Cardiff Replacement LDP Examination / Design and Other Matters / **Action Point HS14.4/ Comments on Council Response from 'Community Engagement in Local Development Plans.'**

We object to the proposed change as outlined in the response to HS14.4.

While we welcome the fact that both Place Plans and Placemaking are now referenced, **the response does not yet clearly distinguish between the definitions of 'Place Plans' and 'Placemaking' as described by Planning Policy Wales Edition 12 (2024) and it does not adhere to Planning Policy Wales Edition 12 (2024)'s definition of Place Plans as '*initiated by the community*.'**

We request that the RLDP *adopts the exact wording used by Planning Policy Wales Edition 12 (2024)* as follows:

> '*1.28 Place Plans are non-statutory documents. **They may be prepared at the initiation of the local community and are a powerful tool to promote collaborative action to improve well-being and placemaking**. Place Plans should support the delivery of LDP [Local Development Plan] policies and are adopted as supplementary planning guidance'. Planning Policy Wales Edition 12 (2024) [our highlights*]

Planning Policy Wales Edition 12 (2024) clearly identifies here that Place Plans may be ***initiated by the local community*** and that they can improve the **separate** process of placemaking.

Placemaking is defined by *Planning Policy Wales Edition 12 (2024)* as:

> *'Placemaking considers the context, function and relationships **between a development site and its wider surroundings**. This will be true for major developments creating new places as well as small developments created within a wider place.' p.14.*

Planning Policy Wales Edition 12 clearly identifies placemaking **as related to a major or small development site**.

The RLDP language uses the term 'Placemaking Plans' to suggest that 'Placemaking Plans' are '**led by the Council** in partnership with local communities' and 'provide an opportunity for understanding the place and its people, identifying opportunities for positive change and providing strategic coordination across sectors and disciplines.' While partnership with local communities is welcomed, this definition sets out Placemaking Plans as **led by the Council**. The initiation of Placemaking Plans have been applied by Cardiff Council to date have been aligned to areas which have pre-confirmed funding streams for pre-defined development areas, rather than applied as an opportunity to partner in a holistic community-initiated Place Plan consideration of an overall area. We therefore believe that Cardiff Council's application of 'Placemaking

Plans' more closely to PPW's definition of 'Placemaking'' rather than 'Place Plans', and that there is still not sufficient distinction in the RLDP language between the community-initiated, holistic nature of a Place Plan, and a council / developer led, development-specific nature of Placemaking.

For example, current reference to Placemaking Plans in Cardiff's Draft Regeneration Strategy 2025-2030 has already proposed three 'priority areas' aligned to funding opportunities. This demonstrates the use of 'Placemaking Plans' as led by Council and linked to funding secured for pre-identified development areas, rather than being Place Plans 'initiated by the community.' In this use of Placemaking Plans, communities are invited to partner **only once decisions have already been made by the Council about the allocation of funding and the criteria for selection of development sites as one-off development opportunities**. The use of 'Placemaking Plans' may therefore lead to enhanced 'consultation' opportunities but the lack of community involvement from the start, and the lack of the ability for the community to 'initiate' the plan does not therefore represent 'partnership' in terms of moving from the 'tokenism' of consultation to the 'citizen power' of partnership (Sherry Arnstein, 'A ladder of citizen participation', 2019), and that does not represent the principes of long-term, preventative, integrated, collaborative or involved principles of the Well-being of Future Generations Act (Wales) 2015.

Place Plans are defined in the RLDP response as being '*produced by Community Councils or by the Council in partnership with local communities*.' This adopts the now outdated language of the 2020 Development Framework which no longer aligns to the more recent PPW Edition 12 (2024) definition.

The change in language from '***produced by Community Councils or by the Council in partnership with local communities*** 'to '***initiated by the community***' is significant as the outdated 2020 language leads to a democratic deficit for communities who do not have access to a Community Council.

