

LISVANE COMMUNITY COUNCIL

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Dear Mr Gilbert

CARDIFF REPLACEMENT LDP PREFERRED STRATEGY CONSULTATION

Please see comments below from Lisvane Community Council (LCC) relating to the Preferred Strategy Consultation closing on 5 October 2023.

GREENFIELD AND BROWNFIELD SITES

Of the 5,000 proposed new homes for strategic sites approximately 3,000 are proposed for brownfield sites and around 2,000 will be located at Jct 33, Cregiau and North East Cardiff which includes Lisvane. It is unfortunate that the policy does not result in 100% housing development being on brownfield sites.

SP15 states: 10.93 Cardiff's countryside is a valuable and finite resource which is under increasing pressure from all kinds of development due to its proximity to the urban area

The proposal to increase the use of greenfield areas is in complete contrast to this statement

To protect greenfield areas, it is recommended that the LDP is reviewed say in 2030 to test the progress of and need for the 2,000 houses allocated to the three greenfield sites and research new available brownfield sites. To ensure 10.93 the timing of development for the brownfield sites must be completed before any construction commences on the three greenfield sites.

Also, if developers build houses which are suitable for older people to downsize this could release larger properties for families; a greater emphasis on this approach would be helpful.

TRANSPORTATION

The information on transportation for North East Cardiff is very limited.

SP16: DELIVERING SUSTAINABLE TRANSPORT AND ACTIVE TRAVEL Development in Cardiff will be integrated with transport infrastructure and services in order to increase active travel.

- i. Achieve the target for 64% and 76% of all journeys to be made by walking, cycling and public transport by 2025 and 2030 as detailed in the Cardiff Transport White Paper
- iii. Reduce travel demand and dependence on the car;
- iv. Enable and maximise use of sustainable and active modes of transport;
- v. Integrate travel modes

SP17 North and South East Corridors – Options are being explored to improve transport links including infrastructure for walking and cycling. The current LDP has included many promises for public transport to serve Churchlands in order to achieve similar aims but there has been no progress on this, so residents have to use their car. The LDP must be stronger in enforcing these promises. It would seem appropriate for developers to pay for the introduction of bus services within six months of the first unit being occupied to help the move from use of the private car.

Appendix 4 - It is noted that the existing SPG's will be reviewed including Managing Transportation Impacts (including Parking Standards) Review - existing SPG prepared for adopted LDP. If the Review includes a reduction in the parking spaces for houses and apartments then this emphasises the need for the early introduction of buses to serve residents including links with Lisvane & Thornhill Station.

Whilst there are planned rapid transport routes for the North and East there are no plans for improvement of rapid transport in the North East. The frequency of the existing bus service needs to be significantly improved if it is to assist with the target of fewer car journeys. This would necessitate financial support for such services by Cardiff Council and/or the developers.

It follows that access to rapid public transport in NE Cardiff will require additional car parking at rail links (Lisvane /Thornhill) and vastly improved local bus services to meet modal targets

INFRASTRUCTURE

Objective 3 refers to the need to ensure adequate and timely provision of new infrastructure to support communities and future growth but we can find little or no evidence of this in North East Cardiff where development is far outstripping any proposed improved infrastructure

ENVIRONMENTAL

(a) Construction standards

The references to Cardiff being carbon neutral by 2030, new houses being zero carbon by 2025 and 20-min neighbourhoods without any detail as to how these will be achieved in such a short time frame risks bringing the exercise into disrepute. Surely it should demonstrate a practical route map.

On the basis that “Responding to our Future Need” requires new homes to be zero carbon by 2025 then LCC wonder why developers are not being made to build ALL new houses to this standard?

If there is a requirement for houses to be low or zero carbon should there not be a similar requirement for industry during the plan period.

