

# Cardiff Civic Society Local Development Plan: options for growth; preferred sites

## I. Introduction

1. This document is Cardiff Civic Society's response following the public consultation held 9 May to 10 June 2011 on the local development plan options for growth and possible development sites
2. Cardiff Civic Society has previously published a response to the consultation draft on the Delivery Agreement (23 July 2010) and three Green Papers: *Our five key challenges* (16 February 2011), *A vision for Cardiff in 2026* (3 May 2011); and *Towards a zero carbon city: a radical approach to city-region transport* (25 April 2011).
3. The CCS's response to the proposed delivery agreement suggested that consideration of development sites could only be undertaken after the identification of development 'strategic objectives'. This proposal followed the advice given by the Wales Government Planning Inspectorate in their "Local Development Plan Manual", June 2006. We restate our regret that the council's consultation has not followed this process: indeed since the publication of its own Delivery Agreement the council has conflated the public consultation for two distinct areas of work for the local development plan – options for growth and possible development sites. The negative implications of this approach are discussed later in this paper.
4. In considering the options for Cardiff's growth, we have been mindful of a recent presentation by Prof John Punter of Cardiff University called "*The future growth of Cardiff and region: towards a sustainable urban extension*". Whilst there is not agreement with all of the detail of his presentation, he set out very clearly two issues that need to be repeated here.
5. Firstly, the example of a past mistake in local authority planning: Pontprennau. Professor Punter describes this as poorly planned, with poor public transport, a coarse grain of uses, car oriented, with poor walk ability, disconnected green space, low biodiversity and 'anyplace' house builder layouts and designs. We seek to avoid these mistakes in future planned development.
6. Professor Punter usefully illustrated the kinds of issues that should be strategic in considering of future plans for the city-region, including:
  - Rapid transit served, regionally linked
  - Link medium-high density sub-centres
  - Walkable/cycle able local communities
  - Compact development: 50-100 du/ha

- Mixed housing tenure/types/affordability
  - Low carbon homes: renewable energy
  - Integral CHP/waste recycling
  - Integral, accessible employment
  - Generous green frame, biodiverse linear park system
  - Sustainable drainage systems
  - A public-private-community partnership
  - Participative 'Enquiry by Design' process
  - A Sustainable Design Code
  - A national sustainable exemplar for Wales
7. In the absence of a list of strategic criteria by the LDP team, we take the above as a good basis for discussion of how the delivery of managed housing growth for the capital city should be assessed.

## II. Growth Options

8. The council has published three growth options but has also said that it has commissioned a consultant to develop and substantiate a further growth option.<sup>1</sup> We find it difficult to give a considered and evidenced response to the question “please tick your preferred growth option and then provide details of any advantages and/or disadvantages of each of the levels of growth”.
9. The three options provided each identify a level need for new homes in total for the period to 2026 with suggested corresponding number of new jobs required. Each of the new homes options is based on assumptions which are debatable and require evidencing. Whilst in consultation meetings council officers have attempted to explain the correlated jobs figures, the logic for these is difficult to understand. No data has been provided on past economic growth achievement for Cardiff. It is our view the correlation given between housing need and employment requirements is not yet demonstrated or proven. Furthermore there is no evidence so far provided, if any of these options were to become housing or job targets, of how they could be met within the timeline of this local development plan.

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<sup>1</sup> CCS Green Paper 1 *Our Five Key Challenges* discussed approaches to options for growth and suggested five possible scenarios for discussion

10. Before considering future need, we need to be clear about current housing supply, the landbank of homes with planning consent; the so-called “windfall sites”; change of use to housing from other uses; and the potential housing loss over the LDP period. The council’s estimate of this number - net - is 23,807 homes. This estimate is, of course, based on the over-riding assumption that the current developer-led model of housing provision is the only model and that it continues without any intervention to meet the needs of the city and that low-cost housing will be met by commercial developers.
11. Two further factors also influence any strategic consideration for the growth of new homes and jobs: the current economic downturn and the past performance of developing housing and jobs in the city. In terms of jobs as noted above, we have no data.
12. Could the developer-led housing industry deliver the homes required in the mix and to the standard required and could the Welsh Government, the council and the private sector between them achieve the parallel estimates of required new jobs?
13. In terms of housing, the lowest annual need indicated in the council’s three growth options is 1,825 homes per annum with the highest 2,976 homes pa. The housing growth needs in terms of build per annum may also increase for each year of the plan as its timeline progresses and as developers deliver – or fail to deliver – the target numbers of houses. The highest house build achievement identified to date is 2,368; last year that figure was just 867. There seems to be little point in suggesting ‘a preference’ for growth targets for either jobs, or the supporting houses they need, if there is no evidence base for suggesting that either homes or jobs could actually be delivered.
14. We suggest that the current economic difficulties should be turned to Cardiff’s advantage in terms of long-term planning. The council says that the land bank could provide nearly 10 years housing needs even based on its largest requirement figures. This gives a planning breathing space of at least five years which, in our view, should be used to identify more clearly and accurately the job growth that Cardiff needs in the context of a capital city in the region – not in isolation. The ways in which housing development can be planned to improve and add value to the whole city, not just new speculative developments can be explored in detail.
15. Of course in the current commercially driven, developer-led housing market there would be a preference by developers to undertake what Professor Punter described as “‘anyplace’ layouts and designs” on greenfield sites because they are the most profitable. Cardiff Council, through the LDP, needs to provide long-term strategic leadership for developing the city. This means using planning policy for the needs of the city and its citizens to create quality of life, sustainable economic growth and meet challenging environmental targets.
16. In summary therefore we do not think it is necessary to immediately accept any of the three proposed growth options but to continue to assess the city’s future needs based on developing evidence of need and capability of delivery for both housing and jobs.

