

Supplementary Evidence on Transport Infrastructure, relating to the new LTP

Cardiff's 15-year Local Transport Plan was adopted by the Cabinet in Nov. 2014. How does it face up to the transport issues and match up to the LDP? Cardiff's transport strategy since 2000, in the era of 'sustainable transport'-speak has been a failure. Fine words, but in practice going backwards. Just rephrasing the fine words in the new document shows continuing refusal to assess the reasons for failure and lack of seriousness in the policy.

How does it face current issues? I pick out:

rapid bus transport routes/corridors never delivered, though promised in previous LTPs. 7.4 lists the context as "...*queues, congestion and delays, complaints about the quality of walking and cycling infrastructure.*..." but makes NO MENTION of complaints and deficiencies in bus infrastructure, failures to extend bus lanes, worsening bus timekeeping, cancellations due to traffic congestion etc.

congestion on the road system is worsening, denied by eg. the previous Cabinet Member. Reluctance to admit traffic congestion as an issue till this LTP (cf. policy to address congestion omitted from the LDP against the Consultants' advice)

decreasing bus performance and patronage, with increasing congestion delays, failure to relieve bus routes and bus stops of illegal and 'inconsiderate' parking, little progress on bus lanes and bus priority measures; removal of subsidy to 'uneconomic' suburban and evening services; close-down of central and cross-city services for long periods over Millennium Centre events (and Xmas shopping congestion) NO MENTION

failure of the 'bus box' with stops dispersed in several streets, poor waiting facilities and difficult interchange. Failure to replace the free shuttle bus connecting the dispersed stops, after initial failure due to bad planning and poor information. NO MENTION

Park & Ride a failure. Proposes a new site at motorway Jn 33, but the poor performance of existing P&R (cf. "context" in 7.7) is NOT MENTIONED

failure to progress a walking strategy; we were promised one in 2012, the document never emerged. Pilot studies of two areas were commissioned, but just shelved (disclosed only via repeated FoI requests with excuse that it should go to Cabinet first). PRETENCE OF A Walkable Neighbourhood Plan THAT'S NEVER BEEN CONSULTED ON

delayed and faltering start on implementing a cycling-network, falling badly short of the 'continuous' and 'high quality' prescription. Funds squandered on substandard provision over Cardiff Bridge; cycling grants mis-used on removing cycle-lanes and road resurfacing; traffic calming wrongly assumed to suffice for Enfys cycle-route 6 thru Canton. NO MENTION OF DELAYS AND POOR DELIVERY

failure to implement the road-user hierarchy that places provision for sustainable transport uses first, as in the refusal to give the second lane over Cardiff Bridge to a bus-cycle lane and failure to continue the cycle-lanes past the Castle. NO MENTION OF THE PRINCIPLE

Many aspirations from the Transport strategy and older aspirations from the old LTP are recycled, but nowhere does the LTP admit failure to deliver them or explain why they could be deliverable in future. Political unacceptability was one reason, eg. from the Caerphilly Rd. bus lane reversal 10 years ago. In practice, the politicians have opted to increase central car-parking for shoppers (while allowing uncontrolled PNR parking at central premises). With political commitment unchanged, spending on infrastructure under the LTP is likely to be similarly ineffective.

Improvements to bus services and Integrated bus & train services score high in the public view reflecting people's priority for spending (second and third in S. 6.8.5), yet this is not reflected in the expenditure plans - cf. the costly Metro, decreasing spending on buses and uncosted Eastern Bay link road concealed under • New link roads 7.7.

The Ministerial Statement of January 2013 *Bus Services in Wales* reminded Cardiff and other LAs

"There remains an overall, strategic requirement to develop an integrated transport system that makes using public transport the most attractive option"

He advocated Quality Partnership Schemes (QPSs) that

ensure that local authorities and bus operators deliver binding commitments that share the objective of making bus travel a more attractive option for everyone.

The LTP is defective in proposing nothing on QPSs with local bus companies. It appears Cardiff has done nothing to follow up this policy guidance, despite its words about making the bus an attractive option. Of course, the Council has strong influence on the main operator, through its ownership of Cardiff Bus; it seems that the reluctance to commit to a QPS lies with the Council itself. This is important for testing the sincerity of statements in the LTPO and the LDP, so the LTP should explain the Council's position on QPSs.

