

CARDIFF REPLACEMENT LDP: CONSULTATION ON OPTIONS (December 2021 - February 2022)

Llandaff Society

1. Llandaff Society is a long-established Civic Society focussing on the area of Llandaff Ward that lies south of the City Circle rail line. Our area of interest includes the historic core of buildings near Grade 1 Listed Llandaff Cathedral, unique heritage and cultural assets representing Llandaff's development over the centuries from an ecclesiastical and market settlement near an ancient crossing point on the River Taff to a thriving suburb of Cardiff.

General comment

2. Llandaff Society welcomes this additional informal opportunity to express views on the Options being considered for the Cardiff Replacement Local Development Plan (RLDP). We have the support of our members in making this submission, and urge the Council to take account of our views in shaping the RLDP Preferred Strategy.

Strategic Options

3. We were very concerned to see that Options A, B and C all anticipate growth above that provided for in the adopted LDP, even though the latest Welsh Government projections of population and household growth are far lower than those on which the LDP was based. We do not consider that any of Options A-C are realistic. Welsh Government projections for Cardiff have been reduced downwards in the light of reducing household formation levels, so it would be wrong for Cardiff Council to plan for continued growth at or above LDP levels. Also, despite the fact that the RLDP covers the period up to 2036 (ie 10 years more than the LDP), there is likely to be lower demand for owner-occupied housing because of the huge increases in house prices in recent years, and the fact that wages are failing to keep up with soaring inflation. The Society contends that there is more than enough land already allocated to accommodate likely demand for housing, employment and other uses to 2036.

4. In addition, even at the current level of housing completions **the consequences of developing housing in advance of infrastructure are painfully obvious** to those who live in Llandaff. Although the peaks are less pronounced, overall traffic levels appear to be higher than pre-pandemic. More people are travelling by car (used car sales in particular are booming) and far fewer by public transport. There are increased traffic volumes by day and evening on the main radial and cross-city routes converging on Llandaff. Whilst we recognise that some of this is due to Covid, it will be very difficult to reverse this trend. In addition, the volume of traffic leads to dangerously high levels of air pollution - recognised by the creation of the Air Quality Management Area (AQMA) along Cardiff Road - which is flanked by a local shopping centre and housing, including two complexes for older people, and two schools. The AQMA is heavily used by pedestrians, so the health problems caused by particulates are of concern, as well as the contribution emissions make to climate change. Unless there is a rapid growth in local facilities in new housing areas, and in places that have developed without them in the past 20 or more years, this situation will get worse.

5. And, while these are for information and not for consultation at this stage, we suggest that the number and scale of Candidate Sites on land in agricultural use indicates the narrow interests of

landowners and developers, rather than the wider interests of current and future generations. It is the latter which should shape strategy for the RLDP. Releasing further large green field sites - including many Candidate Sites - would mean destroying good quality agricultural land and trees and hedgerows vital to helping combat the climate emergency and biodiversity loss. This would be contrary to what the Council has pledged to do. Every possible way should be found to ensure that future development minimises any adverse impacts.

6. We recognise that Welsh Government “Future Wales” includes Cardiff within a “Growth Area”, however in the context of the Council’s duties under the Wellbeing of Future Generations that designation requires Cardiff to encourage **balanced and sustainable** growth that protects existing, and creates new, **public** open space. This type of growth should be measured in terms of increased productivity, opportunity and better health outcomes for all, rather than a narrow focus on private development. Current allocations of land, plus windfall sites such as the former BBC Llandaff and others that may come forward, should be sufficient to accommodate steady growth in quality jobs and housing of all tenures, including far more social rented properties. Large development areas **must** be based on the concept of a 20 minute neighbourhood, including accessible local facilities **from the outset** to reduce the need for motorised travel and to encourage active travel.

7. Clear facts that emerge from the evidence base at this stage are that (i) the number of households on the Council’s Waiting List for social housing has increased and (ii) the LDP has failed to deliver the sustainable communities and transport solutions promised. The current model of housing provision - relying largely on S106 contributions from developers of private housing to fund housing for families on the Waiting List - is clearly not working. This indicates that the overarching strategy needs to change.

8. Options A, B or C are all too optimistic, assuming private housing growth well above increases in the number of households predicted in the latest Welsh Government projections. In the light of the current economic circumstances, and the need to deal with a very different context than existed when the LDP was prepared, it would be wrong to assume high levels of household growth and to continue with the current development and transport model. **We urge the Council to develop its Preferred Strategy based on the latest Welsh Government projection of household growth, accommodating any additional growth to 2036 within current allocations plus reserve sites and windfalls, with phased provision of sufficient infrastructure both on and off-site to ensure sustainability. We call this “Option X”.**

9. On a related point, the **strategic infrastructure including transport and drainage** necessary for development on the scale currently underway and likely to continue to 2036 needs to be provided **in advance** of development. This would be aided by pausing on release of any additional greenfield allocations, and requiring landowners to pay the Council a Community Infrastructure Levy (CIL) on **all** land designated for development. CIL should be levied on all profits on the uplift in the value of this land to help fund strategic infrastructure across the City, less 15% paid directly to the relevant Community Council. This would be more logical than relying on S106 payments, which are intended to fund infrastructure and facilities within each site as well as providing a contribution to affordable housing. CIL payments are based on the quantum of development, whereas S106 requires time-consuming individual negotiation and can be reduced by agreement.

Spatial Options

10. In terms of Spatial Options the adopted LDP already contains large allocations of land for housing and employment - including Strategic Sites such as Plasdwr - and Reserve Sites which could be released if the other allocations are used up. In view of this, and given the need for people to live near work opportunities, we are strongly of the view that the RLDP should focus on bringing forward well-located brownfield sites for housing close to active travel opportunities and public transport. We also consider that new housing should take account of the increased propensity for home-working, and the Council should prioritise development of already allocated employment areas for small scale business start-ups. Finally, it is important that the Option chosen encourages re-use of brownfield land and buildings, and helps protect our heritage assets and our public open spaces.

11. Spatial Options 3 and 4, with mixed development focussed around public transport nodes and active travel provision, would represent the best means of optimising sustainable use of land. This would reflect the best examples of European planning as in Stockholm, Copenhagen and Freiburg, rather than perpetuating the current pattern of new housing in Cardiff, spreading along radial roads with a nod to sustainability via relatively infrequently-used bus lanes. The latter add to the amount of tarmac and increase the potential for surface water flooding without speeding bus operations or encouraging their use. In the light of the Climate Emergency there is an urgent need to find solutions that reduce run-off and thus reduce the risk of flooding. **We favour a combination of Options 3 and 4, supported by phased delivery of all the infrastructure and local facilities required to support sustainable development before any further releases of greenfield land.**

Conclusion

12. In view of the above we would urge the Council to focus on solving the current, formidable, challenge of encouraging much more sustainable development. This implies a change of direction from the current strategy which is failing to deliver on its key objectives. **The Preferred Strategy for the RLDP should be framed taking account of a context that has changed radically since the LDP was adopted, otherwise it will fail to deliver on the Council's RLDP Vision and Objectives. In the view of Llandaff Society, the Preferred Strategy should not be based on Growth Options A, B or C, but on a new Strategic Option X, plus a combination of Spatial Options 3 and 4 and a full range of infrastructure.** Further, we suggest that CIL should be levied on developments including the existing Strategic Allocations, rather than excluding the latter as in the current LDP CIL provisions. This would help to ensure that sufficient strategic and local infrastructure is provided from the outset rather than following on.

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