



THE RADYR AND MORGANSTOWN ASSOCIATION



GENERAL MEETING

In the Old Church Rooms and via Zoom on Monday 21st February 2022 at 7.30pm

Present: David Silver (Chair), Tom Evans (Vice-Chair), Nick Hawkins (Secretary), David Cargill (Treasurer), Anne Rosser, Ian Thomas, Cllrs Rod McKerlich, Clive Morgan, Vina Patel, David Suthers and Ralph Vaughan, and 90 members.

Apologies: Moy Lewis, Cllr Allan Cook, Geoff Saunders and Peter Umbleja

Introduction

The Chairman welcomed everyone to the meeting, being held for the first time both in person and via Zoom. Setting up the meeting had been a bit of a technical challenge but he hoped all would go well. He explained the way contributions from the floor (either in the OCR or via Zoom) would need to be handled.

He then introduced the speakers who would provide the background information on Cardiff Council's Revised Local Development Plan (RLDP) as a basis for further discussion. They were, Ian Thomas (RMA), who would set out the basic purpose of the RLDP and its timetable; Peter Fortune (Radyr & Morganstown Local Development Group - RMLDG), who would provide some detailed information on statistics (e.g. population growth) underlying Cardiff's proposals; Angela Gray (Chair, RMLDG), Stewart Burgess (Chair, North West Cardiff Group - NWCG), and Cllr Rod McKerlich (R&M Community Council) who would each state what their group was doing and suggestions for a joint way forward.

(Secretary's note: the presentations were necessarily detailed and largely covered material contained within the submissions recently made by each group to Cardiff Council as a response to the latest stage of the RLDP process. These submissions are attached as Appendices and the details are therefore not duplicated within these minutes. Additionally, the meeting was recorded and can be accessed via the General Meeting page of the Association's website -

<https://radyr.org.uk/rmassociation/meetings/>)

The Cardiff Revised Local Development Plan

Ian Thomas explained that the RLDP, when completed, will be the strategy which meets the needs of the City of Cardiff up to 2036. The existing LDP (which brought in Plasdŵr) will cease in 2025 when the RLDP comes into force. The City needs to be 'fit for purpose' in terms of having a sufficient number of dwellings for the predicted population growth but also covering other City-wide issues such as transport, services (schools, doctors, etc) and the environment. Part of the plan specifically impacts on Radyr & Morganstown and the surrounding district, where there are five sites being considered for inclusion for development. There are already concerns over the 'active travel routes' into Cardiff resulting from the present level of Plasdŵr development. Adding further housing in the North West Cardiff will worsen this position, particularly as there were no current plans to extend the new Metro system into this area.

Ian mentioned the concept of the 'Cardiff Capital Region (CCR)' which was intended to unify planning across all the authorities in South East Wales and, potentially, means that some housing development might be better placed in an adjacent authority rather than in Cardiff. However the RLDP did not appear to be taking this into account. Peter Fortune stated that the CCR had been established by the Welsh Government as a 'strategic development centre' with a potential growth of 66K houses.

Peter's presentation laid the basis for the biggest challenge to the RLDP - that the underpinning population growth figures are being overstated because they are based on out of date statistics (notably the 2011 census) and incorrect growth assumptions (e.g. inward migration has significantly dropped due to Brexit and the pandemic). Some of this might be corrected when the 2021 census material becomes available later this year but, in the meantime, he could see no need for the 'land bank' established in the present LDP to be extended further in the RLDP by the inclusion of extra sites.

Angela Gray spoke about the formation of the RMLDG which had been spurred on by the suggestion that a large area of Greenfield land and woodland (including Mardy Wood) adjacent to Pant Tawel lane was being earmarked for 1000 houses. This plot of land was included in the present LDP as a

‘potential development site’ but the proposal is for it to be elevated to a ‘strategic development site’, which would mean it would be built on even before much more of Plasdŵr is developed. The RMLDG is keen to keep in touch with Cardiff’s planning team and liaise with all groups who can challenge this proposal on whatever basis, notably need and environmental issues.