Expansion of the city bus network

This phrase is repeated 19 times in the Table of *'High Level Interventions'*. Perhaps it does not need justifying in view of suburban estates with little or no service, but one might expect

- a) assessment of areas that are more than 200m from a bus stop on a regular service and how such a standard might be met with expanded services
- b) areas with no evening services
- c) areas with no early morning services within 3-400m walk.

Details of the proposed expansion, assessment of the viability and guarantees of funding to meet the start-up costs are of course needed to make this expansion a serious proposal.

3.1.5 talks of buses for "orbital cross-city journeys and shorter trips between neighbourhoods and local trip attractors". Addressing these problems requires investment in infrastructure to facilitate "new services and local interchanges". Yet no actions or funding is proposed to meet this, with priority given to 'strategic corridors'. Moreover, the Council is proposing to remove all its remaining subsidy to services (including evening services in suburbs) under next year's budget, while continuing to take £250k pa profit from Cardiff Bus. Bus network support needs to be identified in the expenditure Table. The ring-fenced parking budget has significant surplus from on-street parking and enforcement, and is available for this.

Expansion needs to cover increased frequency of buses, in order to cater for a sizeable modal shift to buses. No estimate is given, but the change from 35% to 50% sustainable transport modes implies a 1.4 increase in bus passengers, which together with the 25% increase in population implies 1.75 times current bus ridership. Road capacity limitations then mean that through traffic on bus streets like Tudor St would have to be prevented. [A bus gate on the Tudor St bridge was in an earlier LTP; Ninian Park Rd/Tudor St is mapped as a priority bus route.] The developers' masterplan for Central Square ignores the need to plan for such bus increases.

Central city bus network is defective.

The Bus Box was set up in order to exclude buses from St Marys Street for pedestrianising it, dependent on use of Westgate St (counter-clockwise to have mainly left turns and avoid the sharp right turn at the Castle end). It was supposed to avoid close-down during events by using Lower Cathedral Road and Tudor St instead of Westgate St. It started with a free shuttle-bus to avoid long walks to interchange buses and to cross the centre. It didn't work. The shuttle bus was abandoned (with promise of an electric bus instead, never delivered), the 'event day' extended bus box was never implemented, but buses are stopped short for

long periods on 'event days', preventing bus-access to the rail station and forcing long walks to change buses eg. to the hospital. Several buses now run clockwise via Westgate St and Greyfriars Rd, using previously abandoned bus-shelters, despite being forced to wait over-long for the right turn from Westgate St into Castle St (because the Council won't adjust the traffic light timing).

The Council never assessed or consulted on the bus-box failure, just asserted it worked fine. Bus operators experienced extra costs with the longer journeys through congested junctions. Cardiff bus drivers said the box is bad, bus 'guru' Prof. Cole wrote against the dispersed 'hubs' in the local press, but the Council suppressed criticisms. The LDP Tech paper¹² (Fig.1) shows decrease in bus patronage in the city centre since the 2007 changes, after rising slightly earlier in the 2000s. Only in the recent consultation on relocating the bus station did public opinion very critical of the bus box break through the Council's normal opinion-management::

Q8. Are there any additional comments that you would like to make regarding the planned development of the Cardiff Bus Station / Central Station.

A total of 1,314 individuals provided additional comments ...some commenting that the development 'couldn't happen soon enough'.

Dissatisfaction with the current 'bus box' system was widespread with frequent reference given to the slow service, difficulty in travel across the city i.e. north/south and high costs. Several individuals also expressed their amazement that Cardiff as a capital city is currently without a functioning city centre bus station. A key priority for respondents moving forward was that the development takes into account the needs of local people travelling within the city as well as visitors coming into the city centre for business and leisure. It was considered essential that the new bus station be fully integrated with all other modes of transport including trains, taxis, cycles and a metro service should such an option become viable in the future.

The Council's central traffic management has stopped efficient bus management and imposed extra costs on operators. They stop cross-city buses during peak shopping periods, rather than suspend shopper-car parking. They've refused to provide for Megabus services at the bus station, providing instead a stop north of the centre (near the Hilton) away from connecting train/bus services and where parking is chaotic. They over-provide for taxis and turn blind eyes to their illegal parking and waiting.

