to, and benefit from, the city's success. Working for Wales - A successful Wales needs a successful capital city. Working for the future - Managing the city's growth in a sustainable way. Working for public services - Making sure public services are delivered efficiently, effectively and sustainably in the face of rising demands and reduced budgets. The Corporate Plan (2019-2022) and the Well-Being Plan 2018-2023 are the key documents in delivering Capital Ambition.

Cardiff Well-Being Plan 2018-2023

2.23. Under the provisions of the Well-Being of Future Generations Act, every Public Service Board in Wales must publish a Local Well-Being Plan by May 2018.

2.24. Having undertaken a local well-being assessment to understand the city's strengths and challenges, Cardiff's Public Services Board (PSB) has produced a Local Well-being Plan – a 5 year plan to respond to the issues raised.

2.25. The Well-being Plan sets out the Cardiff PSB's priorities for action focusing on the areas of public service delivery which fundamentally require partnership working between the city's public and community services, and with the citizens of Cardiff.

2.26. The Plan contains Well-being Objectives, high-level priorities that the Cardiff PSB has identified as being most important. It also contains 'Commitments,' or practical steps that the city's public services, together, will deliver over the next 5 years.

Bilingual Cardiff 5 Year Welsh Language Strategy

2.27. The strategy was published in March 2017 following Cabinet and full Council consideration. It sets out our priorities for facilitating and promoting the Welsh language in Cardiff with our partners, starting our journey to becoming a truly bilingual capital for Wales.

Strategic Equality Plan

2.28. In March 2016 the Council adopted a new plan to set out the Council's equality priorities for the next four years. Seven new Equality Objectives were agreed in conjunction with

local citizens and third sector organisations. These new Equality Objectives are shaping the Council's policy, service delivery, and support to employees – eliminating discrimination, advancing equality of opportunity, and fostering good relations between different groups.

Transport Strategy

2.29. The Council's Transport Strategy was agreed by Cabinet in October 2016 and brings together the proposals in the Local Development Plan and the Local Transport Plan. The purpose of this strategy is to:

- Raise awareness of Cardiff's transport challenges over the next 20 years
- Highlight the main projects and actions which the Council proposes to undertake to tackle the challenges and increase sustainable travel in Cardiff

Clean Air Strategy

2.30. This strategy was agreed by Cabinet in June 2019 and proposes major changes to vehicle access in Cardiff city centre, which form part of a £21 million plan to clean up the city's air. Proposal include:

- A new two-way segregated cycle track around the city centre, passing Cardiff Castle, Queen Street station and the Motorpoint Arena
- Traffic on Castle Street cut to one lane in each direction, keeping the southbound bus lane
- Single-lane traffic in Westgate Street plus one-way cycle lanes
- A gate on Westgate Street which would allow only buses to access the junctions with Wood Street and Park Street
- Loans of £3.8m to Cardiff Bus to buy 36 electric buses
- A target of 30% of taxi trade to switch to electric or hybrid vehicles

2.31. The Council has now submitted the plans to Welsh Government to request funding for the proposals.

Cardiff Older Persons' Housing Strategy 2019 - 2023

2.32. This strategy sets out how the Council and its partners will deliver the best housing outcomes for all older people in Cardiff. The Strategy has a number of key aims, including planning new homes and communities to address future housing and care needs across all tenures and building strong inclusive communities and tackling social isolation.

The Council's Economic Strategy Building More Homes and Better Jobs

2.33. The Economic Strategy contains 3 parts – a spatial strategy, an industrial strategy and underpinning themes to support the strategy and sets out a number of priorities and projects aimed at delivering the Council's aims for the economy over the next 10 years including: generating 20,000 additional jobs for the city –region; creating Wales first significant commercial business cluster in Central Square, Central Quay and Callaghan

Square; establishing Cardiff Bay as a leading UK urban visitor destination in its own right; putting Cardiff at the heart of the UK's Creative and Digital sector; positioning Cardiff as a national centre for Reg-Tech as part of its fin-tech and cyber security cluster; strengthening Cardiff city-region's place as the focal point for advanced manufacturing in Wales, focusing on compound semi-conductors and life sciences; supporting the city's communities and districts to take advantage of the city's growth and; establishing stronger city-region governance that delivers for Wales.

Cardiff 2030 A Ten Year Vision for a Capital City of Learning and Opportunity

2.34. This strategy was launched in October 2019 and includes aims to continue to enhance and develop the education estate in order to meet the changing demographic and societal requirements of the city. The strategy includes commitments to deliver the 21st Century Schools Programme including new/rebuilt schools and deliver new schools to take account of population growth and economic development in the city through the LDP.

Welsh Government Population and Household Projections

2.35. Since the LDP was adopted the Welsh Government has released population and household projections based on mid-year population estimates for 2014 (published 2016) and mid-year population estimates (published annually). The key changes for Cardiff are as follows:

- The 2014 based population projections indicate that population levels will increase from 354,294 to 395,679 between 2014 and 2026. This is a 2% lower level of increase to that projected in the LDP which showed an increase to 403,684.
- The 2014 based household projections indicate that household levels will increase from 147,582 to 169,745 between 2014 and 2026. This is a 5% lower level of increase to that projected in the LDP which showed an increase to 177,845.
- The Mid Year Estimates for the period 2011 to 2018 identify a steady increase from 345,442 to 364,248, which equates to an increase of 0.78% per year over the last 7 years.

2.36. New official Welsh Government population and household projections are anticipated in the near future. Together with previously issued projections since LDP adoption, this important source of evidence will clearly be of significance in the Plan review process where the level of growth over an increased time period will need to be assessed.

LDP Annual Monitoring Report – Key Findings

2.37. Overall the findings of the third AMR for year 3 are positive with the majority of the indicators shown as green indicating that most LDP policies are being implemented effectively. A summary of performance against the main Plan topics are set out below with Appendix 1 setting out the data and conclusions in more detail.

2.38. **Employment** – Monitoring data shows continuing strong performance. Of particular importance is data regarding net job creation - There is a requirement for 40,000 new jobs over the plan period 2006-2026. 20,900 jobs were created between 2006 and 2015

and therefore the target for the remaining plan period is 19,100 jobs or 1,750 jobs annually. Since the first AMR (16/17) the number of jobs has been steadily increasing and the latest AMR shows an increase of 6,000 jobs since April 2018.

2.39. **Housing** – Monitoring data shows new homes have now started to be completed on many of the LDP Strategic Sites. Specifically, there are new completions on 3 of the Strategic Sites.

- 511 completions have been achieved at St Ederyns Village (just short of the 515 target included in the AMR);
- 167 completions have been achieved on the North West Cardiff Strategic site, which has three separate outlets underway with more planned in the near future
- 51 completions have been recorded on the North East Cardiff Strategic site and construction is underway at Churchlands.

2.40. Although these rates are below targets set out in the AMR it is now evident that the Plan-led approach is now starting to successfully drive the delivery of new homes at a level not seen for the last 10 years. The 1,444 completions in 2018/19 (43% higher than 2017/18) contrast with the previous 9 years where completions averaged 725 units per annum, with no year above 1,000 units for this period.

2.41. The data on housing delivery demonstrates the ‘lag’ between Plan adoption and homes being completed on new sites allocated in the Plan. Due to a combination of site assembly, legal and logistical factors experienced by landowners/developers along with the time required to secure the necessary planning and adoption consents, trajectories of delivery are slower than originally anticipated. This includes time spent securing the accompanying Section 106 Agreements which fully deliver the Council's aspirations as set out in the LDP. Overall, over the 13 years between 2006 and 2019 a total of 16,521 new dwellings were built in Cardiff which represents 40% of the overall dwelling requirement.