### III. Ways of providing growth

17. Given that the known housing supply can meet the city's 10 years projected needs at even very high growth rates, we feel that strategic planning should now concentrate on the period from 2017 onwards. In the immediate term the focus should be on the way Cardiff should grow in conjunction with other planning authorities in the region. This would lead to a revised LDP to set out more precisely the last 10 years until 2026. It is possible to create a roadmap for the period until 2026 without the necessity at this stage to agree detail which is either not supported by research, or may be considered undesirable.
18. The first phase of this roadmap should be to prioritise the release and use of all brownfield sites and small-scale extensions and infilling of existing communities to enhance and develop local sustainability. This should obviously be integrated with the council's other priorities in education, healthcare provision and sustainable transport. This phase would probably last 10 years and contain a plan for up to 25,000 homes and supporting jobs. Even this will be challenging: a completion of 2,000 plus dwellings a year has not been consistently achieved in Cardiff in the past 20 years.
19. During this period it is important that key natural, scientific, historic and heritage resources are protected and vital infrastructure sites identified: this is dealt with in the next section.
20. The council should commit to robust and very public bilateral discussions with neighbouring authorities to agree future developments of new communities on or close to its boundaries and within the range of proposed transport networks (see CCS Green Paper 3). We should anticipate that these communities would be models of 21st-century provision (see 6 above).
21. With the help of the Wales Government, the city needs to ensure that second-generation LDP's of south Wales' planning authorities incorporate co-ordinated and agreed plans. All Cardiff's neighbours have completed, or are in the final stages of completing their LDP's, this can be achieved with the normal four-year review timescale.

### IV. Comments on specific sites

22. Cardiff Civic Society has the gravest reservations about considering specific sites at this stage (see 3 above). We believe that the council - not housing developers and speculators - should be setting the strategic agenda for the city. Given that it has embarked on this process however, we suggest that detailed consideration of sites should be split into two stages during the ldp that correspond with the proposals made earlier.
23. For the first period of this local development plan, until 2017:
  - the council should only include infill and brownfield sites and those which have existing permissions for housing development where it can be varied to more readily meet the city's real housing needs

- the LDP should identify and formally protect all the river corridors and designate them as open space: a detailed study of these corridors should be urgently undertaken
- similarly, identify and protect SSIs, public green spaces, parks, recreation grounds, playing fields etc in order to give policy protection from either speculative or local authority development during the period of the plan
- justify the need for, and identify the location of “green belt” areas on the perimeter of the city and protect them
- formally identify and protect potential routes/sites for the proposed metro for a capital city plan based on the current best ideas. This will ensure that important infrastructure developments are not unduly delayed by inappropriate developments
- designate and protect sites for future park and ride provision
- ring-fence the perimeter of a large pedestrianised city centre area
- designate and establish a legal basis for stringent planning in the city’s existing conservation areas.

24. We believe it is possible through planning policy to ensure that housing needs until 2017 are met without any large-scale developments or incursions on current green spaces.

25. During this first period the council should be aggressively identifying potential sites – in agreement with neighbouring authorities – for large-scale new community developments. It is important that this process is not ad hoc, piecemeal and, worst of all, unplanned and simply left to developers. We do not know yet (see 16 above) how many such sites will be required but the general criteria can already be established:

- the transport infrastructure must be in place
- the infrastructure support needed (schools, libraries, medical services, shopping etc) must be defined and developed prior to housing
- there must be a direct benefit to existing local communities
- there should be a defined ratio of public realm and open green spaces of at least 30% – this would include the creation of new ‘Victorian scale’ public parks, country parks and recreation spaces.

26. Each of these community developments should take place as required, the second only begun as the first is completed etc. Such a plan will allow the development of transport infrastructure etc to proceed apace in parallel.

27. Given that the council has decided to invite developers to propose sites for inclusion in the deposit plan all the remarks above can be applied to the six largest conglomerations of development which have been proposed. Notwithstanding the following comments, none of these sites should yet be included in the LDP as preferred sites at the present time except for the purposes of excluding development, for example as “greenbelt” land, protection of river corridor etc.
28. **Sites around Creigiau** this should not be included because transport and infrastructure issues have not been dealt with. It could however be a future community development particularly if the needs of existing communities are taken into account and it is planned with Rhondda Cynon Taff to include a much larger area around Llantrisant than has been identified by these developers.
29. **Fairwater** this should not be included at present because transport and infrastructure issues have not been dealt with. The quality of the agricultural land is not defined and its potential loss needs to be measured. Longer term this could also be a new distinct and viable community area which would benefit the existing community. There would be good opportunities to develop new parkland and leisure spaces but it is essential to have a long-term master plan based on need, high-quality development, and community benefit.
30. **Thornhill** this should not be included – the site is highly visible from the city and an important amenity setting for large areas of the city. There is no justification for establishing a precedent for development in this area. It is difficult to see how transportation issues could ever be resolved.
31. **Lisvane area** this is an area where protection of the Nant Fawr River corridor is essential, leisure use of land towards Cardiff is desirable creating a linear green park. Some minor residential development around Cardiff gate may be appropriate in the first 10 years of the plan but other areas need protection.
32. **Areas between the M4 and the A48** this should not form part of the current first period of the plan since there is no consideration of transport. Protection of the Rhymney River Valley is essential. This is an area between two motorways that may be appropriate for substantial, mainly business, growth, but this has to be in collaboration with the adjoining local authority.
33. **Trowbridge area** there is no evidence of discussion with the adjoining local authority or consideration of transport issues. There is clearly scope for some development for business use in the second half of the planning period but there are serious flood and ecology issues.

Cardiff Civic Society  
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