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Table of Contents

Cardiff Civic Society	1
- who we are.....	1
Considering the LDP	1
The Deposit Plan.....	2
Two evenings of workshops	2
The status of this document.....	2
In summary	2
Housing	3
- what the LDP says.....	3
Housing - why the LDP is unsound.....	3
Economy - office development	4
- what the LDP says.....	4
Office development - why the LDP is unsound	5
Economy - employment	5
- what the LDP says.....	5
Employment - why the LDP is unsound.....	5
Transportation	6
- what the LDP says.....	6
Transportation - why the LDP is unsound.....	6
Environment	7
- what the LDP says.....	7
Environment - why the LDP is unsound.....	7
Consultation and community engagement	8
- what the LDP says.....	8
Consultation and community engagement - why the LDP is unsound	8
Conclusions	10
Unsound, inadequate policy formation	10
Risks of proceeding	10
... but it's only planning.....	11
Appendix 1: expert advisors and contributors and their presentations	12
Appendix 2: documentary evidence cited:	12
Appendix 3: workshop outputs	13
Appendix 4: original (January 2009) CCS submission	15



Cardiff Civic Society: **a considered response**

Cardiff Civic Society

- who we are

Cardiff Civic Society - formed in 1964 - is a registered charity with the following objectives:

- ■ To encourage the highest standards of development and environment in the capital city of Wales and support appropriate new development and enhancements schemes
- ■ To promote civic pride and community action as a mean to encourage sustainable development and quality of life
- ■ To promote high standards of planning, architecture and environment in or affecting the City of Cardiff.

Considering the LDP

Early in 2008, the Society became aware it had missed the Preferred Strategy Consultation of autumn 2007 because it was not on the list of consultees included in the LDP Delivery Agreement.

From March 2008 CSS was in contact with the LDP team at Cardiff Council regarding its participation at a conference CCS was organising in October 2008 to discuss the LDP. In a June 2008 meeting with a senior member of the LDP team the Society was told our planned conference was well timed because the Council were considering a fresh Preferred Strategy consultation for autumn 2008 due to the significant increase in the level of housing now being written into the plan and the inclusion of the International Business Park (IBP), and that we would therefore have our chance to comment on the Preferred Strategy. A decision on this was due in July 2008.

CCS subsequently learnt that at their meeting of 2nd October the Council's Executive had after all decided a fresh consultation was not necessary. CCS never received an explanation of the basis for their decision and submitted this question in writing at the Stakeholder Briefing event of 22nd October 2008. The question was omitted from the response document circulated after the meeting. (The specific purpose of that response document was to answer all questions raised at the Stakeholder Briefing).

In October 2008 the CCS set up a team to analyse and respond to the Draft LDP, despite not being included in Cardiff Council's consultation list. This response (see appendices) delivered to the council in early January 2009 was based on a mapping of the policies and plans in the draft onto the declared vision and objectives. No response to this document has been received.

Although some recognition of the economic and environmental issues that have emerged or been clarified since the plan was drafted are now included in the Deposit LDP, much of this analysis is still relevant and useful pre-work for this final consultation.

The Deposit Plan

Seven members of the CCS attended the presentation made by Cardiff City and County Council on 28th April 2009. The working group considered how to respond in the six weeks allowed and set up two open workshops and issued a widespread invitation to local universities, community groups and associated organisations.

Two evenings of workshops

CCS ran two evenings of workshops on 18th and 20th May 2009 attended by over 100 participants. Each took the same format: a presentation of the key subject findings from the LDP itself (these are substantially reproduced in the pages that follow "What the LDP says 1"); a 'keynote' presentation on the topic by an authority in the field; a moderated discussion from which propositions, concerns and proposals were generated and a record of key inputs and observations which provide the framework for the writers of this document.

The status of this document

This is a considered response by the Society to the Deposit LDP. Individual members have also made personal responses, as have other organisations who have contributed their thoughts to this response. This document represents an extensive critical analysis of the strategic proposals and their potential to deliver the LDP's vision. The process employed requires us to highlight not its positive features - where they may exist - but aspects where it is unsound.

In summary

In summary CCS finds the Deposit LDP unsound in six key areas: Housing; Economy - office development; Economy - employment; Transportation; Environment and Consultation and community engagement.