2.42. However, construction has now started or is about to start on most of the strategic housing sites following the master planning and infrastructure plans approach as set out in the plan and it is therefore expected that housing completions over the remaining 7 years of the Plan period will increase significantly.

2.43. **Affordable Housing** - In terms of the delivery of affordable housing, the plan sets a target for the delivery of 6,646 affordable units to be provided for the 12 years between 2014 and 2026, with an interim target in the AMR to provide 1,942 affordable dwellings by 2019.

2.44. Monitoring data indicates that at 2019, 1,082 affordable units had been delivered which represents 25% of overall completions. Whilst this is less than the numerical target, as highlighted above it reflects the slower than anticipated progress in the strategic housing allocations being delivered. Given the low overall completion rates over previous years, it would be unrealistic in these circumstances to expect any significantly higher affordable housing contribution which inevitably reflects a percentage of the overall number of completions. As set out above, construction has now started or is

about to start on most of the strategic housing sites following the master planning and infrastructure plans approach as set out in the plan and it is therefore expected that affordable housing completions over the remaining 7 years of the Plan period will increase significantly.

- 2.45. **Transportation** - Data collected in relation to travel by sustainable modes is reflecting the fluctuations as shown in past trends over the last 10 years. This demonstrates that sustainable travel trends have continued to increase over the last 10 years for both work and shopping, although for leisure and education the trends show a slight decrease.
- 2.46. There has been a positive outturn in sustainable travel over the past year, with the target 1% increase having been achieved for each of the journey purposes, with significant growth in particular evident for journeys to Work (+5.3% mode-shift). In terms of sustainable travel modes, significant progress has been made in meeting cycling targets for all journey purposes with cycling to work in particular having experienced substantial growth in the past one year period (+3.7%). Train use has very slightly declined over the past year for work and education but the 10 year trend shows a significant increase. Walking has increase over the last year for all journey purposes with a fluctuating longer term trend. Bus use has decreased for education, shopping and leisure, reflecting a longer term downward trend.
- 2.47. At this juncture, without the significant roll-out of new houses and provision of supporting sustainable transportation infrastructure, the early stage of Metro delivery together with the ongoing implementation of wider Council initiatives, it is too early to draw any firm conclusions with regard to policy delivery, particularly given that the 50:50 modal split target relates to 2026. Future AMR's will provide formal regular annual updates. However, the masterplanning approach together with section 106 Agreements already secured will enhance the phased future provision of supporting transportation infrastructure along with other measures such as increased frequency of public transport services and provision of bus passes to new residents.
- 2.48. **Gypsy and Traveller Sites** - work is progressing the identification of sites to meet the evidenced need for permanent and transit Gypsy and Traveller sites. This has included discussions with the Welsh Government and work continues to secure appropriate outcomes. In terms of transit sites, it is considered that these would best be considered on a regional basis, requiring collaboration with neighbouring local authorities through the LDP revision process.
- 2.49. **Supplementary Planning Guidance** – Significant progress has been made in producing a programme of new Supplementary Planning Guidance (SPG) and since adoption of the LDP 18 SPGs have been approved by Council to support the policies in the adopted Plan and the Cardiff Infrastructure Plan is currently being updated.

2.50. **Contextual Changes** – the contextual review highlights significant changes in the national planning policy framework which has evolved significantly over the last three monitoring periods. In particular, Planning Policy Wales (PPW, Edition 10, December 2018) which in turn responds to the Well-being of Future Generations Act, 2015 have made significant changes to the high-level policy framework.

3. Review of LDP and potential changes required

LDP Vision

3.1. In order to tackle key issues and guide and manage future development the LDP identified a clear vision of what the City should look like in 2026. Therefore, an important aspect of the LDP review, will be assessing the extent the Plan vision should be updated having regard to changes since Plan adoption. Specifically, the LDP Vision was derived from the vision is as set out in the 10 year, 'What Matters' Strategy (2010-2020) and states that:

By 2020...Cardiff will be a world class European capital city with an exceptional quality of life and at the heart of a thriving city-region.

3.2. In order to deliver the vision set out in the 'What Matters' Strategy it identified the following seven strategic outcomes:

- People in Cardiff are healthy
- People in Cardiff have a clean, attractive and sustainable environment
- People in Cardiff are safe and feel safe
- Cardiff has a thriving and prosperous economy
- People in Cardiff achieve their full potential
- Cardiff is a great place to live, work and play
- Cardiff is a fair, just and inclusive society

3.3. The "What Matters" Strategy was replaced by a Local Well Being Plan (Agreed May 2018) which a requirement of the Well Being of Future Generations Act (2015).

3.4. The review process provides a timely opportunity to consider the implications of the new context for determining the most appropriate future vision.

LDP Objectives

3.5. The LDP Vision is delivered through 4 Strategic Objectives (and 23 specific objectives) which seek to respond to the evidenced economic and social needs but in a way that is co-ordinated, respects and enhances Cardiff's environment and sets out a framework for delivering the sustainable neighbourhoods of the future. These four strategic objectives are at the centre of the LDP: They are:

1. To respond to evidenced economic needs and provide the necessary infrastructure to deliver development;
2. To respond to evidenced social needs;

3. To deliver economic and social needs in a co-ordinated way that respects and enhances Cardiff's environment; and
4. To create sustainable neighbourhoods that form part of a sustainable city.

Assessment of the existing LDP Objectives against the Well Being Goals

3.6. The assessment of compatibility between the 4 Strategic LDP Objectives (and 37 specific objectives) and the 7 Well Being Goals indicates that the current LDP Objectives contribute to achieving a range of Well Being goals and individual objectives delivering multiple goals. There is no obvious conflict between the Objectives and the Well Being Goals. However, the review process will allow a more in-depth assessment to take place and inform the most appropriate and up-to-date objectives.

3.7. The table below provides an assessment of LDP Objectives against Well Being Goals.

Seven Well Being Goals

Prosperous Wales
Resilient Wales
Healthier Wales
More Equal Wales
Wales of Cohesive Communities
Wales of vibrant culture and thriving Welsh Language
Globally Responsible Wales

LDP Objectives	Well Being Goals						
1. To respond to evidenced economic needs and provide the necessary infrastructure to deliver development							
<i>1a. To effectively respond to Cardiff's role as capital city for Wales, seat of the National Government and centre of the city-region in terms of providing a range and choice of economic opportunities that will drive the prosperity of the region.</i>							

