



# THE RADYR AND MORGANSTOWN ASSOCIATION

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## Response by the Radyr & Morganstown Association to the Draft Vision, Issues and Objectives of the Cardiff Local Development Plan

Version 1.0 – 23 July 2021

### Background

The Radyr & Morganstown Association (RMA) is the independent resident's association which has been working since 1985 for the Radyr & Morganstown Ward of North West Cardiff with the aim "To make Radyr and Morganstown a great place in which to live and work"<sup>1</sup> The Association currently has over 500 members and is open to anyone who lives or works within this community.

### Replacement LDP: Draft Vision

The RMA broadly welcomes the proposed Draft Vision but with the caution that much of the concerns of local residents can only be addressed in the detail of the final plan rather than such a broad statement of the plan's vision.

We particularly welcome the aim to create "a greener, more equal and healthier city which is easier to move around and enhances the wellbeing of future generations"<sup>2</sup>. For us, the realisation of this statement would include improved regular links from all areas of the city to the city centre and between key areas of the city without having to utilise a congested city centre hub.

Where such links are served by Public Transport services they will need to be inclusive and Accessible in nature. These links will also need to function sufficiently to meet the expected needs of the citizens including the ability to travel to work in the hybrid post-pandemic world and to be able to access new and existing leisure and entertainment facilities across the city at the relevant times.

Such links should also include Active Travel routes that are sufficiently interconnected for citizens to travel where they need to go whilst feeling

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<sup>1</sup> <https://radyr.org.uk/rmassociation/>

<sup>2</sup> [Cardiff Replacement LDP – Consultation Paper on Draft Vision, Issues and Objectives](#), Pg4

The consideration of the impact on the environment that proposed developments make, in light of the Climate Change Emergency declared recently by Cardiff Council, should include both the direct impact of the construction process and the impact on the environment of the development being in full intended occupation.

The RMA again welcomes the vision to use “a placemaking approach, working with local communities to improve neighbourhoods to deliver high quality design”. This will require a robust approach to planning permissions using the full range of tools to ensure that developers meet their social requirements. The current Plas Dŵr development, although in an early phase, is showing that unless sufficient restrictions are put on developers through the planning process many residents will move into a newly developed space and rely on existing services if the pressure is not there for developers to provide promised new community areas, facilities and connecting infrastructure early within their development cycle at their own expense.

Full use also needs to be made of the Council’s powers under Section 106 of the Town and Country Planning Act 1990 to obtain contributions from developers “towards the costs of providing community and social infrastructure, the need for which has arisen as a result of a new development taking place”<sup>3</sup> where such facilities are not being fully realised by the individual development’s plans. These funds, once obtained, then need to be utilised by the local authority (where relevant through the local Community Council) to ensure that new or improved infrastructure is developed to meet the identified needs and not cause a detriment to the available services of surrounding existing developments.

High quality design is a great aspiration but only of use to the citizens if it is realised consistently and in a timely way within (and around) developments of all sizes.

## **Replacement LDP: Draft Objectives**

In the following sections the RMA attempts to address each of the Draft Objectives in turn. Where there are overlaps between these themes, some points have been addressed only once and may need to be read across themes.

### **Provide more homes to address future housing needs**

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Whilst understanding that Cardiff needs sufficient suitable homes to meet current and future housing needs, the RMA would like to see future decisions on what this need consists of to be made on the basis of robust and transparent evidence.

In a Post-Covid world, there must be a recognition of the increased need for housing and an environment around housing that supports working from home, hybrid working and de-centralised working in local hub/co-working premises. This is in the nature and size of properties developed and the facilities both within and near such properties.

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<sup>3</sup> <https://www.gov.uk/guidance/planning-obligations>

## **Provide more jobs and maximise Cardiff's role as a Capital City of Wales and economic driver of South East Wales to improve the prosperity of the region**

Cardiff's role as a Capital City, whilst important to the whole of Wales must not be at the detriment of the local residents. Suitable infrastructure must be developed to ensure that Active Travel routes and Public Transport infrastructure exists that residents want to use and feel safe using to access the opportunities for Work and Leisure that being a Capital City can offer.

To access this we wish to see an improved efficiency of the highway network in order to facilitate easier movement around the city by all forms of transportation (Public and Private).

There is also a need to improve the air quality within the county and consideration of all means to achieve this across the City.

