



# Cardiff County Council

## Local Development Plan 2006 - 2026

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Representor  
Number

### Matters Arising Changes Representation Form

As part of the Examination into the Cardiff Local Development Plan (LDP) a number of Matters Arising Changes have been proposed to the LDP. These changes are set out in the Matters Arising Changes Schedule. This is your opportunity to comment on the Matters Arising Changes. All comments previously made at Deposit stage have already been considered by the Inspectors and so this form should only be used to comment on the Matters Arising Changes.

All completed forms should be returned by **midnight on 23rd July 2015** to: LDP Team, Room 131, City Hall, Cardiff, CF10 3ND or email [LDP@Cardiff.gov.uk](mailto:LDP@Cardiff.gov.uk)

Also available for comment are the Sustainability Appraisal and Habitats Regulations Assessment of the Matters Arising Changes at [www.cardiff.gov.uk](http://www.cardiff.gov.uk).

#### PART 1: Contact details

Your/ your Client's details		Agent's details (if relevant)
Title:	Ms	
Name:	Kay Powell	
Job title: (where relevant)	Planning and Conservation Advisor	
Organisation: (where relevant)	Llandaff Society	
Address:		
Telephone no:		
Email:		

Please note that all representations will be made available for public inspection and cannot be treated as confidential. However to ensure data protection we will remove personal details from publically accessible documents

Signed: <i>Kay S. Powell</i>	Date: 23/07/15
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## PART 2: Commenting on Matters Arising Changes

**Which Matters Arising Changes do you wish to comment on (Please refer to the Matters Arising Changes Schedule)**

MAC4 Object

MAC5 Object

MAC5 (Appendix 2) Object

MAC 8 Object

MAC10 Object

MAC15 Object

MAC37-39 Object

MAC41 Object

MAC49 Object

MAC51 Object

MAC52 Object

MAC54-61 Object

MAC75 Object

**If you are objecting to a change it would be helpful if you could indicate which Test of Soundness you consider it to fails (Please refer to guidance note).**

The DLDP fails:

C2 because the strategy will not lead to sustainable development ie it does not accord with national sustainability principles;

CE2 because the strategy, policies, and allocations are not realistic or appropriate and are not founded on a robust and credible evidence base; and

CE3 because there are no effective mechanisms for implementation and monitoring.

*Please note if you do not identify a test it will not mean your comments will not be considered.*

## PART 3: Your Response

**Your comments should be set out in full and relate to the Matters Arising Changes only.**

**Please use the space provided to set out your representation. Please be explicit as to which 'matters arising change' your comments relate to.**

1. Llandaff Society is part of the North West Cardiff Group and supports all the Group's comments on the MAC (included below after our para 2.9); welcomes inclusion of text relating to Masterplanning of the Strategic Sites in the Development Plan policies; but objects to other MAC changes and its critical omissions which make the resulting DLDP unsound.

2. Concerns of particular relevance to Llandaff, and its current and future residents, are the MACs lack of specificity and certainty of effective public transport and lack of phasing of development in line with its provision [**MAC37-39 T1-9; MAC4 KP1; MAC5 KP2; MAC8 KP6**]; its lack of effective proposals to monitor and take action on modal split and pollution [**Appendix Five MAC75**]; and failure to recognise the status of Conservation Area Appraisals [**Appendix Four MAC74**].

2.1 The omission of specificity and certainty of delivery of effective public transport in **Appendix Two MAC5 KP2(C) and KP2(D+E)** is our major objection. Llandaff is one of the main places that will suffer from increased congestion and pollution if the development of Sites C,D and E goes ahead without specific phasing linked to detailed planning and provision of attractive and convenient public transport services to meet the 50/50 modal split aspiration viewed by the Council as essential to ensuring the sustainability of the Plan.

2.2 This issue was raised at the Hearings and was included in the agreed Action Points, but despite the inclusion of “wish lists” of infrastructure in the MAC policies for the Strategic Sites there is still no mode, route or certain provision of a transport system capable of supporting modal shift on the scale envisaged ie an integrated system capable of transporting tens of thousands of passengers, not just a few hundred.

2.3 Llantrisant Road - the main radial route serving sites C, D and E - and its continuation via Cardiff Road cuts through the heart of Llandaff. There is no uncongested alternative for those travelling from the north-west of Cardiff into the City Centre. It is inconceivable that the thousands of people who drive on this road each day will pay extra to use a bus, even if traffic management measures mean that they take longer to drive. They will simply do as they have done over the past decades and adjust their start and finish times to limit increases in journey times. Cars are warm and comfortable, and are available from your door when you need them. Why would anyone walk to, and wait at a bus stop, getting cold or wet while doing so to catch a bus that will take as long or longer to reach its destination as a car after taking account of stops as well as congestion.

2.4. It is clear from **Appendix Two MAC5 KP2(D+E)** that the Park and Ride facility at Junction 33 is to be bus-served. Such a facility will be inadequate to the task of diverting thousands of car-based trips a day. The P&R **must be served by fixed track, high capacity, rapid transit** because this is the only type of service that will persuade most car users to transfer to public transport. This will be vital because the catchment population for the P&R within Rhondda Cynon Taf, Bridgend and beyond is set to continue to expand as housing will remain so much cheaper in these areas than in the City.

