

# COMMENTS ON THE CARDIFF REPLACEMENT LOCAL DEVELOPMENT DEPOSIT PLAN

## Radyr & Morganstown Local Development Group

1. Radyr & Morganstown Local Development Group (RMLDG) broadly supports the Deposit Plan (DP) whose Strategy is a realistic response to the National Plan for Wales (Future Wales), Cardiff Council's One Planet Strategy, declared in 2019 and the City-wide nature emergency declared by the Council in 2021.
2. There are three areas, however, where we have concerns – population growth projections, house build out rates and transport infrastructure.
3. The Deposit Plan proposes to increase the population by 39,742 by 2036 by the construction of 24,000 new homes on a mixture of 50:50 greenfield and brownfield sites. These houses will be occupied by 23,103 households. The 2021 Census shows that in the decade 2011 to 2021, the number of households grew in Cardiff by an average of 500 per annum. The Deposit Plan projects the number of households to grow at an average of 1,500 per annum. This is three times the actual growth experienced between 2011 and 2021, yet there is no clear rationale as to why this is likely to be the case.
4. This strategy is of necessity based upon Cardiff Council's own view of the growth of the City given the absence of any household or population projections for Wales and individual districts since 2018 from Welsh Government. We submit that Welsh Government is failing in its planning duties by not updating population and household projections from the existing 2018 baseline, especially in the light of the results of the 2021 Census and the fact that these Census results showed that the projections for 2021 were almost 2% higher than the actual. Nevertheless, this does not preclude Cardiff Council from the need to set out the rationale to justify their population growth projections that are more than double the Welsh Government 2018 Principal Forecast, and household projections that are three times the actual growth experienced by Cardiff over the last decade 2011-2021.
5. The Strategy of the Deposit Plan (DP) is in broad compliance with the National Strategy for Wales; Future Wales, which requires 66,000 houses to be built in the SE Wales region between 2019 and 2039. However, we have examined the proposals in the RLDPs being proposed by surrounding Local Authorities (RCT, Vale of Glamorgan, Newport, Bridgend, Caerphilly and Monmouthshire)<sup>1</sup> and these suggest a total of 40,725 homes in addition to the 24,000 being proposed by Cardiff. So, 64,725 already allocated up to a variety of end dates between 2033 and 2037, excluding Torfaen, Blaenau Gwent and Merthyr Tydfil. Moreover, Cardiff represents less than 25% of the total population of SE

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<sup>1</sup> *Bridgend RLDP has been adopted*

Wales, yet it is proposing to build 40% of the Future Wales requirement for the SE Wales region. Growth in Cardiff will, therefore, inevitably come at the expense of other areas within SE Wales. We ask the question whether this is acceptable in the regional context? Indeed, the Welsh Government in their comments on the Preferred Strategy (5 October 2023) indicated that there was insufficient evidence to show that Cardiff had taken into account the strategies of neighbouring areas in the SE Region. We would argue that this is still the case.

6. It has to be said, however, that the credibility of Future Wales as a national and regional planning strategy is in doubt given the changes that have taken place since it was produced, especially the lack of any population projections. For example, the latest mid-year population estimate showed the city had a population of 369,202. In fact, the 2021 Census figure states that the population Cardiff in April 2021 was 362,400.
7. We strongly support the strategy in terms of the clear lack of need for any new green field sites. As the Plan shows, of the 26,400 new homes proposed 6,618 have already been built or are under construction by April 2024, and 12,070 are already in the current residential land bank.
8. We do, however, have concerns about the build-out rate proposed within the Plan. The Deposit Plan assumes a build-out rate of 1,600 dwellings per annum. Yet over the last 10 years, an average of only 1,047 dwellings per annum have been built. Things have improved slightly over the last 5 years, with an average of 1,240 dwellings per annum. Whilst it may be argued that a higher proportion of smaller dwellings such as flats may make this target a little easier to achieve, it is still a significant 30% increase over the last 5-year average and a massive 55% increase over the last 10-year average.
9. We also note the Council's current estimate that more than 1,500 homes planned for the Plas Dwr Strategic Site will not be completed by 2036. This means that only around 70% of the "garden city" will be built 20 years after it commenced. We are worried about the implications of this for the delivery of important infrastructure such as shops, schools, medical facilities etc. There are also significant implications for placemaking and a sense of community. What steps will be taken to review the "trigger points" to ensure that important infrastructure is provided, despite this delay in house building? Only when this infrastructure is fully delivered will the "garden city" vision be delivered.
10. With regard to "reserve sites", we believe that there is no need for any greenfield sites to be included in a reserve list, as Plas Dwr will still be more than 1,500 houses short of completion by the end of the Plan in 2036. If further land is needed, completion of Plas Dwr should be the priority.
11. Given that there are more than 8,000 people on Cardiff Council's housing waiting list the proposals in the Preferred Strategy "to deliver 5,000 to 6,000 affordable homes depending on the makeup of the sites" is disappointing and is contrary to Future Wales' policies that at least 50% of the 66,000 houses in the South-East Wales region "need to be home affordable." However, we accept this may be realistic given the low availability of finance for building such homes.

