Cardiff LDP Examination

Hearing Statement

Hearing Session 10: Economy, Employment and Retail

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1.0 Introduction

1.1 This Hearing Statement has been prepared by Nathaniel Lichfield & Partners (NLP) on behalf of St Fagans No’s 1, 2 Trust and St Fagans No 3 Trust (no.2461)

1.2 It deals with issues raised by the Inspector in the Agenda for the Economy, Employment and Retail Hearing session to be held on 4th February 2015. Whilst the Inspector has highlighted a number of questions for discussion, we focus only on those matters that are directly of relevance to our client, namely the delivery of employment opportunities and the inclusion of new retail centres within the Strategic Site allocations.

1.3 Representations were previously made by NLP on behalf of St Fagans No’s 1 and 2 and St Fagans No 3 Trust to the level of growth proposed, Policy KP1 as well as retail Policies R1 and R4 of the Deposit LDP.

1.4 In making these representations, we have had regard to PPW Chapter 10 and TAN 4.

1.5 An outline planning applications seeking permission for the vast majority of proposed Strategic Site C has been submitted to the Cardiff Council (Application ref no.14/02733/MJR). The proposed development at strategic site C is called ‘Plasdwr’. The above application forms part of the Examination library (ref no.ED015) and therefore the below responses cross refer to the application.
2.0 **Issue 3: The need for and supply of employment land**

d) Will the distribution of employment land support the Plan’s strategy and its communities?

2.1 Yes. The LDP approach concentrates on protecting existing offices within the City Centre & Bay (EC4) and existing employment sites across the wider city (EC1). In addition it makes new specific strategic employment allocations in the Cardiff Central Enterprise Zone and South of St Mellons Business Park (KP2). There are also three strategic sites under KP2 that will be required to incorporate an element of employment use namely: North West Cardiff; North of Junction 33 and; North East Cardiff.

2.2 The range of sites proposed rightly retains the employment focus upon the City Centre (KP9 & KP10) and existing key employment locations whilst recognising that the major new urban extensions should contain an element of mix use in line with the plans sustainability objectives.

2.3 The City Centre is the most accessible location within the City and is therefore the appropriate focus for employment use. Sustainable transport links both internally within new strategic site C and between it and the City Centre means that new employment opportunities will not be car dependent. This will ensure that there are also locally based employment opportunities providing a range and choice of locations to both employers and employees.

e) Should the Plan and its evidence be clearer as to how much and what type of employment is allocated in mixed-use sites? It is difficult to determine what contribution they will make to the supply of employment land.

2.4 We do not think that it is necessary or appropriate to set out a specific employment allocation for each of the mixed use sites. Policy KP2 makes it clear that an element of employment will be required with the strategic sites but the precise location is left to the Masterplanning Framework document (Dec 2014). The Framework identifies the District and Local Centres and states that they are to include business and employment uses, it also states that employment uses are to be located on sustainable travel routes.

2.5 It should be noted that not all new employment is expected to come forward on designated B1/B2/B8 employment sites but would be met across a wider range of uses such as retail, health, education and community uses.

2.6 As part of the Plasdwr planning application it is proposed that there would be up to 15,500sq m (gross) of use B1(a), (b) and (c) as part of the district centre
which could generate approximately 1,300 jobs. (See Plasdwr Planning Statement p21). The proposed three primary schools and new secondary school are anticipated to generate approximately 370 jobs whilst the retail and community facilities within the district and local centres could deliver 1,330 jobs. In total Plasdwr is therefore anticipated to support 3,000 jobs on site in the long term, this excludes short term construction jobs and any multiplier effects. This also excludes potential jobs from other appropriate district centre uses such A2 professional uses.

2.7 It is clear from the above that the B1 uses at Plasdwr are anticipated to deliver less than half of the proposed employment generation. Similarly at the wider level it would be inappropriate to assume that the Council’s job growth aspirations are simply linked to employment allocations.
3.0 Issue 4: Delivery of employment land

a) What evidence is there to support the viability of mixed-use sites – will they be delivered?

3.1 The proposed development at strategic site C is based on a robust and thorough understanding of existing base line position (including physical and social infrastructure). The infrastructure is proposed as part of Plasdwr reflects the requirements identified in the emerging LDP Infrastructure Plan and is in accordance with national planning and transportation guidance.

3.2 The submitted application for Plasdwr is a firm signal that the proposals are considered both viable and deliverable. The chosen developer (Redrow Homes), which is an experienced national builder has undertaken a detailed viability assessment and it is upon the conclusions of this assessment that planning permission is being sought for the development of Plasdwr. We are not aware of evidence being presented to suggest that the scheme is unviable.

b) Should a phasing policy be introduced to integrate infrastructure requirements and to ensure that the most sustainable sites are brought forward first?

