

Radyr & Morganstown Community Council

Cyngor Cymuned Radur a Threforgan



James Clemence
Operational Manager (Planning Policy)
Cardiff Council
County Hall
Cardiff CF10 4UW

The Old Church Rooms
Park Road
Radyr
Cardiff
CF15 8DF

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Dear Mr Clemence,

LDP – Consultation on Strategic Options and Candidate Sites

Members of the Community Council have instructed me to write to you to express a number of general concerns regarding issues that effect the City as a whole, together with more specific concerns regarding the proposed Candidate Sites in Radyr & Morganstown.

As one of only six Community Councils in Cardiff we represent the communities most likely to be affected if the information on which the LDP is based is accepted and many of the Candidate Sites, particularly the very large ones, are approved.

The Community Council's general concerns relate to the following fundamental issues:

Future population growth

We understand that the Welsh Government has projected that the city's population will grow by 42% by 2033. This huge figure, reportedly the second highest of any local authority in England and Wales, compares with the much lower figures of 2% to 5% for most neighbouring authorities. We understand that the 42% figure is based on Population and Household Projection figures issued in 2010, based on the period 2003-2008.

Local authorities have worked on an assumption that household size has been falling since 1945. We are now entering a phase where this is changing as household size plateaus or increases as young people cannot afford mortgages and so stay at home longer. This trend should be taken into account when calculating housing need.

To meet WG's growth figures, Cardiff would have to build 2,720 homes a year for 20 years to reach the 54,000 new home target by 2026. Cardiff's highest ever building rate was 2,368 homes in 2006-07 during the recent boom when the vast majority of units were apartments in Cardiff Bay.

The LDP is timetabled for approval in 2014 which leaves 12 years to hit the 42% target. Development will not start immediately the LDP is approved with the very large planning applications taking 2-3 years at best before approval is granted. After taking account of homes that have already been built and those that can reasonably be expected to be built by 2026, to reach this 42% growth target an additional 30,500 new homes will be needed. Assuming that any development of approved sites started immediately the LDP is approved, that would mean a building rate of an additional 2,542 homes a year for 12 years. That is, we suggest, undeliverable.

The economic climate has changed dramatically as has the pressure of in-migration. Taking all this into consideration together with the well-known uncertainties of Cardiff's 2001 Census data and subsequent population counts, we have to question the calculations which led to a forecast growth of 42%.

The Community Council is writing to the Welsh Government Minister to ask that these figures be reviewed in detail as a matter of urgency. We understand that Cardiff Council is challenging these figures and we consider that every effort should be made to substantiate the population predictions which will be at the core of all development proposals before any planning for growth takes place.

Cardiff's hinterland

Even in the unlikely event that the population growth forecasts are accurate, there is an assumption that all additional population must be housed within the city boundaries. Local authority boundaries are not physical and boundary changes are made from time to time. Why has greater consideration not been given to making larger housing provision in the wider Cardiff region? The city itself covers a relatively small area and the available space for development is limited. To make greater housing provision outside the existing city boundaries will both ease the pressure within the city and spread economic benefits to neighbouring councils.

The number of dwellings in R&M has increased by some 40% since 2001 with the building of three new housing developments. In 1981 the population of R&M was 4408 and in the 2001 Census the total population was 4658 in 1847 households. By 2008, the population had reached 5749. Today, we have some 6500 people, of whom 4625 are electors, in 2560+ households. The number of electors is expected to reach 4829 by 2014.

It seems unreasonable to make Cardiff solely responsible for the capital city's growth when it is an issue for the south east Wales region. We understand that the planning system in Wales does not allow for regional plans and perhaps that is also something that should be reconsidered.

Inadequacies of infrastructure

New developments must include the necessary infrastructure to meet the new demands they create. It is our experience that too often the infrastructure requirements of new developments appear to have been given secondary consideration with problems unresolved for many years such as unadopted roads, street lighting and mains drainage. In the view of our community, transportation is the primary infrastructure issue. Many roads in Cardiff appear to be at or near operating capacity and additional developments without improvements to the city-wide transport infrastructure will exacerbate existing problems. The poor condition of many road surfaces suggests that they are operating beyond their structural capacity now.

