

Cardiff Council & Levett-Therivel

Integrated Sustainability Appraisal of the Cardiff Replacement Local Development Plan: Appraisal of the vision and objectives

August 2021

1. Introduction

Integrated sustainability appraisal (ISA) involves assessing how sustainable an emerging plan's vision, objectives, alternatives, draft policies and sites are. This is done by testing them against an 'ISA framework' of sustainability objectives. Where the emerging plan has gaps or possible negative impacts on these ISA objectives, the ISA proposes ways to fill gaps, reduce negative impacts and enhance positive impacts.

Levett-Therivel have appraised the vision and objectives of the emerging Cardiff Replacement Local Development Plan (RLDP) against an ISA framework put forward in an ISA scoping report of March 2020, and updated in August 2021 (shown at Appendix A). Section 2 presents the appraisal. Section 3 presents suggestions for improving the vision and objectives to make them more sustainable, and the Council's response to those suggestions.

Cardiff Council consulted on the vision and objectives of the emerging RLDP for eight weeks, from March 2021. It is this version of the vision and objectives that has been appraised so that the ISA comments can be considered alongside the LDP consultee comments to enable the LDP team to finalise the plans vision and objectives. Due to the iterative nature of the ISA process the updated version of the vision and objectives will be subject to a further appraisal during Preferred Strategy preparation stages.

2. Integrated sustainability appraisal of RLDP vision and objectives

Table 1 shows the results of appraising the RLDP vision and objectives against the ISA objectives of Appendix A.

Table 1. Appraisal of RLDP vision and objectives

Key:

+	-	+/-	
Positive impact likely	Negative impact likely	Impact could be positive or negative, depending on how the RLDP is implemented	No significant impact likely

ISA objective	1. Equality	2. Air	3. Biodiversity	4. Climate	5. Heritage	6. Economy	7. Health	8. Soils	9. Landscape	10. Resources	11. Water
Plan vision/objective To create a fairer and more sustainable city by: <ul style="list-style-type: none"> • Responding to the urgent future needs for new homes, jobs and infrastructure; • Positively tackling the challenges of climate change and post-pandemic recovery; • Creating a greener, more equal and healthier city which is easier to move around and enhances the wellbeing of future generations; • Using a placemaking approach, working with local communities to improve neighbourhoods and deliver high quality design; • Looking after our natural, historic and cultural assets 	+		+	+	+	+	+		+		
1. Provide MORE homes to address future housing needs. The Plan will: <ul style="list-style-type: none"> • Provide a range and choice of new homes of different tenure, type and location in response to specific housing needs • Prioritise opportunities for new homes in sustainable brownfield locations • Set targets for the delivery of affordable housing • Provide a diverse mix of housing including responding to the needs of older people and other groups who need specialised housing • Set out the approach to the sub-division of existing homes. 	+		-				+	+/-			
2. Provide more jobs and maximise Cardiff's role as Capital City of Wales and economic driver of South East Wales to improve the prosperity of the region. The Plan will: <ul style="list-style-type: none"> • Ensure a range and choice of employment sites in response to employment needs • Facilitate the development of high-value clusters of specialist sectors • Ensure the protection of existing employment land which contributes to the required supply of sites to meet employment needs • Support the economic recovery of the city post-Covid-19 and respond to the change in work practices through increased working from home and need for new working and meeting hubs throughout the city. 			-	+		+		-	-		
3. Ensure the timely provision of new infrastructure to support future growth. The Plan will: <ul style="list-style-type: none"> • Identify key infrastructure required, how and when it will be delivered including: <ul style="list-style-type: none"> ○ Transportation- Different modes, public transport and Metro ○ Affordable, high quality digital infrastructure ○ Social/Community Infrastructure 		+		+		+	+			+	

