

## **Cardiff Council's Replacement LDP: Options Consultation**

### **Introduction**

This is Radyr and Morganstown Community Council's response to Cardiff Council's Strategic Options consultation, with regard to options for housing and jobs growth - and possible ways of providing for growth.

The Community Council welcomes the opportunity to respond to the consultation. In doing so, it also wishes to remind Cardiff Council that:

- the Community Council has an excellent relationship with Cardiff Council, in line with the Partnership Charter signed by both parties in April 2019.
- throughout the development of the replacement LDP, the Community Council will seek ways to strengthen its relationship with Cardiff Council and identify opportunities to work together during the life of the new plan, in order to protect and enhance our community.

To this end, we were very pleased to meet with Cardiff Council's planning officials on 3 February, to discuss the current consultation.

### **Radyr & Morganstown Local Development Group response**

The Community Council is represented on the Radyr & Morganstown Local Development Group, which prepared the response attached at annex 1.

The Community Council fully supports that response - and congratulates the group for its work in preparing the document.

### **Additional comments**

Apart from the Radyr & Morganstown Local Development Group's response, we wish to offer the following comments:

- we understand that Cardiff Council will await results from the 2021 Census to assist with the process of predicting population growth in Cardiff.
- we agree that Cardiff Council should consider as much available and accurate data as possible to assist with its planning of new housing. To this end, we understand and accept that the option chosen by Cardiff may not be any of the options set out in its consultation paper - but could be a different option, better reflecting the most up-to-date data.

- the data should include predicted changes to the size of the population already established in Cardiff - along with predictions with regard to migration of people into Cardiff and out of Cardiff
- the data should be used not only to predict the number of new houses required, but also the type of housing required. To this end, Welsh Government data with regard to changes in different types of households should be considered. For instance, single occupancy households are predicted to increase from 56,596 to 66,253 between 2022 and 2036<sup>1</sup>. Any new housing should cater for those households - and should reflect the needs of those households with regard to location, local facilities, transport, lifestyle, money available to buy homes - and other factors.
- with regard to options for housing and jobs growth, Cardiff Council should bear in mind the fact that the Welsh Government has declared a climate emergency. A significant factor, therefore, should be consideration of the impact of new housing - and each option (such as brownfield or greenfield sites) on climate change. Options with the least impact on climate change (at construction stage and long term) should be preferred.
- with this in mind, we wish to draw Cardiff Council's attention to a recent Transport for New Homes report<sup>2</sup> which notes that housing developments on former farmland are adding hundreds of thousands of extra car journeys to England's roads. The report further states that despite plans for vibrant communities with local shops, leisure facilities and community services, the visions of developers have not materialised.
- this is clearly a risk with regard to greenfield site development in Cardiff. As discussed during our meeting with Cardiff Council on 3 February, it will not be possible to guarantee that the proposed Plasdwr District Centre (for instance) will be built. Rather, the developers can be required to market the site appropriately - but if no proposals for a district centre are received then the site (which is a significant area of land) could be delegated for more housing. This scenario would add to the car-dependency issues identified in the Transport for New Homes report.
- this, we feel, highlights the risks of building on greenfield sites rather than developing brownfield or windfall sites within established communities, where local facilities already exist (including good public transport services). We support the 20-minute neighbourhoods concept. And with regard to local facilities, we urge Cardiff Council to do all it can to avoid the

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<sup>1</sup> <https://statswales.gov.wales/Catalogue/Housing/Households/Projections/Local-Authority/2018-based/householdprojections-by-localauthority-householdtype-year>

<sup>2</sup> <https://www.bbc.co.uk/news/science-environment-60245980>

loss of facilities such as public houses - many of which are at risk of being demolished to make way for flats.