1.2.8 promises priority "interventions ...Schemes which facilitate easy interchange between transport modes and services"; this means scrapping the bus box and running most services into the Central Sq interchange. This may require reopening St Mary's Street to buses and excluding the taxis.

Express / Core Bus network

"Improvements to Cardiff's strategic bus corridors will be a crucial component" yet the document just re-badges the previous promise of priority bus routes. Why failure to implement over the last 15 yrs? The LDP proposed a bus rapid transit route on the Cowbridge Rd, requiring removal of on-street parking, but this has been ruled out by the Cabinet Member (R Patel). No evidence that Lansdowne Rd (or the parallel Broad St) or Cowbridge Rd could be made express bus routes after the failure to progress this since 2000. The stated objective 'helping to increase service reliability and reduce bus journey times' is in the context of increasing traffic and 'inconsiderate' parking that has worsened and continues to worsen bus services.

Financially Unsound. £30M is allocated to Buses for 2015-2020 (Table 3.5), half presumed to be for a new central bus station. Only £15M is allocated for 2020-2030 (Table 4.3). No evidence is provided that the sums would cover the creation of the desired Express/Core bus network or for 'expansion of the city bus network' with 'new services and local interchanges, though supposed to cover all. Compare the proposed spending of £250M on the first stages of a metro, which could serve only a fraction of the city trips that buses serve.

Compare too the extravagant spending on a £100M 'Eastern Bay Link' (£30M special WG grant, because the Council put forward this and only this for special funding). Is the £15M symbolic only – symbolic of the lack of seriousness?

S. 2.1.5 promises “Positively managing the highway network to support sustainable travel”, but why believe that general statements like □bus priority and gating.. □junction and crossing improvements ... would be effective this time after the failure of past years? There is no commitment to *priority* for sustainable travel, as under national policy (under the road-user hierarchy) that is required.

Park & Ride was the big idea, so why no assessment of present performance and difficulties? The bus P&R appears to be a failure as it's not “attractive to commuters from areas outside the city”, despite being subsidised (return tickets plus free parking cost less than 'Day to Go' tickets for non-car bus-users). Only 2% of public responses support more funding for it (Table 6.2), but the LTP bungs £5M to a new P&R scheme from Jn 33. This is obviously part of the Jn.33 'urban village' development, so should be wholly funded from s.106 and CIL funds (which I'm told are not included in the LTP figures).

North-West Rapid Transit route

The LTP's 2.1.3 says *Developing the strategic public transport network including:*
□ *rapid transit routes City Centre - Cardiff Bay and North West Corridor (City Centre extending through North West Cardiff ...)*

It fails to defend the LDP's much criticised Bus Rapid Transit through Canton (Cowbridge rd East) – the express buses would need this road one-way for general traffic, to remove on-street parking (incl. for loading and for disabled users) and is incompatible with existing uses for residential, shopping and the Enfys cycle route.

It chooses only the tram-train Rapid Transit (s. 1.5.13), the highly costly 'metro' that uses the Radyr rail line and disused Pontyclun line, but fails to specify sites for stations and interchanges, just as the LDP allocates no sites. It describes the Cardiff Bay-Central Station-Pontyclun tram lines as 'national' projects, despite their serving the City-region alone (almost entirely serving Cardiff-city). WG money was approved only for a start on the Cardiff Bay section (£63-73M), and funding for the £150-250M section to Pontyclun is quite uncertain (Table 3.4).

The Council is not giving due priority to the metro scheme. They had the chance to secure a station at Ely Mill on land owned by the developers and using s.106 funds. The picture below is included in the latest Metro study. But they approved changed plans in 2014 with no station and diverting S.106 funds to roads (officers' insistence on £5M for full access onto the A48). They have no plan to integrate the metro-tram into the 'integrated transport hub' on Central Square. High-quality provision needs space there (or rising from just under the Square). A speedy tram-train system includes some slower road-running, but still takes space for platforms and interchanges as eg. the Manchester Metro-link (images in Annex 2). However, Cardiff Council have not required space for it in the developer-generated master-plan driven by the BBC office development. From Press reports, this includes the Metro simply on-street in lower St Mary's Street and Wood Street among the many traffic uses and subject to disruption by Millennium Stadium 'events'. They've paid no regard to the space demands of a system like Manchester Metro-link. In partnership with Rightacres as developer, they've avoided discussion of the AECOM scoping report and deferred the planning application from October till days pre-Christmas. The application was not posted on the website and the Council will not make public their planning proposals for the Metro until Easter 2015. Rather than produce proposals in time for the LDP Inquiry, their timing appears chosen to avoid it.

