

CARDIFF RLDP EiP: SESSION WEDNESDAY 17 JUNE: NATURAL ENVIRONMENT

REPRESENTOR I.D: 39

REPRESENTATION NO: 39/05 (SP21v) and 39/01 (CP4)

1. Will the LDP protect and enhance biodiversity?

i) **NO.** The Replacement Local Development Plan (RLDP) is key to shaping where, and what, development is allowed in Cardiff, and whether its citizens avoid the worst climate and biodiversity outcomes in future. PEDW and the Council are both bound by their **legal duty** under the Wellbeing of Future Generations Act 2015 to ensure this.

ii) The latest (September 2023) “State of Nature” Report by the State of Nature Partnership shows the UK to be one of the world’s most nature-depleted countries in the world. It is well known that green and blue spaces need to be connected to give plants and animals the best opportunity to survive. Protecting river corridors in Cardiff more adequately than currently is critical to ensuring biodiversity. We thus **welcome** the addition of “strategically important river valleys” to policy SP21 v. as suggested in our comments on the Deposit Plan **but that is not enough to make it sound.**

iii) CP4 has too many “let out clauses” which could enable developments that would harm biodiversity and also heighten flood risk. Strengthening the wording of CP4 as we suggested would reassure community groups that work with the Council currently by helping nature to flourish and increasing ecosystem resilience. It could also encourage other people to volunteer to help the Council by nurturing and monitoring plant and animal life in their locality.

2. Does the LDP comply with national policy with regard to protecting and enhancing biodiversity?

i) **NO.** As pointed out above, policy CP4 is far too weak and is **not** in line with Section 6 of the Environment (Wales) Act 2016 nor national planning policy as set out in para 6.4.3 of PPW (Edition 12). The current LDP which includes this policy allowed Officers to recommend approval of two applications for housing on the same site in the Taff River Corridor. Fortunately for current and future generations both were turned down by the Planning Committee and, subsequently, by PEDW. Leaving CP4 with its current wording could let such circumstances occur again. It would ignore evidence of continued decline in species numbers and not be in line with national planning policy for biodiversity, nor with current scientific evidence.

ii) The latest (2023) International Panel on Climate Change Report makes grim reading. Governments across the World, including those in the UK, are not doing enough, fast enough, to stop catastrophic climate change with all its negative impacts - including further biodiversity loss.

iii) A National Emergency Briefing in November 2025 by ten leading scientists chaired by Professor Tim Berners-Lee given to 1,250 politicians, business leaders and representatives from culture, media and sport in London reinforced this message, warning that the climate and nature (ie biodiversity) crisis is already impacting our health, food security, national security and the economy and - if not stopped by urgent measures - these negative effects will only worsen.

3. For the above reasons we urge the EiP Inspectors to make the wording changes we suggested to CP4 (see para 4.2.3 of our comments on the Deposit Plan) **otherwise the RLDP will not be sound.**