The main arterial routes into the city centre (A48, A470 & A4232) seem to provide the only realistic avenues for commuter access and we question why the southern Bay link road to the east has never been completed. Other routes, such as the A4119, are physically constrained by the communities through which they pass with limited, if any, scope for increased vehicle movement. The effect of proposed new developments on these arterial routes needs to be assessed in depth and not limited to their immediate surrounding areas. The inclusion of 'transport solutions' in developers' application documents is inadequate to answer these questions. They depend on independent bus and rail companies' agreements and focus within pockets of development rather than an integrated system for the whole city over which they cannot have any control. An extension of the local bus route into Radyr Sidings which was set out in that planning application did not happen because Cardiff Bus said it would lengthen travel time unacceptably. There is little point, for example, in a 21st century rapid transport bus link that comes to a halt at the A4119 where all traffic is funnelled into 19th century Llandaff.

For Radyr & Morganstown the most local effects would come from two Candidate Sites at Waterhall and Gelynis Farm. Both these would increase vehicle traffic on the B4262. This road is a residential road and bus route with houses on both sides, many of which do not have garages or off-road parking. It is the only through road in R&M and gives direct access to two schools, the medical centre, library, places of worship and shops. These sites and others in Pentyrch rely on Ynys Bridge for access to the A470 and M4 and the increased carrying capacity of this bridge is already, we believe, in question.

While transportation is the key issue, there are other important infrastructure matters that any big development, whether a few large or many small sites, needs to address. These include schools, medical centres, shops, public open space, and sports.

Loss of greenfield sites

Cardiff Council wants to protect the remaining greenfield sites within the city which the Community Council supports. The previous LDP prioritized brownfield sites for development and this remains CCC and WG policy. The Community Council has consulted with the residents in Radyr & Morganstown in compiling our Village Plan and knows that they value the green fields that give Cardiff its character and enable the village atmosphere of our and other semi-rural communities to be preserved; large-scale developments in these areas will destroy forever their individuality. Any suggestion of building on green spaces closer to the city centre would not and should not be contemplated and the Community Council believes the greenfield sites on the outskirts of the city are equally important and valuable to the quality of life of its citizens. It supports the creation of a green belt to mitigate against urban and suburban sprawl in the heavily developed south east Wales region.

The Community Council believes these four issues are of critical importance and need to be addressed at the earliest opportunity before any development proposals are considered for inclusion in the draft LDP.

We are aware that Cardiff Council is looking again at its flood risk and the effects for both coastal and riverside areas. We hope that any development site-selection is made using the latest flood data and predictions.

We welcome the addition of the UK National Ecosystem Assessment as new guidance to the LDP process.

The Community Council has consulted widely with its residents via a questionnaire to all households which produced a report and the Village Plan, of which you have copies. From this we know that residents already feel that R&M has enough housing and have real concerns about existing parking and traffic.

Cardiff wishes to become a low carbon city but we cannot see how this can be achieved without a city-wide public transport plan to reduce vehicle movements. The existing public transport is inadequate and communities like R&M become 'rat runs' for vehicles avoiding the A470. This increases local pollution and endangers our school children as they walk to and from school. As our example above shows, an integrated transport plan cannot rely on the cooperation of Cardiff Bus to extend its routes.

LDP : Candidate Sites Consultation

The Community Council also has specific concerns relating to the following Candidate Sites. It does not object to the two small sites in Radyr Gardens and, in fact, welcomes a retail development there.

Waterhall 1129

This very large development site proposes some 4,000 new dwellings and 3,000 new jobs. R&MCC objects to its inclusion as a candidate site. Its situation on the existing boundaries of R&M, Fairwater and St Fagans will have enormous impact on the infrastructure for north-west Cardiff and the city area as a whole.