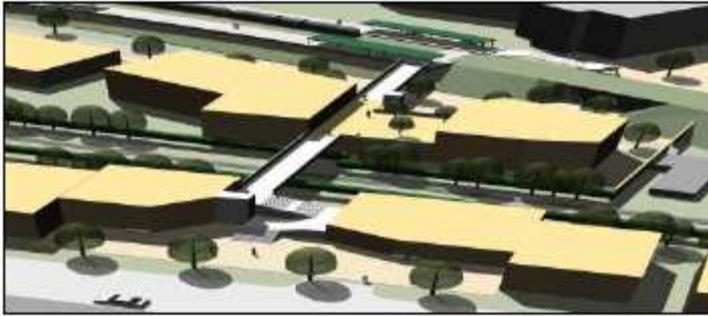


Figure 3 Example of potential stations based development at Ely Mill

From the Mark Barry report to WG Aug.2014

<http://wales.gov.uk/docs/det/report/140826-cardiff-metro-update-report-august-2014-en.pdf>

New *Interchanges/Bus Hubs* (3.1.11) were supposed to include one near Ely roundabout over the rail lines (by the new Ely Mill station is an obvious choice) but the LTP allocates no site or funds, just claims 'ongoing discussion'. In contrast it allocates £1.4M for a bus-link across the Cardiff Barrage, which is more problematic and also subject to discussions (and the VoG's LDP inquiry).

Active Travel plans

The LTP fails to meet duties under the Active Travel Act (in force 26 Sept'14) and pay due regard to its guidance, saying only 1.1.3

The LTP reflects the requirements of the Active Travel (Wales) Act 2013 which places a duty on local authorities in Wales to continuously improve facilities and routes for pedestrians and cyclists, together with preparing maps identifying current and potential future routes.

2.1 of the Statutory Guidance says the Act requires

local authorities to have regard to integrated network maps in preparing transport policies and to ensure that there are new and improved active travel routes and related facilities.

Also (1.5)

The Design Guidance will be essential to local authorities decisions on whether a route is appropriate for active travel, and what steps should be taken to improve their routes.

This is important in the context of Cardiff disregarding the design guidance, eg. in the latest scheme for pedestrians and cyclists on Caerphilly Road (Annex below).

While there is a duty to prepare maps and consult on them, the LTP's

3.1.3 does not include preparation of a map of 'active travel' pedestrian routes

3.1.4 does not say how and when the map of 'active travel' cycle routes is to be prepared. It would overlook Active Travel duties by basing expenditure in the next 5 years on the Enfys routes, which have not been reviewed in regard to the Active Travel specifications, nor reviewed with regard to changes since 2011 and to integration with pedestrian routes. In view of the poor or absent public consultation so far, the LTP needs to state how the Act's public consultation requirements will be met.

The sums allocated up to 2020 and for 2020-30 are not related to any assessment of need and to the requirement to have regard to the network maps and improve active travel routes etc. "Developing the Active Travel Network" is stated over 20 times as a high-level intervention but is nowhere assessed for resources and outcomes, particularly in regard to the modal split required for these modes.

Cycle-route planning and funding

The Council wrongly presumes its Enfys network equals the Active Travel cycle-network. The AT criteria are different (eg. the route is used for commuting) and standards are higher than Enfys (many path widths are less than minimum specified in Design Guidance). Some

Enfys routes were provisional only and changes already on the ground affect them. Therefore the LTP has to state a map of Active Travel cycle routes is being prepared and will be subject to public consultation, as the Act requires.

The LTP does not mention that Cardiff is a designated locality for network mapping purposes, liaising with WG contractors Sustrans (Statutory Guidance 3.5) in a pre-survey consultation and supplying data. Cardiff has then to prepare draft routes maps for public consultation and amend the maps to reflect the outcome of the consultation (3.16). Needing to provide explanation (3.28) and make changes reflecting the consultation will be a new experience for Cardiff.