LDP Objectives	Well Being Goals						
1b. To maximise the economic potential of the city centre of Cardiff as a major financial and service sector opportunity that builds upon its position next to a transport hub of national and regional significance and is readily accessible from all areas within the city and well connected to other UK cities.							
1c. To maintain and enhance the vitality, attractiveness and viability of the city centre as a major retail and cultural destination and as a place to work, visit and live.							
1d. To continue the successful regeneration of the Cardiff Bay area, maximising opportunities for quality commercial buildings and further development, particularly water and river frontage developments that can provide attractive and distinctive environments.							
1e. To promote clusters of specialist sectors and research & development expertise including the following key sectors: ICT; Energy and environment; Advanced materials and manufacturing; Creative industries; Life sciences; and Financial and professional services.							
1f. To ensure a range and choice of employment land and business premises at sustainable locations across the city is provided to assist economic competitiveness, encourage entrepreneurship, promote the growth of indigenous businesses of all types and size and attract inward investment.							
1g. To assist the promotion of Cardiff as a major tourist destination including the provision of the development of a variety of high quality tourist facilities and visitor accommodation.							
1h. To create a physical and economic environment that develops, attracts and retains skilled workers, businesses and entrepreneurs to Cardiff together with maximising links with Universities and supporting indigenous skills and enterprises.							
1i. To quantify critical strategic infrastructure required to realise development aspirations and set out clear mechanisms for delivery including sustainable transport solutions for strategic sites.							
1j. To establish Cardiff as a sustainable travel city by reducing the need to travel, increasing the use of sustainable travel modes and networks (particularly walking and cycling), decreasing private car use and improving the city's key transport hub based at the adjacent central bus and train stations.							
1k. To protect existing mineral resources and ensure an adequate supply of limestone aggregates in the north west of the city for the construction industry and to promote their efficient and appropriate usage, including the use of recycled aggregates where possible.							
1l. To support sustainable collection and recycling methods for Municipal Waste by maintaining and improving an integrated network of facilities in Cardiff.							

LDP Objectives	Well Being Goals						
1m. To lead and participate in securing regional facilities for the sustainable treatment and disposal of Municipal Waste in accordance with the Regional Waste Plan and in a manner that follows the waste hierarchy which seeks to maximise the reduction of waste in the first place and thereafter reusing, recovering and recycling options before the disposal of waste material is considered.							
1n. To facilitate an integrated network of commercial and industrial sustainable waste management facilities consistent with the needs of the South East Wales area and in a manner that follows the waste hierarchy which seeks to maximise the reduction of waste in the first place and thereafter reusing, recovering and recycling options before the disposal of waste material is considered.							
2. To respond to evidenced social needs							
2a. To provide new homes required to support the economic progression of the city and to respond to population change, continued in-migration and evidenced demand for affordable and family housing so that social needs can be addressed.							
2b. To provide a range and choice of new homes of different tenure, type and location that meets specific needs such as the provision of affordable housing, family accommodation, housing for the elderly, the disabled and students and pitches for the gypsy and traveller community.							
2c. To maximise the use of the existing building stock through refurbishment, retro-fitting and empty homes initiatives.							
2d. To bring about changes to Cardiff's environment and neighbourhoods that help to tackle health inequalities, promote good health and enable healthier lifestyles to be led by the city's population in line with Cardiff's status as a World Health Organisation, 'Healthy City'.							
2e. To bring about changes to Cardiff's environment that create a safer city and reduce the likelihood, fear and consequences of crime.							
2f. To create an environment that is made more accessible to all groups in society so that the employment opportunities, facilities and services of the city can be more readily used and enjoyed by all.							
2g. To maximise the multi-functional role played by Cardiff's parks, open spaces and allotments together with improving their accessibility for the whole community.							
3h. To recognise, support and enhance the key role played by existing District, Local and Neighbourhood Centres as accessible local hubs providing community services, local shops, healthy food choices, businesses, employment and access to public transport.							

LDP Objectives	Well Being Goals						
2i. To support the regeneration of local neighbourhoods including reducing inequalities, particularly areas experiencing high levels of deprivation, areas vulnerable to decline and areas with opportunities for change.							
2j. To ensure that the necessary education and training facilities are provided and are accessible to all: to build strong futures for children, provide a diverse range of learning opportunities for all and assist economic progress through the development of required skills.							
2k. To develop new cultural, leisure and sporting facilities to meet needs and enhance Cardiff's role as a premier cultural and sporting destination.							
2l. To ensure that the necessary community and cultural facilities (community centres, shops with healthy food choices, youth facilities, child care, faith buildings, health centres, etc.) are provided that are accessible to all in areas that are deprived.							
2m. To address rising unemployment and provide accessible local job opportunities, particularly in areas of greatest need.							
2n. To promote social inclusion, equality of opportunity and access for all.							
5. To deliver economic and social needs in a co-ordinated way that respects Cardiff's environment and responds to the challenges of climate change.							
3a. To mitigate the effects of climate change through reducing energy demand and increasing the supply of renewable energy.							
3b. To ensure that Cardiff adapts to the full anticipated impacts of climate change and that new development and infrastructure is designed to be resilient to possible consequences.							
3c. To protect, manage and enhance Cardiff's natural environmental assets.							
3d. To conserve and enhance Cardiff's built and historic assets that define distinctive character and reflect its past development.							
3e. In identifying new sites to meet economic/social needs, to follow a sequence of firstly maximising the contribution of brownfield sites, then identifying greenfield sites that are considered to represent the most							
3f. To have full regard to flood risk when considering the acceptability of development proposals and considering mitigation and adaptation measures.							
3g. To maximise opportunities to create a cleaner and more attractive environment that enhances the quality of life and helps Cardiff to become a world-class European capital city.							
6. To create sustainable neighbourhoods that form part of a sustainable city							

LDP Objectives	Well Being Goals						
4a. To ensure that all new development areas (whether greenfield or brownfield) create sustainable neighbourhoods.							
4b. To take opportunities to apply the above principles to existing neighbourhoods in order to create a more sustainable city.							

LDP Strategy and Policies

- 3.8. The LDP strategy and policies have been reviewed having regard to the following:
- Findings of the three LDP Annual Monitoring Reports;
 - Significant contextual changes that have occurred since the Plan's adoption, including changes in national policy and legislation and updates to the evidence base; and
 - Internal consultation with relevant specialist officers.
- 3.9. This gives an overview of whether a policy/allocation is functioning effectively, whether any amendments are likely to be needed and whether any policies should be removed as part of the Plan revision process. The policy assessment undertaken to date is not considered to be definitive and further consideration will be given to the need to revise the Plan's policies as part of the revision process.
- 3.10. The revision of the Plan will also need to consider the implications of an extended Plan period. The current Plan runs to 2026, with the Replacement Plan likely to extend to 2035 (plan period 2020-2035). Extending the Plan period will result in a revised dwelling need and a requirement for new sites for both market and affordable dwellings. It will need to take account of the revised version of Planning Policy Wales, latest population and household projections and a revised Local Housing Market Assessment, as well as other updates to the evidence base. Furthermore, the review process can also explore the ways that a new plan could respond to current challenges such as the climate emergency, obesity crises and other issues identified below. These updates and issues will need to be thoroughly considered and addressed in a comprehensive manner.
- 3.11. The key policy areas that are considered likely to require amendment based on the policy review assessment are discussed in more detail below.

Level of growth, delivery, spatial distribution and allocations (KP1, KP2 A-H, H1)

- 3.12. The proposed level of housing provision in the LDP is 41,415 dwellings (Policy KP1) over the Plan period 2006-2026. This figure was primarily informed by the then latest WG household projections which projected a population rise of 33% over the Plan period. Official WG population and household projections issued since have shown reduced levels of growth, with the latest 2014 based population and household

projections showing a 2% lower level of increase in population and 5% lower level of increase in households.