Additionally, the failure of the Deposit LDP to address the circumstances of a globally changed economic climate and the global environmental issues (particularly as now set out by the *Wales Assembly Government in One Wales: One Planet, a New Sustainable Development Plan for Wales*) are fatal to its usefulness as a plan for Cardiff for the next 15 years.

¹ Where this expression is used throughout it indicates selected summaries of the Deposit LDP made by the authors



Responses by **LDP** topic

Housing

- what the LDP says²

High growth housing targets to match projected employment growth; 40% affordable, full range/mix; attention to safety; predominantly using brownfield sites. Housing growth: 27,442 new dwellings average 1,829 pa; this is higher than 5 year average 1,811; significantly higher than 10 year average of 1,513; “Current evidence suggests a significant decrease in units to be completed due to economic downturn”; proposed growth is: below level in Cardiff 2008 LHMA - higher than SE Wales Regional Apportionment Exercise

Community safety and creating a safe environment: all new development shall be designed to promote a safe and secure environment and minimise the opportunity for crime: maximise natural surveillance of areas which may be vulnerable to crime such as publicly accessible spaces, open space, car parking areas and footpaths; have well defined routes, spaces and entrances that provide convenient movement without compromising security; maintain perceptible distinction between public and private spaces through well defined boundaries and defensible space; provide a good standard of lighting to public spaces and routes while minimising light pollution; be designed with management and maintenance in mind, to discourage crime in the present and future.

2021 - housing will be

- at increasing high density
- more affordable
- give attention to design - layout - safety
- based on a Regional Apportionment Exercise

Housing - why the LDP is unsound

because the combination of the two policies of high dwelling growth and brownfield land leads immediately and irrevocably to development consents that will meet neither

² see earlier footnote

the mix of housing desired by the plan nor resolve the social housing waiting list issues. It will also lead to further collapse in the value of existing apartment stock and create a shortage of family housing which will increase its cost. This is divisive and will enlarge the gap between rich and poor that the LDP wishes to reduce. Over intensification of high-rise development also denies opportunity for effective design of public and private space, and creates issues for urban transport network design.

the evidence is visible in unsold apartments (across the UK, this is not unique to Cardiff) and retrospective conversion of small un-saleable units into larger family accommodation. The lack of family accommodation in the urban area forces workers to move out of town in mid career with consequential impact on transport and social infrastructure.

the solution is to reduce the number of dwellings planned, coupled with a major regeneration scheme contributing towards affordable housing growth, and only relax the prohibition on greenfield sites close to existing communities where those communities can be enhanced and family housing could also be located. In addition, improved liaison with neighbouring authorities may find alternative sites, given a satisfactory transport and social infrastructures. Models for such urban development are plentiful in continental Europe, and have been addressed in the Rogers report in 2001 and in CABI studies.

Economy - office development

- what the LDP says

Jobs are 88% service sector - 25% business & financial; Planned city office development for 20k jobs; Retain 'urban village' feel at city sites; IBP to attract creative - bioscience - IT - HQ for air links; small, green technology site; Focus on high skill jobs

There could be 400,00 sq m of office space developed in Bay and south Cardiff - for 20,000 employees; three hectares at Cardiff Gate for business development; general industry and warehousing - Wentloog (28 ha), Pengam (10 ha), Leckwith (8 ha); a new business park at junction 33 M4 (131 ha); there is sufficient land to accommodate projected employment

2021 business environment will be:

- high rise in city centre
- urban village mixed economy
- IBP HQ at junction 33, M4
- growth focussed

Office development - why the LDP is unsound

because the proposals for new, 'traditional' office accommodation at the IBP and in the Bay are inconsistent with 21st century working practices and the needs of the businesses that are targeted to be attracted to Cardiff. Neither junction 33, nor access routes to the Bay can cope with increased traffic. As such the solutions are already obsolete and unworkable.

the evidence is already visible throughout the UK in empty office blocks (predating the current downturn) and their conversion to hotels where this is feasible. Data on the needs of such businesses clearly demonstrates the mobile, technology dominated work styles that are already widespread. No data is offered in the LDP of which businesses have been consulted or of their needs.

the solution is a change of LDP focus towards smaller units supported by digital, wifi and internet technologies and supported by facilities to assist family life from crèche to gym. Such developments need careful design to provide the "in between" working and interactive spaces consistent with modern needs. The need also exists for ready access to reference, research, technical support and centres of competence that can only be provided in urban and connected environments.