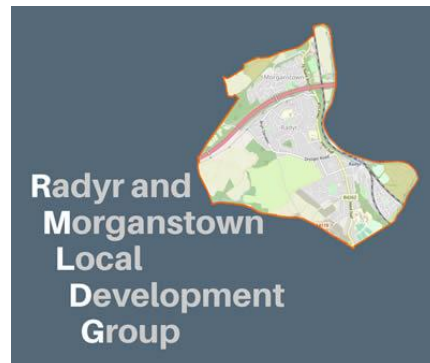
- whatever is agreed with regard to the need for new housing, Cardiff Council should do all that it can to ensure that the housing is of good quality - and built within a reasonable timeframe. To this end, we urge Cardiff Council to consider the proposals set out in a Spectator article (26 June 2021) and to discuss, with the Welsh Government, how the problems identified in the article can best be addressed.
- we urge Cardiff Council to protect green spaces, especially woodlands and other spaces enjoyed by the public, and / or which provide green spaces for walking for leisure or to travel between communities. These spaces also offer habitats for wildlife. Cardiff Council should stand firmly opposed to any developer wishing to destroy such habitats (such as the land to the west of Pant Tawel lane, to the north of Radyr Golf Club - and the woodlands to the east of De Braose Close.
- similarly, we urge Cardiff Council to ensure that developments underway with regard to the current LDP deliver fully on the agreements with regard to green spaces, woodlands, wildlife protection, safe cycling, woodland walks etc.
- we find the Welsh Government's suggestion that the Radyr Station car parks should be 'candidate sites' to be strange. Loosing these car parks for housing would make it difficult for commuters to take the train into town, rather than drive. Above a certain distance, people will opt not to walk to the station, and will drive into Cardiff instead. Alternatively, drivers may park in the streets surrounding the Station Road area, reducing the parking spaces available for those wishing to use Station Road businesses - and making those businesses less viable. We urge Cardiff Council to reject this application.
- given the slow progress with regard to house-building in Plasdwr, we urge the council to take a realistic view with regard to the number of houses likely to be built during the life of the replacement LDP. The land allocated for housing should reflect this - with no more land allocated for housing if the rate of building is unlikely to require it. Similarly, Cardiff should withdraw land allocated for housing from the current LDP (known in the current LDP plan as potential future expansion land), should the figures indicate that it would be appropriate and possible to do so.
- Cardiff should ensure the maximum possible section 106 contributions in relation to the replacement LDP.

- we support Cardiff's status as a National Growth Area. We believe that this status will offer welcome and exciting opportunities for the city's residents - and we look forward to working in partnership with Cardiff Council to ensure that Cardiff can develop as a great city. To this end, we refer Cardiff Council to the principles set out in our response to their previous consultation.

Radyr and Morganstown Community Council  
17 February 2020

**Radyr and Morganstown Local  
Development Group  
Comments on Cardiff RLDP  
First Revision 2021-2036**

20/01/2022



**Summary**

- 1 Radyr and Morganstown Local Development Group fully understands and accepts that planning manages the development and use of land in the public interest and acknowledges the current Future Wales strategy of building 66,400 house in the SE Wales National Growth Area by 2040. However, we submit that the RLDP Preferred Strategy should not be based on the three Growth Options presented, but on a more realistic Growth Option following the 2018 WG household projections. This would mean that the forecast for housing by 2036 should be set at a similar level to the LDP projection for 2026. We are also aware that population projections for Wales may be reduced when using the 2021 Census as a baseline and that this may result in an amended strategy when Future Wales is reviewed in 2026 which might render the RLDP growth options redundant.
- 2 This is necessary because:
  - The level of house building from 2016 to 2021 has been far lower than the projections upon which the LDP is based,
  - House buying is unlikely to accelerate in the foreseeable future as interest rates rise and household spending is squeezed and the economy has only just started to recover to pre-COVID rates;
  - Previous increases in population projections for Cardiff were based substantially on assumed high levels of international inward migration. The effects of Brexit and lower demand from overseas students are likely to result in a considerably lower level of in-migration.