(b) The Sustainability Appraisal and the Habitat Assessment makes it apparent that a detailed assessment is not possible until later stages of the RLDP process as there is not yet sufficient detail available. However both documents are useful as they highlight:-

- the dangers posed to wildlife, mainly birds and plants, by uncontrolled dog walking and increased recreational activity
- the increased atmospheric pollution which will result from greater numbers of vehicular traffic on the A470 and M4

LCC considers that “Sites of importance for nature conservation” (SINCs) are valuable assets that should be protected from any development. Some of the candidate sites (including 33 & 34) are affected by SINCs.

SINC information is based on a map drawn by Cardiff County Council on the internet site. The map is called the Constraints map and comes under Cardiff Adopted LDP Information. These include streams shown as:

- SINC 122 is named as being Nant Ty draw.
- SINC 123 is named as being Nant Ty draw Fach.

LCC requests that these two streams are not overlooked by the developers, if permission is granted.

Site 34 is the Land at Church Farm, and in the correspondence & maps sent to LCC from Redrow, we cannot find any reference to the streams at all. It can be seen that SINC 122 cuts through Phase1 of the Redrow scheme whereas the Wimpey Taylor site application (Site 33) suggests they are aware of the SINCS in their proposals to Cardiff County Council.

(c) Air pollution

The two proposed sites (33 and 34) are planned to be used for residential housing, and run alongside the only motorway in Wales. A Department of Transport report projects future potential travel along the whole of the M4 in Wales between now & 2050:

There will be a 38% increase in mileage travelled along the M4.

- Currently it is estimated there are 2.5 billion miles driven by vehicles along the M4 in Wales.
- But in the next 30 years, it will be 3.7 billion miles.

Even allowing for changes made to cars and fuel used, this will still mean an enormous amount of pollution generated from traffic on both sides of the M4. Because of the density of traffic, the M4 corridor produces dangerously high levels of nitrogen dioxide (NO), carbon monoxide and importantly particles PM.10 and PM.2.5.

NO is not considered to be harmful to health. However, once released to the atmosphere, NO is usually very rapidly oxidised to nitrogen dioxide (NO₂), which is harmful to health. NO₂ and NO are both oxides of nitrogen and together are referred to as nitrogen oxides (NO_x).

Nitrogen dioxide can irritate the lungs and lower resistance to respiratory infections such as influenza. Continued or frequent exposure to concentrations that are typically much higher than those normally found in the ambient air may cause increased incidence of acute respiratory illness in children.

10.104 Road traffic is also the main cause of air pollution. The health effects of air pollution have been extensively researched and are well documented. Along with physical inactivity it is one of the biggest health issues of our time. Cardiff has some of the highest levels of Nitrogen Dioxide (NO₂) pollution in Wales. In fact, levels exceed the EU and national limits for NO₂ in some areas.

Cardiff has a Clean Air Plan which aims to address NO₂ levels in the short term, but we want to get the air we breathe in the city as clean as it can be. Improvements to sustainable travel options such as electric buses and increasing the number of journeys made by active travel (walking and cycling) is a key part of this plan.

The impacts of poor air quality are clear, for Cardiff and Vale University Health Board area, which has stated that:

The number of equivalent deaths due to long-term air pollution are estimated to be in the range of 178-227 per year.

Improving air quality and increasing levels of physical activity doesn't just protect our health.

In view of these policies it is surprising that the Council may support the construction of residential buildings close to the M4.

(d) Strategic Flood Risk Plan

The Strategic Flood Risk plan for Cardiff should be made a high priority. Climate change is accelerating, which means sea levels are rising rapidly. Coastal and low-lying areas in and near Cardiff could be submerged by 2050.

Almost all of the flat low-lying land between Cardiff and Newport could be under water. Areas at risk include the International Sports Village and Cardiff Bay, as well as areas in the city centre, which have the river Taf running nearby, down to the sea.

This LDP must ensure that flood risk & potential flood risk areas are identified and finances are made available for work to be carried out on the erosion of the coast and land identified as at risk. The potential damage that would be caused, would have a major impact on the City of Cardiff and its inhabitants.