Economy - employment

- what the LDP says

The LDP would accommodate the 10.7% growth in jobs in Cardiff (23,200 jobs), forecast by Cambridge Econometrics between 2006 and 2021, if current trends continue; this forecast forms the basis for the current Economic Strategy for Cardiff and would enable the city to maintain its role within the regional and national economies.

No retail growth - given the level of recent and current retail development in the city (90,000 sq m at St David's 2), it is not anticipated that there will be a requirement for substantial additional retail floor space over the Plan period.

Employment - why the LDP is unsound

because the focus on knowledge industries is too narrow in the face of an economic crisis. A city will remain competitive only if a wider range of premium employment opportunities is attracted, to use and need the network of small businesses that already exists. Large companies will decentralise work to units in cities associated with skills and competences, and with a high quality of life. Such a model requires a wide range of industries, skills and knowledge to avoid stagnation and over dependence on a limited range of employers.

the evidence is visible through the implications of changing work patterns, reduced travel and the need to acquire new skills. The strengths of Cardiff are many, and there

is insufficient attention paid to the potential growth in employment in food preparation (food miles) and standards, materials technology, energy, culture and film/TV , sport participation and events, entertainment and tourism for example .

the solution is to recognise the benefits of diversity in the economy, and invest in the facilities to encourage a broad range of business. The key differentiators are and will continue to be the quality of life (a key vision in the LDP but not addressed at all) and specialist facilities supported by centres of knowledge, competence and skill. There is a strong brand associated with Wales that should be at the forefront of Cardiff's plans as the seat of government, and the first natural point of call of visitors.

Transportation

- what the LDP says

Cardiff's road network is at capacity; alternatives to car travel to be encouraged; park and ride (including to IBP) to be provided; bus corridors and frequency to be developed; interchange between modes to be easier.

Transport trends: if trends continue Cardiff will experience 11 to 18% increase in traffic flow over decade; roads already at capacity so congestion will occur; LDP proposes wide range of schemes and packages to encourage alternatives to car use

Success is critical to LDP implementation

2021 will be:

- park and ride
- improved bus network
- encouragement of train, walk, cycle

Transportation - why the LDP is unsound

because, despite the stated recognition that success of the transport network is critical to the success of the plan, the LDP fails to identify or plan in any detail whatsoever an integrated, effective or efficient transport network. The measures to reduce car use are weak and the plan offers neither assistance nor compulsion towards alternative modes of transport. The solutions lack ambition, proposing ideas more relevant to the 1980's, and fails to respond to the criticality of success for the rest of the plan to be successful.

the evidence is clearly demonstrated in the workshop submissions for both transport and environment. Models of successful systems abound throughout Europe, and Cardiff should refer to best practice for its solution. No alternative or state of the art systems are referenced in the LDP to provide feasible and cost effective schemes that could apply here. Previous studies for Cardiff in 1963 may have lessons for today but are not referred to. Further, the Bay remains remote from the city centre and neither

the need or the opportunity for an efficient and high profile link into the city are mentioned. No in depth analysis is offered of the reasons why the Eastern Bay Link Road is not included, nor its potential benefits.

the solution is to be found in the many examples of rapid transit urban transportation systems already implemented throughout Europe. The information on cost and effectiveness is in the public domain and would allow Cardiff to leap ahead of the field. The transformation of the centre of Cardiff into a very large scale pedestrian and cycle only area (with arrangements for deliveries), coupled with a state of the art urban transit system would meet both transport and environmental needs and be very popular. The opportunity of an astounding futuristic and iconic link from the centre into the Bay would provide a landmark for visitors as significant as the Millennium Centre and Stadium have been. The integration of these distinct communities is essential for the social development of Cardiff.

