

## LLANDAFF SOCIETY LDP EXAMINATION SUBMISSION 05/01/15

### SESSION 8: Allocated Site C

#### 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 Site C. Unless this happens there is a **real risk of there being sporadic building of unsustainable, car-dependent housing areas on the edge of the City.**

1.2 It has become clear recently that **the developers of Site C want to build more houses** with higher densities on the site. The planning application submitted in December 2014 for Site C is for 6,890 houses, whereas the DLDP allocates 5,000.

1.3 We contend that the policies in this LDP 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 improve the sustainability of the whole region.

1.4 This is a particular issue for Site C, because how it is developed and how it relates to the surrounding communities will be **critical to overall sustainability** of the North West sector, the City as a whole, and adjacent areas in Rhondda Cynon Taf.

1.5 Decisions made now on Site C need to be taken in the context of 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 and employment land 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 of such a major growth in 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 to walking and cycling to work 5-6 km from North West Cardiff to the City Centre or Cardiff Bay.

3.3 The transport strategy which underpins the DLDP is not robust because it cannot deliver the 50/50 modal split unless it is enhanced to offer attractive and sustainable choices for everyone. Relying on new cycleways, cycle priority, bus priority

measures and a few extra bus services is simply not good enough. If developed without significant investment in infrastructure Site C - which is the size of a small town on its own, leave alone its cumulative effects with the other major sites that sit alongside, and will empty into, the single carriageway Llantrisant Road - would generate enough traffic from its housing, employment and retail uses to swamp the roads in Llandaff and other surrounding communities. However the current planning application for Site C and the Masterplan submitted with it - which did not benefit from any public consultation - is specific in spelling out that it does not make any provision for fixed track public transport and that, if approved and built, traffic flows through Llandaff would be unchanged from current levels. These assumptions are totally unrealistic.

3.4 We will make a case for this application to be refused as premature because 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 C we urge you to amend policies relating to it, to ensure strict phasing and caveats to require provision of fixed track public transport, otherwise its development 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 development opportunities 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 Site C 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 in each phase 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.