Stewart Burgess explained the background to the formation of the NWCG which had fought hard to modify the existing LDP. The main aim of the group had been to ensure the provision of adequate infrastructure before the building of houses but the offered advice had been ignored. He agreed that there was no real foundation for adding to the available land bank in the RLDP and pointed out that the existing LDP had been based on a 50:50 ‘modal split’ for travelling into Cardiff (i.e. 50% private vehicles and 50% bus, train, cycling etc). Because of the lack of substantial road enhancements leading into Cardiff (and, indeed, an inability to do so) there was no sign of the 50:50 split being achieved. Further development in NW Cardiff will only worsen the situation. He also highlighted the huge monetary gain that arose from valuing land as development as opposed to agricultural. The Plymouth Estates, in particular, stood to make many millions out of Plasdŵr and elsewhere. This was a strong motivator. Proper liaison with neighbouring Councils was essential. He concluded by saying that the NWCG needed a Secretary. Anyone interested in contributing to the group’s work should contact him.

Cllr Rod McKerlich said that his personal experience went back many years and he recognised that many mistakes had been made in trying to modify previous LDP proposals. These should not be repeated. It was essential for all parties to speak with one voice; the projected population growth figures needed to be challenged; and planning applications made on the back of LDP proposals should be looked at rigorously at the earliest opportunity. (In this context he noted the size and complexity of some applications which made challenging them a very difficult task which might not be possible without employing experts.)

Further comments were made from the floor following the presentations. David Cargill said that he had written to the Earl of Plymouth suggesting that current development proposals debased his forbears’ stewardship of the land. The response had been that that suggestion was nonsense. He also mentioned that there was a suggestion that Mardy Wood (q.v.) had been the subject of an earlier Conservation Order. A representative from Rhydlafar said they had formed a similar group and wished to be involved. Helen Lloyd Jones pointed out that just 8% of the Cardiff Area was green land, as opposed to 15% in London. There was a desperate need to prevent the loss of further green areas. The Chairman then asked for suggestions on a way forward. In discussion, the following ideas were put forward:

- There was a need for proper cross-community communication. Many attendees had not known about the threat to Radyr & Morganstown until shortly before the meeting and people needed to be informed. (*Secretary’s note: a flyer, of unknown provenance and suggesting that the Pant Tawel Lane had been purchased by Redrow and would be developed soon, had recently been circulated to a number of addresses. This had caused great alarm. Everyone present was given the assurance that this information was false.*) Could there be some sort of news sheet on the topic with contributions from all interested parties? Could this be funded by the R&M Community Council? Sharing the message via websites and social media was fine but excluded key sectors of the Community.
- Any campaign needed to be Community based and not politically based. The latter would obscure the message.
- Challenging the population forecasts was key.
- All groups must work together and speak with one voice.
- More people needed to get actively involved, particularly younger people. New ideas on which to base a campaign were welcome. Contact any of the contributing groups with any suggestions.

The Chairman thanked all for a lively debate and hoped that the discussions had laid the basis for everyone to start pulling together.

Minutes of the last meeting (22nd November 2021) and matters arising

The minutes were accepted as a true record. Regarding other planning matters, it was noted that Transport for Wales had still not responded to a request for information. A pre-planning application had been submitted for land at the rear of Ravensbrook. Both were being pursued by the Association.

The last meeting had made a request for ideas on the future role of the Association - what should it stop doing, what should it start doing? Further feedback was requested.

Treasurer's Report

The Treasurer reported that the Association's 2021 accounts had been audited and would be presented at the AGM in March. 2021 had been a difficult year for all but an Autumn Festival had been achieved, albeit raising less money than usual. Along with grants, the total income generated for both the Association and the Charity (Tenovus) was £7406, with £4528 being reserved for the Charity. Tenovus had raised a further £2000 during the Festival.