Environment

- what the LDP says

New development to be to high eco-standards including renewable energy; protect landscape/wildlife, develop carbon sinks; Improve waste handling and use eg incineration and composting; protect and enhance natural and built heritage; sustainable development principles; managing waste; landscape protection

2021 will be:

- ■ new development reducing carbon
- ■ protection of green space
- ■ waste handling initiatives to reduce landfill
- ■ less car use
- ■ Mitigate and adapt to climate change

Environment - why the LDP is unsound

because the plan fails to recognise or deliver the requisite reduction in climate altering gases and particles that are clearly and specifically identified in WAG and UK government commitments that must be met *within the lifetime of this LDP*. Current and planned reviews of the impact of climate change suggest that even more stringent reductions will soon be imposed and Cardiff will be required to respond as the major contributor. The contributions suggested amount to a tiny fraction of currently recognised reductions and it is vital to us all that leading cities like Cardiff play a leading role, this is not currently the case.

the evidence is in the complete lack of recognition of the scale of change we must make, and no assessment of the impact of what is proposed. For example, the largest

contribution to CO2 reduction appears associated with new development, to be built to the highest standards. It is difficult to imagine that this could contribute more than a percentage point or two. Similarly, transportation in 2021 seems to rely on old technology operated more efficiently in a less congested environment, again contributing no more than a few percentage points. Despite having the freedom to initiate small scale local renewable energy schemes to support clusters of domestic or business users, there are no concrete plans to do so ; and the opportunities for renewable energy generation locally from tidal or indeed fossil fuels that can take advantage of emerging technologies. In summary the plan makes virtually no statement about what everyone in the population believes is the world's most pressing problem.

the solution is to redesign and upgrade the transport proposals, extend the new development standards into the existing business, retail and housing stock, significantly “green” the city, insist on local renewable energy generation and reconsider the capacity of the city to grow by increasing co-ordination with neighbouring authorities. In this way the difficult task of reducing CO2 can be resolved with positive and popular solutions.

Consultation and community engagement

- what the LDP says

Actual consultation took two forms:

- Seeking input from the Citizens Forum, a group of 1430 individuals representative of Cardiff population on the subjects of housing and employment growth
- Seeking input from a list of 226 private companies, government departments and public bodies, plus charities and voluntary organisations.

Consultation and community engagement - why the LDP is unsound

because the actual consultation list as documented, is a small and unrepresentative sample dominated by developers and government/establishment vested interest.

The Delivery Agreement for the LDP required the production of a ‘Community Involvement Strategy’ (required by WAG). The Community Involvement Strategy listed the organisations to be consulted and many relevant organisations were missing from it: it is lacking in length and breadth and there is a particular dearth of local Cardiff organisations. The “Cardiff Deposit Local Development Plan: Initial Consultation Report March 2009” lists the 237 organisations and individuals as ‘Consultees Notified of Consultation on the Preferred Strategy” 40 of these are named in the ‘Respondents to the Preferred Strategy’.

Despite the evidence of emerging concern on economic and environmental issues (immature and ill-informed topics at that stage) no effort was made to seek further

input via workshops or professional groups knowledgeable about future trends or best practice in a host of European cities.

It is perfectly possible to run, for example, successful workshops to engage a wide range of input apart from the 'usual suspects'. This is perhaps illustrated by our efforts documented here or in the February 2006 work by the council's parks department prior to the Heritage Lottery Fund application. Such methods - and there are many others - can deliver thought out, integrated solutions to complex issues that individual surveys on a limited question list cannot achieve.

the evidence is: that of 1430 members of the Citizen Forum, only 123 responded (>9%) of whom all but 4 were white, only 1 unemployed, 3 disabled/sick and 4 carers. This is not a representative sample.

Key messages emerged even from this flawed process which are not reflected or addressed in the LDP: "Support the growth in the valleys as a priority" ; Fix the transport issues ; Better housing mix; 62% found greenfields development necessary to provide adequate ; family and affordable housing (transport dependant); 83% wanted stronger employment enablers; 84% said access and transport were the keys.

Of the 226 businesses and organisations approached only 40 responded (>18%)³:

- 30% of whom were government or public funded bodies
- 35% were developers or agents
- 17% were professional pressure groups
- 17% were employers.