Cardiff needs to ensure that the residents of vulnerable areas are fully aware of the issues and have a plan of action to follow, in case of an emergency.

Cardiff needs to ensure that the three rivers, Taff, Rhymney and Ely (which are part of the City) are carefully monitored and maintained.

Erosion of river banks and flooding has to be monitored to ensure that problems do not occur, and homes are not flooded.

The condition of these three rivers is cause for concern.

- With the Ely in a 'Bad condition'
- And the Taff and Rhymney in a 'Moderate condition.'

If this Local Development Plan is to be adopted until 2036, then the next 13 years will be a critical time for addressing the issue of coastal erosion and flooding in the Cardiff area.

(e) How does this fit in with Cardiff's Vision in the Preferred Strategy? The Vision:

To create a fair, healthy, more liveable, sustainable and low carbon city by: Creating a greener, fairer, and stronger city that enhances the health of the current population and wellbeing of future generations.

2.0 Policies and drivers for HIA (Health Improvement Assessment).

The policies and guidance detailed in this section are not only relevant to the discussion due to the topics that they cover, but also the approach taken by Welsh Government (WG) to develop them – an approach embodied in WG strategic drivers such as the Well-being of Future Generations (Wales) Act 2015 (WFG Act) (Welsh Government, 2015)

This promotes sustainable development, integrated long-term thinking and collaborative working.

The concept of 'Health in All Policies' (HiAP) has been implicitly implemented within the WFG Act by accounting for health, well-being and equity implications as part of its seven Well-being Goals.

HiAP is defined as: "An approach to public policies that systematically takes into account the health implications of decisions, seeks synergies, and avoids harmful health impacts, in order to improve population health and health equity".

Clean Air Plan for Wales: Healthy Air, Healthy Wales. The Clean Air Plan was published in August 2020. It sets out a 10-year pathway to achieving cleaner air. It is structured around four core themes:

- People: Protecting the health and well-being of current and future generations
- Environment: Action to support our natural environment, ecosystems and biodiversity.
- Prosperity: Working with industry to reduce emissions, supporting a cleaner and more prosperous Wales
- Place: Creating sustainable places through better planning, infrastructure and transport

The plan timescales for delivering actions are framed across three Senedd terms: 2020 - 2031.

A key commitment within the Plan is to develop a Clean Air Act for Wales by building on existing legislation, with a focus on delivering air quality improvements through a new legislative and regulatory air quality management framework.

The creation of sustainable places directly contributes to the achievement of the wellbeing goals under The Well-being of Future Generations (Wales) Act 2015, such as the goal of a healthier Wales.

Poor air quality can have a disproportionate impact on the health and well-being of children, older people and other vulnerable people. Contributing to the reduction of air pollution will have a direct and significant impact on improving human health.

Air pollution results from the introduction of a range of substances into the atmosphere from a wide variety of sources. It can cause both short term and long- term effects on health, but also on the wider environment. Improvements have been achieved through the introduction of legislation enforcing tighter controls on emissions of pollutants from key sources, notably industry, domestic combustion and transport. Government statistics estimate that air pollution in the UK reduces the life expectancy of every person.

S106 MONIES

Section 106 Agreements are legal agreements between the local planning authorities and developers that are used to secure contributions from developers to mitigate the impact of their developments on the local area. These contributions can include payments of money to the local planning authority, as well as provision of affordable housing, infrastructure or community facilities.

LCC requests that when planning approval is agreed with developers that the maximum realistic financial contribution should be requested and that collection of the agreed funding should be pursued with alacrity.

Analysis of S106 money received by Cardiff Council for the period 24 January 2018 to 3 August 2022 shows a serious shortfall (approx £7m) in the agreed S106 payments and the amount actually received.

CANDIDATE SITES

We understand that it's already been decided that candidate sites 35 and 62 are not being progressed. It is possible that the developers may try to bring them back to the revised LDP. We would expect Cardiff Council to oppose any such move given that they are located within the green wedge.