2.5 We are very worried about the huge proviso in the **Revised Sustainability Appraisal** (SA para 1.9) on its judgements because of the uncertainty of its assumptions about the quantum of increases in housing and employment. The SA concedes that because the largest Strategic Sites are far from the City Centre this will increase transport impacts “unless sustainable transport provision is made before occupants move in.” In other words, the SA confirms that North West Cardiff Sites C,D and E **will not be sustainable** unless their development is phased to start **after** fixed track rapid transit is in place (ie after 2021) and, only then, if development is designed in a way to make public transport use more attractive than private transport.

2.6 This issue is critical for Llandaff as we already bear the brunt of heavy traffic flows throughout the day, leading to congestion, air pollution in our AQMA, and road safety issues. We have particular concerns about the impact of any major development on key

radial routes - Llantrisant Road/Cardiff Road, Bridge Road/Cardiff Road, and the major cross-city route which bisects Llandaff - Western Avenue, a 1930s 4 lane arterial road which will be expected to carry even more traffic than it does at present.

2.7 **Nowhere in the MAC** is there any clarity on the future of Llantrisant Road. However from supporting documents with the "Plasdwr" Planning Application we gather that this is to be transformed into a wide road with a series of traffic signals and "traffic holding pens". No evidence is presented that this will do anything other than increase and spread traffic over more hours of the day - peak hours currently total over 5 hours ie 7.30-9.30am AND 3.30-6.30pm. Any advantages to bus services gained in using separate sections of bus lane will be lost when they, with other traffic, are held up at the many congestion points in Llandaff and elsewhere in the City.

2.8 Whilst welcoming the expanded monitoring framework in **Appendix 5 MAC75** we are not convinced that it provides a focused, effective framework for tracking progress or lack of it, and triggering effective action to mitigate impacts. Particular concerns are the lack of clarity on how congestion - not just traffic flows - will be monitored, and a reckless approach to air quality which implies that the problem will disappear as and if traffic levels reduce - a highly improbable hypothesis. There appears to be no 'Plan B' to cope if traffic - and thus pollution - increases as we suggest it will. The impact on the health of current and future residents of the City - and the consequent costs to the National Health Service - do not seem to register as an issue.

2.9 We also object strongly to the lack of Development Plan status for Conservation Area Appraisals (CAA) in **Appendix Four MAC74**. Supplementary Planning Guidance (SPG) is proposed for other issues, but none is proposed for Conservation Areas - even though CAA documents following the same process as SPG have already been approved by the Council (in 2006). The Council's stance is illogical and we request that the Inspectors add CAAs to the list of SPG in view of the importance of built heritage of the City, and Wales as a whole, and to enhance their value as policy documents.

**And as stated in para 1, we support the NWCG representations on the MAC ie:**

**" General Comments**

1. The Inspectors' fundamental and legitimate questions on transport, phasing and infrastructure for the scale of development proposed for NW Cardiff remain unanswered. (MAC37-39 for T1-9; MAC4 KP1; MAC5 KP2; MAC8 KP6)
2. If Cardiff and the developers are confident that they can deliver the LDP by 2026 then they should have no fear of phasing development with infrastructure as advocated by Cardiff Civic Society, because it will work. That they refuse to do this suggests they are not confident of delivery. (Tests of Soundness CE2, CE3, CE4)
3. The MAC amendments to the DLDP do not make the Plan a sound blueprint for development. (Tests of Soundness CE2, CE3, CE4). (MAC37-39 for T1-9; MAC4 KP1; MAC5 KP2)
4. Despite the hundreds of voluntary and paid hours worked by all parties involved in this LDP process no notice has been taken of our valid representation and no fundamental changes have been made to the Plan. (MAC1, para 1.6 'Consultation')
5. The MAC talks about bus-based rapid transit (BRT) but what is proposed is conventional bus services on roads with sections of bus lane that lack the capacity or speed advantage to deliver the 50:50 modal split. Cardiff itself acknowledges that 'neither land nor other resources are likely to be available in Cardiff for the adoption of bus rapid transit in the short to medium term' (Cardiff Bus Network Study, Cardiff Council and Cardiff Bus, November 2014). (MAC37-39 T1-9)
6. BRT is defined as "*a high-quality bus-based transit system that delivers fast, comfortable and cost-effective urban mobility through the provision of segregated right-of-way infrastructure, rapid and frequent operations and excellence in marketing and customer service.*" (*The BRT*

*Planning Guide*, Institute for Transportation & Development Policy, June 1 2007). BRTuk's more detailed description of a proper BRT network is shown in Appendix 1 (MAC37-39 T1-9) 7. At the Hearings we objected to the conflation of BRT, bus corridor enhancements and rapid transit corridors. The MAC has made the situation even worse and weakened the language with a lack of precision in the use of transport terminology which is not helpful or clear. This is clearly a fudge made necessary because there is no proper strategy or phased direction of travel. The proposals are a very long way from the BRT definitions above and in Appendix 1 (MAC37-39 T1-9) (MAC56 C8-C10).

8. It is a huge frustration and disappointment to us and our communities that Welsh Government has forced Cardiff Council into a situation which is unreasonable and damaging to our capital city.

