

Radyr and Morganstown Local Development Group Comments on Cardiff RLDP First Revision 2021-2036



20/01/2022

Summary

- 1 Radyr and Morganstown Local Development Group fully understands and accepts that planning manages the development and use of land in the public interest and acknowledges the current Future Wales strategy of building 66,400 house in the SE Wales National Growth Area by 2040. However, we submit that the RLDP Preferred Strategy should not be based on the three Growth Options presented, but on a more realistic Growth Option following the 2018 WG household projections. This would mean that the forecast for housing by 2036 should be set at a similar level to the LDP projection for 2026. We are also aware that population projections for Wales may be reduced when using the 2021 Census as a baseline and that this may result in an amended strategy when Future Wales is reviewed in 2026 which might render the RLDP growth options redundant.
- 2 This is necessary because:
 - The level of house building from 2016 to 2021 has been far lower than the projections upon which the LDP is based,
 - House buying is unlikely to accelerate in the foreseeable future as interest rates rise and household spending is squeezed and the economy has only just started to recover to pre-COVID rates;
 - Previous increases in population projections for Cardiff were based substantially on assumed high levels of international inward migration. The effects of Brexit and lower demand from overseas students are likely to result in a considerably lower level of in-migration.

Detailed Comments

Housebuilding

- 3 The Annual Monitoring Report for the LDP demonstrates clearly that house building since 2016 is well behind target. KP1 of the LDP requires 29,201 dwellings to be completed from 2016 to 2026, on seven strategic sites. The actual performance to

31.3.21 was 6,472. The highest annual house completion figure for Cardiff was 2,300 in 2006 but over the last fifteen years the annual average has been only 1,070.

- 4 Even if house sales rise exponentially for the next 4 years it is extremely unlikely that the LDP target to 2026 will be met. The figures for the year to March of this year, which will not be available until the 2022 Monitoring Report in October are key data for the planning process and the selection of strategic options to 2036 should take account of these figures.
- 5 Land has already been identified as a strategic reserve, but on any interpretation of these figures these sites should not be brought forward until at least 2032 (to allow consideration of 2031 Census figures).
- 6 Having this informal consultation after the call for candidate sites shows the scale of greenfield land that landowners and developers want to develop. Releasing yet more land now will result in multiple sites being opened up, but will do nothing to cater for the demand for social rented homes in more sustainable locations.

Affordable Housing

- 7 Whilst the house building performance is well below the 2026 target, the performance of the building of affordable housing is even worse. The LDP contained a target of 4,468 to be completed by 2026 of which 3,093 were to have been completed by 2021. The actual performance to 2021 was 243 - i.e. only 8% of what was planned - derisory given the urgent need for homes for people on the Council's Waiting List.

Population

- 8 The population projections from Stats Wales estimate Cardiff's population in 2031 to be 379,637 - an increase of 11,547 over the 2021 estimate of 368,090. However, the whole of this increase is anticipated to come from net international migration of 1,700. These international migration figures are a straight-line projection from a 2018 baseline.
- 9 Given that the UK has experienced and continues to experience major changes in its international status via Brexit it is possible that these figures will reduce in future decade. This is surely a poor basis on which to continue to plan for continued expansion and the impact must first be assessed to allow more accurate planning.

Transport

- 10 7,650 dwelling are proposed in the LDP for NW Cardiff on strategic sites C, D and E. The LDP strategy suggests a further 2,500 could be built in this area if demand requires it. RLDP strategies suggest that these sites will be built. However, we submit

that the transport infrastructure policies in the LDP are already inadequate to support existing, leave alone an enhanced, level of growth with without any further improvement. For example, there are no concrete plans for extending the Western Bus Corridor to Cowbridge Road south from Bridge Road through Llandaff village and down Cathedral Road. Without such plans the Western Bus Corridor becomes of limited use to solving the transport problems of this part of the City.

- 11 What is needed is better connected, integrated and affordable public transport, engagement with existing communities to ensure less reliance on private vehicles and development of new communities with readily accessible facilities. Unless the Council takes a lead role on this now, Cardiff will continue to develop as an increasingly unsustainable city. Surely this is not an appropriate response to the current climate emergency nor to the wellbeing of future generations?

What is the Radyr and Morganstown Local Development Group?

- 12 The Radyr & Morganstown Local Development Group is a recently formed group of local residents, who take an active interest in the Cardiff LDP and its proposed revision. Due to its proximity and the many diverse impacts on our community we are particularly interested in the pace of delivery of both the extensive new housing and the proposed local services at Strategic Site C. A major concern is the area adjacent to Strategic Site C identified in the current LDP for potential future expansion. We strongly maintain that this should remain “potential” under any revised LDP until it can be evidenced that a) there is an absolute need for this greenfield area to be offered up as a candidate site for development and b) the infrastructure, facilities and local services in connection with Strategic Site C have been provided.
- 13 We are however mindful of the needs and aspirations of the city of Cardiff as a whole and recognise the requirement to revise the LDP from time to time in order to maintain its relevance, monitor progress and establish a programme for the near future. It is our wish and intention to work together with other interested groups and our elected representatives to ensure the revised LDP provides a justifiable, deliverable and sustainable medium term plan, which takes full account of the needs and well-being of affected communities.