Cardiff Council has a Charter in place to work with Community Councils, which allows for Community Councils to 'prepare Place Plans consistent with the LDP' and which states that Cardiff Council will 'consider adoption of appropriately prepared Place Plans consistent with the LDP.' (A shared community: Charter between Cardiff Council and Community Councils in Cardiff). However, only six of Cardiff's 28 electoral wards have Community Councils in place, and all six wards are located in the north suburbs of Cardiff in relatively affluent areas. Because establishing a Community Council requires a council tax precept, less affluent communities are less likely to be able to access this formalised mechanism and therefore have unequal recognition for community-initiated Place Plans to be adopted by their Local Authority. This **creates and systematically embeds an implicit democratic deficit in communities' ability to take a proactive, rather than reactive, role in shaping their local areas**. The development of

Supplementary Planning Guidance on Place Plans as separate from Placemaking could propose ways of addressing this deficit.

This response is brought forward by a collaboration between community organisations located in the south of Cardiff, who have worked proactively with Cardiff Council to demonstrate their commitment to engagement with the Planning system, and who have demonstrated their capability in delivering innovative engagement approaches with communities which have been described by Cardiff Council's Chair of Planning committee as 'a genuinely amazing opportunity to engage the community', stating the approach was 'a gold standard for me when it comes to council community engagement, and we should seek to do this as we go forward.' (Cardiff Council debate on the Replacement Local Development Plan,30 January 2025). None of the wards represented by the community organisations submitting this response have a Community Council.

It is therefore disappointing that the same groups who have demonstrated commitment and innovation in engagement in planning and who have proactively reached out for partnership with Cardiff Council ***initiated by the community*** are now **explicitly excluded from a described route for support for *initiating* Place Plans** by the proposed language and are entirely dependent on Cardiff Council's willingness to initiate partnership with them. As Cardiff Council's application of Placemaking Plans currently focuses on preselected development areas related to secured funding streams, this creates the potential that wards with no Community Council and with no pre-confirmed funding streams have no described route to securing Council partnership for community-initiated engagement in planning.

Our collaborative research has identified the process of community-initiated Place Plans as extending beyond the identification of spatial planning priorities. The *process* of conducting a community initiated Place Plan has been demonstrated to support community organisations in forming community networks; to upskill community network in planning processes and to subsequently improve long-term relations with Local Planning Authorities and Developers; to create a robust evidence base which subsequently supports community-led funding applications for community-led development including through asset transfers; and to put in place a long-term ongoing engagement process, in lieu of one-off consultation events.

The community organisations represented in this submission are proactively seeking to partner with Cardiff Council to develop a way forward to support community-initiated Place Plans through long-term partnering with Cardiff at the initiation of the local community. This adheres to the Well being of Future Generations Act's five ways of working as well as to the Programme for Government commitment to increase community engagement in planning.

We therefore request that the RLDP revise the description of Place Plans to *align exactly to the wording of Planning Policy Wales Edition 12 (2024)* as;

> '*1.28 Place Plans are non-statutory documents. They may be prepared at the initiation of the local community and are a powerful tool to promote collaborative action to improve well-being and placemaking. Place Plans should support the delivery of LDP [Local Development Plan] policies and are adopted as supplementary planning guidance'. Planning Policy Wales Edition 12 (2024)*

And that the RLDP revise the description of Placemaking ***to align exactly to the wording of Planning Policy Wales Edition 12 (2024)*** as:

> *'Placemaking considers the context, function and relationships between a development site and its wider surroundings. This will be true for major developments creating new places as well as small developments created within a wider place.'*

We also request that, **rather than removing the proposal for Supplementary Planning Guidance on Placemaking**, that a commitment remains in place to creating Supplementary Planning Guidance which can **explicitly distinguish between mechanisms for community-initiated Place Plans and Council/developer led Placemaking**.

'Community Engagement in Local Development Plans' Project Team: Cardiff University; Privilege Café; Action in Caerau and Ely; Grange Pavilion CIO; Grange Pavilion Youth Forum; Splott Community Volunteers; Common Wealth.

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