9. The Plan should and could have aimed to create a bigger, better, more sustainable Cardiff that was fully supported by infrastructure including an integrated public transport system provided in-phase with development. (MAC4 KP1)

10. The elephant in this Plan is that it is distorted by the pressure from Welsh Government to deliver over 41,000 new homes and all associated development by 2026. No one believes that that rate of construction can be achieved. (MAC4 KP1)

11. By forcing Cardiff to put a quart in a pint pot by 2026 it cannot include the essential transport infrastructure like the Metro that Cardiff acknowledges it needs to achieve a 50:50 modal split. The Plan is thus neither honest nor sound. (Tests of Soundness CE2, CE3, CE4)

12. Planning should be evidence-based but the MAC ignores the new evidence presented at the Hearings. It was demonstrated that to deliver the 50:50 split effective transport capacity will be needed for tens of thousands of people in NW Cardiff not the few hundred that an extended bus service could carry. (MAC37-39 T1-9)

13. The evidence at the Hearings from Cardiff Bus showed that no work has been done to assess the vehicle numbers and capital/revenue costs of the hundreds of extra bus vehicles needed. (MAC37-39 T1-9)

14. The developers say, and Cardiff Council agrees, they can deliver sustainability by building self-contained communities without any solid evidence that they can or that it has been done anywhere else. We know of no European example of such a self-contained community. Most existing and new employment in Cardiff will be in central and southern parts of the city. (MAC5 KP2)

15. If the Plan at C7 (MAC56) can specify phasing of education provision per 700 dwellings why is this not possible with the more fundamentally important transport provision? We support the phasing suggested by Cardiff Civic Society for Strategic Sites C, D and E: no development before mode/route is known, 1,000 houses before delivery timetable and funding is finalized and a total of 2,400 houses in NW Cardiff before the rapid transit is operational and not more before the Metro is in place. These should be added to new policy KP2(C-E). (MAC5 Appendix 2 KP2(A-H))

16. A segregated rapid transit system cannot be left to preparation of the Strategic Development Plan for the Cardiff City Region because retro-fitting the scale of infrastructure required will simply not be possible unless the land requirements for the routes and stations/stops are known. (MAC37-39 T1-9)

17. Planning to develop Strategic Sites from the highway edges inwards and towards open country, as set out in Policies KP2(A-H), is not phased development. It is simply the pragmatic sequence preferred by developers and does not guarantee a sustainable community. (MAC5 Appendix 2 KP2(A-H))

18. We share Cardiff Civic Society's reservations along with those of Mark Drakeford, AM and Kevin Brennan, MP about Site C north of the A4119 and south of Pentreban Road which are not sustainable areas and which will develop as car-dependent commuter outer suburbs. We propose deletion of these unsustainable parts of Site C which will be remote from the future fixed-track rapid transit. (MAC5 Appendix 2 : KP2(C))

19. We share Cardiff Civic Society's reservations along with those of Mark Drakeford, AM and Kevin Brennan, MP about Sites D and E and the reserve site which together will swamp Creigiau. Their early development will not allow the retro-fitting of proper segregated rapid transit or the development of an effective park and ride thus inhibiting embedding sustainable travel habits from the outset. We would like to see the whole of Site E omitted from the LDP. (MAC5 Appendix 2 : KP2(D, E))

**In addition:**

**MAC4 : KP1 : Level of Growth**

a While we realize that there is built-up demand for housing, over 22,000 new allocations plus the 10,885 in the current land bank cannot be built and sold in Cardiff within 11 years. Providing allocations for that number within an LDP with an end date of 2026 will simply raise land values with no guarantee of delivery.

b We do not, and will not, need the reserve sites because it is extremely unlikely that the Strategic Sites will be built-out in the period of the Plan.

c Cardiff has an existing land bank that is not being used and the more land that is released the less likely it is that the less attractive brownfield sites will be developed.

d One of the key problems in Cardiff is the real need to provide affordable houses in inner city communities where people are now living and want to remain. All the excessive greenfield land releases will not solve this problem.

e 4.29 : we dispute the statement that brownfield sites cannot deliver 20% affordable housing. Many of the so-called "brownfield sites" are in very sought after areas eg Rookwood, NW Cardiff. The high sales values of private housing on such sites will more than cover clearance, conversion and development costs and provide for that level of affordable housing on site.

f It is a national scandal that viability testing, which can only be an estimate, consistently understates the profits being made and is used to reduce developer contributions to public infrastructure. We dispute the new sentence at the end of 4.29 and consider that the calculations should be made public and be tested independently. This is a public interest issue of a particularly crucial nature at a time of a recognized national housing crisis. Cardiff is to Wales as London is to England and therefore it is instructive to see what has happened to the London housing market. We want to ensure that the same does not happen to Cardiff. (*Revealed: how developers exploit flawed planning system to minimise affordable housing*, Oliver Wainwright in The Guardian June 25 2015) g 4.41 : we would be concerned if this allowed early access to the flexible sites if enough pressure is put on the Council by developers.