**Detailed Comments**

**Housebuilding**

- 3 The Annual Monitoring Report for the LDP demonstrates clearly that house building since 2016 is well behind target. KP1 of the LDP requires 29,201 dwellings to be completed from 2016 to 2026, on seven strategic sites. The actual performance to

31.3.21 was 6,472. The highest annual house completion figure for Cardiff was 2,300 in 2006 but over the last fifteen years the annual average has been only 1,070.

- 4 Even if house sales rise exponentially for the next 4 years it is extremely unlikely that the LDP target to 2026 will be met. The figures for the year to March of this year, which will not be available until the 2022 Monitoring Report in October are key data for the planning process and the selection of strategic options to 2036 should take account of these figures.
- 5 Land has already been identified as a strategic reserve, but on any interpretation of these figures these sites should not be brought forward until at least 2032 (to allow consideration of 2031 Census figures).
- 6 Having this informal consultation after the call for candidate sites shows the scale of greenfield land that landowners and developers want to develop. Releasing yet more land now will result in multiple sites being opened up, but will do nothing to cater for the demand for social rented homes in more sustainable locations.

### **Affordable Housing**

- 7 Whilst the house building performance is well below the 2026 target, the performance of the building of affordable housing is even worse. The LDP contained a target of 4,468 to be completed by 2026 of which 3,093 were to have been completed by 2021. The actual performance to 2021 was 243 - i.e. only 8% of what was planned - derisory given the urgent need for homes for people on the Council's Waiting List.

### **Population**

- 8 The population projections from Stats Wales estimate Cardiff's population in 2031 to be 379,637 - an increase of 11,547 over the 2021 estimate of 368,090. However, the whole of this increase is anticipated to come from net international migration of 1,700. These international migration figures are a straight-line projection from a 2018 baseline.
- 9 Given that the UK has experienced and continues to experience major changes in its international status via Brexit it is possible that these figures will reduce in future decade. This is surely a poor basis on which to continue to plan for continued expansion and the impact must first be assessed to allow more accurate planning.

### **Transport**

- 10 7,650 dwelling are proposed in the LDP for NW Cardiff on strategic sites C, D and E. The LDP strategy suggests a further 2,500 could be built in this area if demand requires it. RLDP strategies suggest that these sites will be built. However, we submit

that the transport infrastructure policies in the LDP are already inadequate to support existing, leave alone an enhanced, level of growth with without any further improvement. For example, there are no concrete plans for extending the Western Bus Corridor to Cowbridge Road south from Bridge Road through Llandaff village and down Cathedral Road. Without such plans the Western Bus Corridor becomes of limited use to solving the transport problems of this part of the City.

- 11 What is needed is better connected, integrated and affordable public transport, engagement with existing communities to ensure less reliance on private vehicles and development of new communities with readily accessible facilities. Unless the Council takes a lead role on this now, Cardiff will continue to develop as an increasingly unsustainable city. Surely this is not an appropriate response to the current climate emergency nor to the wellbeing of future generations?

## **What is the Radyr and Morganstown Local Development Group?**

- 12 The Radyr & Morganstown Local Development Group is a recently formed group of local residents, who take an active interest in the Cardiff LDP and its proposed revision. Due to its proximity and the many diverse impacts on our community we are particularly interested in the pace of delivery of both the extensive new housing and the proposed local services at Strategic Site C. A major concern is the area adjacent to Strategic Site C identified in the current LDP for potential future expansion. We strongly maintain that this should remain "potential" under any revised LDP until it can be evidenced that a) there is an absolute need for this greenfield area to be offered up as a candidate site for development and b) the infrastructure, facilities and local services in connection with Strategic Site C have been provided.
- 13 We are however mindful of the needs and aspirations of the city of Cardiff as a whole and recognise the requirement to revise the LDP from time to time in order to maintain its relevance, monitor progress and establish a programme for the near future. It is our wish and intention to work together with other interested groups and our elected representatives to ensure the revised LDP provides a justifiable, deliverable and sustainable medium term plan, which takes full account of the needs and well-being of affected communities.