ISA objective	1. Equality	2. Air	3. Biodiversity	4. Climate	5. Heritage	6. Economy	7. Health	8. Soils	9. Landscape	10. Resources	11. Water
Plan vision/objective <ul style="list-style-type: none"> ○ Schools, health facilities, sport/recreation, waste facilities, burial provision ○ Environmental - Contributions to combat climate change and creating new accessible greenspace ● Support Cardiff's higher education institutions/ infrastructure in recognition of their key role as part of a learning city and contribution to economic development ● Support measures to improve digital connectivity across the city to meet the demand from increased working from home post covid and facilitate new working meeting hubs across the city. 											
4. Respond to the climate emergency so Cardiff becomes more resilient, reduces its carbon footprint and maximises opportunities for energy-efficient solutions. The Plan will: <ul style="list-style-type: none"> ● Set out how Cardiff can become more resilient and adapt to combat the impacts of climate change including: <ul style="list-style-type: none"> ○ The role of ecosystems in addressing carbon storage, natural flood management, air quality, heat islands and noise pollution ○ Guidelines for the design of resilient new developments ○ Managing flood risk ○ Facilitate the provision of infrastructure for cleaner vehicles ● Set out measures to reduce Cardiff's carbon footprint and mitigate the effects of climate change through reducing energy demand including: <ul style="list-style-type: none"> ○ Locating development in sustainable locations to minimise the need to travel and reduce car dependency ○ Improve energy efficiency and the generation of renewable and low carbon energy in new developments ○ Promoting an increase in tree canopy cover across the city ○ Promote high quality design and environmental performance of new homes. 			+	+			+			+	
5. Make the city easier to move around with a focus on sustainable and active travel. The Plan will: <ul style="list-style-type: none"> ● Set out how people can move around the city in a more sustainable and integrated manner with new development well located to transport infrastructure 	+	+		+			+			+	

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Plan vision/objective <ul style="list-style-type: none"> • Reduce the need to travel, reduce reliance on the car, reduce congestion and reduce harmful emissions • Set a modal split target • Promote sustainable forms of transport and the more effective integration of public transport including new transport interchanges • Promote active travel- Walking and cycling • Capitalise on national and regional investment in sustainable transport infrastructure including the Metro. 											
6. Create healthier environments, reduce inequalities and enhance wellbeing. The Plan will: <ul style="list-style-type: none"> • Support the delivery of healthier, accessible environments to help tackle obesity and promote healthier lifestyles • Set out how air quality can be enhanced • Promote the role of greenspaces in delivering wellbeing benefits • Manage waste and control pollution • Support the regeneration of local neighbourhoods, particularly the ‘Southern Arc’ of deprivation • Promote safer environments which reduce the scope for crime • Facilitate equitable access and opportunity to Welsh Medium education in all areas of the city so that the language continues to thrive. • Promote the provision of services and jobs in areas of highest need to reduce inequalities • Promote the role of Soundscapes in controlling noise pollution. 	+	+					+			+	
7. Ensuring a vibrant, mixed-use City Centre and developing Cardiff Bay’s full potential to provide core destinations for Cardiff and beyond, whilst supporting the key role of district and local retail centres as the heart of local neighbourhoods. The Plan will: <ul style="list-style-type: none"> • Maximise the key strategic role of the City Centre as a high density, major financial and service sector hub of national significance and generate the agglomeration effect in attracting further investment • Maximise the potential for high density mixed use development related to the regional sustainable transport hub • Support the ability of the city centre to adapt by encouraging mixed uses and further investment alongside the key retail role 						+		+			