- 3.13. Whilst the level of growth in the latest WG projections has reduced, Cardiff is still projected to experience significant growth over future years. This is illustrated by the fact that even using these latest WG projections Cardiff's population is still expected to grow by 18% up to 2035. This growth is be driven by both natural change – the difference between births and deaths and net migration levels – the difference between in and out migration. Whilst growth due to natural change is easier to predict growth as a result of migration is more volatile and difficult to predict.
- 3.14. New WG projections are anticipated in the near future and can help directly inform the Plan review process which will need to assess the most appropriate level of growth for a Plan period beyond the end date of the existing LDP.
- 3.15. In terms of spatial distribution, the LDP recognises that brownfield sites will continue to play an important role in delivering windfall sites and proposes that brownfield sites contribute over half of the provision. However, the LDP also recognises that that there is a limited supply of brownfield land. Therefore, in order to provide a catalyst to the local housing market and recognise the role greenfield sites can play in bringing forward high levels of affordable and family housing and wider provision of strategic infrastructure the LDP proposes 5 strategic greenfield housing allocations around the edge of the city, to deliver a total of 13,450 homes by 2026 (Policies KP2 (C) to KP2 (G)).
- 3.16. Future considerations as part of the review process can also be usefully informed by evidence regarding the delivery of growth. In this respect it is clear that the Plan-led approach is now starting to successfully drive the delivery of new homes at a level not seen for the last 10 years. The 1,444 completions in 2018/19 (43% higher than 2017/18) contrast with the previous 9 years where completions averaged 725 units per annum, with no year above 1,000 units for this period.
- 3.17. The data on housing delivery demonstrates the 'lag' between Plan adoption and homes being completed on new sites allocated in the Plan. Due to a combination of site assembly, legal and logistical factors experienced by landowners/developers along with the time required to secure the necessary planning and adoption consents, trajectories of delivery are slower than originally anticipated. This includes time spent securing the accompanying Section 106 Agreements which fully deliver the Council's aspirations as set out in the LDP. Overall, over the 13 years between 2006 and 2019 a total of 16,521 new dwellings were built in Cardiff which represents 40% of the overall dwelling requirement.
- 3.18. However, construction has now started or is about to start on most of the strategic housing sites following the master planning and infrastructure plans approach as set

out in the plan and it is therefore expected that housing completions over the remaining 7 years of the Plan period will increase significantly.

3.19. Evidence gained from the Housing Land Availability Study can also inform the plan review process. Data from the last 10 years is shown below and shows that Cardiff has not achieved a 5 year housing land supply over this period. However, since the adoption of the plan in 2016, the overall land bank, including dwellings estimated to be completed beyond 5 years, has significantly increased to around 13,788. Despite the housing land supply currently standing at 3.5 years, Cardiff has therefore has a large overall landbank of 24,947 dwellings with such data providing an important source of information to inform the review process.

Table 1: Cardiff Housing Land Supply April 2009 to April 2018

Year	Number of Years Supply
2009	4.5
2010	3.4
2011	2.3
2012	2.9
2013	3.2
2014	3.6
2015*	No adopted Plan in place
2016	3.8
2017	3.6
2018	3.5

3.20. Overall, the evidence summarised above demonstrates that good progress is now being made and importantly the spatial housing strategy is sound and is adhering to the masterplanning and infrastructure plan approach embedded in the plan.

3.21. However, the review process provides an opportunity to revisit the most appropriate future levels of growth for an extended Plan period and allows a thorough analysis of all other relevant factors such as delivery, urban capacity, spatial approach and how the level of growth would form a key element of the overall Plan strategy.

Affordable Housing (H3)

3.22. In terms of the delivery of affordable housing, Policy KP13: Responding to Evidenced Social Needs sets a target for the delivery of 6,646 affordable units to be provided for the 12 years between 2014 and 2026, with an interim target in the AMR to provide 1,942 affordable dwellings by 2019.

3.23. Monitoring data indicates that at 2019, 1,082 affordable units had been delivered which represents 25% of overall completions. Whilst this is less than the numerical target, as highlighted above it reflects the slower than anticipated progress in the strategic

housing allocations being delivered. Given the low overall completion rates over previous years, it would be unrealistic in these circumstances to expect any significantly higher affordable housing contribution which inevitably reflects a percentage of the overall number of completions.

- 3.24. Encouragingly, the allocated strategic sites are securing the required 30% affordable housing through the issuing of planning consents. This accords with the policy set in the LDP but the physical completions are yet to be fully implemented on the ground.
- 3.25. Construction has now started or is about to start on most of the strategic housing sites so affordable housing completions over the remaining 7 years are expected to increase significantly. This conclusion is supported by the fact there are an additional 4,790 affordable homes in the landbank, which are due to come forward over the next 7 years.
- 3.26. In addition, the Council has a target of delivering 2,000 Council homes, with 1,000 of these programmed to be delivered by May 2022. Part of this target will be delivered through the Cardiff Partnership Programme, which has a target of delivering 1,500 homes in the next 10 years (600 of these will be council homes). To date 109 Council homes have been completed and a further 191 are currently under construction.
- 3.27. Away from the Strategic Sites, a wide range of percentages of affordable housing has been achieved on brownfield sites. Examples include Former Highfields Road Centre, Allensbank Road (24%), Briardene, North Road (23%), Former Wharf Pub, Atlantic Wharf (17%), Capital Quarter (20%) and Avenue Industrial Park (20%).
- 3.28. An issue which can be further assessed as part of the review process relates to the impact of viability factors undermining the ability of some sites/proposals to deliver either on-site provision or off-site contributions. Whilst the greenfield strategic sites allocated in the LDP with a clear Plan-led requirement to deliver provision have successfully met expectations, some brownfield windfall proposals are using viability evidence to justify a limited or zero provision (given the policy requirement is subject to viability considerations).
- 3.29. The review process will therefore allow a further analysis on need data, the most appropriate policy response, a thorough consideration of viability aspects and wider analysis of potentially suitable sites to meet the demand.

Gypsy & Traveller accommodation (H7)

- 3.30. The Housing (Wales) Act 2014 requires each local authority in Wales to undertake a Gypsy and Traveller Accommodation Assessment to ensure that needs are properly assessed and planned for. An assessment was required to be submitted to Welsh Government by February 2016 with a statutory duty placed on local authorities to make provision for site(s) where an assessment identifies an unmet need.

- 3.31. The Cardiff Gypsy and Traveller Accommodation Assessment was formally approved by Welsh Government in 2016. In summary, the GTAA covers the period 2016-2026 and estimates the additional pitch provision needed for Gypsies and Travellers in Cardiff. For the first 5 years of the GTAA plan period, there is a requirement for 48 additional pitches, and for the remainder of the GTAA plan period, a further 24 additional pitch is required. This gives a total need for the whole GTAA plan period of 72 additional pitches.
- 3.32. Work is progressing the identification of sites to meet the evidenced need for permanent and transit Gypsy and Traveller sites. This has included discussions with the Welsh Government and work continues to secure appropriate outcomes. In terms of transit sites, it is considered that these would best be considered on a regional basis, requiring collaboration with neighbouring local authorities through the LDP revision process.
- 3.33. This issue will need to be given further consideration in the LDP revision process with a clear need for the process to demonstrate the ability to identify an appropriate level of need and how this will be met in terms of site allocation(s).

Detailed housing policies (H2, H4-6)

- 3.34. The plan review provides an opportunity to review these policies which concern changes of use of existing residential properties, conversions/redevelopment to residential use and the sub-division of residential properties.
- 3.35. Collectively, these policies provide the framework for managing an important aspect of housing supply in the city and can help deliver important brownfield contributions to supply in sustainable locations.
- 3.36. The review process allows a refreshed consideration of these policies to take into account changes in national planning policy, contextual changes, any changes in the LDP evidence base and monitoring of on-going Development Management decisions. In this respect, the issue of sub-divisions/conversions into HMOs and flats is a matter which is considered to warrant a detailed analysis in response to concerns regarding the cumulative impact of proposals on local communities and amenity considerations of occupiers and neighbours. Whilst additional SPG has been prepared, appeal decisions are not always supporting the Council's position so a review is considered timely.