The LTP intention to ignore the Active Travel guidance in the 2015-20 period breaches the Statutory Guidance, which includes (3.29) “shovel ready” schemes due for delivery in the next couple of years. Therefore the LTP needs to specify that the draft LTP needs to be made consistent with the Guidance and cycle-route schemes properly reviewed before confirmation or otherwise.

Walking Routes and Walkable Neighbourhood Plan

The Council was intending to consult on preparing a walking plan in early 2012 but instead commissioned pilot studies of walkability in two areas (Ely-Caerau and Llandrumney) in summer 2013. The results never went to Cabinet with an outline plan (scheduled for Oct 2013), and only reluctantly disclosed via a repeated Fol request. The Council have never consulted on the *Walkable Neighbourhood Plan* included in this LTP. The claims to have conducted surveys (WNP E&M plan 7.2) to provide:

- A representation of existing ‘before’ walking patterns within the city
- Specific consultation events obtaining walking information on residents within audited areas of initial implementation
- Information on views and perceptions regarding walking

sound good, extraordinarily so, but the information has not been released and consulted on. I suspect it’s an overblown puff of the still unreleased Ark Lab report (Aug. 2013), seeing that the guidance says that adequate surveys and pedestrian counts would be impracticable. I found officers claiming to do surveys of pedestrian-use before determining current schemes for the Ely-Caerau hub access, but then found there were no surveys to the new facility (as there couldn’t be).

Surveys and consultations may have been intended, but not carried through. Similarly, the future planning described with focus on new counts “to provide baseline data for actual walking levels” is impractical. No explanation is given for not following the design guidance (Ch 5. *Network Planning For Walking*):

“resources required to undertake pedestrian flow surveys.. can be prohibitive. Consultation with the public and stakeholders should be used to identify barriers to walking..”

The Council’s *Problem Analysis* (Ask Cardiff survey, Table 6.1) does not include bad walking conditions, nor does the Transport Spending survey (Table 6.2) include walking. Cardiff has no Walking Officer (the cycling-oriented group covers the subject) except for one serving the Access group (which contains no pedestrian groups eg. Living Streets). The Council hardly recognises walking as a transport mode, hence the repeated deferral of the walking plan (WNP) from Cabinet consideration, just squeezing it in under the LTP.

The WNP E&M plan 7.2 has a single use of the ‘active travel’ catch-phrase and of “requirements under the Active Travel Act” with no explanation of these or how they will be met. It appears from the project spec that the WNP will fall far short. It does not mention the maps being prepared under the Sustrans contract, or the pre-survey consultation and information base supplied to Sustrans (Statutory Guidance 3.5). The LTP does not mention preparing draft routes maps for public consultation and amending the maps to reflect the

outcome of the consultation (SG 3.16). Cardiff opposed the mapping of walking routes in their early response to consultation on the Active Travel Bill and this opposition now appears extended to their implementation in the Act.

The Active Travel design guidance has much of relevance in its Ch 5 *Network Planning For Walking*. But the WNP ignores it

... no regard to mapping 'key walking trip attractors' (stage 2A); only to Hubs and Neighbourhood Centres and not transport interchanges, colleges and hospitals

... no journey-to-work walking routes, not even for big destinations like colleges and hospitals (5.5A)

... no regard to Cardiff's many river and rail bridges, which are natural funnel-routes for walking (5.5B, stage 2B)

Network Planning For Walking recommends a classification of footways to use as a basis for establishing where to focus improvements to walking infrastructure under the Active Travel Act. It recommends the Walking Audit Checklist (Table 5.2) and suggests a pilot street audit with representatives from the various user groups, including people with different types of disabilities.

"This information can form the basis of the Statement and Explanation, required to accompany any routes on the existing route map that are not up to standard, but suitable for mapping none the less."

If Cardiff intends to instead base it on the pilot 'walkability' surveys (*Ark Lab: Walking Consultation Report* for Cardiff Council, August 2013), it should say so, but it has also to include public consultation as

Consultation with the public and stakeholders should be used to identify barriers to walking; Feedback from local residents on specific walking issues forms a key part of the scheme identification

The allocation of £2.3M for WNP funding over 5 years shows the lack of recognition of walking-as-transport in the LTP. Of course funding levels should be decided relative to need, but £2.3M appears wholly inadequate. Cf. the funds for Bus £30M, Road Safety funding of £20M; £1M for a special WG grant in 2013 for walking to the new Ely/Caerau hub. Why from 2020 the low £0.9M pa compared with £4M pa on Road Safety?