Previous iterations of the LDP used the concept of the "Capital Region". With the introduction of the South Wales Metro increasing the ability to travel from "The valleys" into Cardiff on a regular basis for work and leisure, any planning for the "South East Wales Region" will need to see analysis across this region rather than bounded to the Cardiff City area. For example, with the opportunities that the Metro brings, the answer to increased housing for those who work within the City may well be best served by sites that are beyond the City's borders. We would like to see co-ordination between the Local Development Plans across the South East Wales region and any analysis of data to take into account the possibilities across this region not simply within the City.

## **Ensure the timely provision of new infrastructure to support future growth.**

As mentioned above, the RMA sees the success of the LDP in producing its Vision relying heavily on timely provision of new infrastructure. Measure must be in place to ensure that developers are required to produce all community and highway/access infrastructure early within the life of the project.

There should also be a requirement for developers to seek early and complete adoption of new infrastructure so that new developments are not left with poor quality infrastructure for which the cost of maintenance has to be born by the residents on top of their Council Tax.

In a Post-COVID world suitable infrastructure will include the ability to reliably work from home or local working hubs. This will include a need for affordable, reliable, high speed broadband to the home and to local working centres as well as to the traditional workplaces in the City Centre. There will also be an increased need for useable, reliable travel to and from "the office" and places of leisure throughout the day rather than at the traditional rush hour periods.

When combined with Objective 2 above there is a concern within Radyr & Morganstown that sufficient capacity is created within any planned infrastructure. We welcome the intention to develop the South Wales Metro and the proposed increases in rail capacity that should bring through the existing Radyr & Taffs Well railway stations do address the

current difficulty in accessing rail services at peak times. We hope that this growth can continue with new services that start from Radyr when required to further increase local capacity rather than relying on redundant capacity coming down from the Valleys.

We would also like to see a commitment to the development of more local things regarding access to service infrastructure. We were disappointed with recent announcements around the Metro that there is not currently any provision for a halt in Morganstown, leaving this area still disconnected from the rail network despite the disruption the area will face whilst the line through here is electrified.

## **Respond to the climate emergency so Cardiff becomes more resilient, reduces its carbon footprint and maximises opportunities for energy-efficient solutions**

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The RMA welcomes this as a key Objective for the new LDP. In particular we look forward to analysing proposals regarding the provision of infrastructure for cleaner vehicles across the city.

Whilst we support the location of developments in sustainable locations to minimise the need to travel and reduce car dependency, planning for new developments must not ignore the reality of car ownership in the 21<sup>st</sup> Century for families. Whilst sustainable travel options must be attractive to the residents there must also be sufficient space within new developments for cars to be parked. In fact, if we are to drive residents out of their cars on a daily basis then, more local storage will be required in order to keep the new bike lanes and other active travel options open and not turned into unofficial car parking spaces.

Whilst we support the idea to “promote an increase in tree canopy cover across the city” we would also like to see the maximised retention of existing green spaces and green infrastructure. This can be achieved by tipping the balance towards reuse of Brown Field sites over development of Green Fields and by planning conditions requiring the retention of existing green and blue infrastructure over a plan which decimates the existing with a promise of “new trees” when the developer is ready to implement this. Much of Cardiff has well established trees and hedgerows which considerate development should be around rather than through.

## **Makes the city easier to move around with a focus on sustainable and active travel**

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The RMA supports the creation of more and better active travel routes and usable Public Transport routes through and across the City as a driver to reduced use of personal car journeys.

The provision of suitable and sufficient infrastructure for increased home-working, hybrid working and co-working spaces outside the city centre also acts as a driver to reduce unnecessary journeys or driver citizens to make journeys at off-peak times, thus spreading the demand through the day.

Public Transport must also be joined up with its various forms and with Active Travel Routes. It is no use getting a bus into the City Centre if I can't then find where the next bus goes from. We need a working Transport Hub that interlinks Trains and Busses in the City Centre. We also need a de-centralised model that connects Bus and Rail at other locations on the edge of the City. Finally public transport needs to link with active travel allowing users to extend their journey to their destination at either end by safe active means. Connecting bus and rail to key active travel routes and ensuring carriage of bicycles and bicycle related infrastructure at key points to that a whole journey is possible using combined active travel and public transport, not just highlighted parts of the route.

