

St. Fagans Community Council

12 Hollybush Close
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4 October 2023

Sent by e-mail.

Local Development Plan,
Room 219,
County Hall,
Atlantic Wharf,
Cardiff,
CF10 4UW

Dear Sirs,

COMMENTS ON THE PREFERRED STRATEGY

I have been instructed by my members to forward their comments to you regarding the proposed Cardiff Replacement Local Development Plan.

1. INTRODUCTION

According to paragraph 4.2 the preparation and content of the LDP will be judged against three tests of soundness:

- Does the Plan fit?
- Is the Plan appropriate?
- Will the Plan deliver?

In considering our response to the LDP we have considered whether the Plan, as outlined in the Preferred Strategy, can actually be delivered. If the Plan cannot be delivered it will not meet the tests of soundness.

It is our view that the Plan is unrealistic, over optimistic and based more on ambitions held by Cardiff Council than facts or needs. We have no problem with ambition, but when it is about matters that will significantly impact the lives of residents, we submit that it must be based in reality. That cannot be said about the Preferred Strategy.

2. POPULATION/HOUSEHOLDS

The Preferred Strategy is based around a Plan to build 1,600 new homes per annum over a 15-year period. The Plan is already behind schedule: in the two years to 31 March 2023 there were 2,596 completions, a shortfall of 604. Optimistic statements about the number of completions increasing are not supported by the current realities. According to Land Registry statistics sales across Wales and Cardiff are falling, and are more than 20% down on 2022. Major house builders have made numerous public statements about reduced build rates in the next few years. This then raises the average completions needed per annum in future years. The current LDP has made Cardiff very reliant on a few large developers for housing delivery. They will not begin or complete properties unless there is a market. There is currently considerable economic uncertainty. Mortgage costs have

risen, as have other basic living costs. Mortgage rates may now be stabilising, but it will take time before confidence returns. This will continue to impact house sales for some time.

We appreciate that work on the strategic sites started slowly, at least in part due to the time taken to put the planning applications and associated matters in place. Even now, several years after adoption, progress is still slow. The RLDP will include new sites which will need to go through the same processes before work starts. Is it assumed that this will be quicker than for the current strategic sites? If so, what is the basis for this optimism?

The Preferred Strategy acknowledges an obligation to use Welsh Government (WG) housing and population projections as a starting point when setting levels of growth in the RLDP. A departure from these projections must be justified by demonstrable evidence. The Preferred Strategy is Option B, which significantly exceeds WG projections for population growth, housing needs and jobs, but does not provide evidence to support this stance.

The population growth assumed by Option B, 39,700, is more than twice the last WG projection. The WG projections are from 2018 but the results of the 2021 Census lend greater credibility to their position than the numbers used in the Preferred Strategy. Indeed, WG projections could well be revised downwards (not upwards) to take account of the lower population and household growth in Cardiff over the last decade, as shown in the 2021 Census. This could mean that the discrepancy between Option B and the WG forecasts will be wider still, and there may be difficulty in getting the RLDP accepted.

Cardiff Council assume a high level of net inward migration. Edge Analytics has suggested that “international internal migration” is likely to reduce over the next 10-15 years. We have seen no evidence to suggest that inward migration from other parts of Wales or the wider UK is likely to grow. On the contrary, there has actually been outward migration from Cardiff to other parts of the South East Region (e.g., Newport and The Valleys) over the last decade, possibly driven by high house prices in Cardiff.

The 2021 Census revealed an average household size of 2.46. The Preferred Strategy assumes a size of 1.65. This is a difference of 32%. What is the basis for the discrepancy? It appears to have no basis other than a need to justify a particularly high number of new households (and hence houses) required.

The 2018 WG projection is that Cardiff requires an additional 13,500 homes over the plan period, equivalent to 900 per annum: Option B states a requirement for 24,000 or 1,600 per annum. This is an increase of 78%. WG projections are dismissed on the basis that they “are based on the last 10 years when we have seen an under provision of housing to meet our housing needs”. That is a completely illogical statement. ‘Need’ and ‘provision’ are not the same; there is no direct correlation between the two. Projections are forward not backward looking.