**MAC8 KP6: NEW INFRASTRUCTURE**

a the phrase "in accordance with PPG" should be replaced by: "**in advance of major new housing or commercial development**"

b New para after 4.105 after "...development of Strategic Sites.." insert "**will be phased to follow provision of core transport routes and services including: walking and cycling**"

c The wording of Para 4.117 "will seek to secure on-site and off-site infrastructure" is too weak to secure anything approaching a 50/50 modal split. The words "seek to" should be deleted.

d In the new para after 4.149 it is not good enough to say that "...the affordable housing target...will not meet the need figure as set out in the LHMA..." When we know that affordable housing completions are well below target and the Welsh Government should be commissioning housing associations to build more affordable housing on a range of sites, not just at Ely Bridge.

e Using S106 alone is a failed model. The new CIL regulations seek to substitute S106 with CIL **plus** S106. It is important that Cardiff maximises contributions from S106 to fund major on- and off-site infrastructure. This is a position which, because Cardiff has not achieved large S106 payments in the past, is entirely in line with the new CIL regulations. (Appendix 2: email interchange between Mark Newey and Kay Powell)

f Funding of community and health infrastructure is vital. Unfortunately, Radyr & Morganstown has lost three community facilities which were promised under past S106 agreements: a primary school in Morganstown was lost to housing and the result is that both primaries in R&M are struggling with over-capacity with Radyr Primary teaching children in portacabins. At Radyr Sidings, a new library on a site large enough to make it an integrated community facility was lost to housing and another site for a residential care home for elderly people has just been lost for community benefit.

g Our key issue is thus: who is going to deliver and fund the 'integrated citizen focused resources' (ICFR)? Cardiff Council has been forced to delay closing seven libraries including one in Radyr (the only one remaining in the outer wards of NW Cardiff) by the

public outcry. Libraries currently provide our 'integrated citizen focused resources'. Unless substantial monies are levied from S106 for capital and revenue costs ICFRs will not materialise in the Strategic Sites. The reasoned justification for this new policy KP6 needs to be clearer on the point of securing these new facilities. Otherwise, pressure on existing community facilities in neighbouring communities will be unrelenting. This is an issue for the University Health Board as well as Cardiff Council and the developers.

h NW Cardiff has seen no major significant investment in improvement of water and sewerage facilities for several decades. It is high time that Welsh Water were able to plan in advance for development rather than relying on site by site negotiations which is clearly a failed model. The Westfield Park Development in St Fagans is still unadopted after at least ten years due to issues with sewerage and water capacity and facilities. In Christmas 2014, raw sewage backed up into houses as a result. Raw sewage is also leaking onto a recreation field by the failing pumping station. This is a horrendous public health hazard which should have been mediated years ago. This is not an isolated case and there have been issues in the early days at Radyr Gardens, Morgantown.

i There is a house in St Fagans Drive, St Fagans with a swimming pool. Welsh Water demand notice before the pool is emptied. This shows the massive lack of capacity in NW Cardiff.

j These problems have been well known for decades, which is why NW Cardiff has not already been extensively developed.

**MAC10 : KP8 :** The mis-match between policy aspiration and delivery is highlighted by T4. The DLDP at T4 envisaged a high-quality regional transport hub but the reality is a rail station, surrounded by high-rise office development and dislocated bus services with no European-style transport interchange. Only the regional bus services will use the new bus station leaving local routes to fight it out on the street at open-air bus stops.

**MAC15 : KP16 GREEN INFRASTRUCTURE** MAC proposes to delete the word "created" We object to this deletion. This must be strengthened so that developers will be **required** to create new green infrastructure.

a There is a need for axial connections to be maintained via a web of green routes for pedestrians cyclists and horse riders. Where old rail formations and public footpaths are still in existence this is facilitated, avoiding the need for all such journeys to converge on/emerge from the centre.

b There is no interconnected network outside the Strategic Sites. (T5, T6, T8) **MAC38 T2 : STRATEGIC RAPID TRANSIT AND BUS CORRIDORS**

c Whether inadvertently or deliberately, a key section on rapid transit corridors of Policy T2 has been deleted. We suggest instead inserting the following: "**STRATEGIC RAPID TRANSIT: Provision of fixed-track rapid transit linked to the Regional Transport Hub as part of a wider integrated public transport network, with comprehensive cycling and walking infrastructure and measures to facilitate efficient road traffic management, car and cycle parking; together with ....** "

d The reasoned justification makes it crystal clear that there are no firm proposals for either the mode or route of the public transport rapid transit infrastructure. The result will be ribbon development along Llantrisant and Pentrebanne Roads which will be largely car-based, relying wholly on existing bus services. The centres of the sites will only be developed for retail which will generate even more traffic.

e There is no mention of means of regulating traffic impacts such as congestion charges and workplace parking levies. We therefore propose that the T5 Reasoned justification should include options to introduce congestion charging and workplace parking levies.

f The reference to "rapid transit" would have been missed if we had not been working on three documents at once so that we could compare the MAC against the Deposit LDP. The MAC strategy depends on small elements of the "Metro" package and an extension of bus-based public transport, but the experience in Cardiff is of a sustained increase in rail patronage with reducing bus patronage and service levels. Moreover, evidence from UK metropolitan areas shows that reliance on enhanced bus services cannot achieve anything approaching the required level of modal shift (see PTEG report attached: 'What Light Rail can do for Cities'). Buses will be operating on roads

increasingly congested as part of Cardiff's explicit deliberate traffic-slowing strategy, with only small sections of bus priority plus some bus-only routes within the Strategic Sites. No self-respecting transport or planning professional would refer to such bus services - running largely on-street - as "rapid transit". The Wikipedia definition is as follows: "**Rapid transit**, also known as metro, subway, underground, or colloquially as "the train", is a type of high-capacity public transport generally found in urban areas." Cardiff and developers use 'rapid transit' very loosely to cover what is in fact a conventional bus service with some lengths of bus lane. This is not an honest description.