The WNP schemes are all described as "Improvements in pedestrian facilities and environment surrounding Hubs and Neighbourhood Centres" so do not address the bridge-funnels (DesignGuidance, as above). There are none for the inner city wards, where walking to central jobs, leisure facilities and shopping is feasible (and is common, if comparatively low because of poor pavements and crossings) – see the *Prioritised programme* in 3.4

WNP 2015-20 wards: Llanrumney, St Mellons, Ely & Caerau, Splott, Grangetown, Llandaff North, Llanishen and Pentwyn; for 2020-30 Phases 2 and 3 of these are listed.

3.1.3 claims these areas have been identified via a 'methodology', but that is neither apparent nor explained. No justification is given for excluding too wards like Fairwater-Pentrebane, Danescourt-Radyr and Tremorfa, with sprawling estates designed for the car against walking and currently having a very low sustainable transport modal split. It's surprising that the WNP envisages tackling many wards in the first 5 years on only £0.46M pa funding, then does relatively little on £0.9M pa after that. If they are really ready to go from 2015 with Llanrumney, St Mellons and Ely & Caerau, we'd expect a bigger sum in the budget and public consultation being rolled out forthwith. In actuality, it's likely to be cut completely out of this year's budget.

Shared-Paths policy in Cardiff, contrary to Active Travel Guidance

The Strategic Highway Improvements (7.9) include '*New footways, shared paths and off-road cycle paths*'. This implies a continuation of the Council's unwritten policy of putting

cyclists on the pavement via 'shared paths' in busy streets. This policy is contrary to the Active Travel statutory guidance (October 2014). Examples are the Park Place/Corbett Rd junction (Cycle Route 9; busy with students), Grand Ave/Cowbridge Rd West (busy with pedestrians to shops and community hub), Birchgrove shopping area (Caerphilly Road – ANNEX 1). The first two mis-used cycling funds, the third mis-uses Road Safety funding.

Footway Safety Schemes are justified (7.10) "To provide improved and safer footway links particularly within busy community areas" and include projects • *Provision of shared use paths*. Cardiff does not reserve 'Shared paths' for semi-urban and rural areas, but uses them as a general strategy in 'Strategic Highway Improvement'. Despite the Active Travel guidance, they propose continuing to use 'shared paths' as a 'road-safety' measure in busy streets – in practice, to give traffic flow and parking priority, contrary to the road-user hierarchy policy.

Nowhere do Council officers and the LTP mention the impact on pedestrians of cyclists on shared paths – as on Caerphilly Rd (ANNEX 1) they argue for it to improve safety for inexperienced/child cyclists, without acknowledging that it includes and encourages speedy experienced cyclists who frighten and deter pedestrians, especially in shopping areas with their complex movements.

New 'Link' Roads - Eastern Bay 'link'

The 'new link roads' descriptor hides the major £100M project for a new strategic highway, classing it (7.9) with '□New footways, shared paths and off-road cycle paths' and '□New pedestrian crossings *if appropriate*', and implying this major road project encourages 'sustainable travel'.

The road has not been through legal processes. Cardiff Council put it in the UDP over a decade ago; one reason given for abandoning the UDP was then that no assessment of alternatives had been undertaken, so it probably did not comply with the (then new) SEA legislation. That deficiency has never been rectified.

The WG 'commitment' (para. 21) is the only justification; this is not a planning commitment, but an offer of funding for phase-1, dependent on planning etc. approvals. It was part of a political deal with the Lib Dems, to secure their support for next year's WG budget. The WG Minister has left funding for phase-2 up to Cardiff Council. It has to be justified in this LTP and LDP.

Though supposed to be starting in 2015/16, no cost estimate for Phase-1 is given (Tables 3 4.3 'TBC'). WG funding is stated (p.40), but Press report say WG grant is just £30M of a £57M total. Phase-2 is wrongly claimed to be National/Regional and funded by WG/DC (p.59). The whole scheme should be struck out of the LDP as unsound, lacking proper evidence and justification.