As stated above, Cardiff is already behind in its aim to deliver 1,600 homes annually. There is no basis for believing that it can deliver this number of homes on a consistent basis. It is higher than delivery in the previous 15 years (1,070), 10 years (832) and 5 years (1,044). The Preferred Strategy states that Edge Analytics, who were commissioned to produce options, have pointed out that 1,600 is almost twice what Cardiff has delivered over the previous 10 years. A strategy that cannot be delivered will not meet the tests of soundness.

The Preferred Strategy uses selective quotes from Future Wales rather than hard facts. It is claimed that Option A is in line with WG projections “but does not provide sufficient growth to meet the Welsh Government aspirations in terms of Cardiff being in a National Growth Area”. The statement is correct in that Cardiff is in a “National Growth Area”, but the key word is “in”. The National Growth Area is much more than Cardiff, which represents around 24% of the Region’s population. Future Wales contains no specific details on what level of growth is expected from Cardiff.

Future Wales mentions 66,000 additional houses in the South East Region between 2019 and 2039 - 3 years beyond the RLDP period. Option B aims to provide 24,000 additional homes over 15 years - more than 36% of the Future Wales requirement for the Region over a 20-year period. Not every settlement will be expected to grow at the same rate, but Cardiff appears to be claiming a disproportionate level.

UK population is predicted to increase by 5.4% over the period to 2036. Again, change will not be uniform across all parts of the country, but how does Cardiff justify planning on the basis of population growth twice the predicted UK average?

Table 2 claims a Total Housing Provision of 26,400 (including 10% Flexibility Allowance). The Total Housing Supply is 26,693, more than the Provision. While we believe that Option B is over ambitious, and question whether it can be achieved, it is clear from the Council's own calculations in the Preferred Strategy that no new greenfield sites are required.

The Preferred Strategy uses Future Wales to support the choice of Option B, but we suggest that that Strategy is not consistent with Future Wales. Aside from our comments above, there are other areas. Future Wales requires a near 50/50 split between affordable and market homes. The Preferred Strategy aims "to deliver 5,000 to 6,000 affordable homes depending on the make-up of the sites". This only comes close to the Future Wales requirement for a 50/50 split if the WG projection of 13,500 homes is agreed. Put against the Preferred Strategy number it falls well short of the Future Wales requirement.

SP11 (10.73) mentions the draft Local Housing Market Assessment which identifies an "annual overall additional net affordable housing need of 1,090 per annum over the plan period to 2036". We cannot see how a Preferred Strategy which aims to deliver up to 6,000 affordable homes is compatible with the assessment.

There are 8,000 on the Cardiff housing waiting list. The proposed number of affordable homes will not clear the waiting list. This is hardly consistent with the supposed aim of a "Fairer" Cardiff.

3. GREENFIELD/BROWNFIELD

We support the intention to focus newly approved development on brownfield rather than greenfield sites. There are many advantages to brownfield development, as outlined in the Preferred Strategy. Thriving local and district centres are vital to creating sustainable neighbourhoods, supporting renewal and regeneration of areas, helping to reduce inequalities, supporting and encouraging enhancement of local infrastructure and facilities, reducing the need for car journeys and creating a 'community spirit'. The provision of facilities and housing for all age groups, including older person's housing, encourages families and friends to stay close and maintain friendships and relationships.

Much is often made of the extra financial cost of brownfield sites compared to greenfield. Greenfield development also incurs financial costs, but not all costs are financial. Greenfield development comes at considerable non-financial costs to Cardiff and residents. This must not be ignored.

Greenfield development is incompatible with many of the statements in the Preferred Strategy. 10.93 describes Cardiff's countryside as "a valuable and finite resource which is under increasing pressure from all kinds of development". Some of that pressure has been created by the current LDP.

