

LLANDAFF SOCIETY LDP EXAMINATION SUBMISSION 05/01/15

SESSION 7: Allocated Sites D and E

1. PART OF THE PLAN THAT IS UNSOUND

1.1 We argue that there should be **phased release** of all the Deposit Local Development Plan (DLDP) housing sites, including Sites D and E. Unless this happens there is a real risk of there being sporadic building of unsustainable, car-dependent housing areas beyond the edge of the City.

1.2 It became clear when the developers of Site D submitted their outline application titled "Junction 33" (of the M4) that they intend to develop it as a series of small housing sites accessing directly from Llantrisant Road, leaving open the possibility of a primary school and other facilities in the longer term, together with large amounts of employment which would inevitably attract car drivers, and a 1000 car Park and Ride facility.

1.3 We contend that the policies in the LDP in relation to these Sites must be changed because this Plan will provide the context for future development of the City Region as a whole. Unless key policies are changed now, and in the right way, the opportunity will be missed to **make future development of the whole region sustainable, as required by the Wales Spatial Plan and Planning Policy Wales.**

1.4 This is a particular issue for Sites D and E, because they include the Park and Ride facility. Serving this by "express" buses could add to road congestion when there is a solution available - provision of fixed track public transport - that has been extensively researched but does not feature in the DLDP. It will be vital to include policies relating to **provision of the Metro** for the North West sector as this will serve the needs of the City as a whole, and adjacent areas in Rhondda Cynon Taf.

1.5 Decisions made now on these significant land allocations need to be taken in the context of **sustainable growth of Cardiff and its region to 2026 and beyond.** It would be reckless to leave the issues to be resolved by a future Strategic Development Plan.

2. WHICH SOUNDNESS TEST DOES IT FAIL?

CE1-4 Coherence and Effectiveness; P2 Sustainability

3. WHY DOES IT FAIL?

3.1 It would be irresponsible to adopt the LDP with such a large allocation of housing, employment and transport in this key location without an adequate phasing policy. Phasing needs to be introduced to provide an effective means of controlling release of land in a way that reflects the public interest and leads to an orderly and sustainable form of development.

3.2 Fixed track public transport must be provided from the outset at this key location which has the potential to intercept significant volumes of car traffic from outside the

City. This has been demonstrated as the only way to achieve the 50/50 modal split which is acknowledged by the Council as vital to the creation of its vision of a sustainable City. Despite their aspiration for more active travel, it is not realistic to expect thousands of people to switch from driving cars into the City to catch buses that will be held up in traffic and at numerous bus stops, or to switch to cycle 6km to the City Centre or Bay or more to their workplace.

3.3 Without specific provision for fixed track public transport the current planning application for Site D and the Masterplan submitted with it - which did not benefit from any public consultation - will result in unacceptable traffic flows along Llantrisant Road and through Llandaff. Whilst leaving land for future “rapid transit” linked to Park and Ride on the M4, the applicants do not make certain provision for a fixed track public transport link to Cardiff City Centre and Cardiff Bay. They rely on diversion of an existing bus service along Llantrisant Road that runs full at peak hours, is diverted into communities alongside the route, and gets stuck in congestion. This cannot be sufficient to encourage new and existing residents and car users from outside the City to switch from using their comfortable and convenient cars. Moreover the totally deficient Environmental Statement does not take into account cumulative impact as required by the legislation, and relies too heavily on unrealistic assumptions on levels of walking and cycling.

3.4 We made a case for this application for Site D to be refused as premature. It is out of accord with the current policy framework, and is of such a scale and has such potentially large cumulative effects that - if approved - it would pre-judge the outcome of this examination of the Deposit Local Development Plan (DLDP). A decision to refuse this application - and any others that may be submitted - is supported by *Planning Policy Wales (Edition 7 July 2014) Chapter 2 Development Plans 2.6.3*.

3.5 In order to ensure sustainable development of Site D and E we urge you to amend policies relating to them, to ensure strict phasing and caveats to require provision of fixed track public transport, otherwise development of these Sites will be unsustainable and the result will be gridlock - and increased fumes and air pollution - on the approaches to, and through, Llandaff at all times, not only during weekday peak hours.

3.6 Unless relevant policies are changed the LDP could provide an incentive for investors to look for car-accessible development opportunities on the edge of or outside the City ie the exact opposite of what is intended.

4. HOW CAN THE PLAN BE MADE SOUND?

4.1 The DLDP policies relating to Sites D and E must require robust phasing and specifically require integration of land use development with fixed track public transport provision. Wording should be introduced to ensure early phasing of brownfield opportunities, to be followed by phased release of the most sustainable sections of this Strategic Site, which should be developed in reasonably self contained stages for a mix of housing, employment, education, health, community supported by sustainable transport provision.

5. WHAT IS THE PRECISE WORDING BEING SOUGHT?

5.1 The following words need to be added: **KP2 STRATEGIC SITES** ...*will be phased to ensure that infrastructure, including the Metro fixed-track services between NW Cardiff, Cardiff Central Station and Cardiff Bay, is in place and operational before occupation of any houses and other buildings for public use.*

5.2 In addition there needs to be a new Policy T7(iii) requiring early provision of Metro (heavy- or light-rail) from NW Cardiff via Cardiff Central Station to Cardiff Bay.

5.3 The Metro route(s) to be constructed by 2026 should be included on the Proposals Map.

5.4 There also needs to be a change to the Masterplanning principles to require Masterplans to be subject to public consultation and adoption as SPG by the City Council before any planning applications are processed.