ISA objective	1. Equality	2. Air	3. Biodiversity	4. Climate	5. Heritage	6. Economy	7. Health	8. Soils	9. Landscape	10. Resources	11. Water
<p>Plan vision/objective</p> <ul style="list-style-type: none"> • Continue the regeneration of land south of the regional transport hub • Ensure centres can operate as flexibly as possible where a variety of retail, employment, commercial, community, leisure, health and public sector uses come together in a hub of activity to make them viable as go-to destinations once more by setting out a vision for each centre, establishing boundaries and identifying sites for redevelopment. • Promote a new chapter in the regeneration of Cardiff Bay as a high density, mixed-use destination to identify: <ul style="list-style-type: none"> ○ The provision of supporting sustainable transport infrastructure ○ Enhancements to the Mount Stuart Square area and development of an arena at Atlantic Wharf including linkages to the Bay Waterfront ○ Future phases for the International Sports Village site ○ Regeneration of the Roath Dock/ Roath Basin and Alexandra Head areas. 											
<p>8. Ensure that the city positively adapts to the new challenges posed by the implications of the pandemic. The Plan will:</p> <ul style="list-style-type: none"> • Pick up on lessons learned to ensure that the city is more resilient and adaptable in the event of future pandemics • Support the economic recovery of the city after the pandemic has passed and restrictions eased • Identify wider changes required which also help the decarbonisation agenda, tackle climate change and improve general health and well-being • Identify any required positive permanent changes in places and as part of new development • Respond to the change in work practices post-Covid through increased working from home and need for new working and meeting hubs throughout the city. 		+		+		+	+				
<p>9. To use a placemaking approach which creates sustainable places, maximises regeneration opportunities, enhances the role of public spaces, ensures that future growth can be effectively managed and delivers new developments of high quality design. The Plan will: Use the placemaking principles as an overarching approach in plan-making to ensure:</p>							+	+	+	+	

ISA objective	1. Equality	2. Air	3. Biodiversity	4. Climate	5. Heritage	6. Economy	7. Health	8. Soils	9. Landscape	10. Resources	11. Water
Plan vision/objective <ul style="list-style-type: none"> • People and Community – The needs, health and well-being of all people are considered at the outset • Location - Development is promoted in the most sustainable locations and land is efficiently used with a ‘brownfield first’ priority • Movement - Sustainable and active travel are promoted as part of a more integrated movement network • Mix of Uses - Promote high density mixed-use development • Public Realm - Well designed and connected public spaces • Identity - Features of local distinctiveness are respected in new development • High quality design of new development. 											
10. Protect and enhance Cardiff’s Green and blue Infrastructure, its biodiversity and other natural assets. The Plan will: <ul style="list-style-type: none"> • Identify and set out how key natural assets of the city will be protected and enhanced including: <ul style="list-style-type: none"> ○ Open spaces, parks and allotments ○ The strategically important river valleys of the Ely, Taff, Nant fawr and Rhymney ○ The countryside, including strategically important ‘green backdrop’ formed by the ridge north of the City ○ Cardiff’s rich biodiversity and wildlife resource including designated sites and other features/networks including trees and hedgerows. • Recognise the wider role that green infrastructure can play in contributing to tackling climate change and providing healthy environments • Ensure natural resources are protected including mineral and sand/gravel resources and reserves. 			+	+					+/-	+	
11. Protect and enhance Cardiff’s historic and cultural assets together with supporting sustainable tourism and cultural sectors. The Plan will: <ul style="list-style-type: none"> • Identify and set out how key historic and cultural assets of the city will be protected and enhanced including: <ul style="list-style-type: none"> ○ The city’s Conservation Areas, Listed Buildings, Ancient Monuments, Registered Historic Landscapes and areas of archaeological importance ○ Other non-designated features which make important contributions to Cardiff’s historic and cultural distinctiveness • Maximise Cardiff’s role as an international tourism destination and host city of major events 					+	+					

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Plan vision/objective <ul style="list-style-type: none"> • Set out how Cardiff's night time economy and music scene can form part of a vibrant and diverse city centre • Set out how the Welsh Language can be protected and enhanced in line with relevant legislation. 											

3. Suggested modifications to the RLDP vision and objectives

Table 2 shows modifications to the RLDP vision and objectives suggested as a result of the appraisal of Table 1. They include gaps (e.g. young people, reuse/recycling, healthy food, Gypsies and Travellers); ways of reducing negative impacts (e.g. prioritising the use of brownfield land for employment as well as housing sites, focus on achieving environmental targets); and clarifications (e.g. 'Soundscapes', 'Southern Arc'). The final column of Table 2 shows changes to the vision and objectives made by the Council in response to the appraisal. Where no changes has been made, an explanation is given about why.