### **Create healthier environments, reduce inequalities and enhance wellbeing.**

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In general, the RMA supports this Aim. Many relevant specific points have already been made under other headings, so will not be repeated here.

### **Support a vibrant, mixed-use City Centre, develop Cardiff Bay's full potential to provide core destinations for Cardiff and beyond and support the key role of district and local centres as the heart of local neighbourhoods.**

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These developments are supported by the RMA but will only be of benefit to the residents of Radyr & Morganstown if the infrastructure is in place for them to safely and conveniently access the provisions mentioned in this section at the relevant times of day.

We would also not want the through travel of visitors and workers from beyond the edge of the City to have a detrimental effect on access to services and facilities for local residents.

We support the development of local centres as the heart of local neighbourhoods offering an increase in services available near where people live.

### **Ensure that the city positively adapts to the new challenges posed by the implications of the pandemic**

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The Post-Pandemic world brings great opportunities as people look to keep those aspects of remote and hybrid working that have worked for them during this time. We have a key opportunity over the next few years to develop and deliver new services and work with developers to bring in more co-working spaces, spreading the load from the traditional City Centre whilst also making more of the City Centre as a destination place.

The increased trend of working from home, either full-time or for part of the day/week will mean an increased reliance on Broadband and other communications infrastructure beyond the traditional office spaces.

There are also opportunities as more work from home and seek good coffee and small meeting spaces near to home to avoid unnecessary travel into the City Centre purely to meet with colleagues.

Now is the time to steer the traffic movements and preferences of users for the future rather than sitting back and waiting to see what will emerge naturally within the existing broken infrastructure as that can only lead to a slip back to old habits.

Previously, trends in past habits have been a fair indicator of future intent. Coming out of the pandemic many individuals are looking to work differently. None of the measures proposed in this section seek to gather the aspirations and intentions of the individual involved for their future working and travelling practices. We would suggest that some direct, survey based, measures of future intention and desire for change should be included in the data gathering exercise alongside the proposed analysis of past trends in service use to take advantage of this emerging desire for change and ensure that individuals are not restricted from a step change by the currently available services and past trends.

**To use a place-making approach to create sustainable places, maximise regeneration opportunities, enhance the role of public spaces, ensure that future growth can be effectively managed and deliver new developments of high quality design.**

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Placemaking is a marvellous ambition but will only be successful if enforced. It must be enforced on developers as an early requirement within their plans at the developer's expense. For smaller developments where this is not possible, Section 106 of the Town and Country Planning Act 1990 must be used to its full effect. Together, these measures will ensure that developers are responsible for either providing the required facilities themselves in good time, or providing funds for the County Council and Community Council to be able to provide those facilities and services in good time and ensure that those surrounding any new development are not disadvantaged as their existing services are over-consumed by the new population before they can be provided for separately by new or increased provisions.

**Protect and enhance Cardiff's Green and Blue Infrastructure, its biodiversity and other natural assets**

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The RMA welcomes the proposed protection and enhancements to the key natural assets, particularly the river Taff as it passes alongside our area and leads many of our Active Travel routes into the City Centre, out to the wider countryside and to access other areas of the City.

Proposed developments should also protect the existing green infrastructure rather than clearing the existing and attempting to re-instate with fresh green-ness at the end of the project.

One of the best protections for our existing Green Infrastructure is to prioritise the re-development of brown field sites over the building on fresh green fields.

## **Protect and enhance Cardiff's historic and cultural assets together with supporting sustainable tourism and cultural sectors**

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In the RMA's view, it is important that the LDP provides enhanced protection for Cardiff's historic and cultural assets. This protection needs to exist at both macro and micro levels.

The protections for proper use of the Welsh Language in house and street naming is as important as the protection of individual buildings and topology

### **Final Comments**

To re-iterate the RMA's support for the renewal of the LDP and the broad agreement with the Vision as proposed but with the hesitation to do so as the detail of the full LDP is likely to be where our concerns are realised and will require further comment later in this consultation process.

The RMA also notes the call for Candidate Sites as currently issued, we are concerned that this means the new LDP will again be led by what Developers are seeking to develop and what is easy (and cheap) for those developers to work on rather than taking the more independent route from a Community Led approach to identifying sites with potential for development (or re-development). We would like to see the option for communities to propose Candidate Sites rather than proposals having to come from owners or potential developers of sites.