It would now seem after all the new house building that has taken place across Cardiff, there were to be three more sites proposed in Lisvane and one huge site planned for building on the Green Wedge, affecting Thornhill and Rhiwbina areas.

Under the new replacement LDP :

- Site 62 - Briwnant. Land to the East & West of Thornhill road. (164 hectares).

It has now been decided by Cardiff City Council that Green Wedge designation will remain in place and the area will be protected. The proposals to build on the land will finally be rejected & not be taken forward. The decision to protect the area (an important green backdrop to the City) is to be welcomed. However, changing its status to a Green Belt would offer much better protection for the future generations of Cardiff and the City as a whole.

The Green Belt serves five purposes:

1. To check the unrestricted sprawl of large built-up areas.
 2. To prevent neighbouring towns merging into one.
 3. To assist in safeguarding the countryside from encroachment.
 4. To preserve the setting and special character of historic towns and cities.
 5. To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
- Site 35 - Land to west of Graig Road (13.2 hectares). This proposal will not be taken forward. This land is north of the M4. and has SINCs (Sites of Importance for Nature Conservation) 113 and 179 on the land. Again, this decision is welcomed. Building north of the M4. would set a precedent for other applications to follow, and would lead to a loss of the countryside.

It would also lead to a blurring of boundaries between Cardiff & Caerphilly.

- However, two sites remain in Lisvane under the proposals for the LDP development:
- Site 33 - Land south of M4. -West of Rudry Road. (4.95 hectares) which runs along the boundary of the M4. Motorway. 250 houses are proposed to be built.
- Site 34 - Land at Church Farm (14.16 hectares). This land also runs along the boundary of the M4 motorway). It will be built by Redrow in 2 phases:
- Phase1 - 61 Houses are proposed. This site includes a children's playground situated on the main road into the site. It is also in an enclosed area surrounded by trees and isolated from housing, which could be potentially dangerous.
- Phase 2. – 144 Houses are proposed.

POPULATION FIGURES

It should be noted, that there has been controversy surrounding the plan, with Cardiff Council using inaccurate population growth figures for the City.

Since the last LDP was adopted, the Welsh Government has released population & household projections based on mid-year population estimates for 2018 (published in August 2020) and mid-year population estimates.

The key changes for Cardiff are:

- The 2018 based population projections indicate that population levels will increase from 364,248 to 372,944 between 2018 and 2026.

This is 8% lower level of increase to that projected in the LDP which showed an increase of 403,684.

- The 2018 based population projections indicate that household levels will increase from 153,204 to 160,052 between 2018 and 2026.
- This is 10% lower level of increase to that projected in the LDP, which showed an increase to 177,845.

- The mid- year estimates for the period 2011-2019 identified a steady increase from 345,442 to 366,903, which is an increase of 0.73% per year over the last eight years.

This important source of information should be of significance in the review process. It is vital that the correct population figures are used, when assessing the need for housing, amenities, schools etc.

Therefore, it will be necessary to ensure that that any figures used on population and households predicted until 2036 are accurate and reviewed on a regular basis.

Working with incorrect figures will cause many problems in the planning of the new communities, hospitals, schools and transport etc. in and around the city neighbourhoods. It could also prove an extremely costly exercise for Cardiff City Council.

The figures for the whole of the Welsh population below, are taken from the National Development Framework – Future Wales 2040.

Period covered - 2020-base. Released: - 12 January 2022

Last updated: -12 January 2022

Population projections are subject to uncertainty and are based on assumptions on future trends in fertility, mortality and migration.

The impacts of the coronavirus (COVID-19) pandemic on demographic behaviour is not yet clear and this contributes to greater uncertainty. Further information is available in the Office for National Statistics bulletin and methodology document

- Between mid-2020 and mid-2030, the population of Wales is projected to increase by 2.6% from 3.17 million to 3.25 million.
- Between mid-2020 and mid-2045, the population of Wales is projected to increase by 4.2% from 3.17 million to 3.30 million.
- The population of the UK is projected to increase by 3.2% between mid-2020 and mid-2030 to 69.2 million, with the population projected to grow in each of the four countries.