3.3 No - It is neither necessary nor appropriate to set arbitrary phasing benchmarks for development. In fact given that 8 years (40%) of the LDP period has already elapsed and a step change in development is now sought the introduction of arbitrary phasing targets would be counterproductive.

3.4 The proposed phasing of development is set out in the planning application for Plasdwr (please refer to phasing parameter plan). This comprises a total of 8 phases. Chapter C (Site and Scheme Description) of the ES sets out the detailed phasing of works, including the timing of all land uses and infrastructure requirements that are envisaged to come forward. This focuses on works in the period up to the end of the Plan and beyond.

3.5 The proposed quantum, scope and timing of the infrastructure related to Plasdwr is being developed as part of the planning application process based on a thorough understanding of the local context and collaborative working with key stakeholders, including the Council’s Education Department and Cardiff Bus.

3.6 It is envisaged that the phasing and timely provision of necessary infrastructure would be controlled by way of condition attached to an outline planning permission in due course as well as reflected in the legal agreement accompanying the permission.
3.7 A s106 route, as favoured by the developer, will ensure a direct link between development and infrastructure delivery. This will ensure that development will not be able to come forward without the necessary infrastructure being delivered in tandem/or in advance. This is considered preferable to the CIL route where there is no direct link between infrastructure provision and development rates.
4.0 Issue 5: Is the scale of employment allocations proposed supported by the Plan strategy?

a) Does the Plan provide an adequate numerical and geographical correlation between employment land supply and housing provision?

4.1 The LDP should be internally consistent in terms of its aspirations for job growth and the size of the workforce that it proposes to house. Policy KP1 refers to a dwelling requirement of 41,100 dwellings and the delivery of 40,000 new jobs.

4.2 Table 7 (p45) of the Edge Analytics Report on Housing & Population (EBH.07) indicates that the Council's preferred housing scenario G will sustain an increased workforce of 40,000 people. There is therefore a good level of internal consistency between homes and job growth.

4.3 It is far more difficult to convert a job requirement into an employment land supply due to the wide range of employment density and the fact that at least half of the new jobs are likely to come forward from non-B uses. The employment density from B1 uses (typically 1 job per 12.5sqm) is significantly higher than from B8 uses (typically 1 job per 65sqm). In addition a significant element of all employment growth will be spaceless i.e. employers will be taking on new recruits without the need to move to bigger premises.

4.4 Whilst it would improve clarity to provide information on the scale of new employment allocations this is not in our view essential.

4.5 Similarly it would not be expected that there should be a linear correlation between new homes and new jobs. Whilst new strategic allocations should be mixed use communities that include an element of employment uses the main focus for employment growth will continue to be the City Centre and Bay area.

b) Do the employment allocations reflect the role and function of settlements?

4.6 Yes. The allocations primarily reflect the existing hierarchy whilst ensuring that new strategic allocations include an appropriate level of employment uses to ensure that they are sustainable and vibrant new communities.

b) Does the spatial distribution accord with the Wales Spatial Plan?

4.7 Yes. The primary focus is on the City Centre but it also reflects the WSP designation of North West Cardiff as a Strategic Opportunity Area.
5.0 **Issue 8: Retail**

**a) Is the Plan’s Retail Strategy Consistent with the Vision and Objectives of the Plan and the Overall Development Strategy**

5.1 We consider that if the minor changes are made to Policies R1, R5 and R6 as per our previous representations, the Plan’s retail strategy will be consistent with the Vision and Objectives of the Plan and Development Strategy.

5.2 Overall, the LDP Strategy responds to the clear evidenced need to make provision for new homes and jobs. It does not have a singularly defined retail strategy, however, there are three recurrent themes within the LDP that come together to set out the Plan’s approach to retail, as set out in Section 4 of the LDP, namely:

a) To include new retail centres within the Strategic Site Allocations

b) Protecting the City Centre as the top of the retail hierarchy in South Wales; and

c) Supporting District & Local Centres

**a) To include new retail centres within the Strategic Site Allocations**

5.3 Theme a) is consistent with the LDP Objectives 1 and 4:

*To respond to evidenced economic needs and provide the necessary infrastructure to deliver development.*