This bias leads - we suggest - to a dominance being given to interests desiring maximum growth and development. There were no efforts documented to seek the input of urban planning professionals for unbiased advice and alternatives, no references to models of good and bad behaviour or best practices, nor are there efforts to seek input from the businesses that it is said are the target market for the proposed development; the lack of market research has led to the adoption of obsolete solutions to the business and working environment.

the solution: a completely rethought LDP should be created based on a meaningful dialogue with citizens, extensive and thorough research (not reliant on the authority's own research teams), and a process that *enables* rather than *deters* genuine consultation in which all voices are valued.

³ Cardiff had 8,345 VAT registered businesses in 2007 - a number that therefore excludes all micro business and many small ones: so sample number was significantly less than half a percent of Cardiff businesses



Conclusions

Conclusions

Unsound, inadequate policy formation

The Cardiff Civic Society believes that the process of developing this LDP has been followed in accordance with the guidelines: its implementation however has been unsound leading to inadequate policy formulation. Whilst the CCS concurs with the vision section of the LDP, our mapping of policy proposals onto that vision reveals patchy coverage and this leads, inexorably, to inadequate and inappropriate proposals.

We conclude therefore that the plan is unsound and thus has to be rejected in its entirety.

Risks of proceeding

The risks of proceeding with the LDP as it stands are:

- 1) Cardiff as a capital city and home to the Welsh Assembly should be a leader in spatial planning, embracing the challenges of economic and environmental change and working with neighbouring local authorities: growth in the valleys will fail - and economic deprivation increase - unless radical steps are taken to integrate and share the prosperity sought in Cardiff - if necessary accepting lower growth, less expansion to benefit the valleys
- 2) enforced commuting for families with its social, environmental and economic cost
- 3) continuation/enlargement of homelessness issues
- 4) businesses will “follow the bandwidth” and locate in cities offering 21st century infrastructure (eg today, courts offer virtual justice and universities virtual degree congregations; Amsterdam has developed Smart Work Centres, Stockholm has reduced car use by 20% with its programme of controlled access)
- 5) obsolete empty offices will demonstrate the employment policy failures
- 6) skilled jobs will migrate to areas with skills, expertise, centres of competence and quality of life

- 7) sufficient reduction in carbon and particle emission will not be made; as shown in the Stern report the cost of inaction on carbon/particle emission is greater than the cost of action
- 8) transport will remain an issue as it has since the Buchanan report in 1968. this will curtail future development and put pressure on Cardiff businesses (some of which are world class now) to move away. Whilst costly investment is always given as the reason for not adopting innovative solutions, other cities have turned the problem on its head and generate income to support sustainable transport⁴
- 9) the experiences over the past 30 years of towns and cities in the UK that were over dependant on narrow economic base/wealth creating industry with inadequate social, technological, transport, expertise will be repeated in Cardiff
- 10) as a result of poor consultation during the LDP process, and - if this LDP is accepted - the subsequent imposition of an inadequate planning strategy, the alienation of Cardiff population from its governing and political establishment will be complete.

... but it's only planning

During the extensive process undertaken by the Cardiff Civic Society to write this document the planning experts amongst the group have continually reminded us that this is only 'a land use plan' not a document for social engineering to redress all of Cardiff's ills.

But, to recap on the document's primary vision, it is: "to ensure that Cardiff is a world class European capital city with an exceptional quality of life".

That quality of life is - and will continue to be - structured around, focussed on, mediated by, the buildings, roads, open spaces and infrastructures that make the environment in which real people live and work.

If we fail to create that quality of life, some - the most economically important - will be fortunate enough to vote with their feet and leave.

For the rest, the LDP's inability to frame the policies that will best deliver that 'world class' environment - or even something aspiring to be measured on those terms - will mean that the country's capital will have failed its citizens, now and for decades to come.

⁴ Road charging is costly to implement but quickly yields revenue: The collection of €1 in revenue costs 22 cents in Stockholm, 21 cents in Singapore, 10 cents in Oslo, 5 cents in Bergen—and 60 cents in London - see Economist Intelligence Unit: *Driving change: How policymakers are using road charging to tackle congestion*. Appendix



Appendix

Appendix 1: expert advisors and contributors and their presentations

Professor Stuart Cole, Professor of Transport, Wales Transport Research Centre, University of Glamorgan

Neil Harris, Lecturer in Statutory Planning, Cardiff University

Peter Jones RSPB

Professor John Punter, Professor of Urban Design Cardiff University

The Work Foundation/Ideopolis - key findings (presented for them by Peter D Cox, managing director TMPL Consultants)

Appendix 2: documentary evidence cited:

Stern, P, 2009. *A blueprint for a safer planet: How to manage climate change and create a new era of progress and prosperity*. London, The Bodley Head

Welsh Assembly Government, May, 2009. *One Wales: One Planet: The sustainable development scheme of the Welsh Assembly Government*. Cardiff.

