

CARDIFF RLDP – Biodiversity

The *Cardiff Replacement Local Development Plan 2021 to 2036 Draft Preferred Strategy* contains a number of Strategic Policies (SP). To avoid the problem of ‘issue silos’, it is essential that each SP explicitly mentions other SPs that are relevant to the issue in question. For example, SP1 (Providing for Sustainable Growth), SP2 (Sustaining Economic Growth and Resilience), SP3 (Ensuring a Masterplanning Approach), SP5 (Securing New Infrastructure) and SP5 (Securing Planning Obligations) all need to reference SP19 – Biodiversity and Green Infrastructure.

A particularly egregious example of this problem can be found in SP2 (Sustaining Economic Growth and Resilience). This says nothing about protecting the environment in providing employment land. It includes a long paragraph (10.18) defending the decision to promote the Hendre Lakes business park without acknowledging the ecological significance of that land. This is not even hiding behind the concept of ‘planning balance’: any promise (however dubious) of employment is seen as trumping any environmental considerations. At a time of climate and nature emergencies, which have been formally acknowledged by Cardiff Council, this is unacceptable.

The following is suggested wording to replace the biodiversity part of RDLDP, Strategic Policy 19. This policy needs to be split into two sections – biodiversity and green infrastructure, as they are not the same thing.

1. Introduction

- 1.1 *Biological diversity is the variety of life on Earth and the natural patterns it forms. The biodiversity seen today is the result of 4.5 billion years of evolution and, increasingly, of human influence as well. It forms the web of life, of which humans are integral and upon which people and the planet so fully depend.*

(United Nations - <https://www.unep.org/unep-and-biodiversity>)

Biodiversity is not a ‘nice to have’, ‘add on’ or optional, it is fundamental to all life on earth. And it as important to ensure that a city is biodiverse as it is the countryside.

- 1.2 The Council is a signatory to the Edinburgh Declaration on Biodiversity which includes this statement -

We.....are deeply concerned about the significant implications that the loss of biodiversity and climate change has on our livelihood and communities. The impacts on our environment, infrastructure, economy, health and wellbeing, and our enjoyment of nature are already visible.

For information on the links between biodiversity and health and well-being - <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5204155/>

- 1.3 Cardiff Council recognises that biodiversity (nature) is in sharp decline – as shown by the latest State of Nature 2023 Wales report - and is committed to meeting its legal duties to maintain and enhance biodiversity (Environment (Wales) Act 2016).
- 1.4 In furtherance of this, Cardiff Council will ensure that all development enhances biodiversity. This means that as well as protecting existing biodiversity and habitats

(e.g. woodlands, parks and allotments), the Council requires new developments to incorporate features that provide habitat and space for nature. An example of this is the Kingsbrook housing estate -

<https://www.rspb.org.uk/our-work/conservation/projects/kingsbrook-housing/>

- 1.5 Biodiversity is linked to climate change, but is not the same issue. However, healthy biodiversity can help mitigate some of the effects of climate change.

2. Policy statement

- 2.1 Cardiff Council expects all development applications to comply with -

- Planning Policy Wales
- this LDP, including its accompanying policies and guidance
- any future relevant policies and guidance produced by Welsh Government, the Council and UK Government
- any relevant guidance produced by professional bodies – e.g. BSI

If these are not followed, development applications will be refused.

- 2.2 Cardiff Council will refuse development applications that destroy, damage or degrade Sites of Special Scientific Interest (SSSIs) and Sites of Interest for Nature Conservation (SINCs), including those sites that meet the criteria for SINC designation, but have not been so designated.

- 2.3 Cardiff Council recognises that some brownfield sites are rich in biodiversity. Accordingly, all development sites will be considered on their individual biodiversity merits. Brownfield sites will not automatically be favoured for development over greenfield sites.

- 2.4 Cardiff Council recognises that the built environment can provide important habitat for biodiversity.

3. Details

- 3.1 Biodiversity must be central to development decisions on

- **Trees and hedgerows** – must not be destroyed for development unless there are wholly exceptional circumstances. Mature trees are particularly precious – for example, a large oak tree provides a habitat for about 2,300 species - <https://www.woodlandtrust.org.uk/trees-woods-and-wildlife/british-trees/oak-tree-wildlife/>
- **Ponds** – provide a habitat for species such as waterfowl, fish, frogs, newts and dragonflies. No existing ponds can be destroyed and all available opportunities must be taken to build new (but not ornamental) ponds - <https://www.wildlifetrusts.org/habitats/freshwater/ponds>
- **Landscaping** – must be at least 75% native, nature-friendly habitats and plants. Grassland areas must be managed to promote meadow habitats.

<http://www.magnificentmeadows.org.uk/advice-guidance/how-can-i-manage-my-meadow/managing-for-grassland-habitats>

- **Built environment** – all building proposals must include integrated bird, bat and insect boxes, hedgehog holes in fencing, log piles, etc

<https://www.bbc.com/future/article/20210727-how-to-boost-biodiversity-and-attract-wildlife-to-your-home>

- **Lighting** – poorly designed lighting is highly destructive of biodiversity and detrimental to human health . It must be avoided

<https://darksky.org/app/uploads/2022/06/IDA-State-of-the-Science-2022-EN.pdf>

- **Areas of scrub** – often described as ‘low amenity’, scrub is a very important habitat. Areas of scrub must be preserved and new areas allowed to develop

<https://data.jncc.gov.uk/data/39590874-8927-4c42-b02a-374712caccd6/JNCC-Report-308-SCAN-WEB.pdf>

- **Wildlife corridors** – developments must ensure that wildlife can move from one habitat to another, to prevent the isolation – and probable loss - of a wide variety of species, such as hedgehogs

<https://www.wmca.org.uk/documents/environment-energy/natural-environment-plan/west-midlands-natural-environment-plan-2021-2026/wildlife-corridors/>

3.2 Biodiversity degradation – e.g. replacing a biodiverse area with a less biodiverse area will not be permitted.

Below, we highlight some of the problems with the existing wording of SP19.