Wales population projections by age: The number of children aged under 16 is projected to decrease by 10.5% to 503,800 between mid-2020 and mid-2030.

- The number of people aged 16-64 is projected to increase by 1.7% to 1,971,300 between mid-2020 and mid-2030.
- The number of people aged 65 or older is projected to increase by 16.1% to 776,300 between mid-2020 and mid-2030.
- The number of people aged 75 or older is projected to increase by 23.9% to 380,200 between mid-2020 and mid-2030.
- Between mid-2020 and mid-2030
- The number of people aged 16-64 is projected to increase by 1.7% to 1,971,300 between mid-2020 and mid-2030.
- The number of people aged 65 or older is projected to increase by 16.1% to 776,300 between mid-2020 and mid-2030.
- The number of people aged 75 or older is projected to increase by 23.9% to 380,200 between mid-2020 and mid-2030.

Wales population projections by component of change. It is projected that there will continue to be more deaths than births, with a total of 77,000 more deaths than births between mid-2020 and mid-2030. The projected growth in the population is driven by migration with total net migration of 159,000 between mid-2020 and mid-2030.

NB. The Office for National Statistics (ONS) has published a notice on its 2020-based interim national population projections to inform users of an error affecting international migration out of Wales. The ONS states that the impact of this on the projections for Wales is modest, with the population projected to be around 2,700 lower by 2030 than is published, and around 16,400 lower by 2045.

To Summarise:

- It would seem that these figures show that Wales has an ageing population, and the whole of Wales will only see an increase of 4.2% in the population by 2045.
- In the last LDP for Cardiff, the city had been expected to see a population boom with the number of people growing by 39,436 between 2018 and 2026. Eventually this forecast proved wrong and it was reduced to just 8,696. (less than a quarter of the predicted number).
- The changing forecast has serious implications on planning, because the original number was used to justify the building of 40,000 new homes, using Greenfield sites on the outskirts of the city.

Therefore, why is there a need to build on any more Greenfield sites in the outskirts of Cardiff, when the population increase is significantly lower than forecast? Why continue to use greenfield sites, when brownfield sites are available and there are more than enough to accommodate a rise in population figures?

CARDIFF COUNCIL'S PREFERRED STRATEGY

The first part of the Preferred Strategy looks at how Cardiff will need to grow by 2036.

To estimate how the population might change over this time, the Council looked at how it has changed in the last couple of decades.

It narrowed down 3 different population growth scenarios to a single preferred option. It then thought about how different factors can influence the city's population, such as providing more affordable housing and supporting the city's economic and regeneration ambitions.

The selected population projection shows that the Council will need to provide:

26,400 new homes by 2036, including affordable homes. This figure assumes an average of 2,300 homes per year, until 2036. These will need to be provided on both large and small sites to cater for different housing needs across the city.

Given this total of sites available for future use and the decrease in population figures, should Cardiff Council re-evaluate the housing situation, as it currently stands?

It has also been recognised by Cardiff Council that high density, high rise accommodation is needed centrally. This will be to cater for visitors, tourists and people who work within or near the city centre. It is hoped that with this amount of available accommodation, will come regeneration of the City centre and the nearby neighbourhoods.

The accommodation includes:

- A 30 - storey tower, in Guildford crescent.
- Two huge apartment blocks on Dumballs road.
- Giant 30 storey tower opposite the BBC studios.
- Atlantic Wharf site

Brownfield sites available in 2023, now exceed prediction, and there are potentially 10,000 sites not included in the proposed LDP. Whilst planning for future housing needs, Cardiff Council should ensure that the massive changes currently taking place within the City, are closely monitored. This is necessary to allow the Council to correctly forecast and meet housing needs with the population.

Thank you for the opportunity to participate in this consultation and I hope the LCC comments are helpful.

Yours sincerely



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