Llywodraeth Cynulliad Cymru, Mai 2009. *Cymru'n Un: Cenedl Un Planed: Cynllun Datblygu*

Cynaliadwy Llywodraeth Cynulliad Cymru. Caerdydd.

Labour Market Statistics for Cardiff: <https://www.nomisweb.co.uk/reports/lmp/la/2038432103/report.aspx>

Connected Urban Development http://www.connectedurbandevelopment.org/connected_and_sustainable_work

Foresight: *Sustainable Energy Management and the Built Environment* Project Final Project report (2008).

Economist Intelligence Unit: *Driving change: How policymakers are using road charging to tackle congestion*. At <http://tinyurl.com/trafficcharging>

Appendix 3: workshop outputs

Workshop 18th May 2009

Urban design and housing (verbatim)

- Influencing existing allocation
- Can distribution to the vale/valleys for family housing be sustainable?
- Family housing
- Essential to have private, communal, public space
- Longer term release of green fields
- Define minimum standards for flats eg: parker morris
- Design flats for families not elderly & single people (as on continent)
- Mix appears to be wrong and is unsound
- Connections/pushing with other authorities
- Stronger design strategies needed
- Design not defined
- How will plan deliver high quality designs?
- Only tall buildings
- Promise is there but delivery not there
- Do we want brown fields only? Is this a sound strategy?
- Deterioration of housing stock
- Will those be included in future housing numbers?
- House builders want houses not flats
- Community infrastructure planned before release of land for build
- What is evidence for increased employment?
- Population projections are they unrealistically high?
- Will identified areas actually emerge

Workshop 18th May 2009

Work and the economy (verbatim)

- Digital divide issues
- Mapping digital infrastructure lacking in LDP
- LDP could identify wi-fi hotspots & lowspots
- LDP could use it to address pockets of unemployment
- Exponential growth in retail (internet shopping)

- Exponential growth in working from home
- LDP based on old model
- LDP should focus on infrastructure in technology not office block
- It content in LDP where?
- LDP lacks arts centres; “in between centres”, enhanced libraries
- It industries adequacy of infrastructures
- Attract industries by offering quality of life
- LDP should look towards food manufacturing: local food, local producing
- Food miles support/food niches facilitated
- The LDP can be the start of implementing social strategies. It could be but it is not
- Equalities issues
- What type and quality of jobs/employment
- Does LDP address disadvantaged communities?
- Sustainable communities planning
- Transition (?)
- How many empty office blocks at present?
- Figures planned for m2 office space are astronomical
- Do we need a junction 33?
- LDP “unsound” because of junction 33
- Sporting and cultural industries are under-represented.
- No recognition of these industries
- Not an economic downturn issue but a way of working
- Is an international business park totally obsolete?
- LDP is supposed to be sustainability neutral on biodiversity”!!!

Workshop 20th May 2009

Transport (verbatim)

- Possible stick measures needed
- How will carrot measures be achieved?
- Cardiff connections out north but not across (Penarth)
- Joining the city not just the centre to the bay
- Frequency of rail runs to airport
- Operational and investment issues: bus stops shelters, bike racks location/safety as on continent

