# CAERPHILLY LDP UP TO 2021

# **GREENDOORSTEP SUPPLEMENTARY EVIDENCE**

# **OUTDOOR FORMAL LEISURE FACILITIES**

## **1.0 INTRODUCTION**

1.1 Caerphilly Greendoorstep Environmental Group have been involved with various Local/County Development Plans for more than 15 yrs and our members have made representations to earlier plans .

1.2 All Central Government (Welsh office and now Assembly) guidelines etc. have clearly placed a duty on the Local Authorities to provide sufficient land to meet the outdoor leisure needs of the population. We have used the 6 acre NPFA standard as our standard when assessing the level of provision. This standard has also been used by the Local Authority and the Welsh Assembly and is being used by the County and the Assembly as their benchmark.

1.3 Despite this the Local Authorities have consistently failed to move towards a reasonable level of provision of outdoor land for leisure. At all previous Public Inquiries for development plans we have demonstrated the chronic shortfall that exists in the Caerphilly town area (for the purpose of this document Caerphilly means the St Martins, Morgan Jones, St James and Penyrheol wards of Caerphilly). Yet still the situation has worsened, with increasing population due to overdevelopment of housing, and no increase in facilities,

# 2.0 HISTORY OF DEVELOPMENT PLANS SINCE 1983

#### 2.1 Caerphilly Local Plan 1983

2.1.1 Caerphilly Local Plan 1983 identified a shortfall of 60 ha of playing pitches in Caerphilly Basin at the time. We estimated that at least 40 ha of the deficiency was in Caerphilly town. That plan did allocate approx 28 ha of land in Caerphilly town for playing pitches.

2.1.2 However of the 28ha allocated, NONE has been developed for playing pitches. A number of tennis courts were provided at Virginia Park. The rest of the land has been re-allocated for other uses such as housing, schools, a golf driving range (golf courses are specifically excluded from within The N.P.FA standard). This has occurred even though 3,800 houses were allocated for Caerphilly Basin alone (see page 10 LA2). These houses were allocated for in-migration and the needs of outlying villages of Caerphilly Basin. The Basin has had the 'pain but not the gain'.

2.1.3 The Rhymney Valley draft District Plan acknowledged the deficiency but had very little plans to address the problem. 23 playing pitches were required to bring the plan up to standard but only 2 (now Diamond Close off Mill Road) were proposed. These were subsequently removed from the Deposit Plan and re-allocated for housing. Caerphilly Greendorstep objected to the Deposit Plan .

2.1.4 We had a meeting with officers of Rhymney Valley Council as part of the Plan procedure to try to resolve the problem without recourse to a Public Inquiry. We were assured that the Council had plans to provide a large area of outdoor playing space but could not reveal where the area was. Therefore we did not withdraw our objection.

2.1.5 The plan was <u>approved</u> by the planning inspector\_despite the <u>shortfall</u>. The new outdoor playing space did not materialise. Thousands more houses were proposed for the Caerphilly town area and have subsequently been built.

# 2.2 Caerphilly UDP 2003

2.1.1 At the start of the next plan (UDP 2003) there was still the <u>same shortfall</u> but a <u>bigger</u> population.

2.2.2 The Greendoorstep again objected to the proposed UDP due to the lack of formal outdoor play space. Again the Inspector <u>approved</u> the Plan.

2.2.3 Even by counting all the school playing pitches and by counting some pitches twice (counting dual-use soccer and cricket as two pitches), the Councils own figures showed that there was still a 65% shortfall. The Plan did propose to upgrade school playing pitches for public use.

2.2.4 The NPFA standard will only allow inclusion of school playing fields in the figures if there is written agreement that the pitches were available for public use.

# 2.2.5 Tar Plant

The draft UDP <u>acknowledged</u> the serious <u>shortfall</u> in playing pitch provision. The draft UDP included a large area for <u>leisure at the Tar Plant</u> site in the Caerphilly town area. By the time the Deposit Plan had been issued the site had been <u>re-allocated</u> as white land which could be used for housing.

#### 2.2.6 Cwrt Rawlin School

A small area was proposed and <u>approved</u> for an <u>all-weather outdoor</u> play area in the UDP on the community site adjacent to the Cwrt Rawlin School. However the community area has now been taken over by the school for a <u>car park</u>, an extra school <u>classroom</u> and an indoor play area for the school.

#### 2.2.7 More houses built

Again more houses have been built since the 2003 Plan, but have not even yielded the correct play space for the new houses built e.g.