Modal split confusion and Capacity limits

The statement in the project Table's item 20 (p.25): "*Achieving 50:50 modal split in order to accommodate the projected 32% net increase in Traffic*" is actually false

The LDP's *tech paper 12* gives 41% increase in *demand for travel by car* (1.4.3; 3.2.1); 10% would be stopped by lack of capacity, resulting in 32% increase in traffic irrespective of the modal shift. Journey times would increase by av. 41% (by car). In default of significant improvement of rapid transit routes (even the current proposed Caerphilly road bus-lane covers just a fraction of the radial route and has taken a decade to progress) bus travel times would likewise worsen.

The forecast 32% increase in traffic cannot be accommodated as modelled, insofar as "a number of key junctions and roads either at or approaching capacity at peak times" (2.9.1). No list of these capacity-limited places is given, nor whether it is practicable to introduce bus

priority measures for buses to by-pass the congestion. Without such a list and costings of potential by-pass measures, it is impossible to judge whether bus journeys could be made attractive vis-à-vis the car, as the LDP and LTP aspire to do.

As the routes are capacity-limited – how strongly is dependent on which routes are involved – setting a 50:50 modal split target for the new green-field developments is not directly relevant. As the 50% car traffic has to pass through congestion points, what's relevant is the impact of extra traffic on those and of any mitigation measures. Clearly the NW Cardiff/Waterhall development puts traffic on the congested zones of Llandaff and Western Ave, so claims to meet a 50:50 modal split are hardly relevant.

Moreover, that modal split target of 50:50 (CE1) is for all trips, of which journey-to-work trips are only 25%. Unless relieved from the congestion, 'rapid transit' buses will not be attractive, and loading on the congested network will cause high cost and delay to the many other commuters by car and bus on the NW Cardiff network.

LDP tech paper 12 makes it clear that measures are required to improve the modal split throughout the city:

1.4.4. Ensuring that 50% of all trips on the transport network are made by sustainable modes (achieving this proportion is necessary to accommodate the additional vehicular trips on the highway network which will be generated by new development).

The LDP puts it (4.110) *"it will be necessary that at least 50% of all trips on Cardiff's transport network are made by sustainable modes"*.

Thus the Waterhall development would require other measures to secure a modal shift in j-t-w trips from existing areas (of Fairwater/Pentrebane, Radyr/Danescourt and Ely/Caerau).

The LDP in proposing no such requirement, but only the 50:50 all-trips modal split, is quite unsound.

The Waterhall developer should also address shifting some of the 37% travelling into Cardiff from outside (80% by car) eg. from Llantrisant and Barry/Cowbridge. The proposed P&R at Jn 33 might cater for the former, but LDP has nothing for the latter.

The confusion between all-trips modal split and j-t-w split poses a general problem of soundness of this LDP. The justification for choosing all-trips is unclear, having an inadequate technical base with most figures being for j-t-w, as usual in transport planning. The all-trips figure is easier to influence by behaviour change and provision of local services, whereas for peak-hour congestion that imposes high costs and requires costly transport investment, j-t-w trips are relevant. That transport investment could, for example, make the Waterhall development quite uneconomic if it had to bear the full social/congestion costs. Furthermore, use of the all-trips figure implies Cardiff Council would put resources into behaviour change and provision of services in each locality, which might be feasible and desirable on social grounds but the LDP makes no provision for this.

Traffic Congestion

Congestion is admitted as an issue (projects Table item 12) but no mention of intervention over parking – this in the context of over-provision of public car parking (at low price), uncontrolled PNR parking and unwritten policy of generous car-parking for the St Davids 2 shopping development. A promise in the previous LTP to consider a parking levy (Nottingham style) which would raise funds for public transport has been deleted, just as the LDP consultants' advice on inclusion of a parking policy was deleted.

