

CARDIFF REPLACEMENT LDP: LLANDAFF SOCIETY COMMENTS ON VISION AND OBJECTIVES CONSULTATION

VISION STATEMENT:

1. The draft RLDP Vision reflects “business as usual” with a few politically correct “add-ons”. There appears little sense of urgency re tackling Climate Emergency, current and future pandemics, nor acknowledgement that the current LDP is failing to deliver on multiple objectives (tackling inequality, creating a healthy environment, reducing car and goods traffic etc). Now is a time to pause and reflect, not to plough on with only minor changes - we need a new Plan to tackle these fundamental problems head on. To do this we urge the Council to change course over the next 15 years (the life of the RLDP) to forge a more sustainable and equitable future. Our key issues with the draft are:

1.1 The **Vision Statement** could refer to any city; it **needs to be improved** by re-ordering its bullet points to reflect the concerns of its citizens and to provide a context for a radically new spatial strategy - suggested additions are in red, deletions in brackets:

To create a fairer and more sustainable (city) Cardiff by:

- *positively tackling climate change and post-pandemic recovery;*
- *creating a greener, more equal and healthier city, easier to move around and enhancing well-being;*
- *using place-making, working with local communities to improve - and increase the range of - local facilities, create 20 minute neighbourhoods, and to deliver high quality design;*
- *looking after the city’s natural, historic and cultural assets; and*
- *responding to (urgent) future needs for homes, jobs and infrastructure.*

1.2 The amended Vision in para 2 above is more ambitious and challenging than the one being consulted on, implying the need to **change direction** from the LDP’s policies, and in approaches to delivering them. Developing such an RLDP will need to involve intensive work across the sectors (private, public and voluntary), and with communities across Cardiff.

1.3 The 2018 housing and population projections - which are much lower than those on which the LDP was based - are to be subject to an “independent assessment”. However this appears to be an open invitation to developers to force up housing figures. Communities and our Councillors need an equal opportunity to feed into this process. **The RLDP forecast of the housing requirement to 2036 needs to be reduced to reflect the fragility of the economy, affordability, housing type and tenure, and the impact of student housing and under-occupied dwellings on supply.**

1.4 The current LDP allocates several large Strategic (greenfield) Sites, including in North West Cardiff, for housing, employment and community facilities, but only the housing has been built so far, and this at a much slower rate than estimated during the Examination in Public. Much of the sustainable transport and drainage infrastructure remains to be completed. The houses built to date are generating much more private traffic than forecast. This has led to higher levels of traffic flowing through Llandaff, and there will be more traffic as development proceeds. It is very doubtful that the Council’s modal split target in the LDP of 50/50 has been achieved as is claimed. Use of cars has increased and public transport

drastically reduced as a result of the Covid Pandemic. It will be hard to reverse this trend. The problem of peak hour congestion remains, and indeed the afternoon peak period is extending so that it covers the period from 3pm to 6pm. **The RLDP needs to include proposals to tackle the current sustainable infrastructure deficit, and deliver on this before any further land releases.**

1.5 Another key concern is poor air quality, recognised by designation of an AQMA covering part of Cardiff Road within the Llandaff Conservation Area. **Despite the recent introduction of a (poorly enforced) 20mph limit along part of Cardiff Road, the increase in traffic flows generated by existing and new development means that poor air quality remains a problem.** Bus travel is the only option, unless they have a car or motor bike, for many people living in outlying suburbs. The plan includes an aspiration to increase bus use - this will require increased subsidies and/or reduced car traffic to keep bus frequencies at least at re-Pandemic levels. **In order to improve environmental and air quality all buses in the City need to become electric and powered from renewable sources as soon as possible.** Increasing use of electric vehicles (EVs) will go some way to reducing future levels of pollution, but are not a panacea as they too emit particulates which are a prime cause of respiratory health problems, particularly in children and older people. EVs will need far more charging points to be provided in existing and new neighbourhoods, transport depots, employment areas and local centres, and these need to be planned for in the RLDP.

1.6 Part of the problem of increasing volumes of private car and delivery vehicle use derives from the loss of small shops and local employment opportunities, an increase in the number of large superstores and retail parks, the concentration of retail and office jobs in the City Centre, and growth in internet retail with a consequent increase in home deliveries. **The RLDP also needs specific policies to support growth of the foundational economy, delivering jobs from the bottom up. This will need a different approach than the current developer and landowner-led one, to ensure more distributed local employment opportunities in future, policies to reduce the need to travel by car, and a measured response to the likely growing demand for electric vehicle charging infrastructure.**

1.7 The **Review of Employment Land should be accompanied by a re-assessment of the need for Retail and Commercial floorspace** taking account of the growth of home working on the need for office space, the likely increased demand for home/work units, for accommodation for R&D enterprises, affordable premises to house start-ups, and space for advanced green technologies. All of these would help rebalance the City's skewed economy in a way that adds diversity to the region and nation's economy. Cardiff's future can't all be about private housing, sport and hospitality businesses.

1.8 Any changes in the use of more agricultural land, employment land and commercial buildings will lead to major changes in land values. Great care needs to be taken to ensure that these changes don't exclude lower value uses and low-cost units to support local employment and provision of training facilities. **The uplift in the value of ALL land due to Planning needs to be subject to CIL, which should be levied on landowners, not developers.**

1.9 As a Civic Society we were disappointed to see that there is more detail on **Green Infrastructure, Heritage and Culture** in the Appendix than the main text. We trust that this does not mean that that they are considered of less importance than other issues!
Integration of all of three will be vital to create a distinctive future for our City and its suburbs, to make sense of the past and future of the region as a whole, and to make Cardiff a great City in which to live, work, study and visit.

1.10 There is only one reference to agricultural land, and few to allotments, in the Vision document, although food security will be vital for future generations and the more that can be grown locally the better. **We urge the Council to protect agricultural land, allotments and large gardens from development, and to allocate new areas for allotments in the RLDP.**

ON-LINE SURVEY:

2. The balance between brownfield and greenfield for housing depends on a huge range of issues including availability, housing type, location relative to facilities and transport etc - asking for views on it without respondents knowing more about implications will yield meaningless results. We are concerned that an artificial choice has been created in several of the Survey questions which ask respondents for priority order of attributes, when all of these will be needed to some extent. The Society will point out this problem in its on-line response to the Survey. **We urge the Council to take into account the impossibility of respondents judging priorities for land use without more detailed information, and thus urge the Council to continue to engage communities in coming to a view on the optimum balance of types of land use in the light of the limited capacity of the City to absorb new development.**

Submitted by:

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