#### a) Penrhos

More than 450 houses (approx 1,000 population) at Penrhos will not yield enough adult play space for a full size adult <u>playing pitch</u> (It should yield 2.5 ha in total).

#### b) St Martins school

The proposed upgrade and public access to St Martins school playing fields has <u>not</u> materialised. Even if it had there would still be <u>24 ha</u> of playing pitch <u>deficiency</u>.

c) Parc Owain Glyndwr

There are however 2 redundant school playing pitches (Parc Owain Glyndwr) which have officially been given public access but these are <u>too remote</u> from the areas of Caerphilly with the biggest shortfall.

## d) GE Aircraft factory, Nangarw

The public have however <u>lost the use</u> of the privately owned cricket and rugby pitches at GE Aircraft factory at Nantgarw, which were outside the Caerphilly Boundary but within 1.2 km walking distance of the area with the worst shortfall.

# 2.3 Caerphilly LDP 2010

# 2.3.1 Continued shortfall

The current LDP does hardly anything in the Caerphilly town area to lessen the shortfall, e.g.

# a) St Martins school

It does propose to upgrade facilities at St Martins School. The same facilities that were to be upgraded for the previous Plan and the same facilities as those to be upgraded for the proposed increase in housing at the Caerphilly Miners' hospital site, i.e. upgrading the same facilities 3 times.

# b) Cwrt Rawlin

There is a proposal to adopt the balancing lake area on the Cwrt existing Rawlin estate for leisure, but as this area is required for drainage purposes it cannot be used for formal recreation. There is currently hardly any space for even a modest kick-about area and it also a health risk, due to its use by dog owners.

# 2.3.2 Continued shortfall

Even if all proposals materialise there will still be the same shortfall, if not an increased shortfall of, outdoor play areas, especially in the Caerphilly town area, for the current population.

2.3.3 If the LDP proposes an increase in population the production of these guidelines seems to have been a pointless exercise as far as Caerphilly town is concerned.

# 2.3.4 Adequate provision by adjacent Authorities

Other adjacent Authorities such as Cardiff, Newport and Rhondda Cynon Taff seem to provide playing fields, even at sites close to the M4 junctions where there is more pressure for building land, e.g. Tongwynlais, Pontprennau, Thornhill, Taffs Well, Tredegar Park & Malpas (Newport).

## 2.3.4 Allotments

Greendoorstep have also commented that there is a lack of allotments in some areas of Caerphilly. Notably there are 4,000 people in Caerphilly living beyond a reasonable walking distance to allotments, and the other sites in Caerphilly have long waiting lists.

## 2.4 Greendoorstep Proposals

2.4.1 The Greendoorstep propose that Caerphilly CBC should:

i) Compulsory purchase land at Penrhos cutting and adjacent farm land at Gwaun Gledyr Isaf for <u>outdoor leisure</u> (outside the county but within 1.2 km walking distance).

ii) allocate the land south of the Miners Hospital for <u>allotments</u> and

iii) allocate the Tar Plant for leisure and employment.

2.4.2 The LDP should not base their playing pitches 'need' figure on a survey of existing sports clubs as they tend to be well looked after. The situation in Caerphilly is that only one rugby club exists with one team playing. Since there are no facilities no clubs are able to form. The participation rate for soccer is also very low in Caerphilly with no teams at all in the upper tiers of the Welsh leagues and only a few teams in the lower leagues.

## 3.0 CONCLUSION

3.1 Just as the 1983 Caerphilly Basin Plan(see page 10 la2) allocated housing in Caerphilly for in-migration from outside the County and surrounding villages, now other areas should be taking the housing allocation

3.2 The LDP should have a <u>moratorium</u> on all house building in Caerphilly Basin until the outdoor leisure space provision is at a reasonable level.

3.3 The LDP should not base their playing pitches 'need' figure on a survey of existing sports clubs as they tend to be well looked after.

3.4 By the end of the LDP period there will still be a <u>chronic shortfall</u> of outdoor play space with a deficiency of at least 27 ha of adult play space alone and at least 5,000 people living in Caerphilly town beyond the benchmark 1.2 km walking distance of a facility. This is not compliant with Welsh Assembly guidelines (TAN16 and previously PPG 12 & 17).

**3.6** This Local Authority and the Welsh Assembly appear to attach no importance to outdoor leisure space provision and appear to have no commitment to provide it.

**3.7** THIS APPARENT LACK OF COMMITMENT MAKES A MOCKERY OF THE WHOLE PLANNING PROCESS!

**B.** Williams & M Rickard (For the Greendoorstep)