



Radyr & Morganstown Community Council Cyngor Cymuned Radur a Threforgan

James Clemence
LDP Team
Strategic Planning
Cardiff Council
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The Old Church Rooms
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November 26, 2013

Dear Mr Clemence,

The North-West Cardiff Group Joint Response to Cardiff's Deposit LDP

1. The communities of Pentyrch, Radyr & Morganstown, St Fagans and Llandaff have united to represent the views of our more than 24,283 residents¹.
2. This letter makes observations on common concerns arising from the Deposit LDP (DLDP). Our individual responses are submitted separately and contain detailed references to the DLDP and its supporting documents.
3. Cardiff must have a Local Development Plan to ensure that Cardiff Council can meet the needs of a changing city and improve the quality of life and access to amenities for current and future citizens.
4. The latest version of the LDP is some improvement on the previous plan, particularly the reduction in housing numbers.
5. We are responding to a consultation aiming to engage Cardiff residents. We have responded to all previous consultations but, apart from a reduction in housing numbers, we cannot see that our earlier concerns, particularly on transport and infrastructure, have been addressed.
6. The DLDP plans 11,650 dwellings in NW Cardiff or a new town nearly the same size as Caerphilly Town.
7. A development on this scale happens only once or twice a century for a city like Cardiff.
8. The DLDP makes many references to Cardiff's quality of life. The LDP vision is that 'by 2020 ... Cardiff will be a world class European capital city with an exceptional quality of life and at the heart of a thriving city-region' ('What Matters' Strategy 2010-2020). That is an exciting and laudatory aspiration.
9. Aspirations are not enough. They can only be achieved through evidence-based infrastructure that is realistic and achievable.
10. Cardiff Council has a duty to its present and future residents to create welcoming, functioning

¹ 2011 Census

communities that meet its vision for the capital city for Wales.

11. We argue that the DLDP does not present the evidence to support the scale of development that increases Cardiff households by 29.6%.
12. Development must be controlled to create sustainable, liveable spaces fit for the 21st century.
13. Ineffective plans and uncontrolled development will create congested, poorly serviced communities where people do not want to live and developers do not want to build.
14. We are convinced that development in the NW Cardiff strategic sites should be delayed until evidence-based plans are in place.
15. Our AM, Mark Drakeford, and our MP, Kevin Brennan, both support our argument.

Cardiff Region

16. The Welsh Government accepts now that a regional approach is needed, illustrated by the £62M budgeted for Cardiff Capital Region Metro over the next three years as part of a new integrated public transport system.
17. The DLDP references the coming regional approach but does not include explicit planned provision to cater for the transitional period that makes sense in a sub-regional context.
18. We fear that the timing of the LDP process risks being out of alignment with the development of SE Wales and the Cardiff city region.
19. A new City Region will change the required patterns of settlement and house building.
20. It is absolutely vital that the LDP anticipates and is consistent with the City Region approach to planning being developed by Welsh Government.
21. The LDP should embrace this huge opportunity by carefully and strictly phasing development to enable NW Cardiff to work with and benefit from the Metro and other regional initiatives.

Infrastructure

22. We know that funding for big infrastructure projects is complex and cannot be wholly Cardiff Council's responsibility. Now that the Welsh Government has been granted borrowing powers from 2016 to increase capital investment and will have the power to levy stamp duty, it will be in a stronger position to fund and support regional infrastructure plans.
23. In the Preferred Strategy it was explicit that infrastructure must be in place before development started.
24. In the DLDP that has been weakened and replaced with 'timely provision' that, in the context of a plan of this magnitude, is close to meaningless. Yet one of your officers said, in the Plasmawr public consultation, that "without new infrastructure people will not be able to move on the network".
25. There is a commitment in the Masterplanning Site Specific Principles for the Strategic Sites to 'ensure frequent public transport provision is in place prior to residential occupation of the site'. If there was a dispute about delivery of an infrastructure project, which policy document has precedence?
26. We consider that the DLDP's reliance on subsequent assessment and data to resolve the provision of infrastructure elements essential to key policy means that the LDP clearly fails to meet the soundness test. It is vital that this wording is strengthened following discussions with the Welsh Government, SEWTA, adjacent unitary authorities, Network Rail, transport operators, and landowners so that the final LDP provides greater certainty.

Phasing

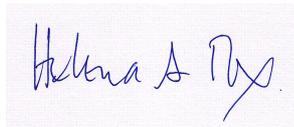
27. We ask that development in NW Cardiff be delayed and phased to align with the coming regional plans and legislation or, if that is not possible, phased so that housing is not occupied until a sustainable rapid transit service is provided.
28. We argue that only by strictly planned and enforced phasing can development on the huge scale planned for NW Cardiff create successful communities.
29. With each phase must come infrastructure and supporting facilities appropriate and acceptable to that community and its Masterplan. The DLDP is not detailed enough to reassure us that that will happen.
30. The definition of 'appropriate and acceptable' should not be dictated by developers who have no long-term interest in the communities they build.
31. Phasing gives Cardiff the flexibility to adapt the LDP to changing political, economic and social needs which may alter the scale and the type of development that is required. The DLDP only plans flexibility for more development not less

Transport

32. In consultations with our local communities, transportation is by far the primary concern. Independent professional transport surveys have been conducted in NW Cardiff and we have submitted these separately.
33. We do not find evidence that the transportation infrastructure demanded by the LDP is deliverable and sound.
34. The LDP recognises that the existing transport infrastructure is already under strain. The current road system in NW Cardiff is operating at or beyond its full capacity with several very evident pinch points. It is inconceivable that this system can cope with the additional traffic created by 11,650 more houses.
35. Controlled phasing is necessary to ensure that housing is not occupied until a sustainable rapid transit service is in place.
36. Public transport must be fast, easy to access and serve multiple destinations if it is to provide a feasible alternative to car use.
37. Our independent transport appraisal by Transport Planning Associates (TPA) finds that before adoption of the LDP and the start of development the necessary supporting sustainable transport infrastructure must be in place to avoid grid lock on Cardiff streets.
38. We support the ambition for a 50/50 modal split but it cannot be assumed that if provision for sustainable travel is provided, then people will use it. What will Cardiff do if this split is not reached?
39. The 50/50 modal split is recognised as an ambitious target but achievable should the relevant infrastructure be in place.
40. Failure to provide new infrastructure before development will make the situation intolerable for existing and new residents.
41. This is a time for bold planning, for looking 50 or 100 years into the future. To miss such an opportunity due to the constraints of the time line of the LDP would not be acting in the best interests of Cardiff's population, now or to come.
42. We argue that the only solution to transport in a developed NW Cardiff is to implement the

Metro top priority line² from Cardiff Bay via Fairwater to Creigiau and beyond. This is supported by the report from TPA which makes the case for the alignment of Cardiff's transport strategy with the Metro proposals which propose a tram-train route between Llantrisant and Cardiff Bay passing through the strategic development site in north-west Cardiff. This would allow for a dedicated high frequency service which would not require reallocation of road space and further allow for the accommodation of additional vehicular traffic generated by the development.

Yours truly,

A handwritten signature in blue ink, appearing to read 'Helena A. Fox', is placed on a light grey rectangular background.

Helena Fox
Clerk and Proper Officer

Cc Mark Drakeford, AM
Kevin Brennan, MP

² A Cardiff Capital Region Metro : Impact Study (October 2013)
Joint Letter to Cardiff DLDP from NW Cardiff Group