Table 2. Suggested modifications to the RLDP vision and objectives, and Council response

Vision or objective	Suggested modification	Council response
General	The plan objectives are a somewhat-confusing mixture of doing ('provide', 'ensure', 'reduce') and preparing/planning to do ('investigate', 'set out an approach', 'set out how'). Do they need to be more consistent, one way or another (e.g. all doing)?	As the plan is at an early stage no preferred approach has been determined for some aspects of the plan. For these issues, the objectives are to 'investigate' etc. Where a preferred approach is known, it is stated in the objectives.
	Refer to environmental targets/standards: climate change objectives, achievement of air and water quality standards, biodiversity net gain.	Objective 4 changed to refer to One Planet Cardiff and Objective 6 changed to refer to air and water quality standards. The correct reference in the Welsh context is biodiversity enhancement as referenced in objective 10 and no further changes are therefore required.
Vision	Third bullet point: A "healthier city which is easier to move around" could encourage car-based travel. Better to stress accessibility rather than mobility, e.g. 15 minute neighbourhood approach.	Agree.
Objective 1	Bullet points 1 and 4 seem to duplicate each other.	Agree bullet points 1 and 4 merged.
	Add reference to Gypsies and Travellers.	Reference to Gypsies and Travellers added.
Objective 2	Objective 1 includes reference to prioritising brownfield land for housing, but Objective 2 does not do this for employment land.	Add "Prioritise opportunities for new employment sites in sustainable brownfield locations".
Objective 3	The list of infrastructure does not include water, wastewater and energy.	Water, wastewater and energy added.
Objective 4	Include reference to the One Planet Cardiff Strategy.	Include "in line with the One Planet Cardiff Strategy to become a carbon neutral city by 2030." Remove "reduces its carbon footprint" as this is covered by the above.
	Bullet point 2, sub-bullet point 2 limits improvements in energy efficiency etc.	Reference to new developments removed.

Vision or objective	Suggested modification	Council response
	to new developments. Widen this to all developments.	
Objective 5	“Capitalise on national and regional investment in sustainable transport infrastructure including the Metro” sounds odd. Reword to emphasise linking new development to sustainable transport infrastructure rather than capitalising on investment.	Agree amend to read “Integrate new development with national and regional investment in sustainable transport infrastructure including the Metro”.
Objective 6	Refer to access to healthy food.	Add “and access to healthy food” after tackle obesity in bullet point 1.
	Given the Welsh Government emphasis on future generations, refer to young people.	Add “To support strong and cohesive communities which recognises Cardiff’s commitment to make Cardiff a Child Friendly City and Age Friendly City”.
	Refer to reuse and recycling.	Reuse and recycling added.
	Remove reference to Southern Arc of deprivation.	Replace with “communities in the Southern Arc”.
	Access to Welsh Medium education sounds like it would fit better under Objective 11 on culture.	The point of the objective is to provide equality of access to Welsh Medium education, i.e. emphasis is on access so this point should remain under Objective 6.
	Clarify what Soundscapes are.	Replaced with “Promote the role of natural and hard infrastructure to reduce noise pollution”.
Objective 7	Last bullet point: “to identify” doesn’t fit with subsequent bullet points.	Agree amended to “with”. Also for clarity amend second bullet to “Maximise the potential for high density mixed use development related to the sustainable regional transport hub at Central Square”.
Objective 9	Include reference to dealing with need (e.g. for accessible food, green areas) or redressing imbalances.	As set out above, objective 6 amended to add reference to access to healthy food and issue relating to green areas is already covered in objective 6 where reference is made to promoting the role of greenspaces in delivering wellbeing benefits.
Objective 10	Refer to achievement of biodiversity net gain.	The objective is worded correctly in the Welsh context as it refers to biodiversity enhancement.