SP19: ~~PROTECTING, COMPENSATING AND ENHANCING GREEN INFRASTRUCTURE AND BIODIVERSITY~~ MAINTAINING AND ENHANCING BIODIVERSITY AND GREEN INFRASTRUCTURE

This policy needs to be separated into two distinct parts -

- **biodiversity**
- **other ‘green infrastructure’**

Green (to include blue and aerial) infrastructure is not synonymous with biodiversity. Widely spaced trees on tightly mown grassland (e.g. many of Cardiff’s parks), sports pitches, etc, are

likely to be biodiversity deficient. However, they will be part of 'green infrastructure'. It is most important that these two terms are not used interchangeably.

Biodiversity

Biodiversity is vital to all life, including human life. Without it, the essentials for human life – e.g. breathable air, food, water, medicines and mental well-being – disappear.

~~provides nature based solutions to a range of environmental and societal issues, such as the climate emergency, nature emergency, flooding, air pollution, urban heat island, public health and mental well-being.~~
The built environment can also provide important habitats for a wide range of species, including birds, bats, mammals and insects.

Development will be expected to protect and enhance the integrity, extent, diversity, quality, **resilience** and connectivity of ~~green infrastructure assets~~ **biodiversity**; and provide multi-functional green spaces; **this needs to be clarified. For example, a sports field may be 'green infrastructure, but it is highly unlikely to support biodiversity.** ~~provide "Net Benefits for Biodiversity"; and ensure the resilience of ecosystems can be maintained.~~ Development that compromises the integrity of ~~green infrastructure/~~

~~biodiversity assets, and the overall green infrastructure network will not be permitted.~~

~~10.120 The policy aims to ensure that Cardiff's green infrastructure assets are strategically planned and delivered through a green infrastructure network. The green infrastructure network is important for its own sake and for its contribution to the wider quality of life, including the value that people attach to it. It provides a range of economic, social and environmental benefits including reducing impacts of climate change, enhanced biodiversity habitat and species connectivity, providing greater opportunities for sports and recreation, contributing to the communities' health and wellbeing and providing visual benefits for all.~~

10.121 It is important **essential** that biodiversity and resilience of ecosystems considerations are taken into account at an early stage when considering development proposals. In accordance with the Biodiversity and Resilience of Ecosystems Duty (Section 6 Duty) introduced by the Environment (Wales) Act 2016 all reasonable steps must be taken to maintain and enhance biodiversity and promote the resilience of ecosystems and these should be balanced with the ~~wider and economic and social needs of business and communities.~~

10.122 Where development is permitted, planning conditions and/or obligations will be used to protect ~~or~~ **and** enhance **biodiversity**. New developments should ~~must~~ **must** incorporate new and / or enhanced ~~green infrastructure~~ **biodiversity features** of an appropriate size, type and standard to ensure ~~no~~ **enhanced biodiversity, and no habitat** fragmentation or loss of connectivity. They should ~~must~~ **must** also demonstrate how the development will achieve net biodiversity benefit and promote the resilience of ecosystems.

Green Infrastructure

~~Green infrastructure/biodiversity assets~~ are key to Cardiff's character, value, distinctiveness, and sense of place. Cardiff's green infrastructure assets include:

- i. Undeveloped countryside and coastline.
- ii. Non-statutory to statutorily protected sites.
- iii. ~~Priority/protected habitats and species, and the general range of species across Cardiff.~~
- iv. Landscape, geological and heritage features which contribute to the Cardiff's setting.
- v. Hydrological networks including strategically important river valleys of the Ely, Taff,

Nant Fawr and Rhymney, streams, lakes and ponds.

vi. Trees, woodlands and hedgerows.

vii. Soils.

viii. Roadside verges, roundabout islands and screen planting along roads.

ix. Strategic recreational routes, cycleways and the public rights of way network.

x. A range of active and disused railway lines, providing habitat connectivity throughout.

xi. Parks, playing fields, green play areas and open spaces.

xii. Growing spaces including allotments, community orchards and private gardens.

xiii. Freshwater habitats such as Cardiff Bay, Llanishen and Lisvane Reservoirs, and a network of ponds throughout the city, and

xiv. Holistic integrated surface water management systems.

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All significant developments must clearly show how green infrastructure will be incorporated into the site design.

10.122. The implementation of policies designed to provide and protect public open space throughout Cardiff would also serve to offset any increase in recreational pressure on the Cardiff Beech Woods SAC, thereby helping to avoid likely significant effect upon that site.

10.123 Management of Cardiff's green infrastructure network should be in place prior to development, and appropriate planning obligations sought. The Green Infrastructure SPG outlines the extent of Cardiff's green and blue infrastructure and how this policy will be implemented in more detail.

A Green Infrastructure Assessment will be required for all significant development proposals.

The Green Infrastructure SPG outlines the requirements that will need to be met to comply with this policy. ~~extent of Cardiff's green and blue infrastructure and how this policy will be implemented in more detail.~~

**Cardiff Civic Society
3rd October 2023**