g To illustrate Cardiff's low commuting bus patronage, the current Cardiff East Park and Ride on the very busy A48 runs seven days a week but was used by an average of only 338 cars a day in 2014. Its 4 buses operate a 15 minute service, advertising a journey time to Churchill Way of 18 minutes. The capital cost for this was some £7,500,000, including associated bus priority measures on the A48 and current costs are £35,000 pa under the terms of the contract with Cardiff Bus, plus £8,000 to cover any maintenance items not included in the contract. (Appendix 3)

h T2 has moved backwards from the DLDP paras 5.228 and 5.229 which gave greater clarity if not certainty of delivery.

i We argued during the Hearings for clarity on the difference between RTCs and Bus Corridors because we were concerned that they were being conflated. The resulting MAC policy even further conflates the two, confirming our fears.

j It is clear to us that the LDP and its policies are being re-shaped to justify reliance on on-road buses masquerading as rapid transit. This is a serious and embarrassing failure of Welsh Government and Cardiff Council to plan for a modern mass-transit system for our capital city. The failure to plan for and provide adequate transport infrastructure while simultaneously insisting on the building of over 41,000 new homes with associated employment, retail and community facilities means that we will never achieve a 50:50 modal split despite the claims in developers' transport reports. The refusal to recognize the conflicts of interest now looks like wilful blindness.

k There is no reference to the provision of new vehicles for the 'enhanced bus corridors'. This is a key cost and a rate-limiting factor in the provision of more routes and more frequent services.

l Para 5.227 has been deleted. We object to the revised Para 5.228. The previous one was clearer provided that 'on-road and' is deleted. Rapid transit by definition cannot run on-road with increased amounts of general regular traffic (*The BRT Planning Guide*, Institute for Transportation & Development Policy, June 1 2007).

m The four RTCs have been deleted from the policy T2 and are therefore not named in it. They now appear only within the Strategic Site maps. No new Proposals Map has been published so consultees have no idea how and if these are proposed to be linked up. The confusion continues because the title of the MAC policy, rather than covering two separate entities, is now conflated as "Strategic Rapid Transit and Bus Corridors". As currently phrased, the text appears to rule out any form of true rapid transit being delivered during the timescale of the LDP which means it is unlikely ever to be delivered. (Cardiff Bus Network Study, Cardiff Council and Cardiff Bus, November 2014). Because it will be essential to deliver 50:50 modal split we contend that it must be delivered within the Plan period and before most development happens. This will ensure that developers' contributions can be levied as part of the development management process.

n Para 5.229 There is no justification for deletion of the four RTCs - a vital part of the infrastructure proven as absolutely essential in other expanding city regions in the UK. (see PTEG Report attached)

o Whilst heavy rail remains as an option the detailed work required to ensure that it is delivered in advance of development has simply not been done.

p Para 5.230 : Whilst efficient use of available road space is clearly desirable the situation in Cardiff now is that lanes are so narrow that there is no provision for cyclists and large vehicles on many roads. Cyclists thus use footways meant for pedestrians. Cardiff lacks capacity now. Buses moving out to overtake stationary vehicles (such as the new one on Llantrisant Road by the BBC, which is little more than a short link



between 2 bus stops) - including cycles and other buses - are turning into the lane for on-coming traffic.

q Whilst sensible proposals for removing on-street parking may be appropriate there is a limit to this on roads such as parts of Heol Isaf, Radyr, where residents have no other alternative to on-street parking outside their home.

r Para 5.231 refers to "Rapid Transit Corridors and Bus Corridor Enhancements" but there is no plan for a network of new RTCs. The previously identified RTCs have been deleted from the detailed policy wording.

s Para 5.232 : We have no faith that the Council will be able to deliver this since it has recently announced its intention to close the key transport interchange between bus and rail services at Cardiff Central for 2.5 years from August 2015. Passengers changing between bus and train will have to carry their luggage between a number of different locations in the City Centre and Cardiff Central Rail Station – a fact which will discourage current, leave alone attract new, travellers! Is this really the experience Cardiff Council wants for people arriving in our capital city?