12. We particularly support Policy SP17 Managing Spatial Growth through Settlement Boundaries. This policy will make it clear to all where development will and will not be permitted and will impose a strict control on development of the countryside.
13. In terms of candidate sites, we support the rejection of sites 23 (Plas Dwr Uchaf), 61 (Goetre Fawr) and 80 (Cwm Farm) which were proposed for housing on the basis that:
- the sites are outside settlement boundaries proposed in SP17;
  - they are clearly not needed for further housing need;
  - current demand for housing on allocated strategic sites is low;
  - each of the sites has clear environmental and natural advantages (including a SSSI and many SINCs) and their development would be against the Council's One Planet Strategy and Nature Emergency ;
  - Cwm Farm is located within the "Green Wedge".

### **Countryside**

14. We are delighted to see that, notwithstanding the above comments, the DP proposes no new greenfield development over and above the Strategic Sites in the current LDP and also that para 6.131 states that Cardiff's countryside is a "valuable and finite resource which is under pressure from all kinds of development due to its proximity to the urban area.....Cardiff's countryside is particularly vulnerable to the cumulative impact of new developments that may harm its character and appearance."
15. In this regard it is particularly encouraging to see that the DP allocates considerable amounts of land in NW Cardiff as "countryside to be enhanced and protected." This is to be especially welcomed in Radyr and Morganstown which has a very low level of public open space. We would like further clarification of how these areas will be "enhanced" and the specific "protections" they will be afforded.

### **Transport**

16. In our view, the policies relating to Transport in the Deposit Plan are weak - paragraphs 7.401 to 7.435. The detailed policies T1 to T6 are based on some heroic assumptions which do not seem realistic in NW Cardiff. We fully understand that these policies are based upon the Council's Transport White Paper (TWP) but this is now five years out of date and only contains vague cost estimates. It is difficult for even an optimist to see that much of the proposed Cardiff Cross Rail tram-train line will be complete - or even started - by 2035 (The White Paper states that it will be complete by 2030). In the White paper's own words the "new communities in the west of the city.....are currently poorly served by public transport" yet the DP does nothing to improve this situation.
17. Improvements to the Core Valley Lines, which policy T3 particularly relies on, from Radyr from 2025 will help a little and the increase in daily seats from approximately 15,000 to

32,000 is to be welcomed but many of these will be occupied by passengers from north of Cardiff.

18. The proposals to improve the level of active travel are welcome yet ignore the hilly topography and lack of pavements in North West Cardiff which deters less-active members of the population. The key has to be full integration of active travel, bus and car into fixed rail in the suburbs with integrated ticketing. The improvement of bus services in the North West Corridor is important and the provision of bus lanes in Llantrisant Road is welcome but the DP contains no detailed policies to indicate how bus times will be improved through current bottlenecks of Llandaff and Cathedral Road.
19. Our detailed comments on the Candidate Sites will be sent separately.

## **Conclusions**

20. We fully support the strategy of the DP centred on no new greenfield development over and above the Strategic Sites in the current LDP and the proposed policy to manage spatial growth through settlement boundaries. We are also pleased to see the designation of large areas of NW Cardiff as “areas of countryside to be enhanced and protected”.
21. We also strongly support the rejection of sites 23 (Plas Dwr Uchaf), 61 (Goetre Fawr) and 80 (Cwm Farm) on the basis that the sites are outside settlement boundaries; they are clearly not needed for further housing; current demand for housing on allocated strategic sites is low; and each of the sites has clear environmental and natural advantages that should be protected.
22. However, we have concerns about the population growth projections, the proposed build-out rates and the policies concerning transport in NW Cardiff.

**Radyr & Morganstown Local Development Group**

**April 2025**