SP18/10.115 states that "Trees and soils act as substantial reservoirs of carbon, sequestering atmospheric carbon and contributing substantially to soils, which accrete carbon faster under tree cover. This carbon will usually be emitted as a greenhouse gas if trees are removed or damaged, or soils removed, covered, or disturbed." This is precisely what happens with greenfield development.

SP19 states that development will be expected to "protect and enhance.....green infrastructure assets.... provide 'Net Benefits for Biodiversity' and ensure the resilience of ecosystems can be maintained." We suggest that this is impossible for greenfield development, which requires removal of mature trees and hedgerows and removing and/or covering soil.

When are the 'Net Benefits for Biodiversity' expected to be delivered? The city has declared a climate emergency. We read one application recently which said that "mitigation planting would provide some positive

change to land use which will increase by year 15". In an emergency 15 years is a long time to wait! We assume that a Climate Change Impact Assessment will be requested for all developments. It takes many years for new planting to provide the benefits of mature trees and hedgerows: and planting often doesn't happen until several years after the mature infrastructure is removed.

The latest Climate Change Committee report (June 2023) states "Planning policy needs radical reform to support Net Zero.... The planning system must have an overarching requirement that all planning decisions must be taken giving full regard to the imperative of Net Zero". This is a clear mandate to protect trees, hedgerows, fields, wetlands etc. whatever the claimed added cost of brownfield development.

We strongly support the allocation of large amounts of land in NW Cardiff as "countryside to be enhanced and protected" but ask why this valuable land is not being given greater protection.

For the reasons stated, we believe the no future greenfield development should be approved. Candidate Sites 23 Plas Dwr Uchaf and 61 Goitre Fawr are greenfield sites in North West Cardiff. There is no justification for either site on the basis of population growth, even as reserve sites.

Candidate Site 23 Plas Dwr Uchaf does not meet the criteria for development stated in the Preferred Strategy. It is greenfield, within an area designated as "countryside to be protected and enhanced", is crossed by public footpaths and provides valuable open space for residents. As Preferred Strategy 10.93 states, our countryside is a "valuable and finite resource". Large areas of Cardiff countryside are already being lost due to the current LDP. "Stronger, Fairer, Greener" and One Planet Cardiff will be meaningless if further greenfield sites are given up to developers.

The site includes the Ty Du Moor SSSI, one of the best remaining areas of marshy grassland in the Cardiff area. It contains many marshland plants and grasses including rare species. The site is also home to several Sites of Importance for Nature Conservation (SINC), including Nant Rhydlafar, Nant Dowlais, Coed y Glyn and Ty Du Marsh. Nant Rhydlafar and Nant Dowlais streams provide water to the SSSI. The area is home to several protected species, including horseshoe bats, barn owls and great crested newts.

How will these sites and protected species be protected if the site is accepted for development? Future Wales Policy 9 states that "protected sites should not be seen as islands.....but as nodes as large scale resilient and functional ecological networks and green infrastructure." This alone should cause the candidate site to be rejected.

Candidate Site 61 Goitre Fawr is also within an area designated as "countryside to be protected and enhanced". Similarly, it is crossed by well-used public footpaths and is a piece of countryside that the Preferred Strategy acknowledges is a "valuable and finite resource which is under pressure from all kinds of development". The words in the Preferred Strategy mean nothing unless they are put into practice.

The site includes four SINCs and borders the Penrhos Branch Line nature reserve.

Acceptance of these sites would not conform to Future Wales: for example, Section 4 Strategic and Spatial Choices: Future Wales spatial strategy which states:

"Choosing to develop new towns or enabling sprawling greenfield development would be to ignore the untapped potential of places which already have town centres, universities and colleges, public transport infrastructure and a good range of public services. It would also squander key assets in the form of productive countryside and natural resources".

There are other Candidate Sites that if accepted will lead to greenfield development and the loss of valuable open space, for example site 24 Land Archer Road North Ely. These sites must be rejected. According to the City's own analysis in the Preferred Strategy "no new greenfield releases are necessary" (10.8).