In 2021, costs exceeded expenditure by £2500, depleting the retained bank balance from £8172 to £5160.

The Treasurer commented that, in 2022 and in line with the RLDP discussion, the Association and other bodies would be involved with negotiations with Cardiff Council. Professional advice might be necessary and the Association would be looking towards the R&M Community Council for both the cost of that advice and production of leaflets for residents.

There were no questions.

May Festival

The Chairman reported that the Festival had been fully planned with nearly 30 events being run from 30th April to 15th May. Full details would be found in the programme which would be circulated in the forthcoming Radyr Chain, together with draw tickets for the nominated Charity, Headway Cardiff & South East Wales. Some events were as usual - the opening Fete and the closing Charity Concert - and some were new, such as a 'Happy Hats' parade from the War Memorial to Lychgate Gardens on the Band Holiday Monday, followed by games and the dog show. There was also a whole day of 'Brain Games' being organised by Cardiff University at Radyr Primary School. In short, there was something for everyone of all ages and encouraged all to get fully involved.

Platinum Jubilee Celebrations

The Chairman reported that he had been liaising with Allan Cook and the R&M Community Council and it was proposed to hold a major event on the Thursday, based at the Comprehensive School, which would include the lighting of a beacon, activities, food and drink, and, hopefully, fireworks. The R&MCC was setting up a Committee to consider other activities for the rest of the Jubilee period.

Election Hustings

Ian Thomas reported that the Association was organising two hustings - one on Monday 4th April for candidates for elections to Cardiff Council, and one on Monday, 25th April for candidates for the R&M Community Council. He reminded everyone that it was necessary to register to vote by 14th April (and the voting age had been reduced to 16) and that the elections themselves would take place on Thursday, 5th May.

AGM details - an opportunity to get involved

The Chairman reminded everyone that the next Association meeting would be the AGM, on Monday, 28th March. It was sincerely hoped that it would be in the Old Church rooms and, as usual, it would be possible to offer refreshments after the formal business. He emphasised that all positions on the Executive Committee were up for election and he hoped to be able to welcome some new members.

Any other business

The following subjects were raised:

- **Rubbish collections.** Concern was expressed at the new trial collection scheme, involving the use of multiple receptacles. It had been observed that some rubbish lorries had simply been emptying the contents of the different receptacles into one vehicle, thus mixing the content. Cllr McKerlich explained there had been some teething problems, including the breakdown of the specialised rubbish lorry which would have kept the contents separated. He also emphasised that the trial scheme was part of a consultation scheme. Nevertheless, the feeling of those attending was that things were not going well.

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- **Festival Charity.** The Chairman reported that the decision had been taken to extend the present nominated Charity's year (Headway, Cardiff and South East Wales) year to the end of December 2022. In future, the 'Charity Year' would then be aligned with the Association's financial year.

The Chairman concluded the meeting by thanking everyone for their attendance and also thanking Ian Thomas for setting up the joint OCR/Zoom environment. He noted the excellent attendance that had been achieved and wondered if this might be a possible format for future meetings. He invited comments.

Next Meeting

Set for Monday, 28th March - the AGM, as mentioned above.

(Note - this submission also contains the RMLDG submission as Annex 1)

Cardiff Council's Replacement LDP: Options Consultation

Introduction

This is Radyr and Morganstown Community Council's response to Cardiff Council's Strategic Options consultation, with regard to options for housing and jobs growth - and possible ways of providing for growth.

The Community Council welcomes the opportunity to respond to the consultation. In doing so, it also wishes to remind Cardiff Council that:

- the Community Council has an excellent relationship with Cardiff Council, in line with the Partnership Charter signed by both parties in April 2019.
- throughout the development of the replacement LDP, the Community Council will seek ways to strengthen its relationship with Cardiff Council and identify opportunities to work together during the life of the new plan, in order to protect and enhance our community.

