

North West Cardiff Group

Responding to the concerns of our communities

Creigiau Danescourt Gwaelod y Garth Groesfaen Llandaff Llantrisant Miskin Pentyrch Pontyclun Radyr & Morganstown
St Fagans

By Email to ldp@cardiff.gov.uk

February 3 2021

NORTH WEST CARDIFF GROUP COMMENTS RE CARDIFF REPLACEMENT LDP REVIEW REPORT

1. NWCG welcomes the opportunity to comment on the proposal to prepare a Replacement LDP - as the current one is not fit for purpose. We urge the Council to take on board our views, and the views of other resident and community groups. The Replacement LDP needs to set a new direction for development of the City, otherwise there is no point in wasting £1m on preparing it.

2. We have the following comments:

2.1 Cardiff's Replacement LDP (RLDP) should take account of the regional context. In the absence of an SDP the reviews of LDPs across the region need to be synchronised.

2.2 The Council should confirm the origin of statistics used in plan preparation, to help consultees assess the basis for the policies proposed.

2.3 Para 2.48 quotes the latest household and population projections from Welsh Government. For Cardiff these are 8% lower for population and 10% lower for household formation than in the LDP. These are significant changes from a year ago - when the household formation rate was reported to be - para 2.35 of the February 2020 Review report - 5% lower than previously by 2026.

The Council must make a judgement based on those projections and other relevant factors to produce a new LDP that helps create a more live-able and sustainable City taking into account the current very large housing land bank (24k - para 3.19). The new plan must encourage a wider range of house types and tenures, all with much better energy efficiency, not the current focus on numbers and private ownership/private rental when around half of demand is for good quality, low cost, homes for rent. We suggested at the LDP Examination in Public that all new properties should be fitted with at least one solar panel. Failure to require this was a missed opportunity, so we were pleased to note (para 3.59) that renewable energy will get higher priority in the RLDP.

2.4 According to para 2.52, employment is showing 'a continuing strong performance'; 20,900 jobs have been created in Cardiff since 2006. This may well double-count

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employment in firms that have moved within the City to Central Square and St Mellons such as BBC Wales, Hugh James Solicitors, Cardiff University and Brains Brewery, so we would welcome a breakdown of gains and losses by location. While we understand that this a review of what has already happened we question the optimism. Some of the increase in jobs has been in low paid self employment. Para 2.67 lists COVID-19 issues to be considered: impact on the economy and rising unemployment are top of the list.

2.5 Para 3.39 states that the Strategic Allocations (including those lining Llantrisant Road) are not delivering any employment land. They are not delivering any other facilities either, which means that new residents have to travel to and from them daily, mainly by car. NWCG considers that continuation of this type of developer-led expansion is unsustainable and is embedding poor travel choices.

2.6 Para 2.54 acknowledges that housing completions are below target, but para 2.56 shows optimism that housing completions will increase significantly from current levels. This optimism is repeated in para 3.18. This could well be misplaced in view of continuing economic uncertainty and the impact of COVID-19. We would be interested to see the evidence on which this claim is made. Any reduction in output of housing should not be used to justify further land releases in advance of a thought-through plan that develops real communities rather than housing estates.

2.7 Paras 2.59-61 refer to a reduction in car use for journeys to work with an encouraging increase in cycle use, but an **increase** in car use for journeys to education. The LDP will need to bring forward policies to reverse this trend and the linked increase in congestion levels. We also note that congestion increased by +1 % from 2017-8 (page 62, Annual Monitoring Report March 2019), and this had a negative impact on bus journey reliability - and thus bus use - and has reduced air quality. Congestion may have reduced in 2020/21 due to COVID-19 impact on travel and work and shopping, but we suggest that the longer term trend is uncertain.

With interest rates at a historic low it makes sense to invest in new cleaner public transport; we've waited too long already. We were dismayed to see that the hourly bus service to Rhydlafer along Llantrisant Road (no: 62) was provided by poaching one bus an hour from Radyr and Morganstown's service (no: 63). Further reductions in bus services are likely post-Covid - this is not the way to encourage use of buses instead of cars.

2.8 Para 3.50 suggests that the current LDP addresses national policy on sustainable travel adequately, albeit modified in the light of Covid. [Recent announcements by the Council re Congestion Charging do show a more radical approach to reducing car use for journeys to

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the City Centre, without convenient alternative options the City Centre will not retain its appeal.] Planning for, and funding of, transport infrastructure has been far too slow. The imperative for action in the light of the Climate Emergency, as well as the need to tackle the obesity crisis, make it vital that the Replacement LDP takes a fresh approach. It needs to phase better public transport and much improved provision for cycling **before** release of any more housing land.

2.9 Para 3.65 says that £165m has been raised from S106 from 2009-2019, part of which derives from North West Cardiff sites. This is a relatively small sum in the light of the scale of investment needed in transport infrastructure and social housing in Cardiff as a whole. Negotiations should be conducted by suitably qualified and impartial valuers (eg District Valuer).

Para 3.69 suggests that Community Infrastructure Levy (CIL - which was designed to raise a proportion of the funding needed for City-wide infrastructure) will only be considered for brownfield and small sites. This is clearly wrong. Whilst there are extra costs arising from opening up Strategic Sites, there are major costs in developing brownfield and smaller ones. The huge uplift in land values accruing to owners of any greenfield allocations in the RLDP **must** be subject to a substantial rate of CIL in order to deliver the strategic City-wide infrastructure needed for developing a sustainable City, including Metro. We fail to understand why Cardiff persist with a S106 or CIL approach when they can be used together.

Para 2.61 states that without significant delivery of new houses, transport infrastructure and early Metro delivery "it is too early to draw conclusions about policy delivery, particularly given that 50/50 modal split target relates to 2026". 50/50 modal split was said to be crucial to the success of the LDP. It is clear to us that that policy is not working now, and sustainable transport infrastructure is not being delivered quickly enough to deliver it in future. This **must** be addressed in the RLDP.

2.10 NWCG welcomes the acknowledgement of the importance to health and well-being of open space, but is dismayed to see the amount that is no longer "public" as its maintenance is to be paid for by new residents and its use is thus semi-private. We suggest that this practice should stop.

2.11 Para 2.67 lists the COVID-19 impacts that will need to be considered. The list includes "Need to deliver "critical infrastructure" in a consistent and joined up manner." This should be essential for any strategic development, not something to be considered as a pandemic impact. Failure to do this explains why strategic developments are not delivering the

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facilities and infrastructure required by residents. One result is car dependent estates (not sustainable communities), where the good habits the Council placed so much importance on are not being embedded upfront.

The list does not include the impact on housing demand. This is a serious omission.

2.12 Para 3.12 talks about 'revised dwelling needs' and requirement for new sites. There seems to be an inbuilt assumption that more sites will be required. Yet para 3.19 shows that there is an overall landbank of over 24,000. If dwelling need continues to reduce (WG household projections are 10% lower now than they were when the LDP was adopted) additional sites will not be required if production on the existing strategic sites is speeded up.

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Chairman, Stewart Burgess