Brownfield development supports existing communities and helps them to flourish. Small businesses, retail and leisure, benefit from thriving local populations. These communities are more likely to be sustainable as they build on existing relationships and infrastructure. Greenfield development creates new communities but takes much longer to become sustainable. North West Cardiff strategic sites are mostly currently unconnected ribbon development along Llantrisant Road with few, if any facilities, poor public transport, incomplete walking and cycling routes, with no sign of significant improvements in the next few years. If Cardiff is serious about wanting more people walking and cycling joined up routes are essential. Incomplete or interrupted routes will not encourage use.

Section 6 mentions a “commitment to raising the City’s tree canopy and biodiversity areas from 19% to 25% of total land use”. We admire and support the commitment, but it provides a strong argument against any further allocations of greenfield sites for development. Every field covered up or tree felled takes the city backwards.

The same section mentions maintaining and enhancing “a diverse urban forest”. How is “urban forest” defined?

4. AIR POLLUTION

Particulate Matter (PM) is a serious health problem in Wales (and most of the world). Air pollution is often associated with exhaust fumes but non-exhaust emissions resulting from braking, tyres, and road surfaces, are major contributors to both PM2.5 and PM10. Studies vary but non-exhaust emissions account for up to 85% of PM2.5 and up to 90% of PM10. Electric vehicles are heavier than conventional vehicles and so generate more PM. The move to more electric vehicles will not solve Cardiff’s air quality issue. Nor will development in greenfield areas with poor public transport. Development in areas with existing good public transport will make a positive contribution.

5. TRANSPORT

We understand and support the Council’s wish to reduce car use. To achieve this, good active travel routes and public transport must be available. SP16 and SP17 offer little that is substantial and consist mainly of platitudes and wishful thinking.

The Council’s Transport White Paper, now 4 years old, acknowledged that the new communities in the west of the city “are currently poorly served by public transport” but very little has happened since then to improve the situation. The White Paper outlined a 10-year plan. What progress has been made in the 4 years since the plan was published? We see no signs of a Bus Rapid Transit (BRT) system - bus lanes are not BRT. We welcome bus lanes if effective, but they cannot be the whole solution and proposals are needed to deal with bottlenecks such as Cathedral Road and Llandaff Village.

SP17 states that infrastructure projects for North West Cardiff “may include a Bus Rapid Transit and tram-train connecting the communities of Llantrisant, Talbot Green and Cardiff”. “May include” offers no certainty or solution. If these ever happen it will likely be well beyond the RLDP period.

Improvements to the Core Valley Lines from Radyr will offer an improvement but many of the current LDP sites in NW Cardiff (and Candidates Sites 23 and 61) are not close to Radyr station. The improvements are likely to be of more benefit to residents from outside Cardiff travelling to and from the city. While this may reduce their car journeys it does not support NW Cardiff communities.

Living in NW Cardiff, residents see more effort going into endless digging up and resurfacing of Llantrisant Road than in delivering public transport improvements. The layout seems to change regularly, suggesting there was no clearly defined plan at the outset.

Other issues: the Preferred Strategy does not offer integrated ticketing. Cardiff Bus in their 2022 report stated that the bus station closure in 2015 is still causing reduced passenger numbers (around 10%). The coach station

is located some distance from the railway station and discourages people with luggage using the train to get to and from their coach. The coach station is not well lit at night, making it dark and unwelcoming - hardly consistent with an integrated transport policy aimed at encouraging people out of cars and onto public transport.

6. INFRASTRUCTURE

The Preferred Strategy identifies Essential/Enabling Infrastructure which “needs to be delivered prior to or from the commencement of the relevant phases of development”. This is similar to the statements about Category 1 infrastructure in the current LDP. Transport is essential, so too are utilities such as water and sewerage.