*To create sustainable neighbourhoods that form part of a sustainable city.*

5.4 The LDP’s response to evidenced need for new housing is to make a series of strategic allocations, including North West Cardiff. The LDP recognises that part of the infrastructure needed for these strategic sites to become sustainable neighbourhoods is accessible new district and local centres. Policy R1 allows for new centres to be integrated into the strategic sites. We note however, that R1 states that retail provision in the Strategic Site allocations will be supported where:

i. It is of an appropriate scale which satisfies an identified local need

5.5 The LDP objective is that the sustainable neighbourhoods should form part of a sustainable city. They cannot and should not function as separate entities, and by integrating into the existing city, it is inevitable that the new district centres will serve local needs in the surrounding communities such as Radyr, Danescourt, Fairwater Pentyrch/Creigiau and Pentrebane. As per our previous representations, we consider that inclusion of the word ‘local’ within criterion i) should be deleted in order to be consistent with the LDP objective.
b) Protecting the City Centre as the top of the retail hierarchy in South Wales

5.6 Theme b) is consistent with LDP Objective 1:

To maintain and enhance the vitality, attractiveness and viability of the city centre as a major retail and cultural destination and as a place to work, visit and live.

5.7 There is a clear retail hierarchy in Cardiff, with the City Centre at the top. It is also the main retail destination in South Wales. The LDP recognises that: There is a continuing need to improve facilities within the Central Shopping Area in order to provide a quantity and quality of shops that will enhance its primary shopping role and character, and its vitality, attractiveness and viability.

5.8 Policy R2 (Development in the Central Shopping Area) is therefore aimed at allowing, monitoring and managing the diversity of uses within the Central Shopping Area.

c) Supporting District & Local Centres

5.9 As set out in paragraph 4.10 of the LDP:

The Strategy also addresses wider social issues….. The approach is very much about promoting more sustainable communities where emphasis is placed on supporting District & Local Centres, encouraging the full range of accessible social, health and educational facilities, together with supporting regeneration initiatives, utilising the potential positive benefits which new developments can bring to adjoining areas.

5.10 Policy KP13 suggests that this element of the retail strategy comes from the LDP objective to respond to evidenced Social needs. Reference is made to the findings of the Health and Equalities Impact Assessments carried out for the plans, which highlight the importance of local, accessible shopping opportunities. Policy KP13 goes on to stipulate:

ii. Supporting the vitality, viability and attractiveness of existing District and Local Centres and their regeneration, including retail and other commercial development and housing of an appropriate scale;

5.11 Policies R5 and R6 aim to promote and protect the shopping role of District and Local Centres while supporting a mix of appropriate uses.

5.12 As per our previous representations, we consider it important that the proposed new District and Local Centres should be referenced in Policies R5 and R6, in order to be consistent with the LDP’s objective responding to evidenced need and creating sustainable neighbourhoods.
c) Is the Plan’s Retail Strategy Consistent with National Policy, including that set out in PPW and TAN4?

Policy R4 of the LDP encapsulates the key matters described in paragraph 10.1.3 of PPW for local authorities to consider in the development management process, and this policy is therefore considered to be consistent with national policy. For clarity however, we consider that it should be made clear that R4 does not apply to retail proposals for new local and district centres in the strategic sites.

Is the retail hierarchy realistic and appropriate and should it be set out in Policy?

As per our previous representations, we feel that it is important that the proposed district and local centres should be included within the retail hierarchy. This is important in providing clarity, as per our comments above, that the centres are considered ‘designated’ and the planning applications for them do not need to go through a sequential assessment.

In following the definitions set out in TAN 4, the largest of the centres in the North West Cardiff Strategic Allocation should be identified as a ‘suburban district centre’. The three smaller centres should be identified as ‘Local Centres’.

d) Policy R1: Retail Provision within Strategic Sites – Is the Plan suitably clear and flexible enough to allow retail uses to effectively integrate within the strategic sites without any adverse implications on Protected Retail Centres?

and

k) Is the Plan’s Retail Strategy Sufficiently Flexible enough to respond to changing circumstances and does it include clear and appropriate mechanisms for the implementation and monitoring of the Plan’s objectives?

The retail economy is very dynamic. The nature of the way in which we shop has changed dramatically in the last 15 years, and the LDP needs to be able to respond to further changes over the course of the plan period. We consider that the LDP has struck the correct balance between its forward planning duties and the need for flexibility to respond to changing needs, particularly with regards to the Strategic Site allocations, subject to our previous representations.
5.17 Because of the dynamics of the retail economy, the level of flexibility accorded in the LDP is essential. Protected Retail Centres will not be adversely affected by this approach because PPW 10.3.1 requires impact to be considered at the development management stage, regardless of whether the proposal is allocated in an up to date development plan or not. The policy also requires that the retail centres are of an appropriate scale to meet identified local need, and they will therefore not be disproportionate competition for the existing centres.