

North West Cardiff Group

Responding to the concerns of our communities

Creigiau Danescourt Gwaelod y Garth Llandaff Pentyrch Radyr & Morganstown St Fagans

Amanda Sutcliffe
Development Control
Cardiff Council

Old Church Rooms
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By email

June 26, 2014

Dear Amanda,

14/00190/DCO Strategic Site C: St Fagans/Pentrebane/Radyr/Rhydlafar Environmental Impact Assessment (EIA) Scoping Report submitted on behalf of Redrow Homes South Wales.

We understand that Cardiff Council has no statutory duty to consult with us on this application or to consider our response. However, in light of the importance of development in NW Cardiff we feel that we have a duty to our communities of some 24,000 people to record our concerns. We respond to the above application as follows.

Some of the report's text acknowledges the scale of provision needed eg: *"Major improvements to public transport networks within and beyond the site will be central to the proposal.."* (para 2.15) and *"...a hierarchy of transport connections is required (with) potential to link to the national rail and road networks and Cardiff International Airport"* (para 4.16). However, much of the text downplays the impacts that the Environmental Statement (ES) is to address and gives no confidence that the applicants have grasped the context for the development, the enormity of what they are proposing, or the need for much more involvement by the communities affected.

The following comments should be taken into account in the decision on requirements for the ES:

Para	Issue	Comment
2.15	Housing numbers: 'Land at North West Cardiff meets all of the above criteria and is therefore included within the Deposit Draft LDP as a mixed use strategic allocation capable of delivering up to 7,000 dwellings (5,000 within the emerging Plan period)...'	Para 4.1 states: 'The proposed development of up to 6,100 dwellings comprises the main phase of the strategic mixed-use development opportunity at North West Cardiff identified in the emerging Deposit LDP for up to 7,000 dwellings.' '6,100 dwellings' does not align with the LDP.
2.16	"RHSW is committed to appropriate consultation with the local community ...as part of the EIA and planning process".	There have been meetings with R&MCC and St Fagans CC in mid June: nothing earlier than that that we are aware of.
2.19	The proposed development (has been) subject of workshops and consultation events aimed at the general public as part of the Plan	This refers to Cardiff Council-run events as part of the statutory LDP process. There have been no events in Llandaff or Danescourt.

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	preparation.	
3.2	“Smaller conurbations exist to the south (St Fagans) and north (Radyr)”.	St Fagans is a very small village and a Conservation Area which recognises its distinctive landscape setting. It is physically separate from Cardiff. Radyr is an expanded village, also spatially separate from Cardiff. Neither can be described as a “conurbation”.
3.5	The site is described as being close to 2 rail lines... and having “good bus accessibility”.	<p>The site is so huge that counting numbers of bus services around the periphery is irrelevant. The ES needs to assess the impacts if the routes, frequencies and destinations required are not provided. There is no bus service to the 540+ homes in Radyr Sidings because Cardiff Bus said that extending its route would be an unacceptable increase in travel time.</p> <p>The ES should also assess the risk of service cuts because recent cuts in Cardiff Bus services (particularly to outer suburbs) shows that initial provision of a bus service is no guarantee of its continuance.</p> <p>The nearest rail stations are barely within walking distance at the closest points and well outside walking distance for most of the site; bus-rail transfer is highly unlikely for many journeys within the City.</p>
3.6	‘The description of ‘the site’ provided below relates to the land defined on the plan provided at Appendix 1.’	<p>Appendix 3 shows the whole of the strategic site as allocated in the DLDP.</p> <p>Appendices 1 and 2 have the same area less 3 sites along the eastern edge.</p> <p>Why does the EIA not cover the whole of Strategic Site C?</p> <p>The DLDP has allocated 5,000 dwellings to Site C as a ‘more realistic, robust and reasonable delivery figure for the Plan period (to 2026)’ but the whole site capacity is considered to be 6,500 – 7000.</p> <p>The developers are applying to develop the whole of Site C as 6,100 house rising to 7,500 after 2026 (as per this EIA). Added to this figure will be, we understand, a total of 900 dwellings in the 3 smaller sites. This gives a final total of 8,400 which is 1,400-1,900 more homes than the DLDP’s capacity for the site.</p> <p>We object to this increase in the housing density for the site.</p>
3.9	Agricultural land	The fields at Ty Gwyn Farm have not been ploughed since WW2 and should be assessed for important species biodiversity. Natural Resources Wales (NRW) will survey all the land when requested by Cardiff.
3.11	Woodland blocks	All areas of semi-ancient woodland should be protected and in addition, the EIA should

