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## **Cardiff's Local Development Plan: Preferred Strategy consultation**

### **A statement by Kevin Brennan MP for Cardiff West and Mark Drakeford AM for Cardiff West**

Our starting points, in relation to Cardiff's Local Development Plan 'Preferred Strategy' document are these<sup>1</sup>:

First, Cardiff needs an LDP. The failure of the previous local authority administration to complete a Plan has left parts of the Cardiff West constituency, along with other parts of the city, vulnerable to piecemeal development by happenstance developers. This has already led to a planning refusal being overturned by the Inspector on appeal. We recognise the constraints faced by the current administration in producing a Plan within a timeframe and a set of rules which are not of their own devising, and we commend their efforts to release an early working draft of the document in July 2012, in order to allow for open public discussion.

Second, Cardiff needs more housing, and in particular more affordable family housing. Our surgeries are dominated by Cardiff residents, with long term Cardiff ties, who cannot obtain the housing they need. The Preferred Strategy and its subsequent LDP must offer them hope for the future and it is the responsibility of all of us to find a way to meet that housing need. It is important to be aware, however, that availability of land is not the most pressing, current problem in relation to housing supply. Rather, the unlocking of finance to provide new investment in social housing would do far more, in the near term, to meet the urgent needs we know to exist.

We want to see a Plan which addresses both these concerns. It is not our belief, however, that the current set of proposals do so in the most effective fashion.

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<sup>1</sup> Particular thanks are due to our constituent, retired architect Jeremy Lowe, for some of the additional facts and figures included in this submission.

As a starting point, we remain thoroughly unconvinced by the scale of house-building, within the city, which the Preferred Strategy envisages.

The *Preferred Strategy* suggests adding an extra 45,500 houses to the figure which appertained in 2006, the base-line date for the Strategy's proposals. In April 2005 the number of relevant dwellings within the city boundaries numbered 136,740. By 2006 this had risen to 138,801. At the start of December 2012, the figures stood at 149,840. As such, we recognise that a proportion of the additional dwellings suggested by the Strategy are already in place. Nevertheless, for reasons set out below, we remain highly sceptical of the overall figure to be provided during the lifetime of the *Strategy*.

Currently, the average household size in Cardiff is 2.49 persons. If the new houses were to follow the same pattern, the result would be to add 113,000 to the population of Cardiff, over the life time of the *Strategy*. That amounts, for example, to the size of a city such as Cambridge (with a population of 125,000) and is well over twice the size of Wrexham.

The Welsh Government paper from which the figures are derived is very clear in pointing to their inherent limitations and for the need for further work to be undertaken before they could be regarded as a fully adequate basis for policy planning. Indeed, Planning Policy Wales makes it clear that these figures should be regarded only as a *starting* point for the final numbers to be adopted in any Local Development Plan, with local authorities able to deviate from Welsh Government projections, where this is supported by evidence (PPW para. 9.2.2). We recognise that that figures currently used in the *Strategy* are below those originally cited in Welsh Government documents. We also recognise that the local authority has taken independent and expert advice in order to arrive at its now new assumptions. Nevertheless, we remain firmly of the view that it cannot be sensible to take the growth in demand for housing over the past decade as a guide to the demand over the next ten years. The period between 1995 and 2008 was one of year-on-year economic growth. The next decade is set to be very different - and housing demand will have to be reassessed accordingly. The consultation document dismisses the current economic depression as 'short-term'. Our view is that this flies in the face of very widely shared economic analysis. The projections set out in the Chancellor of the Exchequer's Autumn Statement in December 2012, reduces the expected level of growth in the economy in each of the next three years, and extends the coalition government's austerity programme well into the next parliament. It is because it fails to respond to these latest projections that the current Plan makes its heroic projections of growth in the level of house building, to an extent which has never been achieved in recent times.

Option B suggests house building at a level (300 every year) above that of the highest rate achieved in only one year, 2006/07 – and 1000 above the year-on-

year average achieved in the decade of strong economic growth. Moreover, the level of building achieved in that period involved high numbers of flats and apartments - unlike the family housing envisaged in the Strategy. When the up-turn in the economy comes, there is nothing in the Strategy which discusses the very real likelihood that developers (faced now with pent-up demand across the UK) will face skill-shortages and supply bottle-necks which will constrain their ability to build at this rate during the period covered by the Strategy. Nor does it face the market inducements which will exist for developers to switch their attention to parts of the UK where even greater profits will be on offer.