**MAC39 : T9 : Cardiff City Region 'Metro' network**

a We object to this policy which is phrased so weakly that it will have little effect. It should make bold declarative statements about what is planned and the delivery mechanism. b Masterplanning cannot produce a joined-up transport network. This has to be planned

by the Council working with Welsh Government and Network Rail. The time for 'seeking to facilitate', is long gone.

c We suggest "**T9 : Cardiff City Region Metro Network : Cardiff forms a key role in joining up the city network and expanding it to its hinterland. Key elements to be delivered in the Plan period include, but are not limited to, fixed track rapid transit from the city centre to NW Cardiff (as shown on the Proposals Map) ....**

**Land for development of the route, stations and interchanges will be safeguarded and linked to park and ride at J33.**"

d Reasoned justification should be amended to be more positive about the planning and delivery of this vital section of infrastructure. We recognize this will be towards the end of the Plan period but it is vital that the developments in NW Cardiff contribute towards the cost.

e In advance of CIL adoption, contributions to on- and off-site transport infrastructure should be made via S106.

f The Cardiff City Metro Network should build on, and add to, the existing fixed-rail network, and be complemented by local and regional bus services. It should make specific provision for a fixed track rail or tram-train route through NW Cardiff to RCT.

g Again, text relies wholly on the Masterplanning process and is focused on developments within the Strategic Sites without considering the whole network and its interchanges.

**MAC41 : Amend Policy R1**

Reinstate 'local' in R1i to avoid retail developments of a city-wide/regional scale being developed at or near J33 on the M4.

**MAC49 : Insert new policy : "Housing, health, education, community facilities and affordable housing within the Strategic Sites to be delivered in phase with public transport provision to ensure delivery of a 50:50 modal split from the outset."**

**MAC51 : C2** : We welcome an additional C2 policy on Protection of Existing Community Facilities but there is already a C2 on Community Safety/Creating Safe Environments. **MAC52 and 53 : C4, C5 :**

a Policy C5 : Provision for Allotments and Community Growing : deletion of this policy with no reasoned justification is completely outrageous. For health and well-being this is a vital community resource and benefit, and deletion is not in line with Welsh national policy. There is nothing in the new C4 to suggest that it has been included there.

b Whether inadvertently or deliberately, the policy on Provision of Allotments and Community Growing in Policy KP16 C5 Green Infrastructure has been deleted. There is no reasoned justification for this. We believe that for reasons of health and social integration and food security it should be reinstated.

**MAC54** : The new C4 does not replicate the detailed provision for children's play set out in the

original C6. Without sight of the Open Space SPG we cannot know whether the new C4 provides for children's developmental needs or is in line with the 'associated model for play' referred to. Simply inserting 'children's play' into C4 appears inadequate. No reasoned justification, again, is given for the change.

**MAC55 : Health C7**

a This amended policy deletes one of the essentials for ensuring health and well-being which is to limit the location of take-away food outlets. It also deletes reference to HIA, which is ridiculous. It should be taken into account in every major planning application. This should not be left to SPG.

b The new C7 should be C8 (C7 relates to Health).

**MAC56-58** : The revised numbering is confusing. There is nothing wrong with the original policies. The new C7 policy and its reasoned justification is much weaker, far too wordy, and does not give a clear steer on where schools will be needed. Such weak drafting leaves the policy open to manipulation by developers.

**MAC59 C7 : Planning for Schools**

a Delete first paragraph and then insert '**New and improved school facilities will be provided for new and existing communities affected by development including on-site provision. Planning contributions (S106) will be levied commensurate with the scale of the proposed developments.**'

b Para 2 of the reasoned justification should start: '**The Council will secure financial contributions ...**' c Para 3 of the reasoned justification should start: '**The Council will secure the provision of land and/or premises ...**'

d Para 6 of the reasoned justification implies that the Council may not be able to secure developer contributions for expanding existing school provision. This is unacceptable. It is not right that public provision relies on a negotiation which we know favours the developers (*Revealed: how developers exploit flawed planning system to minimise affordable housing*, Oliver Wainwright in The Guardian June 25 2015).

e This paragraph is out of alignment with para 4 above it which states how provision should be phased per dwelling completions. Without sight of the SPG it is not possible to assess whether guidance will be adequate and provide certainty. SPG does not in any case have the force of development planning policy; it is not yet in existence; it is unlikely to produce the goods.

f It is essential that Radyr Comprehensive School and Bishop of Llandaff High School, both excellent schools, are not left to provide extra places without adequate funding, staff and all necessary infrastructure.

**MAC60 - 68 : Mineral reserves**

a These leave R&M and Pentyrch isolated in a sea of mineral extraction zones. Safeguarding from all other development is not unwelcome now and in the immediate future but our concerns are for the longer term future of our communities.

b We note that there is a phasing policy for mineral resources but none has been inserted to meet the very real problems that will occur from unrestrained housing development.

c Creigiau Quarry extension: we do not object to the swap with less environmentally sensitive reserves **only** provided it does not lead to a net increase in the quarry area.

d The implications on quarrying and ready-mix sites (probably located in or near working quarries) and transport to and from these sites need to be considered with safeguarding limits such as weight limits on roads and a policy that favours construction of haul roads direct from the motor way and trunk roads.

e There are specific problems in relating to extensive use of Creigiau and Taffs Well Quarries for aggregate and cement supplies because the existing road system on all the Strategic Sites in NW Cardiff is totally inadequate. The existing B4262 has a weight-restriction that bars heavy vehicles unless delivering within Radyr & Morganstown.