		<p>include a definitive retained features (including hedgerows and trees) assessment plan. Any decisions about retained features need to be worked up in conjunction with other design/masterplanning considerations, such as pedestrian and cycle connectivity, strategic green infrastructure corridors and development areas.</p> <p>In addition to the 'retained features' assessment plan, the ES should provide a clear explanation as to why certain features are to be retained and others not.</p>
3.12	Topography	Ridges will have an effect on drainage and this should be assessed.
3.13	Landscape quality	The land is a much-valued rural green space at the edge of Cardiff and has social and well-being benefits.
3.18	Site of the Battle of St Fagans (Civil War)	Cadw proposes statutory protection for historically significant battle fields.
3.19	Archaeology	This site should be protected or excavated before development.
3.20	Agricultural land ecology	The fields at Ty Gwyn Farm have not been ploughed since WW2 and should be assessed for important species biodiversity. Natural Resources Wales will survey all the land when requested by Cardiff.
3.21	Woodland	<p>All this land should be protected from development. NRW will survey in due course.</p> <p>Attention is drawn to Section 5.2.8 of Planning Policy Wales (Welsh Assembly Government, March 2002), which states that: <i>'Ancient and semi-natural woodlands are irreplaceable habitats of high biodiversity value which should be protected from development that would result in significant damage'</i>.</p> <p>Woodland on site should be protected in the eventual layout of the scheme by a buffer of at least 15 metres between the woodland edge and any gardens, buildings or roads.</p>
3.23	Hedges	<p>All these should be protected. The number of species within a hedge relates to its age. Has this been assessed? Hedges are key corridors for animals and plants to move and will be vital post-development.</p> <p>Ephemeral ponds have particular biodiversity importance and this should be recognised.</p> <p>NRW will survey in due course.</p>
3.24	Statutory designations	Attention is drawn to Section 5.2.8 of Planning Policy Wales (Welsh Assembly Government, March 2002), which states that: <i>'Ancient and semi-natural woodlands are irreplaceable habitats of high biodiversity value which should be protected from development that would result in significant damage'</i> .

4.1	'The proposed development of up to 6,100 dwellings comprises the main phase of the strategic mixed-use development'	Proposed up to 6,100 as part of the main phase. This is 1,100 more than in the current LDP for Site C: 5,000. We refer to our comments on housing numbers in 3.6 above.
4.7	Proposals include 4.5ha of B1, B2 (offices) and B8 warehousing Housing numbers Primary Schools	Such a potentially large area of B8 would be totally inappropriate for a site with no immediate M4 or trunk road junction - the nearest is miles away via congested single carriageway road. Its most likely use is retail warehousing - a major traffic generator. An objective analysis of impacts should lead to rejection of B8 uses on this site. This paragraph repeats the 6,100 number of houses (see 3.6 and 4.1). This para refers to 2 primary schools. The Masterplan for Site C refers to 3 primary schools as does the indicative plan for the site as shown to Community Councils by Redrow.
4.8	30% affordable housing, subject to viability considerations	This site should be a prime candidate for the maximum affordable housing integrated within the new communities rather than being concentrated in a corner of the site.
4.9	New infrastructure	As a 341ha greenfield site there is no existing infrastructure as needed by a development of this size.
4.11	Likely need for work "to extend and upgrade primary off-site (utility) facilities.	The scale of disruption for existing residents needs to be assessed and mitigated.
4.13	55-60% of the site will be subject to built development and infrastructure	If developed as a Garden Village a figure closer to 50:50 would be more appropriate.
4.15	Densities	If 60% of the site is built development and infrastructure, the housing density would average 30 houses/ha. However, it will be essential to plan higher densities to make the development sustainable and we argue that densities should be highest near to the Metro stations. Experience from Radyr Sidings suggests that initial phases at the more public edges of sites are built at lower densities with more variety of design. This leaves much higher densities and mediocre designs further into the site. We want to be assured that high quality design will be consistent throughout the development. The development should be tenure-blind. Recent development by Taff Housing Association on Cowbridge Road is an example of good quality affordable housing.
4.18	Phased improvements to public transport infrastructure appear to be limited to: 1. St Fagans Rd corridor -	The ES should include a realistic assessment of the public transport services required to serve the population to be housed, based on achieving a 50/50 modal split.