Employment (KP9, EC1-7)

- 3.37. Local Development Plan Policy KP9: Responding to Evidence Economic Needs responds to Cardiff's role as the main economic driver in South East Wales and deliver the strategic aspirations for economic development in Cardiff and meet the demand for 40,000 new jobs over the plan period through the identification and protection of

employment land and premises and opportunities to deliver the key economic growth sectors.

3.38. The Local Development Plan's employment land is safeguarded for employment purposes, with Policies EC1, EC3 and EC4 and the future prosperity of the local economy is facilitated by ensuring that Cardiff can offer a range and choice of employment sites and premises for employment uses with the allocation of Cardiff Central Enterprise Zone (Policy KP2 (A)) and South of St Mellons Business Park (Policy KP2 (H)). In addition policy EC7 allows for employment proposals on land not identified for employment uses which provides an element of flexibility, should there be an additional demand for employment land over the plan period and which will satisfactorily enable businesses to locate within the County.

3.39. An analysis of monitoring indicators during the period 1st April 2018 to 31st March 2019 shows continuing strong performance. Of particular importance is data regarding net job creation - There is a requirement for 40,000 new jobs over the plan period 2006-2026. 20,900 jobs were created between 2006 and 2015 and therefore the target for the remaining plan period is 19,100 jobs or 1,750 jobs annually. Since the first AMR (16/17) the number of jobs has been steadily increasing and the latest AMR shows an increase of 6,000 jobs since April 2018 which demonstrates that Policy KP1 is functioning effectively. Other findings include:

- The employment land permitted (hectares) on allocated sites as a percentage of all employment allocations is 2.4%, slightly higher than the previous 12 months. While the take up in terms of hectares would appear low, the schemes permitted are high density, high rise offices which have smaller land requirements.
- Office completions amounted to 39,726sq m largely attributable to completions within the Central Enterprise Zone. A further 42,652sq m of office floorspace is under construction and 49,328sq with planning permission which is not yet started.
- Although falling short of the annual target there have been a number of significant industrial completions, which includes 0.6ha for a new brewery production facility/head office at Pacific Business Park.
- There are a number of current planning permissions for industrial use including 16.5ha of land for a biomass power plant with industrial accommodation.
- The employment land lost to alternative uses has largely been as a result of uses which are considered complementary uses such as day nursery, gyms and small scale food and drink uses to cater for the needs of the workforce.
- Planning permissions have been granted on strategic sites at North West Cardiff, part of north east Cardiff and North West Cardiff, however, the employment elements of these residential led schemes are yet to be started. Pre application

dialogue is continuing with regard to the strategic employment site at St. Mellons Business Park which will inform a submission for consent in the near future.

3.40. Overall, the LDP policy review has found in general the Plan's employment policies are functioning effectively in enabling appropriate industrial and business development across the county. However as part of the revision process, consideration will need to be given to the economies of the future and their locational, sites and premises requirements, new labour force projections, an assessment of current employment land allocations and the identification of new employment land allocations. The Council's long term economic priorities and aspirations linked to the Cardiff Capital Region City Deal and Cardiff's Economic Strategy 'Building More and Better Jobs' will also need to be considered through the revision process.

Retail (Policies KP10, R1 to R8)

3.41. Policy R1: Retail Hierarchy is the central component of the retail strategy and establishes the hierarchy of centres in line with national guidance and favours new and improved retail facilities within the Central Shopping Area and at an appropriate scale, within district and local centres, whilst seeking to control the amount, size and nature of out-of-centre retail.

- The latest annual retail survey indicates that:
- Central Shopping Area – vacancy rate is 10.7%
- District centre – vacancy rate is 10%
- Local centre – vacancy rate is 8%
- Vacancy rates in the Central Shopping Area and Local Centres have fallen since the 2017/18 AMR and are in line with national trends.

3.42. These average vacancy rates are below the Goad UK average 11.8%. This below average vacancy rate suggest that the LDP retail policies are functioning effectively and there is a reasonable balance between the supply of shop premises and occupiers demand for space within these centres. The presence of some vacancies within centres provides an opportunity for new businesses to enter the market, attracting investment and modernising vacant units.

3.43. A new Retail Study will be undertaken in order to inform the revised LDP. This study will provide an update of the retail expenditure forecasts for comparison and convenience retail for the County. The purpose of a new retail study will be to provide comprehensive data and information on the current performance of the retailing and commercial centres and to provide an up-to-date assessment of retail expenditure capacity within the County and identify capacity for comparison and convenience goods. This updated study will inform the Plan revision in terms of retail strategy, retail policies and LDP allocations. Wider work will also be undertaken in response to the current challenges faced by the High Street to inform the merits or otherwise of how future LDP policy can respond most effectively.

Transport (KP8, T1-T9)

- 3.44. Data collected in relation to travel by sustainable modes is reflecting the fluctuations as shown in past trends over the last 10 years. This demonstrates that sustainable travel trends have continued to increase over the last 10 years for both work and shopping, although for leisure and education the trends show a slight decrease.
- 3.45. In terms of sustainable travel modes, significant progress has been made in meeting cycling targets for all journey purposes with cycling to work in particular having experienced substantial growth in the past one year period (+3.7%). Train use has very slightly declined over the past year for work and education but the 10 year trend shows a significant increase. Walking has increase over the last year for all journey purposes with a fluctuating longer term trend. Bus use has decreased for education, shopping and leisure, reflecting a longer term downward trend.
- 3.46. In accordance with Welsh Government Local Transport Plan (LTP) guidance (May 2014), Cardiff Council prepared a new Local Transport Plan (LTP) in 2015 which was approved by Welsh Government. The LTP replaces the 2010 South East Wales Regional Transport Plan (RTP) which informed the preparation of the adopted LDP. As directed by the guidance, the LDP is an update of schemes and priorities identified in the RTP.
- 3.47. In addition, the LTP reflects the requirements of the Active Travel (Wales) Act 2013 which places a duty on local authorities in Wales to continuously improve facilities and routes for pedestrians and cyclists, together with preparing maps identifying current and potential future routes. Cardiff has made good progress in advance of the Act through schemes to develop the city's Strategic Cycle Network and numerous pedestrian improvements. Recent increases in cycling trips demonstrate Cardiff's potential to become one of the UK's leading cycling cities. Any new or amended proposals for active travel routes and facilities, especially for walking and cycling may be considered for safeguarding through the LDP revision process where they are within a programme, supported by funding and likely to be delivered in the plan period.
- 3.48. The Council's Transport Strategy was agreed by Cabinet in October 2016 and brings together the proposals in the Local Development Plan and the Local Transport Plan. The purpose of this strategy is to:
- Raise awareness of Cardiff's transport challenges over the next 20 years
 - Highlight the main projects and actions which the Council proposes to undertake to tackle the challenges and increase sustainable travel in Cardiff
- 3.49. Consideration will also be given to the policy/land use implications of the Cardiff Capital City Region South East Wales Metro proposals in the Plan revision process.