To this end, we were very pleased to meet with Cardiff Council's planning officials on 3 February, to discuss the current consultation.

Radyr & Morganstown Local Development Group response

The Community Council is represented on the Radyr & Morganstown Local Development Group, which prepared the response attached at annex 1.

The Community Council fully supports that response - and congratulates the group for its work in preparing the document.

Additional comments

Apart from the Radyr & Morganstown Local Development Group's response, we wish to offer the following comments:

- we understand that Cardiff Council will await results from the 2021 Census to assist with the process of predicting population growth in Cardiff.
- we agree that Cardiff Council should consider as much available and accurate data as possible to assist with its planning of new housing. To this end, we understand and accept that the option chosen by Cardiff may not be any of the options set out in its consultation paper - but could be a different option, better reflecting the most up-to-date data.
- the data should include predicted changes to the size of the population already established in Cardiff - along with predictions with regard to migration of people into Cardiff and out of Cardiff

- the data should be used not only to predict the number of new houses required, but also the type of housing required. To this end, Welsh Government data with regard to changes in different types of households should be considered. For instance, single occupancy households are predicted to increase from 56,596 to 66,253 between 2022 and 2036. Any new housing should cater for those households - and should reflect the needs of those households with regard to location, local facilities, transport, lifestyle, money available to buy homes - and other factors.
- with regard to options for housing and jobs growth, Cardiff Council should bear in mind the fact that the Welsh Government has declared a climate emergency. A significant factor, therefore, should be consideration of the impact of new housing - and each option (such as brownfield or greenfield sites) on climate change. Options with the least impact on climate change (at construction stage and long term) should be preferred.
- with this in mind, we wish to draw Cardiff Council's attention to a recent Transport for New Homes report which notes that housing developments ² on former farmland are adding hundreds of thousands of extra car journeys to England's roads. The report further states that despite plans for vibrant communities with local shops, leisure facilities and community services, the visions of developers have not materialised.
- this is clearly a risk with regard to greenfield site development in Cardiff. As discussed during our meeting with Cardiff Council on 3 February, it will not be possible to guarantee that the proposed Plasdŵr District Centre (for instance) will be built. Rather, the developers can be required to market the site appropriately - but if no proposals for a district centre are received then the site (which is a significant area of land) could be delegated for more housing. This scenario would add to the car-dependency issues identified in the Transport for New Homes report.
- this, we feel, highlights the risks of building on greenfield sites rather than developing brownfield or windfall sites within established communities, where local facilities already exist (including good public transport services). We support the 20-minute neighbourhoods concept. And with regard to local facilities, we urge Cardiff Council to do all it can to avoid the loss of facilities such as public houses - many of which are at risk of being demolished to make way for flats.
- whatever is agreed with regard to the need for new housing, Cardiff Council should do all that it can to ensure that the housing is of good quality - and built within a reasonable timeframe. To this end, we urge Cardiff Council to consider the proposals set out in a Spectator article (26 June 2021) and to discuss, with the Welsh Government, how the problems identified in the article can best be addressed.

¹ <https://statswales.gov.wales/Catalogue/Housing/Households/Projections/Local-Authority/2018-based/householdprojections-by-localauthority-householdtype-year>

