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Response to Cardiff Council's LDP Preferred Strategy

We appreciate the aims and vision of the LDP and accept that Cardiff has to grow and sustain its major economic role as the capital city. We want that development to improve the quality of life of both existing and new communities and highlight below some of the key issues we have identified. These can be summarised as:

- Growth rate
- Transport
- Neighbourhood and community place-making
- Infrastructure and deliverability

We do not support strategic growth Option B's 45,400 new houses and 40,000 new jobs. We suggest that growth is scaled back to allow for a regional approach that would also increase the likelihood of a deliverable LDP. The OECD predicts a world economy growth rate of 3% per year for the next 50 years with growth in the UK being much less robust (*Looking to 2060: Long-term global growth prospects*, OECD Economic Policy Papers No 3, November 2012). The Autumn Statement (5 December 2012) of the Chancellor of the Exchequer extended the programme of austerity until 2018. We understand that the LDP is, in part, driven by Welsh Government targets but it is unrealistic to take so little account of the current economic recession and the bleak long-term forecasts.

For each strategic site, or groups of sites, the LDP must consider the feasibility of providing the necessary infrastructure on the ground, its funding sources and deliverability if the plan is to be demonstrated as sound. The expectation is that this will come out of simultaneous Masterplanning exercises on all the strategic sites over the next year. It may not be possible to complete this work in this tight timescale, even taking account of the resources of the major landowners and consortia. All the LDP documentation acknowledges that for the LDP to work, much of the infrastructure will need to be provided ahead of occupation of the sites. For this reason, as well as the global downturn, some strategic sites comprising Option B are unlikely to be deliverable in the life of the plan.

Below we follow the headings and numbering of Background Technical Paper No 8, Summary of Candidate Sites Assessment. We comment on the LDP generally and specifically in relation to NW Cardiff and Radyr & Morganstown (R&M).

2. Candidate Site Assessment Factors

2A. Environmental :

- 2A3. Historic/Built Environment :
 - We understand that a local group is registering part of Site 82 extension as a Village Green.
 - The Llandaff-Penrhys pilgrim route runs through the NW Cardiff extension site.

- What steps will be taken to protect this important historic route?

2C. Transportation Factors : In consultations with local people, transportation is by far the primary concern. We have commissioned an independent professional transport survey of NW Cardiff by Transport Planning Associates (TPA) and it is attached to our response.

The candidate site assessment for the NW Transport Corridor in Combination (NWTCC) codes red for transport context and amber for potential for sustainable transport. TPA's survey corroborates this assessment.

Both TPA and the LDP site assessment agree that the NWTCC will bring greatly increased road traffic to an already congested part of Cardiff with some 4,500 vehicle trips during rush hour from Site 82 alone. They also agree that highway and sustainable transport solutions range from very limited to unlikely.

We assert, therefore, that this is strong evidence that roads and transport (public and private) in existing communities are barely adequate now and inadequate to cope with the demand that the LDP strategic sites will place on them. Mitigation is demonstrably very limited.

TPA agrees with local experience that there is no way round the bottlenecks in R&M and Llandaff, whatever the transportation Masterplans *within* the sites of the NWTCC. As we have said in previous consultations, 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.

We ask that you consider our evidence and provide solutions to its key questions:

Transportation context and sustainability

- We do not believe that the NWTCC is deliverable or sound on transportation grounds.
 - Site 82 alone is calculated to attract an additional 4,500 vehicle trips during rush hour.
 - What is the evidence that area-wide transport modelling supports the deliverability and soundness of these combined sites?

Highways : car and bus

- All the key highways are single lane and single carriageway with significant sections of constrained road width.
 - Heol Isaf (B4262), Llantrisant Road (A4119), St Fagans Road and Michaelston Road suffer high levels of congestion during peak flow:
 - What is the evidence that the A4119 can be improved to allow reasonable traffic flow, particularly in Llandaff?
 - What is the evidence that the B4262 can be improved to allow reasonable traffic flow, particularly at Ynys Bridge, Kings Road junction and Radyr Comprehensive School?
 - What is the evidence that the B4262 can be improved to allow reasonable traffic flow while maintaining community safety?
 - How will the single car-width Golf Club Lane, a turning off the A4119 in Radyr, be protected from becoming a short-cut?
 - What is the evidence that Ynys Bridge is structurally able to take the increased traffic from the NWTCC traffic?
 - What is the evidence that the highways can be improved to create bus lanes/priorities and cycles lanes?
 - How will the provision of new direct bus routes be guaranteed?

Rail

- Radyr Station is the closest rail access for Site 82:
 - Radyr Station passenger commuter numbers are at capacity now
 - What is the evidence that Radyr Station can be improved to cope with more passengers from the NW development?
 - Radyr Station car parking is over capacity now and spills onto local highways
 - What is the evidence that car parking at Radyr Station can be improved to cope with traffic from the NW development?
 - Radyr Station is 650m from the northern tip of Site 82. The preferred maximum walking distance to rail stations is 800m.
 - What is the evidence that a shuttle bus to Radyr Station will decrease car use without improvements to the A4119 and B4262, particularly the bottle-neck at Radyr Comprehensive School?
 - How will commuters from Site 82 be deterred from driving when the station is not accessible on foot?
 - Site 82 includes a proposal for a segregated public transport corridor along a disused railway line. The LDP is clear that sustainable transportation infrastructure should be 'embedded from the first occupation of new developments' (*Background Technical Paper 12 – Transportation paras 4.2.1 and 6.1.4*)
 - What is the evidence that this corridor can be funded and functional before development takes place?