The statements made by both Cardiff and DCWW regarding sewerage during the previous LDP process were both incorrect and misleading. For example, in their submission to the Hearings on 23 January 2014 for Site C DCWW spoke of improvements that “were not insurmountable to the delivery of the site”. While the planned growth “would exceed the design capacity of the waste water treatment works that serve the site” no mention is made of the need for an additional off-site pumping station. In their Infrastructure Plan, Cardiff only mentions “Upgrading of the Cog Moors Waste Water Treatment works”. Significant disruption is now resulting from the failure to properly analyse and identify the real utility infrastructure requirements. We suggest that the City has a responsibility to ensure that the developers and service/utility providers conduct a full and open analysis of required infrastructure prior to submitting a planning application. The analysis should be part of the planning application. No further development in NW Cardiff should be considered until all problems have been satisfactorily resolved for the long term.

What this situation highlights is that Essential/Enabling infrastructure is not being delivered “prior to or from the commencement of the relevant phases of development”. Section SP3 d) iv states that Master planning will “set out the provision of necessary infrastructure and utilities”. Given that Master planning failed to do this for the existing LDP, where is the confidence that matters will be different for the RLDP?

SP4 states that “Developments must ensure no undue effect on the amenity of neighbouring occupiers and connect positively to surrounding communities”. We welcome the intention, but we regret that it has not been applied to the existing LDP. We doubt that the residents of Llandaff North, faced with a pumping station on an area of land given to the city for recreation purposes would feel that there is no “undue effect” on their community. The pumping station in Hailey Park and an electricity sub-station in St Fagans both result from the Plasdwr development. Neither requirement seems to have been identified at the outset, despite the supposed Master planning. Will this commitment be kept if future development somehow demands that new infrastructure is required and developers want to site it outside the development area?

Section 7 Vision and Objectives, Objective 3 states “Consider a Community Infrastructure Levy (CIL) as a mechanism to secure infrastructure investment associated with qualifying developments”. The city is long overdue in adopting CIL. We and others have previously argued that Cardiff has missed out on considerable funding by refusing to adopt CIL for the strategic sites. The policy seems to have been S106 or CIL, whereas in fact they can be used together.

7. SURFACE WATER/FLOODING

SP18 deals with climate resilience, de-carbonisation, and renewable energy in new developments. Section 6 describes trees as “a valuable visual and environmental resource..... retaining soil, intercepting and storing rainfall”. But the statements in 10.116 are weak: “As far as possible trees should be retained and protected, and land kept as functioning vegetated soil.” The statement is meaningless when greenfield developments are allowed - land cannot be kept as “functioning vegetated soil” when it is built on!

10.116 also acknowledges that “Open vegetated soils absorb rainfall and runoff”. Loss of “vegetated soil” means less rainfall is absorbed and runoff increases. New plantings do not immediately deliver the benefits of

mature vegetation. Despite the reassuring statements from developers about managing runoff residents are experiencing increased runoff on roads and pavements. This can create dangerous conditions.

North West Cardiff is well known as an area of underground streams and springs. It was inevitable that surface runoff would present a problem. Solutions put forward and accepted have a lack of clarity and certainty: solutions rely on an “unnamed watercourse” with uncertain flow. For example, “Flow from this point is assumed to go through a series of culverts and open channels before eventually outfalling into the River Ely (survey required to confirm this)” or in another application “is thought to be a tributary of the Nant Dowlais”: “thought to be” offers no certainty. This tributary drains into Ty Du Moor SSSI. No assessment is made on the impact on the SSSI. When does the City intend to start protecting valuable green infrastructure?

Future Wales states that projections show an increased chance of “milder wetter winters, hotter, drier summers, rising sea levels and an increase in the frequency and intensity of extreme events”. The Cardiff sea level is projected to rise by 24cm by 2050. We cannot find a commitment in the Preferred Strategy to require all developments to meet the requirements of the new TAN 15 and, for example, consider the 1 in 1000-year event.

8. WHAT COMES FIRST?

The Preferred Strategy lacks clarity on key issues. When land is designated for mixed use, what comes first - houses, shops, commercial units? Is it the intention to continue to build houses without providing nearby facilities and job opportunities for many years (as is currently happening on the strategic sites)? The RLDP appears to put population increase before anything else, including jobs. We suggest that jobs should come before population increase: a thriving economy will attract people. People without jobs does not work.

Yours faithfully,



Hilary Dyer

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