² <https://www.bbc.co.uk/news/science-environment-60245980> ²

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- we urge Cardiff Council to protect green spaces, especially woodlands and other spaces enjoyed by the public, and / or which provide green spaces for walking for leisure or to travel between communities. These space also offer habitats for wildlife. Cardiff Council should stand firmly opposed to any developer wishing to destroy such habitats (such as the land to the west of Pant Tawel lane, to the north of Radyr Golf Club - and the woodlands to the east of De Braose Close.
- similarly, we urge Cardiff Council to ensure that developments underway with regard to the current LDP deliver fully on the agreements with regard to green spaces, woodlands, wildlife protection, safe cycling, woodland walks etc.
- we find the Welsh Government's suggestion that the Radyr Station car parks should be 'candidate sites' to be strange. Loosing these car parks for housing would make it difficult for commuters to take the train into town, rather than drive. Above a certain distance, people will opt not to walk to the station, and will drive into Cardiff instead. Alternatively, drivers may park in the streets surrounding the Station Road area, reducing the parking spaces available for those wishing to use Station Road businesses - and making those businesses less viable. We urge Cardiff Council to reject this application.
- given the slow progress with regard to house-building in Plasdŵr, we urge the council to take a realistic view with regard to the number of houses likely to be built during the life of the replacement LDP. The land allocated for housing should reflect this - with no more land allocated for housing if the rate of building is unlikely to require it. Similarly, Cardiff should withdraw land allocated for housing from the current LDP (known in the current LDP plan as potential future expansion land), should the figures indicate that it would be appropriate and possible to do so.
- Cardiff should ensure the maximum possible section 106 contributions in relation to the replacement LDP.
- we support Cardiff's status as a National Growth Area. We believe that this status will offer welcome and exciting opportunities for the city's residents - and we look forward to working in partnership with Cardiff Council to ensure that Cardiff can develop as a great city. To this end, we refer Cardiff Council to the principles set out in our response to their previous consultation.

Radyr and Morganstown Community Council
17 February 2020

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 Radyr and Morganstown Local Development Group Comments on Cardiff RLDP First Revision 2021-2036 2 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 Radyr and Morganstown Local Development Group Comments on Cardiff RLDP First Revision 2021-2036 3 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.

North West Cardiff Group

Responding to the concerns of our communities

Creigiau Danescourt Gwaelod y Garth Llandaff Pentyrch Radyr & Morganstown St Fagans

Comments on RLDP Strategic Options Consultation

1. Existing LDP

There is much on which to fault the existing LDP.

Starting with the level of control Cardiff appears to have exercised over the developments that are progressing in North West Cardiff. The developers have been allowed to lay waste to significant areas of countryside, not least by the removal of many miles of mature roadside hedging and therefore the consequent loss of wild life habitat.

The Plasdwr development is advertised as a 'garden city' for Cardiff, but to date there has been no evidence of the provision of any gardens or parkland. No consultation appears to have taken place with the providers of health services as to how they were expected to cope with the increasing numbers of prospective users of their services and five years have now passed without the development of any of the community facilities that were promised. These facilities are the subject of S.106 Agreements drawn up between Cardiff Council and the developers but Cardiff Council's track record in actually securing the benefit of these Agreements previously leaves no confidence that Plasdwr will be treated any differently. Developers appear to be successful in belatedly claiming a lack of viability as a reason why S106 agreements can be abandoned, but these reasons are never explained publicly. Cardiff Council also decided that no CIL contributions would be required from the developers, despite the existence of a long list of required environmental improvements within the city. This leaves these improvements to be provided at the expense of the Council rather than at the expense of developers.

As Highway Authority, Cardiff Council is subject to a statutory legal requirement, subject to policy, to improve the efficiency of its highway network. There is no evidence to date of this work being undertaken and the only relevant 'policy' of Cardiff Council appears to be to ignore this legislation. Bus lanes and cycle lanes, which are grossly underused by the traffic they were designed to encourage, have been squeezed into existing road widths in many locations, thereby reducing the available road width for all other traffic and an accompanying reduction in road safety standards for all users. These measures certainly do not add up to any form of improvement in network efficiency.

Newly constructed roads are being built to only minimum width and roads that are widened to accommodate either or both bus lanes and cycle lanes require again only minimum width for the remaining carriageway. Legislation is currently passing through parliament that will make pavement parking illegal and subject to fining. If this legislation is enacted and drivers actually change their parking habits to park on the road, then in residential areas it will be almost impossible to safely gain access due to the narrow road widths. The policy of requiring only these minimum standards of road width must change.

