LLANDAFF SOCIETY RESPONSE TO CARDIFF RLDP DRAFT PREFERRED STRATEGY CONSULTATION

4th October 2023

**Draft Preferred Strategy:**

1.  We welcome the fact that some of our responses to consultation on the draft Vision and Objects, and Options, in February and July 2022 have been taken into account in preparing the draft Preferred Strategy for the Cardiff Replacement Local Development Plan (RLDP).  **In particular, we welcome the focus on providing sustainable transport and drainage infrastructure, and local services, and on consideration of Community Infrastructure Levy as a means of raising part of the considerable resources needed.**

2.  However, as the Civic Society for Llandaff we consider that heritage is not protected sufficiently by the current LDP.  In our view the Strategy underpinning the RLDP needs to make it clear that heritage buildings and open spaces - for example our now statutorily protected parks and gardens gifted to the City and a haven for wildlife as well as people - is what makes Cardiff distinctive and should be retained, and properly maintained. **The protection and enhancement of our heritage assets should be an integral part of the Vision and Strategy for the City.  Policy deriving from the Strategy should make it clear that multiple layers of heritage and/or natural environment designations - eg a scheduled monument that is also a listed building set within a conservation area or historic parkland -  will receive added protection from inappropriate development.**

3.  We welcome the prominent mention of climate change, but given the clear evidence of more and more chaotic climate patterns and the human cost of flooding and drought that is inevitable, we consider that not enough emphasis is given to tackling this.  For example, the Taff River Corridor and others in the City are protected by policy in the current LDP, and indeed have been since the 1996 Local Plan.  However it appears that in practice this can be set aside for other reasons.  Every time this is done it raises the risk of flooding that will overwhelm flood defences.  In our view our river corridors should be protected from all development to enable them to help mitigate flood risk as well as protect wildlife habitats and biodiversity, and contribute to people’s health and well-being.  **We urge the Council to  protect the Taff River Corridor, and all our river corridors, from development in the RLDP to reduce flood risk and to enhance the environment for people and biodiversity.**

4.  In previous submissions we requested the Council to base the RLDP on Welsh Government’s 2018-based population forecasts rather than their much higher 2014-based ones.  We agree that Option C (+30.5k homes and +43k jobs) should be rejected because it is clearly undeliverable.  However it is disappointing that the Council has chosen Option B (+26k homes [with 10% ‘flexibility’ allowance ie 1,600 pa] and +32.3k jobs), which we consider is also too high.   Option A (ie +19k dwellings and +30k jobs), which is closer to Welsh Government forecasts, has been rejected - even though the average house building rate between 2006-21 was 1,070 per annum, and prospects for the UK economy over the next decade mean that this would be a more achievable target.  **Thus we reaffirm our view that Option A would be a more realistic basis for the RLDP Strategy than Option B.**

5.  We do not consider that the draft Strategy sets the direction needed to get us out of the mess delivered by current LDP policies.  Para 2.1.4 of the Transport Paper admits that while ..”commuting trips are down,  traffic volumes are returning to similar levels pre-Covid 19, which suggests that more car trips are being made for other purposes.” and that “Further surveys and data collection are needed to confirm these trends..”  The Transport Paper is also over-optimistic about public transport patronage returning to pre-Covid levels given recent further cuts in local bus services.  These no longer provide an attractive choice for longer journeys that can’t be made on foot or by cycle.  There is also evidence that walkers are being inconvenienced and in many case intimidated by cyclists on shared routes.  **We urge the Council to include stronger policy in the RLDP to extend and enhance public transport provision, and to separate cycle routes from paths for pedestrians.**

6. The RLDP also needs to correct the LDP's failure to phase the Strategic Sites and its failure to require Community Infrastructure Levy (CIL) on the LDP Strategic Sites.  The housing being developed in Plasdwr is occupied mainly by car-owning households, resulting in clogged local roads and high pollution levels well over WHO guidelines through Llandaff.  This will be the case even with more electric vehicles.  Retrofitting fixed track public transport from the City Line at Fairwater must be a priority if this situation is to be improved.   However the £14m S106 funding that we understand will be paid by developers of Plasdwr will not provide the strategic infrastructure needed unless the Council introduces a levy on the huge uplift in value of the land from its allocation for development in the LDP.   **We very much welcome the fact that the Council is to give further consideration to CIL, and urge the Council to levy CIL on all the Strategic Sites and major developments so that strategic infrastructure can be provided in advance of further phases of development.**

**Candidate Sites:**

7.  We welcome the fact that several Candidate Sites have been ruled out of further consideration, and that others that are part of Strategic Sites in North West Cardiff in the LDP are being re-assessed.  However we are most concerned that several new greenfield Candidate sites accessed off Llantrisant Road are to “progress to Stage 2 assessment” as potential “Reserve” sites.  The LDP vastly over-allocated Strategic Sites on the basis of a 2014-based population forecast, now superseded by the lower 2018-based one.   The result is a monoculture of housing estates with no amenities being developed along Llantrisant Road.  **We urge the Council not to allocate further Strategic Sites nor Reserve Sites for housing in North West Cardiff, but to phase existing Strategic Sites so that their development follows provision of infrastructure and local services.**

8.  Two of the Candidate Sites fall within Llandaff Ward.

Re (i) Rookwood we are concerned that this former hospital site was allocated in the LDP solely for housing.  Whilst we understand that the adjacent buildings are to be retained by the Health Board for specialist health facilities, we would welcome this site being allocated for health-related uses (eg a GP surgery or Army Medical Museum) and housing . **Future development of Rookwood must respect and enhance the site's significant heritage assets and its unique role in the history of Llandaff.**

   (ii) Land off De Braose Close straddles a public right of way forming part of the recreated Penrhys Pilgrimage Path which is used by long-distance and local walkers.  This land  falls within the Taff River corridor within which we have argued (in para 3 above) that no development should be allowed.  **In view of its importance for recreation and place-making, as well as as part of a wildlife corridor, we consider that the land off De Braose Close should not be allocated for Housing, but as Open Space within the RLDP.**