**Appendix 2 MAC5 KP2(A-H)**

a R&MCC asked for the wording of essential, enabling and necessary infrastructure to be clarified. This has not been fully done. We suggest that essential/enabling means delivered in advance of substantial development and necessary means provided in phase with development. If this is done, these policies will have real strength within the

development management process.

b For Sites C, D and E, there is nothing for water and sewerage! The essential/enabling infrastructure must include basic trunk water and sewerage infrastructure with each phase having local supply.

c Parts of Site C north of the A4119 and south of Pentreban Road are not sustainable areas and will develop as car-dependent commuter outer suburbs. We propose deletion of these unsustainable parts of Site C which will be remote from the future fixed-track rapid transit.

d The proposals for sites D and E between M4 J33 and Creigiau are not taking into account public reaction in the village of Creigiau. Site E is merely an extremely unwelcome extension of Creigiau Village evidenced but the overwhelming local reaction to the public consultation in 2014. More feedback was received about this particular site than **any other** in the whole city. It has less certainty over its relationship to the NW rapid transit route. It will develop as a car-dependent suburb of the car-dependent commuter village of Creigiau. Sites D and E are separated by the very strong barrier of the A4119 which prevents them developing as one community.

e By contrast Flexible Expansion Site B at Henstaff Court, which now has defined boundaries, could form an integral part of a larger more self-contained settlement with Site D. Moreover, the two sites could potentially be linked by the most likely rapid transit route linking to the growth areas of southern RCT around Talbot Green.

f We propose that the whole of Site E is omitted from the LDP altogether as a primary Strategic Site. As an alternative the area designated as the 'Flexibility Site B' would make more sense to develop as a primary site and the current Site E allocated as a Flexibility Site. Site B could developed in a phased relationship with Site D under a common Masterplan for them both.

g Leaving areas undeveloped as suggested above will create green wedges that would limit urban sprawl and help existing communities to maintain their individual identities and new communities to establish their own. We advocated this at the Masterplanning Consultation stage because community identity is part of what makes Cardiff a good place to live.

h It is very unhelpful to have only insets of the Proposals Map particularly where there are no identifiable features to help the public identify the sites. Even for people who know the city well it is hard to identify the locations.

#### **APPENDIX 5 MAC 75 : MONITORING AND IMPLEMENTATION**

**Note: suggested additions or replacements in italics, deletions of words in [ ]**

a **Para 9:** a trigger of + or - 10% may not be appropriate in every case, for example in terms of house prices (see below).

b **Para 11:** we are disappointed to note that the Council has not amended its list of six options if the targets in the LDP are not met. The traffic light system we put forward (para 2 in Hearing Session 19, NWCG Statement Addendum: Monitoring Framework, February 2015) would be simpler and more effective in ensuring appropriate action is taken if there are wide variances between Plan targets and actual delivery eg:

**a. GREEN – all indicators being met, no need for review**

**b. AMBER – one or more indicators not being met trigger action with key stakeholders to address the issue(s) and further monitoring in 6 months**

**c. RED – one or more indicators not being met trigger urgent action with key stakeholders and consideration of a full or partial review of the LDP**

c **Contextual indicators:** we welcome the addition of the indicator related to health, and one for waste reduction.

d **Table, p186 Obj 1:** under the heading "PLAN REVISION REQUIRED" revise the repeated statement "**When a trigger point is required.....whether the underlying reasons [ ] require a partial or full review of the LDP**"

e **OB1 EC14:** Welcome this indicator but consider that it should be CORE (not LOCAL) and should measure all trips within and into the city. This would enable it to measure whether the Plan is delivering sustainable transport, and thus sustainable communities, in line with Welsh Government as well as Cardiff Council policy. Unless the DLDP has a reasonable prospect of delivering improvements in the proportion of people travelling by sustainable modes it will fail the tests of soundness. f **SOB1 EC19 and 20:** Welcome these

indicators, but as presently worded they do not differentiate between travel modes. EC19 will only be relevant if it measures reductions in TOTAL travel times by sustainable modes. Moreover, the phrase "improvement in journey time" is very imprecise and should be refined as **"10% reduction in journey time"**. Again, it would make more sense for this to be a CORE rather than simply LOCAL indicator because this indicator goes to the heart of Plan delivery.

g **OB1 EC21:** Welcome this indicator, but we regret that the "Regional Transport Hub" that is to be delivered will be a smaller hub than exists at July 2015. The Hub as currently envisaged will actually REDUCE the convenience of interchange between local bus, regional bus and rail for existing and new residents of North West Cardiff as the new "bus station" seems to be being planned only for regional bus services, so people will have to wander about the City Centre to find their local bus service stop. In any case this indicator should be CORE rather than LOCAL because a "Hub" is such an important part of an integrated public transport system!

h **OB1 EC23,24,25:** Indicators should relate to the **impact of policy** rather than production of SPG which may, or may not, have any impact on outcomes.

i **OB2 SO13,14,15:** We consider that these indicators (and others relating to Strategic Sites) should be amended - or new ones added - to link with infrastructure provision, specifically transport and education.

j **OB2 SO25:** Using the standard "10%" as a trigger in this case will be unlikely to register concern. Even a 5% increase in any one year of such a high value and essential commodity as housing would be of concern, so we propose 5% as the trigger.

k We are concerned that no indicator is proposed to measure the level of private housing rental levels, which is a key indicator of the health of the local housing market.

l **OB2 SO29:** The indicator for S106 should relate to success in negotiation and delivery of public infrastructure, rather than production of an SPG which is an administrative indicator relevant to the Planning Department, not the Plan.