Option C is dismissed by the document on the grounds that growth at this level would be insufficient to generate new infrastructure. Yet., this too is contrary to contemporary economic consensus. Infrastructure-led growth is the policy of all major political parties (albeit belatedly at the UK Government level), and all mainstream economists. Rather than expecting growth to lead to infrastructure, we need a Strategy where prior provision of infrastructure is used to shape the sort of growth we need, in the places where it is best provided. We recognise that the means to achieve this does not lie solely with the Local Authority.

The current Strategy document does not make explicit that full consideration has been given to the likely availability of brownfield sites in the City. There are a set of powerful, established social changes which are likely to produce new sites for redevelopment within existing communities. The contraction of church attendance, pub closures, police station contraction, the restructuring of financial institutions into fewer buildings – and at an accelerating pace – all suggest that new brownfield sites will come into play over the next decade. None of these developments, by themselves, will produce a major contribution to the city's need for new housing land, but cumulatively they can make a real contribution. As it stands, however, these possibilities are neither explored in the Strategy, nor factored into its future designations. We remain of the view that the final LDP must make maximum use of those brown fields sites which are available for development within the City limits. Our anxiety that this will not be pursued with the necessary energy is shaped by the experience of the lengthy and on-going delays in the development of the former Arjo Wiggins site. Under the new city administration we are fully supportive of the drive which is now underway to turn this, one of the most extensive brown field sites in the City, into new housing for Cardiff residents. We remain to be convinced, however, that the Strategy applies the same level of energy and imagination to the deployment of other, and potential, brown field sites for these purposes.

Only when every possibility for brown field site development has been exhausted should, we believe, attention shift to green field areas. In that sense, the consultation document appears to take the wrong approach, in appearing to put green field sites at the heart of the debate. Our conclusions are two fold:

1. The Strategy seriously overestimates the number of houses which can and should be built on green field sites in the City; and
2. Where green field building is required, the Strategy fails to provide a convincing case for the sites it has so identified.

When housing is to be created on the scale proposed then it seems fundamental that sites have also to be identified for their community and transport infrastructure which needs to go alongside such development. The Preferred Strategy makes no specific provision, or allocation of sites or areas of land, for the community facilities (for education, health, recreation and so on) which the occupants of the new housing will require. It is insufficient to suggest that these are matters in the process which lies beyond the Strategy, *because the areas that these facilities would require would need to be subtracted from the area available for housing.* The same is true for the extra facilities for public transport on which the Strategy relies. Here, despite its highly optimistic proposals for new reliance on bus travel (with which we deal more fully below), it does not locate clearly the bus terminal points, park and ride areas and other interchange with private car use. Where these facilities have been provided successfully elsewhere, they necessitate substantial areas of land (as well as costs and time for construction), which are not identified in the Strategy. Once again, therefore, such land allocation matters are, in our view, intrinsically important to the Strategy stage, rather than matters of detail to be considered later in the process.

As far as Cardiff West is concerned, we believe the Strategy is flawed, in failing to address a disconnection between its own suggestion that all future new office accommodation should be located on the East of the city, and the very high level of new house building intended on the North West of the City. Not only will the Strategy have to demonstrate how traffic flows *into* the city, but *across* the city as well. The Strategy does not propose any additional crossing points for the Taff. It recognises that, at peak times, existing bridges are all heavily congested. The Welsh Government is currently grappling with the difficulties which have been caused in Newport where traffic uses the M4 for short, cross-city journeys, causing jams and tail-backs on the motorway itself. As currently configured, the Strategy will recreate the same problems, on a larger scale, around Cardiff, with the M4 and A4232 becoming used as major routes for cross-city circulation, as car drivers drive out of the city at one side, re-entering it again at the other, in an attempt to avoid the congestion at crossing points within the city.

In order to prevent the very real dangers of further congestion which would otherwise be a consequence of the flows of traffic it envisages, the Strategy relies on new levels of public transport usage to cope with the extra population, and population movements. Yet, as its own figures demonstrates, bus usage has fallen in the City, even with a good level of service and with the added impact, in terms of bus use, of free travel for people over 60 and by disabled people. Transport has to be a top priority for any LDP. We welcome the commitment in the

Strategy to 'prior provision of transport infrastructure' to create sustainable travel patterns from new housing developments. We believe that irreversible commitments to such provision ought to be in place before, not after, land is released for housing purposes. Nor do we think that modal shift in favour of public transport can be predicated on wishful thinking about the way planners might prefer people to travel, rather than the actual decisions we know will be made. The current Strategy does not meet these tests. Indeed, despite its welcome statements on prior provision, the brevity and paucity of its proposals for transport are a very significant weakness in it.