The Metro proposals seek to improve transport connectivity across the region which is integral to achieving wider economic and social outcomes for South East Wales.

- 3.50. Overall, the direction of travel of the LDP policies is considered to be consistent with subsequent guidance produced at a national and local level. Indeed, the approach set out in the LDP for sustainable travel, modal shift and active travel are considered to become more fully embraced in national policy. The review process allows for the further development of this approach to maximise the way that sustainable travel can form part of the overall plan strategy.

Environment (KP3 A&B, KP15-16, KP18, EN1-8, EN10-14)

- 3.51. The effectiveness of Green Wedge and Settlement boundary policies has been monitored by the 3 AMR's produced to date and no applications for inappropriate development in the Green Wedge have been permitted and no applications were permitted outside the settlement boundary that did not satisfy policy, since the LDP was adopted. Given this it is considered that both these policies are functioning effectively. However, as part of the review of the plan a review of both the boundary of the Green Wedge and Settlement boundary will take place to ensure it takes account of changes in national planning policy and the evidence base for the plan.
- 3.52. The effectiveness of wider environment policies (EN1-8) has been monitored by the 3 AMR's produced to date and have shown that there has been no negative impact on Special Landscape Areas, Ancient Woodlands, SSSI's, SNCI's, and Natura 2000 and European designated sites. Given this it is considered that both these policies are functioning effectively. However, as part of the review of the plan a review of these policies will take place to ensure it takes account of changes in national planning policy, contextual changes and any changes in the LDP evidence base.
- 3.53. The effectiveness of natural resources policies (KP18, EN11, and EN13) has been monitored by the 3 AMR's produced to date and have shown that there has been no negative impact on water quality and quantity and the number of Air Quality Management Areas has not increased since the plan was adopted. Given this it is considered that both these policies are functioning effectively. However, as part of the review of the plan a review of these policies will take place to ensure it takes account of changes in national planning policy, contextual changes and any changes in the LDP evidence base.
- 3.54. The effectiveness of policies regarding climate change (KP15, EN10, EN12, EN14) have been monitored by the 3 AMR's produced to date and they have shown the policies are functioning effectively.
- 3.55. Monitoring for the flood risk policies shows that no applications for highly vulnerable development have been permitted in flood zone C2 and only 4 applications for highly vulnerable development have been permitted in flood zone C1, which didn't meet the flood risk criteria set out in TAN15. These applications related to the conversion and

extension of existing properties in the Canton and Riverside area of the city to flats and Natural Resources Wales had objected stating the depth of flooding at ground floor level would be greater than 600 metres and therefore did not meet the tolerable limits set out in TAN15 (Section A1.14). In determining these applications the Council considered that it would be unreasonable to refuse planning permission on this issue as the properties were already in residential use and surrounded by other residential properties with the same finished floor level. In addition it was noted that each flat unit has access to a first floor refuge and in both cases the applicant was made aware of the risk of flooding at the premises. Given this it is considered these four applications raise particular issues that need separate consideration and are not related to the performance of Policy EN14 which is functioning effectively as evidenced by the fact that flood risk has been considered.

- 3.56. However, as part of the review of the plan a review of these policies will take place to ensure it takes account of changes in national planning policy and the evolving evidence base relating to the links between climate change and flood risk in order to ensure the plan review responds to the climate change emergency.
- 3.57. In relation to Policy EN12: Renewable Energy and Low Carbon Technologies the LDP review found that since the adoption of the LDP a total of 6 schemes have been permitted.
- 3.58. In many respects, it is considered that there is relatively limited scope for renewable energy in Cardiff. Unlike some other local authorities in Wales, Cardiff has no Strategic Search Areas (TAN8) thereby restricting the potential for harnessing large-scale onshore wind power. With regards to other technologies, Cardiff is a relatively small area with much of its land already developed. Outside the urban areas, topography, environmental constraints plus relatively high land values constrain opportunities for medium-large renewable energy generation. There are however exceptions, within the former docklands two notable schemes are already in operation including an Energy Recovery Facility in Splott (30MW) and more recently a biomass plant in Tremorfa (2MW). Planning permission was also granted in June 2018 for a biomass plant at Rover Way (9.5MW) and just outside the current monitoring period in May 2019 for a 8.7 MW Solar Farm on the former Lamby Way tip. Also during the year 9 applications were granted planning permission which incorporated solar energy amounting to 0.52 MW in total.
- 3.59. However, significant contextual changes have occurred in relation to renewable and low carbon energy since LDP adoption which will need to be considered/addressed through the LDP review process. In addition, the Cardiff Renewable Energy Assessment (September 2013) informed the policies set out within the LDP. The new LDP will need to consider the revised Toolkit and address the additional requirements set out within it to produce a revised REA as evidence to support carbon reduction targets and mitigate the effect of climate change.

3.60. Overall, the plan review process will need to look beyond AMR reporting and the analysis of existing policy in response to the current declared Climate Emergency and wider evidence regarding the extent and magnitude of issues faced. The review process can explore the most appropriate policy response to this changed context.

Built Heritage (KP17, EN9)

3.61. The effectiveness of these policies has been monitored by the 3 AMR's produced to date and have shown that all the relevant applications received on historic environment assets were considered to be policy compliant subject to conditions/recommendations placed on the permission. No applications were permitted with an outstanding objection from statutory heritage advisors. Given this it is considered that both these policies are functioning effectively. However, as part of the review of the plan a review of these policies will take place to ensure it takes account of changes in national planning policy, contextual changes and any changes in the LDP evidence base.

Masterplanning, design and infrastructure (KP4-7)

3.62. The Masterplanning Approach set out in KP4 (and delivered in a site-specific manner through Policies KP2 (A) to (H)) has proved very effective in providing an over-arching framework to ensure that Strategic Sites are delivered in a comprehensive manner; putting placemaking principles at the heart of new developments, and delivering necessary infrastructure in a timely manner. Policy KP5, alongside a series of new design supplementary planning guidance, has also proved effective in setting detailed criteria to secure high quality and sustainable design.

3.63. Changes to Planning Policy Wales (Edition 10) in 2018 are broadly consistent with this policy approach. The review process will provide the opportunity to further embed placemaking principles through good design, preservation of heritage assets, biodiversity and community infrastructure delivery within the planning policy framework.

3.64. LDP Strategic Policy KP6: New Infrastructure identifies that new development will make appropriate provision for, or contribute towards, the necessary infrastructure required as a consequence of proposed new development. LDP Strategic Policy KP7: Planning Obligations seeks contributions from developers towards the additional demands new development generates upon existing services, facilities, infrastructure and the environment, as well as negotiating benefits that improve the standard of development proposals by providing necessary infrastructure and community benefits. This policy is delivered through the development management process.

3.65. Since 2009, the Council has secured £164 million in financial contributions from planning applications (see table 2 below). This figure does not include on-site works such as affordable housing, green infrastructure, active travel and highway improvements. A significant proportion of these contributions are from the LDP strategic sites where detailed policies and the masterplanning approach have assisted in negotiating, securing and phasing infrastructure delivery in a comprehensive and timely manner.

Table 2: Section 106 Financial Contributions secured 2009 to 2019

Year	Section 106 financial contributions secured (£)
2009	2,057,283
2010	3,488,465
2011	8,331,659
2012	1,459,561
2013	5,779,325
2014	31,304,088
2015	12,555,008
2016	14,248,428
2017	77,470,070
2018	4,223,307
2019	3,204,329
Total	164,121,524

3.66. Contributions are secured through the use of planning obligations as set out in Section 106 of the Town and Country Planning Act 1990. Agreements can also be entered into under Sections 278 and 38 of the 1980 Highways Act. These prescribe the highway works required as a result of proposed developments.