	<p>Cowbridge Rd</p> <p>2. New or extension to existing bus services and rail stations</p> <p>3. Improved information at bus stops and “spatial integration” at interchanges</p>	<p>There is no mention of road links or bypasses, only junctions from the new development onto existing roads.</p>
4.19	<p>‘The primary focus for trips to and from the site will be public transport’</p>	<p>The proposal is to build 6,100 homes rising to 7,500 after 2026. This does not align with the LDP. We refer back to our comments in 3.6 above.</p> <p>We estimate, conservatively, that from 6,100 homes some 6,000 people will be working. If they are similar to Radyr residents now, 25% will try to drive into Cardiff centre. This could put an extra 1,500 vehicles on the roads at peak hours.</p> <p>Traffic calculations made for R&MCC and submitted to Cardiff Council indicated that 7,500 homes on Site C site would attract up to an additional 4,500 vehicle movements during the peak hour. This does not take into account proposed employment uses on-site. This level of traffic will have a significant negative impact on an already congested network, which could inevitably result in grid-lock at peak periods.</p> <p>There will be severe congestion at Radyr Station and St Fagans National History Museum and already identified pinch points at Ynys Bridge, Gwaelod-y-Garth; Radyr Comprehensive School, Heol Isaf; St Fagans railway crossing; Cardiff Road, Llandaff.</p> <p>This EIA states that the primary focus for trips will be by public transport but the only provision that we are aware of for this site is a bus to the City Centre and one to Radyr Station, both of which would be subject to delay and congestion.</p> <p>Some residents will be travelling to destinations other than Cardiff centre using roads through Radyr or Groesfaen to reach the M4. Without the Metro it is very hard to see even 30% of people going by non-car modes.</p> <p>Cardiff Council’s own transport officers have acknowledged that the roads in NW Cardiff are already at their maximum capacity now (meeting April 23 2014, NWCG with Cllr R Patel and officers).</p>
4.23	<p>Comprehensive landscape strategy</p>	<p>We will be interested to see the results and whether any of the existing landscape structure can be preserved.</p>
4.24	<p>Sustainable urban drainage (SUDS) to be provided only</p>	<p>Drainage systems should be provided throughout the site that will limit the surface</p>

