

Radyr & Morganstown Community Council

Cyngor Cymuned Radur a Threforgan



James Clemence
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Strategic Planning
Cardiff Council
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December 14, 2012

Dear Mr Clemence,

A Joint response to Cardiff's LDP Preferred Strategy

The Community Councils of Cardiff make a number of observations on common concerns arising from the Preferred Strategy. Individual responses are submitted separately. Our concerns focus on growth, infrastructure and deliverability, transport and regional planning.

1. Growth

We accept that Cardiff has to grow and sustain its major economic role as the capital city of Wales and want that development to improve the quality of life for both existing and new communities. However, we challenge the deliverability of strategic growth Option B and suggest that growth is scaled back to allow for a regional approach. This would also increase the likelihood of a deliverable plan. The LDP is, in part, driven by Welsh Government targets and it is unrealistic to take so little account of the recent dramatic economic downturn. We support the Civic Society's call for a five year holding plan to avoid the dangers of having no LDP while it is scaled back to allow for a regional approach that will provide a more sustainable plan for Cardiff and its neighbouring authorities. We note that this is supported by Mark Drakeford, AM, Kevin Brennan, MP and Jonathan Evans, MP.

Green Belt

We support a green belt within and around Cardiff. Managed parks and amenity landscapes are no substitute for open countryside. A green belt preserves valued countryside that is integral to the identity of existing communities and provides long-term protection for vulnerable sites. Views of open countryside extending throughout the city must be protected as a valuable contributor to the quality of life for residents and visitors (*Strategic Summary, point 6, LDP*). We also value the city parks and green riversides which link communities with each other and the city centre. Our community council areas contain listed buildings, national monuments, conservation areas and St Fagans National History Museum. We expect to see clear statements on preserving protected sites in the Deposit Plan.

The loss of a significant proportion of Cardiff's agricultural land is proposed at a time when there are increasing concerns about food shortages and security. This is in direct conflict with Cardiff's goals to be a sustainable city with a reducing carbon footprint (*Carbon Lite Cardiff Action Plan June 2010; Cardiff's Ecological Footprint, 2005*). What is the justification for this at a time of exceptionally low economic activity?

Cardiff's Scrutiny Committee opposed development north of the M4 yet Sites 46 and 102 are to the north of this boundary (*Scrutiny Committee: points KF7, R5*). 'The strategically important ridge north of the M4 will be protected' (*Strategic Summary, point 6, LDP*). What is the justification for new development that would intrude into a green belt north of the M4?

2. Infrastructure and Deliverability

Background Technical Paper 9 gives past completion rates of 1,450 new dwellings/year between 2001-2012 with only 1,186 between 2007-2012 and a maximum of 2,368/year in 2006-07. The LDP Option B needs a completion rate of 2,614 dwellings/year. We challenge the expectation that this growth rate can be achieved and that the supporting infrastructure can be funded and built. We expect the Deposit Plan to include realistic funding proposals that show how infrastructure can be in place before developments, particularly greenfield, start.

The Community Infrastructure Levy (CIL) is being developed alongside the LDP. We emphatically expect, through the Charter, all Community Councils to be consulted on the CIL's development and to be involved in the planning of their local projects. What are the plans for doing this?

Major works have been undertaken in the east of Cardiff to upgrade the sewers and sewage treatment. What is the evidence that they are sufficient to meet the needs of strategic sites? No comparable work has been undertaken in the west. Sewerage capacity problems occurred at developments such as Westfield Park, Cwm Farm and Radyr Sidings as well as long-standing problems in older communities. What plans are there to ensure that the existing and new sewerage infrastructure is operating before any development starts?

3. Transport

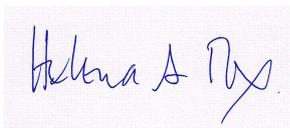
In consultations with our local communities, transportation is by far the primary concern. Independent professional transport surveys have been conducted in NW Cardiff and NE Cardiff and the community councils of St Fagans, Radyr & Morganstown, Lisvane and Pentyrch have submitted these separately. What is the evidence that the transportation infrastructure demanded by the LDP is deliverable and sound?

We understand that Cardiff is in discussions with its neighbouring councils to plan for shared transport problems including park and ride and regulating traffic flow. We expect to see these inter-authority proposals identified in the Deposit Plan (*Planning Policy Wales, Para 8.3.3 and 8.4.3, Ed 5, 2012*).

4. Regional planning

We accept that this LDP cannot take a fully regional approach. However, we feel that it should take much more account of the move towards regional planning for SE Wales. Clearly, a regional spatial plan including a transport strategy is badly needed. We ask that Cardiff and its neighbouring authorities use their powers over adopted LDPs to implement regional solutions wherever possible.

Yours truly,



Helena Fox
Clerk

Cc Mark Drakeford, AM, Kevin Brennan, MP, Jonathan Evans, MP