m **OB3 EV14** This indicator is entirely unsatisfactory. Cardiff currently has 4 AQMAs so this means the Council thinks that this is acceptable! AQMAs are designated when air quality over a whole year is above EU recommended levels - which are lower than WHO limits and do not measure the most harmful small particulates arising from diesel vehicles. Having even one AQMA means that residents of Cardiff are living in heavily polluted areas. The number of people living in AQMAs would be a more appropriate indicator, with a trigger for considering a partial/full review if the number of residents in an AQMA increases by 5%.

n We also consider there should be an indicator to show changes in the overall level of pollution across the City, whether within or outside AQMAs. We suggest this is **"the proportion of air pollution monitoring sites registering an increase in pollution levels", and the trigger for urgent action "5% or more sites with increased pollution levels in any year"**. This indicator could be as important as measuring congestion levels in enabling assessment of whether action is needed and/or a review of LDP policies required.

o **OB4 SN12,13** We welcome these indicators which seek to measure whether the elements required to produce new sustainable communities in the Strategic Sites are being delivered.

p **NEW OB4 SN23** We propose an indicator for Conservation Area SPG to be produced to replace the current Conservation Area Appraisals, giving guidance greater status for Development Management commensurate with their importance for residents and visitors, and thus the economy of the City. The Conservation Area SPG should be produced by involving the local community and Conservation Groups more actively - for example using the new Place Plans - thus helping to re-build trust and confidence in the planning process.

q Finally, there are no indicators proposed to measure (a) **changes in the amount of productive agricultural land in the City**, nor (b) **changes in the amount of tree cover**. The former is as relevant an indicator of the contribution to the economy and to the health and well-being of its citizens as the number of jobs created. The latter is an important environmental indicator, measuring the success of the City in retaining its

green setting, which is valued for the importance of trees in carbon capture, cooling, pollution control and aesthetic quality. We propose **both triggers for urgent action should be set at 5%**

### References

1. Cardiff Bus Network Study, Cardiff Council and Cardiff Bus, November 2014
2. *Revealed: how developers exploit flawed planning system to minimise affordable housing*, Oliver Wainwright in The Guardian June 25 2015
3. *The BRT Planning Guide*, Institute for Transportation & Development Policy, June 2007)  
<https://www.itdp.org/the-brt-planning-guide/>
4. What Light Rail can do for Cities: A Review of the Evidence. Final Report February 2005, Passenger Transport Executive Group “

## PART 4: What Happens Next?

**All comments received by the closing date will be forwarded directly to the Inspectors for consideration; noting that they will not receive a response from the Council. Should the Inspectors decide that further hearing sessions are necessary please indicate whether you would want to speak at a session. It is important to note that written comments will be given the same weight by the Inspectors as those made verbally at a hearing session**

***4a) Do you want your comments to be considered by ‘written representations’ or do you want to speak at a hearing session?***

***(Please tick ✓ one of the following)***

**I do not want** to speak at a hearing session and am happy for my written comments to be considered by the Inspector.

**I do want** to speak at a hearing session ✓

***4b) If you wish to speak, please confirm which part of your representation you wish to speak to the Inspector about and why you consider it to be necessary to speak at the Hearing***

Llandaff Society wishes to speak at any resumed Hearing in order to ensure that the points it has made on the inadequacy of the MAC can be explained and to help the Inspectors make decisions on final revisions to DLDP policies prior to adoption.

The Matters Arising Changes Schedule is available on the Council website at: [www.cardiff.gov.uk](http://www.cardiff.gov.uk) Hard copies are also available for public inspection during the consultation period at: City Hall, Cathays Park and County Hall, Atlantic Wharf, Monday to Friday between 9.00am and 4.00pm. They will also be made available at all local libraries.

### Additional Assistance

If you require assistance to complete the form or have any questions relating to your representation please contact:

LDP Team,  
 Strategic Planning – Policy  
 Cardiff Council  
 Room 131 City Hall  
 Cathays Park  
 Cardiff CF10 3ND

**Telephone: 029 2087 1297**  
**E-mail: LDP@cardiff.gov.uk**

## Tests of Soundness

	<b>Procedural Tests</b>
P1	It has been prepared in accordance with the Delivery Agreement including the Community Involvement Scheme.
P2	The plan and its policies have been subjected to Sustainability Appraisal including Strategic Environmental Assessment.
	<b>Consistency Tests</b>
C1	It is a land use plan which has regard to other relevant plans, policies, and strategies relating to the area or to adjoining areas.
C2	It has regard to national strategy.
C3	It has regard to the Wales Spatial Plan.
C4	It has regard to the relevant community strategy/ies (and National Park Management Plan).
	<b>Coherence and Effectiveness Tests</b>
CE1	The plan sets out a coherent strategy from which its policies and allocations logically flow and/or, where cross boundary issues are relevant, it is compatible with the development plans prepared by neighbouring authorities
CE2	The strategy, policies, and allocations are realistic and appropriate having considered the relevant alternatives and/or are founded on a robust and credible evidence base.
CE3	There are clear mechanisms for implementation and monitoring.
CE4	It is reasonably flexible to enable it to deal with changing circumstances.