We reiterate here a fundamental point, made in earlier observations to the Council on LDP matters. Cardiff's housing needs are best met by focusing on Cardiff's role within the wider City Region. For many years it has clearly been the case that many of those who work in the City's economy travel to work from its urban hinterland. The consequences of that fact need to be recognised in the development of the LDP. Its existence is already noted in the text of the Strategy. In our view, however, three new factors make responding to that pattern even more urgent today. The Welsh Government's endorsement of the Elizabeth Haywood report on City Regions means that the future will be shaped in that way – and the LDP needs to reflect that fact. The Welsh Minister responsible for Planning recently confirmed his commitment to Local Development Plans being produced as the result of 'discussion with neighbouring authorities'. He also makes it clear that the fact that other authorities, adjacent to Cardiff, have already completed their LDP processes does not stand in the way of such discussions. To quote his letter, 'the timing of LDPs is not an issue that will not inhibit a wider approach to resolving cross boundary issues'.

The Davies Report on regional planning has proposed that the Welsh Government's Planning Bill should take new statutory powers to resolve major planning issues at a regional, rather than local, level and the Welsh Government tell us that the Bill is, indeed, likely to contain provisions to strengthen cross authority collaboration in this way. The Strategy needs to make its proposals in that context. It is not a matter of waiting until the Bill becomes an Act of the Assembly. Rather, the Strategy has to demonstrate that it *goes with the grain* of policy priorities for the future.

Finally, the decision to go ahead with electrification of the Valley lines means that rail connections between Cardiff and its neighbouring local authorities will now be hugely improved over the coming period, including the possibility of a City Region Metro. The Preferred Strategy needs to reflect this radical change in the regional context, and to recognise its impact on where future housing is best provided.

Population density in Cardiff today is already over three times as great as that in Caerphilly, four or five times that of RCT and between six and eight times that of the Vale of Glamorgan. The extra population which would be a consequence of

the Preferred Strategy would be to raise density of development in Cardiff still further, and to widen still further the gap between developmental density between the city and its immediately neighbouring local authorities.

The choice here is between a view of Cardiff as a 'closed fist' city, in which everything it requires has to be provided within its own highly restrictive boundaries, or Cardiff as an 'open handed' city, reaching out towards, and directly connected to the five adjacent authorities which are its immediate neighbours. This is surely the approach which will maximise the economic and social benefits to the City Region.

Our own overall conclusion is that the Preferred Strategy, as currently set out, demonstrates the urgent need for a *Regional Housing Strategy*, for Cardiff and the wider City Region. Such a Strategy would ensure that housing was provided in places where the regeneration impact of the substantial investment involved was maximised, the advantages of transport investment deployed to the greatest possible extent, and the wider housing needs of Cardiff residents, and Cardiff's working population met. All the available evidence shows that cities are the modern drivers of economic growth, and integration with their regions the key to sharing prosperity and quality of life.

There is a leadership role for Welsh Ministers in bringing all this about, and we have written to the Welsh Government in similar terms, urging them to exercise this leadership with real vigour.

There are two further points which we need to make.

In the first place, the need for extra housing to which the Strategy responds has been generated because of the success of Cardiff as a city over the past quarter of a century. That success rests upon the 'manageability' of the city to those who live and work within it. A city in which high levels of congestion are a regular experience for its residents is one which will quickly lose its reputation as a good place to live. Nor will high density, indistinctive housing, poorly served by basic amenities, do anything to sustain Cardiff's appeal as a place to live in the future. The current Strategy puts at risk precisely the qualities which have made Cardiff a success. It radically undervalues those components which contribute to quality of life, on which, in turn, economic attractiveness in the future will depend. Indeed, the Strategy threatens to undermine the very conditions which it hopes to create.

Finally, we draw attention to the very important need for *phasing* in whatever final set of developments the Plan finally determines. Once land is identified for housing it becomes, in legal terms, almost irrevocable. If, as we believe, the growth projections set out in the Strategy are unrealisable, it will be too late to revisit land allocations. At a time of huge economic uncertainty, it is our firm belief

that identifying land in this way, for use in 15 years time, really does not make sense. The Cardiff Civic Society argues for a five year holding plan, to avoid the dangers of having no LDP in the immediate future, followed by a five year brownfield development plan, with other development held back for the third and fourth periods as the impact of City Regions, rail electrification and other developments become clearer. We believe there is much to commend in this proposal.

Given the very preliminary nature of transport infrastructure arrangements which the Strategy sets out for proposed developments West of the River Taff, we want to re-emphasise our firm belief that any designation of land for housing purposes should only become operational when the transport issues have been addressed.

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