Appendix A. ISA framework (from ISA scoping report of March 2020, updated in August 2021)

ISA objective	Sub Objectives: Will the vision/objective/alternative/policy...
1. Help deliver equality of opportunity and access for all	<ul style="list-style-type: none"> • Meet the need of Cardiff's population for homes, jobs and community facilities • Address existing imbalances of inequality, deprivation and exclusion • Improve access to education, life-long learning and training opportunities • Improve access to affordable housing and employment opportunities, particularly for disadvantaged sections of society • Improve access to community facilities and services, particularly for young and elderly people • Support the regeneration of deprived areas
2. Maintain and improve air quality	<ul style="list-style-type: none"> • Reduce the need to travel through the location and design of new development, provision of public transport infrastructure and promotion of cycling and walking • Avoid locating new development, including active travel routes, where air quality could negatively impact upon peoples' health • Help to meet air quality standards for people and ecosystems
3. Protect and enhance biodiversity, flora and fauna	<ul style="list-style-type: none"> • Maintain and achieve favourable condition of international and national sites of nature conservation importance (SACs, SPAs and SSSIs) • Maintain extent and enhance the quality of locally designated sites (LNRs and SNCIs) and LBAP priority habitats • Protect and enhance protected species and LBAP priority species • Maintain and enhance connectivity of corridors of semi-natural habitats • Provide opportunities for people to experience wildlife and habitats • Help to provide a net benefit for biodiversity, consistent with Planning Policy Wales 10
4. Reduce emissions of greenhouse gases and adapt to the effects of climate change	<ul style="list-style-type: none"> • Support energy conservation and energy efficient design • Promote renewable energy generation • Promote efficient land use patterns that minimise the need to travel • Promote sustainable modes of transport and integrated transport systems • Reduce vulnerability of the built environment to the effects of climate change • Help Cardiff to achieve the One Planet Cardiff vision to become a carbon neutral city by 2030
5. Protect and enhance historic and cultural heritage, including the Welsh Language	<ul style="list-style-type: none"> • Protect and enhance historic and cultural assets including scheduled ancient monuments, listed buildings, historic parks and gardens, historic landscapes and conservation areas • Encourage access to the historic and cultural heritage • Support local character and distinctiveness through good design • Support the use of the Welsh Language
6. Help deliver the growth of a sustainable and diversified economy	<ul style="list-style-type: none"> • Increase the number and range of employment opportunities • Support and enhance the role of Cardiff as a key economic driver of South East Wales city region • Promote and support city and local centres, local employment opportunities and mixed use development • Support a post-pandemic green recovery

ISA objective	Sub Objectives: Will the vision/objective/alternative/policy...
7. Improve health and well-being	<ul style="list-style-type: none"> • Reduce health inequalities • Encourage and facilitate walking and cycling, particularly in green infrastructure • Protect, and improve access to, open space, the countryside and other opportunities for physical activity • Improve environmental quality by minimising adverse impacts on health and wellbeing from pollution, flooding and waste management disposal • Promote good design that minimises adverse impacts on health and wellbeing from crime and road traffic accidents
8. Use soils and minerals efficiently and safeguard their quality	<ul style="list-style-type: none"> • Re-use derelict and other previously developed land • Remediate contaminated and unstable land • Safeguard soil quality including the best and most versatile agricultural land, and protect and enhance allotments • Safeguard mineral resources and encourage their efficient and appropriate use
9. Protect and enhance the landscape	<ul style="list-style-type: none"> • Protect and enhance the landscape including the countryside, areas of landscape value, river valleys, greenspaces and the undeveloped coastline • Protect and enhance Cardiff's Special Landscape Areas • Promote high quality design in keeping with its landscape context • Increase access to open space
10. Minimise resource use and waste, increase re-use and recycling	<ul style="list-style-type: none"> • Reduce Cardiff's ecological footprint • Promote resource efficiency and the use of secondary and recycled materials • Promote waste reduction, re-use, recycling and recovery
11. Maintain and enhance water quality and resources, and manage flooding	<ul style="list-style-type: none"> • Conserve water resources and increase water efficiency • Improve the water quality of rivers, lakes, groundwaters and coastal areas • Ensure that a precautionary approach is applied, and that the location and design of new development manages the potential risks and consequences of flooding down to an acceptable level. • Ensure new developments have adequate sustainable drainage systems • Help to achieve water quality standards