

Radyr & Morganstown Community Council

Cyngor Cymuned Radur a Threforgan



<p>John Griffiths AM Minister for Environment and Sustainable Development Welsh Government 5th Floor Ty Hwyl Cardiff Bay Cardiff CF99 1NA</p>	<p>The Old Church Rooms Park Road Radyr Cardiff CF15 8DF</p>
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June 16, 2011

Dear Minister,

Cardiff Local Development Plan

Radyr & Morganstown Community Council write to you as the Minister responsible for overseeing and approving the Welsh unitary authorities' Local Development Plans. We ask that the new administration notes the concerns expressed at our most local level on a number of issues relating to the LDP currently being prepared for Cardiff.

R&MCC is one of only six Community Councils in Cardiff representing the communities most likely to be affected by Cardiff's expansion if the information on which the LDP is based is accepted and many of the Candidate Sites, particularly the very large ones, are approved. Our 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 between 2% and 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 asks that these figures be reviewed in detail as a matter of urgency.

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 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 the immediate surrounding areas. The 'transport solutions' in developers' application documents are inadequate answers to these questions. They depend on independent bus and rail companies' agreements and focus within their own pockets of development rather than on 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 Gelynys Farm. Both these would increase vehicle traffic on the B4262 which is the only through road in R&M. 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.

Cardiff's hinterland

There is an assumption that any 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 Cardiff 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 is our experience that little community gain through s106 agreements ends up in local improvements to help manage such an expansion.

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.

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. 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 understands that the LDP is an important process that will help to shape and determine the future of Wales' capital city and our own community within it. Radyr & Morganstown Community Council believes it essential that the LDP be based on accurate information with deliverable outcomes. It should reflect the views of the residents whose lives it will affect not just the aspirations of developers and landowners. In fact, we question the ethics of involving developers in consultation events where they are asked to give their views with no account taken of their business interests.

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

The Community Council asks that you give serious and urgent consideration of the issues in this letter.

Yours truly,

Helena Fox
Clerk

Cc Jon House, Chief Executive, Cardiff Council
James Clemence, Operational Manager (Planning Policy), Cardiff Council
Mark Drakeford, AM
Andrew RT Davies, AM
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