- Issues of peak oil
- Plan has no connections with other authorities
- The whole of the LDP rests on the transport strategy and the strategy is not sound
- More walking, change of culture
- The world we have made, as a result of the level of thinking we have done thus far, creates problems we cannot solve at the same level of thinking at which we created them this quote applies to the LDP
- Impact of working from home on transport
- Transport involves hours defined by schools and work timetables
- LDP does not talk about the points made in presentation of professor Stuart Coles
- LDP torpedoed by the IBP
- IBM originally supported by transport route now taken away IBP even more unrealistic
- £500 m are needed for transport but only £14 m will be available
- What are the deliverables/
- LDP is more of the same
- Communities facilities lacking (children are bussed around the town's schools
- Schools runs aggravate the traffic
- LDP has no steps to delivery
- LDP has no indication of future needs analysis
- Work from home not applicable to all jobs
- Flexi time has not proved popular due to behavioural/ family culture
- No organic maintenance in parks
- Regulations and compulsion on way of life needed
- Ask Peter Jones what are the policies in his view which should be in the plan but are not
- Has CCCC done a sustainable appraisal of impact of LDP implementation on the ecological footprint of Cardiff?
- Plan is not explicit/ plan is not sound
- Growth extrapolation from statistics (given on Monday 18th session on housing) is unsound
- Lack of communications with council
- Communities input to council ignored
- Protection of rivers' corridors
- Detailed designation of these corridors needed
- If this plan is unsound alternatives should be provided
- It is not sound to think that we can provide an alternative when the council has spent x man days and x years writing it
- The LDP does not match/fit the "One Wales "document
- LDP is for new developments it lacks things to do for existing developments
- What evidence can we bring forward to challenge the plan?

Workshop 20th May 2009

Maintaining our environment

(verbatim)

- Uk climate change act requires a reduction of 26/34% (unclear?) By 2020 i.e. within the life time of the LDP
- WAG legally committed to have sustainable development approach to all it does
- Need education and mild form of authoritarianism
- No funding available for organic horticulture

Appendix 4: original (January 2009) CCS submission



Registered Charity No. 517544
www.cardiffcivicsociety.co.uk

James Clemence
Strategic Planning
Cardiff Council
County Hall
Cardiff CF10 4UW

Dear Mr Clemence

LDP PREFERRED STRATEGY CONSULTATION

We spoke to you shortly before Christmas to request a meeting at which a few members of Cardiff Civic Societies could talk to you about issues arising from the LDP Conference we held on 18th October, and which was addressed by Stuart Williams. The Conference was attended by 60 representatives of local Civic Societies, Community and Cardiff Council members and others. All were grateful to Stuart for providing the briefing and, in subsequent discussions, all felt that they had not had the opportunity to participate as fully as they would have wished in the consultation exercise leading up to the publication of the preferred strategy. The full conference report is specific in the main areas of concern.

Rather than have a meeting, you asked for a written submission, which is given below and summarised in the associated diagram. You will see that we have positive suggestions to make on a number of aspects of the plan. However, we are very concerned that recent economic events have so skewed the 'playing field' that pushing ahead with the plan in its present form would, as 'Sir Humphrey' might say, be "a very brave decision".

We hope you are able to consider the following comments fully at this time, and prior to continuing to the next stage of the process. A number of our members attended the Stakeholder Briefing you held on 22nd October and were concerned that too many of the issues raised then were deemed suitable to be resolved in the next consultation phase. In our view, there comes a time when a suggested plan is sufficiently out of tune with current circumstances that, however uncomfortable, it is better to reconsider than plough on regardless.

As well as providing this brief, we should add that we would still like to meet with you as soon as possible to carry the discussion forward. We trust our contribution will be constructive and helpful to the process, in order that we can achieve the best possible result for the future development of Cardiff.

Yours sincerely,

Karen Allen, David & Jeanne-Hélène Eggleton, Nick Hawkins
On behalf of **Cardiff Civic Society - LDP Working Group**

Please reply to:
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4th January 2009

Copies to:

Civic Trust for Wales, Llandaff Society, Radyr & Morganstown Association, Rhiwbina Civic Society, Penarth Society

COMMENTS

The LDP Process

Prior to our conference of October 2008, we became aware that we had missed the Preferred Strategy Consultation of autumn 2007 - we were not on the list of consultees included in the LDP Delivery Agreement. We understood from our meeting with Stuart Williams in June 2008 that the Council were considering a fresh Preferred Strategy consultation because of the significant increase in the level of housing deemed necessary and the inclusion of the International Business Park, and we would therefore have our chance to comment on the Preferred Strategy. We subsequently learned that the Executive had decided a fresh consultation was not necessary at their meeting of 2nd October, but do not know the basis for their decision. We raised this question at the Stakeholder Briefing event of 22nd October but the question was not addressed in the response document circulated after the meeting.