	“where appropriate”	water run off from the site to be no greater than that from a greenfield situation otherwise there will be heightened flood risk downstream in the Ely River Valley adversely affecting areas of Ely and Canton.
4.27	Sustainability	This should include renewables.
4.28	Construction and phasing: 15 yrs assumed, starting in 2018	The ES needs to include mitigation provisions should this programme not be met.
4.37 + 4.38	Re Alternatives to their proposals, RHSW has given “limited consideration to other sites for the development of similar urban extensions”.	The ES should include comparison with the Cardiff Civic Society proposal for a series of new communities developed around stops on the Metro and delivered by a New Town Development Agency ie a sustainable option
4.42 + 4.45	The report refers only to Land north and south of Llantrisant Road with outline approval for 630 houses, and south of Pentreban Rd with outline approval for 290.	The ES should include sites which will add significantly to cumulative impact, including sites in RCT. It must also include all sites currently under construction in the north west of the City and those allocated in the LDP.
5.6	Socio Economic Effects	Consultation will be needed with existing communities on their needs and projects/facilities to mitigate against the effects of this development
5.20	Baseline transport conditions	Work done by Transport Planning Associates for Community Councils and submitted to Cardiff Council with previous responses to LDP consultations should be taken into account.
5.29	The (transport) assessment will assume that the Council will be successful in achieving a 50/50 modal split.	There are major uncertainties and risks in the assumption. A range of scenarios needs to be assessed in the ES for this site. One of the scenarios should consider the implications of the current modal split (62/38) continuing.
5.31	‘In terms of vehicle movements, the EIA will consider the effects on receptors along the following corridors:’	There is no mention of Michaelston Road. Some traffic from the proposed development will inevitably use that road and it is essential that this road be included in the assessments undertaken, particularly because of the level crossing at St Fagans.
5.40	“The development will introduce an increase in the area of impervious surfaces...”	The Council's aim should be to ensure that through appropriate drainage design no increase in run off from the site above that which a greenfield situation would provide will be allowed.
5.52	SINCs etc	These should all be protected and not isolated.
5.54	Land	The fields at Ty Gwyn Farm have not been ploughed since WW2 and should be assessed for important species biodiversity. Natural Resources Wales should survey all the land.
5.55	..”seasonally and permanently wet ditches/streams and a number of ponds were also present..”	Large parts of the site are always boggy This area acts as a sponge, preventing water from running off too quickly and causing flooding downriver in Ely and Canton. Large areas of land need to be set aside for water retention to reduce this risk. Hydrological work should take into account climate change and increased likelihood of prolonged periods of torrential rain and flooding. Biodiversity value should be assessed.

5.58	Surveys	These should be undertaken to recognised quality standards and cover seasonal variation where appropriate.
5.65	Study area covers approximately 330ha	Para 3.1 refers to 341ha.
5.71	St Fagans Castle HPG	Insufficient recognition of the importance of St Fagans Historic Park and Garden
5.72	Craig y Parc HPG	The view from this Conservation Area should be protected.
5.77	Hinterland landscape: This is a discussion as to whether this area is appropriate for an urban extension or separate communities.	Our view is very strongly that the area demands development as a series of linked communities, not by urban extension.
5.113	Air quality for the operational phase	Any predicted air quality will be heavily affected by predicted traffic flow. The assessment must include the consideration of the effects on the Llandaff and Ely Bridge AQMAs. Traffic impact during term time and out of term time should be considered, suggesting that, as a minimum, they should look at classified counts during the am and pm peak hours and the impact upon Annual Average Daily Traffic flow (which is of concern for air quality). It is advised that they need to assess impact on queue lengths and queuing times at the junctions and journey times through the AQMA. As stated above, the Cardiff Road/Llantrisant Road/Cardiff Road junction is at or near capacity now and increased traffic might manifest itself as increased queue length. Counting traffic and assessing AQ are different things. Traffic counts are one of the inputs. It is not possible to reliably predict AQ solely from traffic counts as prevailing meteorological conditions and local topography are key influences. A separate AQ Assessment is needed.
5.128	Cardiff Council's points for consideration.	What are the points raised by Cardiff Council?
5.132	Pre-determination archaeology field work	Good
5.141	Land classification	Why are the WG surveys not available?
5.142	Land classification	The fields at Ty Gwyn Farm have not been ploughed since WW2 and should be assessed for important species biodiversity. Natural Resources Wales will survey all the land when requested by Cardiff.
5.150	Tenant farms	We are aware of tenant farmers within Site C who have serious concerns about their future.
5.151	Soils	The fields at Ty Gwyn Farm have not been ploughed since WW2 and should be assessed for important species biodiversity. Natural Resources Wales will survey all the land when requested by Cardiff.
5.172	Regional area for waste includes the whole City Region and Powys	Powys should not be included in the Cardiff Region.

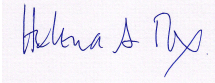
We submit these comments as evidence of our concern about the development of NW Cardiff and this site particular.

We are extremely concerned at the apparent increase in housing numbers which does not align with the LDP period or thereafter.

Overall, the EIA gives us no confidence that the applicants have grasped the context for the development, the enormity of what they are proposing, or the need for much more involvement by the communities affected.

Without these changes the ES will not provide an adequate basis for assessing the environmental impact of development proposed on Site C.

Yours sincerely,



Helena Fox

Clerk to R&MCC on behalf of the North West Cardiff Group