3.67. The Council resolved on 18 September 2014 to commence work on a Community Infrastructure Levy (CIL) for Cardiff and consult on a Preliminary Draft Charging Schedule (PDCS). Following consultation on the PDCS in November/December 2014, a consultation on the Draft Charging Schedule (DCS) took place in September/October 2016. The next stage would have been to submit the DCS for Examination by an independent inspector. However, further stages in the preparation of a CIL for Cardiff were not actioned given impending changes to CIL governance outlined below.

3.68. In 2017, the Department for Communities and Local Government (DCLG) published a review of the Community Infrastructure Levy, entitled 'CIL Review: Report to Government', which recommended a series of changes to the process. CIL has now been devolved to the Welsh Government through the Wales Act 2017. The *Welsh Ministers (Transfer of Functions) Order 2018* also transferred the necessary executive functions to the Welsh Ministers to accompany devolution of the CIL. This came into force in May 2018.

3.69. The review process will provide a timely opportunity to consider if there is merit in progressing a CIL for Cardiff given the changes in context. For example, this could examine if there is scope for the CIL to secure monies from the type of sites and uses which are sometimes proving challenging to secure Section 106 monies due to viability

factors or policy thresholds. The CIL can apply to residential and non-residential developments, and may include smaller brownfield and non-strategic sites.

- 3.70. The extended plan period allows for a review of infrastructure requirements associated with growth, along with a parallel consideration of realistic policy expectations, development viability and alternative infrastructure delivery mechanisms.
- 3.71. Supplementary Planning Guidance on Planning Obligations to supplement Policies KP6 and KP7 has been prepared to ensure that developments contribute toward the provision of the necessary infrastructure and measures required to mitigate their impact and to provide clarity to developers, agents and other stakeholders regarding the basis on which planning obligations will be secured.
- 3.72. In addition the Cardiff Infrastructure Plan (IP) is updated on an annual basis and is a 'living document' which sits alongside Cardiff's Local Development Plan (LDP). It covers the plan period to 2026 and identifies the infrastructure required to facilitate and sustain the city's projected level of growth. The Infrastructure Plan is directly linked to the LDP Monitoring Framework and updated annually in order to effectively respond to changes in baseline information, procedures and legislation.
- 3.73. As part of the monitoring of LDP sites, a series of bespoke Strategic Monitoring Documents have been produced to monitor ongoing progress in terms of planning consents and infrastructure provision within each of the strategic sites.

Social and community (KP13-14, C1-7)

- 3.74. It is considered that in general the Plan's open space policies are functioning effectively in safeguarding existing recreation facilities and public open space and in securing provision of new facilities in connection with new residential development in accordance with the adopted standards. However, as part of the revision process the implications of the findings of the latest open space survey, undertaken in May 2019 will need to be considered.
- 3.75. In addition the implications of the contextual changes to national planning policy set out in Planning Policy Wales (Edition 10, December 2018) will need to be considered together with new guidance produced by Fields in Trust in 2017, 'Guidance for Outdoor Sport and Play: Beyond the Six Acre Standard.' This guidance, while retaining the same headline rates of provision as the original "Six Acre Standard", draws out new recommendations for accessibility, for flexible application of standards and the minimum dimensions of formal outdoor space. The revision of the guidelines also introduces benchmarking for informal open space not involving organised sport and play and includes parks and gardens and natural and semi-natural habitats. The amendments to the guidance do not result in a requirement to make modifications to current LDP standards as the TAN16 promotes evidence based locally generated standards. However, the revised recommended benchmark guidelines for both formal and informal outdoor space will be taken into account in the LDP revision process. The

Council is also moving away from an approach to recreation and open space provision based on strict compliance with predetermined standards. This is in accordance with LDP Green Infrastructure policies that encourage the multifunctional use of open space.

3.76. It is considered that policies regarding health are functioning effectively. However, as part of the review of the plan a review of these policies will take place to ensure it takes account of changes in national planning policy and the evolving evidence base setting out links between obesity and the built environment. Overall, the plan review process will need to look beyond AMR reporting and the analysis of existing policy in response to the increased evidence, which highlights the links between health and the built environment and seeks to favour the creation of more healthy and active environments. In particular, the review process can explore the links between obesity, health and well-being and healthy and active lifestyles and the built environment and consider the most appropriate policy response to this changed context.

3.77. It is considered that policies regarding the community (C1 to C3, C7) are functioning effectively. However, as part of the review of the plan a review of these policies will take place to ensure it takes account of changes in national planning policy and the evolving evidence base setting out links between obesity and the built environment.

Waste (KP12, W1-2)

3.78. The LDP Waste policies were prepared in the context of the South East Wales Regional Waste Plan (RWP) – First Review 2008. This set out land requirements for new waste management facilities, which were taken on board in the Policy W1: Sites for Waste Management Facilities, which identified sites that had potential for the location of waste management facilities – class B2 industrial sites and existing waste management sites. The monitoring report results for the last three years show that this policy is functioning effectively and there is sufficient land available to meet Cardiff's waste management needs.

3.79. RWPs, however, no longer have effect after a re-write of national planning policy on waste was needed to reflect the new waste policy context introduced through the EU Directive on Waste (2008/98/EC), the Waste Strategy for Wales, 'Towards Zero Waste', June 2010 and the underpinning suite of waste sector plans, in particular the Collections, Infrastructure and Markets Sector (CIMS) Plan. The general approach of the CIMS Plan has been to move away from land-take based calculations to an approach where the need for waste management facilities is expressed by future capacity in tonnes. As stated in Welsh Government Policy Clarification Letter CL-01-12, technology development has led to the potential for smaller, more dispersed facilities to be developed (more flexible, able to take advantage of niche opportunities). It has also led to the possibility of larger facilities being developed to reflect economies of scale and reduce expenditure by businesses and local authorities on the management of their residual waste. The end result of this is that it is now more difficult

to ascribe a value to an 'average facility' – and as such, area-based land-take calculations have become less applicable.

3.80. The CIMS Plan describes the waste management framework considered to provide the best solutions to meet environmental, social and economic needs in Wales to 2050. Waste assessments contained within the CIMS Plan do not have to be repeated by local planning authorities at a regional or local level. However, monitoring needs to be carried out through voluntary co-operation at a regional level to inform decision making in future LDPs and in dealing with planning applications for waste. The regional monitoring work has resulted in the first Waste Planning Monitoring Report (WPMR) for South East Wales (April 2016). This concluded that the regional position was:

- There is no further need for landfill capacity within the South East region.
- Any proposals for further residual waste treatment should be carefully assessed to ensure that the facility would not result in overprovision.

3.81. It appears, therefore, that there is no current need for residual waste facilities in Cardiff although PPW (Edition 10, paragraph 5.13.12) requires that the identification of suitable locations for sustainable waste management facilities should be considered as part of LDP preparation. PPW (paragraph 5.13.8) also requires that development plans should demonstrate how national waste policy, and in particular the CIMS Plan, along with any updated position adopted in the waste planning monitoring reports and any other form of waste management priorities relevant to its local area have been taken into account.