We are aware that we are not the only individuals and organisations to have missed out on the chance to comment on the Preferred Strategy. The Council's record of consultation responses lists only 75 respondees (approximately), and there is an apparent lack of breadth in the individuals and organisations represented - a low proportion of the responses come from citizens of Cardiff or local organisations. During our recent conversation you mentioned that developers have also been in touch with you to express their concern at having missed the Preferred Strategy consultation.

During our conversation we also talked about the importance of interested organisations and individuals getting into the process at the early Preferred Strategy stage, as the potential for the Inspector to overturn the Preferred Strategy is extremely limited under the new development plans legislation. This would tend to leave us feeling disenfranchised by not being selected for the original Preferred Strategy consultation but we are determined to make as much contribution to Cardiff's LDP as possible and, as already mentioned, we would welcome the chance to meet to discuss how best we can do this.

The Council's LDP Vision

We concur the LDP Vision and Objectives identified in paragraph 4 of the LDP Preferred Strategy document, the following questions and observations relate to the ability of the strategies identified within the LDP to deliver these essential goals.

The first vision concerns the quality of life, and we see little in the LDP strategies to impact significantly on this difficult task. We would have expected to see contributions such as

- sporting participation at grass roots level
- green space and other outdoor recreation
- artistic and cultural clubs and facilities
- built environment quality /design
- much greater focus on traffic free urban spaces

The second vision relates to a skilled, creative and buoyant economy. The main elements cover some but not all the areas expected and we ask if the following have been considered

- Creation of nuclei of skills and research, by expansion of the University, in industries of the future such as alternative energy sources and a host of green technologies.
- Expansion of training and education in skills in which Cardiff has been traditionally strong, such as engineering, mineral technology and power generation.

- Using your background survey data to identify key industries relevant to Cardiff's perceived strengths, and prioritising development of infrastructure to encourage job growth where local skills and experience is strong.
- Tourism has a major potential for Cardiff, this is barely mentioned
- As far as housing is concerned, and recognising the above, we suggest a policy shift away from apartments to family homes, on brown field sites in preference or by sympathetic enlargement of existing communities with local input.

The third vision relates to social issues, resolution of which is essential if major businesses are to be attracted to Cardiff. We believe that the focus on training and skills above would be a large contributor, and in addition we would expect to see the following.

- Growth in community support programmes especially in sporting, cultural and public health
- A public safety strategy
- Expansion of Housing Association activity to provide affordable and rental accommodation for essential workers
- A realistic assessment of retail needs in the mid 21st century, to avoid city centres becoming obsolete.
- A bigger focus on improvement of existing homes and communities.

The fourth vision is concerned with the environment. The LDP strategies do not in our opinion address the key issues with enough force, and appear to be very 'last century' ideas. In order to meet the demands of both citizens and governments a much-strengthened set of strategies is needed. Has the council considered the following?

- A carbon reduction strategy (including contingencies that give consideration to peak oil).
- Investment in a truly 21st century urban transit system (e.g. tram, trolley) throughout Cardiff that would drastically curtail car use, rather than park and (bus) ride.
- A proactive approach to relocation of inner city low added value industry to release land for appropriate development.
- Improved design through open competition (as for much of the Bay development)
- A serious flood prevention scheme
- A power generation strategy for Cardiff to utilise alternative local energy sources, including carbon capture.
- A city food strategy to maximise opportunities for local food provision via urban agriculture, safeguarding and expanding allotments provision, and development of community markets (which in turn reduces fuel consumption, emissions, etc).

Further and perhaps even more critically, we observe that the underlying economic assumptions made by the LDP have been made obsolete by recent events in the financial markets. Growth will be severely constrained, demand reduced in all areas of economic activity, unemployment will grow, and property values are unlikely to recover (according to many pundits) until 2016. We therefore fear that the present LDP is sustainable neither environmentally (as stated above) nor economically.

For all the above reasons, we recommend that the plan is withdrawn and reworked, taking advantage of new data and strategic direction, and with much more effective local input.

The attached diagrams* indicate, simplistically, our analysis of the vision/strategy relationships in the LDP and our independent assessment of what is needed.

**Attached:* LDP Vision analysis & alternatives