A direct effect for R&M will be the increased traffic on the B4262, our only through road. This is a residential road and bus route with houses on both sides, many of which do not have garages or off-road parking. This through road in R&M gives access to three schools, the medical centre, library, places of worship and shops. It is also the only access road for Radyr Sidings and Radyr Gardens.

The B4262 is already congested because of its use as a bye-pass of the A470 in and out of Cardiff and for access to the M4 at J32. All such users must cross Ynys Bridge and the increased carrying capacity of this bridge is already, we believe, in question.

The A4119 is already congested, taking traffic from the B4262, and outlying communities. Traffic on the A4119 will be greatly increased by any development at Waterhall and by other Candidate Sites further west.

The development is wholly on green fields which would create a suburban sprawl, harming the amenity and individuality of separate communities which are just managing to keep their identities.

Having seen the previous 'Vision for Waterhall', we note that no matter how detailed and aspirational a developer's plans, they must integrate efficiently and realistically with the city's transport plan as a whole. We also refer to our comments above in relation to agreements with independent bus and rail companies.

Waterhall includes three SSSIs and four SINC's (with a further 14 SINC's with 1.5km radius of the site boundary). While the application talks of protecting these within a proposed country park the density and scale of the development will put such fragile sites at risk. We welcome the addition of the UK National Ecosystem Assessment as new guidance to the LDP process and feel that it will demonstrate the risk to those sites by reducing them to islands within a suburb.

The application refers to 'public transport users that seamlessly integrate with existing networks in surrounding areas'. To repeat what we said above: there is little point in a 21st century rapid transport bus link that comes to a halt at the A4119 where all traffic is funnelled into 19th century Llandaff. The use of dirty, over-crowded two-carriage trains at stations that are hard to access is not going to increase their use. Radyr Station is impossible to use for anyone with physical disabilities.

Gelynys Farm 101216

R&MCC objects to this site's inclusion as a Candidate Site. Up to 300 new homes in R&M will have a significant effect on the B4262, the only through road for R&M. This road is a residential road and bus route with houses on both sides, many of which do not have garages or off-road parking. It is the only through road in R&M and gives access to three schools, the medical centre, library, places of worship and shops. It is also the only access road for Radyr Sidings and Radyr Gardens.

The B4262 is already congested because of its use as a bye-pass of the A470 in and out of Cardiff and for access to the M4 at J32. All such users must cross Ynys Bridge and the increased carrying capacity of this bridge is already, we believe, in question. At the southern end of R&M, the A4119 is already congested, taking traffic from the B4262, and outlying communities.

The proposed access to the site is close to a roundabout which serves Taffs Well quarry and offices at Ty Nant Court. We question the safety and effect on traffic flow of a new road junction serving some 300 dwellings.

The Candidate Site application refers to 'Scheduled Ancient Monument (AM12)' and describes its setting as 'compromised'. However, this ancient motte and bailey monument is in fact on land owned by Cardiff Council and is the subject of a current conservation project which will include an archaeological investigation of the site, conservation and the building of a visitors' centre with café and display area.

The Candidate Site lies in the flood plain of the River Taff. The Environment Agency describes the site as at 'significant risk' of flooding meaning the chance of flooding each year is greater than 1.3% (1 in 75). We understand that Cardiff is reviewing its own flood data and risk management and ask that this be completed before riverside sites are included in the LDP. We understand that some riverside sites are needed on the Taff to take flood water and that it is not good management to protect too many sites from flooding. Flood warnings on the River Taff can give as little as four hours' notice. In the light of climate change and rising sea levels it would seem advisable to avoid development on a green field site which is known to flood and can thereby reduce downstream problems.

In terms of air quality and noise pollution the application does not refer to the fact that the site runs under the M4 which should be taken into account. The M4 is a source of noise pollution in much of R&M and has been complained about for many years.

Please take our comments on the two Candidate Sites as our official response to that consultation.

Yours truly,

Helena Fox
Clerk.

Cc :
Mark Drakeford, AM
Andrew RT Davies, AM
David Melding, AM
Leanne Wood, AM
Cllr Rod McKerlich, Cardiff Council