3.82. It is considered that the waste policies are functioning effectively. However, the review of the plan will need to ensure it takes account of changes in national planning policy and the evolving evidence base, including any changes to national recycling targets and the need for additional waste management recycling facilities over the extended plan period up to 2035.

Minerals (KP11, M1-8)

3.83. LDP Minerals policies were prepared in the context of the Regional Technical Statement (RTS) 1st Review (August 2014), which was produced by the South Wales Regional Aggregates Working Party. A 2nd Review of the RTS is currently ongoing and following consultation is due to be finalised in March 2020. The monitoring of the Minerals policies set out in the three AMRs show that the policies are functioning effectively. However, the review of the LDP will need to consider the implications of the recommendations in 2nd Review of the RTS for the mineral strategy set out in the LDP along with any changes in current government guidance.

Supplementary Planning Guidance (SPG)

3.84. A number of supplementary planning guidance (SPG) documents to support key LDP policy areas have been approved by the Council since adoption of the plan. These are:

- Houses in Multiple Occupation
- Waste Collection and Storage Facilities
- Locating Waste Management Facilities
- Planning Obligations
- Tall Buildings
- Residential Design Guide
- Childcare SPG
- Planning for Health and Well-being
- Infill Design Guidance
- Residential Extensions and Alterations Guidance
- Green Infrastructure (including Technical Guidance Notes relating to Open Space, Ecology and Biodiversity, Trees, Soils, Public Rights of Way and River Corridors)
- Safeguarding Business and Industrial Land and Premises
- Food, Drink and Leisure Uses
- Archaeologically Sensitive Areas
- Managing Transportation Impacts (including Parking Standards)
- Flat Conversions
- Student Accommodation
- Shop Fronts and Signs Guidance

3.85. A review of the existing SPG including ones recently amended and adopted will be undertaken as part of the LDP Revision process.

Proposals Map and Constraints Map

3.86. The form and content of the LDP Proposals Map will require changes as part of the LDP Review to reflect any changes to the plan.

3.87. The LDP Constraints Map contains designations that are not directly proposals of the LDP but are constraints to development created by legislation or other mechanisms outside of the LDP process such as Flood Risk Areas, Conservation Areas, SSSI's, etc. The printed Constraints Map for the LDP represents a point in time and includes a number of designations particularly flood risk areas that have been updated since adoption of the LDP and therefore it is out of date. Going forward it is likely that the Constraints Map will be produced in an electronic form with public access that will allow for it be updated as necessary.

4. Future LDP Evidence Base Requirements

4.1. To inform the review of the LDP there will be a need to update various elements of the evidence base that informed the current Local Development Plan which is out-of-date and needs to be updated and/or replaced in order to fully understand the land use requirements of the City up to 2035 as well as taking into account any contextual or policy changes that have occurred since adoption of the plan. A sample of potential evidence base studies which may be required to inform the LDP include:

1. **Population and household forecasts** – to inform the LDP's dwelling requirement up to 2035.
2. **Local Housing Needs Assessment** – to inform the housing requirement tenure type and size of dwelling to match future household type and age profile of the population.
3. **Gypsy and Traveller Accommodation Assessment** - to identify the need for permanent and transit pitches up to 2035.
4. **Transport Assessment** – to assess the impact of the scale and distribution of development detailed in the emerging Local Development Plan.
5. **Employment Land Review Update** – to assess the future need of employment land suitable for all employment sectors and regional employment aspirations.
6. **Retail Needs Assessment** – to identify if there is a requirement for additional floorspace to help inform the Council's approach to manage the vitality and viability of our town centres.
7. **Urban Capacity Study** – to quantify the amount of brownfield land which could contribute to the housing need in the city up to 2035.
8. **Settlement Boundary Review** – to define, clear, defensible boundaries around settlements in the form settlement boundaries.
9. **Affordable Housing Viability Assessment** – to provide advice on achievable and viable targets and thresholds for affordable housing.
10. **Infrastructure Requirements over the plan period** – to build upon existing Cardiff Infrastructure Plan and extend to cover proposed plan period.
11. **Renewable Energy Assessment** – evidence to support carbon reduction targets and mitigate the effect of climate change.

12. **Strategic Flood Risk Assessment** – to identify areas at risk of flooding.

13. **Green Infrastructure Data** – to identify relevant data regarding Cardiff's natural environment.

4.2 The above is not a definitive list and additional evidence base update requirements may emerge as plan revision progresses. There are number authorities in South-east Wales who are currently in the process of considering reviewing their Local Development Plans on the basis that their current plans expire at the end of 2021. This presents an opportunity for collaboration regarding the sharing of data and/or methodologies.

Sustainability Appraisal including Strategic Environment Assessment

4.3 A requirement of the LDP process is that Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA) informs preparation of the LDP. The SA/SEA process is integral to the development of the LDP to ensure the policies in the LDP promote Sustainable Development through integration of the key economic, environmental, social and cultural objectives in the development of the LDP policies and proposals and take account of any significant effects on the Environment. The SA/SEA has been an iterative process throughout preparation of the LDP and policies and proposals in the LDP reflect this.

4.4 SA monitoring of the Sustainability Appraisal Objectives is undertaken on an annual basis and reported through the LDP Annual Monitoring Report. This enables the Council to assess the extent to which the LDP is contributing to the achievement of sustainable development and to identify any concerns. To inform the review of the LDP it will be necessary to revisit and update the environmental, social and economic baseline information, along with the review of relevant plans policies and program. The SA Monitoring Framework including the SA Objectives will need to be reviewed to ensure this remains up to date, and this will include considering whether the methodologies need revising due to changes in legislation.

Habitats Regulations Assessment

4.5 The LDP was informed by Habitats Regulations Assessment (HRA), the purpose of which is to assess the impacts of a land use plan, in combination with the effects of other plans and projects, against the conservation objectives of internationally important European sites of nature conservation importance such as Special Areas of Conservation and Special Protection Areas (designated for their ecological status) and to ascertain following screening what needs Appropriate Assessment (AA). As part of the review of the LDP the HRA will need to be reviewed.

5. The LDP Review options

Joint LDPs and Joint Working

- 5.1. In line with national guidance, consideration must be given to the scope for preparing a Joint LDP. However, it is noted that 7 of the 10 Local Authorities in South East Wales are already preparing their own Replacement LDPs with no examples of a joint approach or regional collaborative exercises to help inform Plans. Of the remaining 2 Local Authorities excluding Cardiff, the Vale of Glamorgan and Newport, it is not considered that there are sufficient synergies to warrant the preparation of a Joint LDP.
- 5.2. The existing LDP benefitted from a bespoke regional collaborative exercise to help inform the Plan strategy involving all Local Authorities and other key stakeholders in South East Wales. This process worked well and is considered the most effective way of addressing cross-boundary matters. Given this a similar approach is proposed again to help inform the LDP review.
- 5.3. Should work commence on a Strategic Development Plan (SDP) for South East Wales, information gathered through the LDP process can be used to inform the SDP and vice versa. Ongoing dialogue with other Local Authorities will help maximise efficiencies and consistency with regard to gathering/sharing evidence and agreeing methodologies where possible.

6. Conclusions and next steps

Recommendation

- 6.1 This report concludes that the full revision procedure is considered the most appropriate form of review and that a Replacement LDP is prepared for the period 2020 to 2035. In this respect, it is recognised that the strategic nature of issues to be addressed in a replacement LDP cannot justify the short form revision procedure. This will ensure the Council has up-to-date Plan coverage beyond 2026 and supports the Plan-led approach in Wales.