When this NWCG complained to Cardiff Council that the LDP did not comply with the requirements of the Well Being of Future Generations Act, we were disappointed to learn that Cardiff Council felt it had successfully avoided the requirements of this Act by rushing through all the planning permissions for the LDP prior to the introduction date of the Act, despite full knowledge of the likely content of the then forthcoming legislation. Clearly this situation cannot be allowed to continue under the RLDP.

Hansard records that when the original Town and Country Planning Act of 1947 was discussed in parliament, "the object of town and country planning is to secure that all the land in the country is put to the use which is best from the point of view of the community." This requirement is now reflected in the content of the Well Being of Future Generations Act, and the RLDP must embody this principle.

It is common knowledge that the housing projection contained within the LDP of an increase 30,140 by 2026 was a gross over estimation. According to an article published by Wales Online, a more correct figure would have been 8,696, which is a reduction of nearly three quarters approximately.

A KPI in the LDP required 29201 new dwellings to be erected by 2026 across the strategic sites, an average of 2,920 each year. The figure actually achieved to March 2021 is recorded as being 6,472, an annual average of only 1,294. 2,368 is the highest house completion achieved in recent years, (in 2006) but the average for the last fifteen years was only 1,070. Another LDP target was for the construction 4,468 affordable homes by 2026, of which only 243 had been achieved by 2021. This level of performance by developers presumably reflects demand levels for their product and suggests that the previous LDP projection levels were indeed excessive.

The actual development in North West Cardiff has been poorly handled. Planning consent has been issued for tall property to be constructed very close to the highway on raised ground which results in a very overbearing result and will in future offer a poor introduction to Cardiff. We strongly believe the positioning of these tall buildings to be inappropriate. The alterations to Llantrisant Road seem to suggest the design work was given to a work study student with a brief to fit in as many variations of junction design as possible. The junction at Heol Isaf, with its slip road for traffic to turn left onto Llantrisant Road at a very slight angle has made it most uncomfortable for many people to twist their neck sufficiently far back to check the need or otherwise to give way to traffic and has led to a lot of complaint. The white painted roundabout at the entrance to the filling station is an accident waiting to happen and this feature should be removed. Drainage capacity also appears to have not been adequately assessed given the belated construction of attenuation ponds in the field adjacent to Herbert March Close, the need for which did not feature in any planning consent. The total number of traffic signal controlled junctions between Creigau and Llandaff will badly affect journey times into Cardiff compared to the more efficient roundabouts and are likely to deter the attractiveness to purchasers of the more outlying new developments.

2 The current consultation

We do not believe the arguments presented in respect of Options A, B and C have been presented appropriately. Option A claims to deliver an average of 1,267 new homes each year, but this is clearly excessive compared with previous developer performance. Options B and C are claimed to be in general conformity with Future Wales National Growth Area objectives, which raises a question of why Option A has been presented at all if it does not also so comply. All three options are claimed to deliver varying numbers of new homes, but no justification for the stated figures is offered, all of which exceed previous developer performance levels.

If the strategic development sites identified by the LDP are capable of accommodating all of the 30,140 housing need projection of the LDP, then given the excessive nature of this projection, and if the population projection for 2026 of 8,696 for Cardiff published by Wales Online was correct, there will be a capacity in 2026 for a further 21,444 dwellings remaining in the planning consents already issued. Using the 15 year average housing completion achievement above of 1,070 per annum, the current strategic sites will have capacity to accommodate this level of growth for 20 years, ie until 2046. The figure of 1,070 anyway exceeds the 2018 WG projected need for Cardiff of 900 houses per year, which suggests this level of activity is all that is required to meet need. This also suggests there is currently no need to identify any further strategic sites and that the three scenarios presented are therefore unnecessary.

Table 2 Item 2 suggests there is a current land bank of 13,185 potential new dwellings, but this does not tally with the analysis above which suggests a more likely figure is a land bank of around 21,444 new dwellings post 2026. The basis of this stated figure of 13,185 should therefore be explained.