Foot and bike

- Site 82 is more than 5km from sites of employment and the other NWTCC sites even further from, eg, the city centre, Cardiff Bay and St Mellons
- Radyr Station is 650m from the northern tip of Site 82. The preferred maximum walking distance to rail stations is 800m.
 - What is the evidence that the existing highway system can and will be improved to encourage walking and cycling and decrease car use?

2D. Neighbourhood and Community Place-making :

- 2D1. Local Neighbourhood :
 - Maintaining the distinctiveness of existing communities with strong identities is important if they are to welcome development. We suggest sufficient green space at community boundaries to help Cardiff keep its much-valued neighbourhoods and encourage new communities to follow in this tradition.
 - What provision will there be for this at the Masterplan stage?
 - Site 82 : The area to the north of Llantrisant Road forms an existing natural boundary between R&M and new development.
 - What justification is there for extending the existing community of R&M to merge with the new?
- 2D2. New schools : New schools should be ready to meet the demands of the new communities.
 - For NW Cardiff, we note that existing schools in R&M are full and could not cope with an extended catchment, however temporary.
 - What is the evidence that sufficient CIL funds can be raised to cover the costs of new facilities and infrastructure?
 - What is the evidence that funding for this essential infrastructure can be secured ahead of occupation of the housing?
- 2D2. Health :
 - We note that for the NWTCC air pollution from increased traffic has been highlighted.

- What are the plans to ameliorate this?
 - New health facilities should be ready for new communities as existing ones in R&M are full.
 - What plans are there for new NHS hospital space to meet the expanded population of Cardiff?
 - What is the evidence that sufficient CIL funds can be raised to cover the costs of new facilities and infrastructure?
 - What is the evidence that funding for this necessary infrastructure can be secured ahead of occupation of the housing?
- 2D3. Local connectivity : Please refer to our transport report which demonstrates the current and future limitations in NW Cardiff.
- 2D4. Sustainability and Design :
 - Reducing crime : currently one PC and one PCSO cover all of R&M, Pentyrch and St Fagans Community Council areas.
 - What is the evidence that policing in the strategic sites could be funded and staffed?
 - The greenfield strategic sites include most of the green space south of the M4.
 - How does that allow for future sustainable development?
 - The loss of a significant proportion of NW Cardiff's agricultural land is proposed. 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?

2E. Infrastructure and Deliverability Factors :

- 2E4. Deliverability : we question the deliverability of the strategic sites in the life of the plan.
 - 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.
 - What is the evidence that the LDP growth rate is realistic and deliverable when it was not achieved in the pre-crash boom?
 - What is the evidence that sufficient CIL funds can be raised to cover the costs of infrastructure?
 - What is the evidence that funding for infrastructure can be secured before occupation of the site?
 - What is the evidence that the NWTCC is deliverable and sound in terms of transportation?
 - Phasing : We ask that priority be given to brown-field sites and then to sites with existing adequate infrastructure. Sites with little or no existing infrastructure should not be brought into development until their infrastructure is in place. We ask that the CIL per site be costed to ensure adequate funds.
 - Sewage and water :
 - Does the five year spending plan of Dwr Cymru take account of the new infrastructure needed for the LDP in NW Cardiff?
 - What is the evidence that adequate funding can be secured to avoid the problems of Cwm Farm, now Radyr Gardens?
 - What is the evidence that existing services in R&M can and be funded and upgraded to meet new demand?

2F. Sustainability Appraisal Factors : Background Technical Paper 1 Initial Sustainability Appraisal Report states:

- Air pollution : Maintaining and improving air quality is incompatible with the LDP objectives because 'sites are on the edge of Cardiff ... and likely to be heavily car dependent'.
 - That conflicts with the LDP's key 50:50 car:non-car transport objective.
 - The NWTCC is stated to have a negative impact on air quality due to increased traffic.
- Protecting and enhancing biodiversity, flora and fauna is incompatible with the LDP objectives because of the scale of development on greenfield sites.
- Reducing emissions of greenhouse gasses is incompatible with the LDP objectives because 'the largest strategic sites are on the edge of Cardiff ... and likely to be heavily car dependent'.
 - This conflicts with the Carbon Lite Cardiff goals.
 - What is the evidence that all these contradictions can be reconciled?

Conclusion

1. R&MCC is not opposed to all development but feels that unrealistic growth demands have been placed on Cardiff Council by the Welsh Government.
2. Cardiff Council has identified strategic sites which meet these demands but create a scale of development and infrastructure that is undeliverable in the life of the plan.
3. Intensive development on greenfield sites with required new infrastructure in place before occupation conflicts with inadequate existing highways and infrastructure, necessary improvements that are outside the life of the plan, unyielding constraints in existing communities and uncertain funding.
 - a. This is particularly clear in the North West Transport Corridor in Combination from the evidence of Transport Planning Associates' transport survey, LDP Background Technical Papers 12 (Transportation) 5 (Summary of Scrutiny Committee) and 1 (Initial Sustainability Report) and the Preferred Strategy itself.
4. We support the Civic Society's call for a five year holding plan. This would avoid the dangers of having no LDP while development in the NWTCC 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 and Kevin Brennan, MP.

Yours truly,



Helena Fox
Clerk