Table 2 Item 7 states that 2,637 homes from the land bank are unlikely to be built "due to constraints and viability considerations". This is a significant proportion of the land bank, whether it be of 21,444 (12%) or of 13,185 (20%). How this figure has been derived is not explained, but the question that needs to be answered is why was planning permission granted for these 'lost properties'. In particular, why were these constraints and viability considerations not duly assessed during the consideration of these planning applications and perhaps also why were they not made apparent during that process. We have already commented above on the apparent success of developers to argue a lack of viability as a reason to abandon S>106 Agreements, but clearly there are legal reasons why should not be allowed.

Part 2 of your paper provides options for the provision of future growth.

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For the reasons we have outlined above we do not believe that any growth in housing provision over and above what has already been approved under the LDP is necessary during the currency of the RLDP.

Nevertheless, we will offer our comments on the options presented.

We strongly object to Option 1 because any extension of the existing strategic sites in North West Cardiff would further exacerbate the problems created by the LDP that we have already listed in our introduction. These include the loss of agricultural land and countryside, drainage problems, absence of sustainable development due to lack of infrastructure, not least transport infrastructure. Result to date of all this is simply increasing congestion levels and bottle necks on main roads and thereby increasing travel times. None of this is of any benefit to the health of the city.

Options 2 – 7 offer better prospects for healthy development and we can agree in part to each of these. We strongly support the regeneration of brownfield sites in that it is essential to remove urban decay. Much has been written about the ‘rust belt’ in the USA which exists due to the urban decay around the former industrial areas in Philadelphia for example and we do not want to encourage the development of a Cardiff rust belt by leaving brownfield sites behind to decay. To attract investment of any sort, Cardiff needs to be seen to be an attractive city to live and work in. Brownfield development also allows existing infrastructure and facilities to be used to their full potential as well as obviously protecting the existing greenfield areas by not seeking to develop them. The retention of greenfield sites clearly offer many benefits, not least for recreation and health.

Your paper lays out many of the benefits of redeveloping brownfield sites, but it also refers to “the costs associated with remediating brownfield sites could deliver less affordable housing to meet the need of families on the housing waiting list and those identifying themselves as homeless” and “less range and choice of housing sites and types. The only difference in cost that should be applied to the regeneration of any brownfield site is a reduction in land value, which is simply a problem for the land owner rather than the developer. Essentially the land owner, through reduction in land value, has to finance whatever remediation may be required, so that the developer only then bears the cost of the actual development. It is quite wrong to dismiss these sites on the basis of increased cost. We also cannot see why brownfield sites should not offer a choice of type of residence or for it to offer only limited choice as claimed by your paper.

3 Lost Opportunities

There have been several significant lost planning opportunities that have not been grasped by Cardiff Council whilst considering planning applications. For example we consider a link road should have been required across the BBC site in Llandaff in order to remove the present inadequate mini roundabout at the junction of Llantrisant Road with Cardiff Road and Bridge Street. Another is that an opportunity to complete the Eastern Avenue scheme was lost. We believe this should have been achieved by requiring construction of a new road from Ely roundabout to the A4262 Link Road across the paper mill redevelopment site. Cardiff would then have achieved the inner bypass that the Eastern Avenue scheme set out to achieve, but was curtailed by the abandonment of the Hook Road scheme fifty years ago. We do not know if either of these schemes was requested by Cardiff Council, but we hope they were not abandoned when Developers perhaps claimed a lack of viability in their development in order to avoid the provision of these schemes.

It is important that similar opportunities are recognised and grasped when future planning applications are receiving consideration.

4 Other Responses

The North West Cardiff Group fully endorses and supports the responses submitted by Cardiff Civic Society, Pentyrch Community Council, Radyr & Morganstown LDP Group and St Fagans Community Council

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