The proposed 'interventions' do not try to manage congestion, but propose again the pro-bus measures that have been largely frustrated by congestion and on-street parking:

- Development of rapid transit routes
- Strategic bus corridor development

- Expansion of the city bus network
- Development of a multimodal transport hub at Cardiff Central

Bus rapid-transit in eg. the NW corridor is unfeasible, as the roads are congested and road-space taken by on-street parking (legal and illegal). Bus routes in the city centre are badly affected by congestion; Cross-city services are cancelled on some days (a cross-town shuttle bus substituted, but poor information on such ad-hoc provision). Over Cardiff Bridge, buses stick in queues, yet our proposal to take one traffic lane for a bus/cycle lane was rejected as causing congestion ('gridlock' claimed the Cabinet Member) so they took out a traffic lane for months while constructing a separate high-cost sub-standard cycleway.

Refusing to include car-parking control and taking road-space for buses make the LDP/LTP proposals on the congestion issue quite unsound and set for failure.

Central Square attempt to pre-empt an integrated transport interchange

A new Bus Station in an integrated transport hub has been delayed several times, because the previous Council and this one want maximum space for commercial development on Central Square. Cardiff Council plan to dispose of this publicly-owned land, even though it is not surplus to requirements for an integrated transport hub. They plan to dispose of the land 2 or more years in advance of a new bus station, on the excuse of waiting for leases to expire on the new Marland House site (instead of requiring the BBC/developers to buy out the leases).

The Central Sq plans are heavily criticised (Prof Stuart Cole) as not transport-driven but commercial development-driven. The Council publicity denied this but the LTP's s.19 confirms it. The Council mounted a 'consultation' on moving the bus-station off Central Square, as an isolated change unrelated to integration with trains and metro.

The Council claims to be in partnership with the developer (www.rightacres.co.uk/capital-square/4584419104), but the latter says

Rightacres is the exclusive developer of Central Square - Cardiff's new premier financial and professional services destination at the heart of the Cardiff Enterprise Zone that will set a new standard for city centre regeneration.

The 800,000 sq ft development will be office-led, but with a mixture of uses, providing high quality commercial, civic, residential, hotel, leisure and retail space in a carefully planned and managed environment.

A contemporary integrated transport hub will be provided in the immediate vicinity of Capital Square.

Cardiff Council as property developer has signed a contract that would exclude areas of publicly-owned land being used for transport infrastructure. As planning authority, the Council could reject an application that does not leave proper space for the metro, coach and bus station and joint passenger facilities. The conflict of interest needs the LDP Inspector to intervene and require it to be set in the context of LDP decisions.

Rightacres and the Foster partners operating for the BBC are writing the Masterplan, which has been long promised, never made public, but details of the proposed masterplan were leaked in October: www.propertymall.com/property-news/article/37005-Cardiff-Central-Square-Masterplan-unveiled

Wood Street... has been completely revamped to create a new boulevard with high quality office buildings either side and the space is designed to accommodate the Metro as and when it comes in to play.

The redevelopment project will include unrivalled local and international transport links, the latest in sustainable design and a vibrant mix of business, retail, leisure and public spaces.

The Council has now accepted a planning application for the BBC building with a masterplan that ignores requirements for integrating a metro station into the 'integrated transport hub', and expects to push the plan through before the LDP inquiry reports. I'd ask the inspector to

issue an interim decision to stop this premature decision that pre-empts sensible planning; alternatively to ask the Welsh Government to call in the planning application.

The Central Bus Station and continual delays in delivering a new one as part of an integrated transport interchange goes contrary to Welsh and City policies. The LDP's half sentence in clause j of objectives 1 (economic needs) "improving the city's key transport hub... " and the LTP's half sentence in s.19 "This will be further enhanced by ... the relocation of the Central Bus Station" show the lack of regard to public transport.

The earlier discussions show Cardiff Council was set on providing a small capacity bus station with fewer stands (19-22, compared with 26) and about 3 layby positions (smaller than eg. Swansea and Newport). Hull has a recently-built integrated bus/train station and over 20 stands for smaller population (250 000 and no city-region). Cardiff planners did not allow space for expanding buses with population growth and modal shift (75% as above; less if the Metro takes a fraction).

Press reports still talk of a smaller bus station though there's no official report. The LTP (and LDP) give no figures for capacity. The Council planners apparently do not want to provide for long-distance coaches, though National Express said they want to stay. The following sentence in the LTP's 3.1.5 is revealing

"CCC will continue to facilitate the high profile use of Cardiff Bus Station by Traws Cymru services"

This special regard to the Airport coach (and a daily bus to Llandrindod/Newtown,) highly subsidised by the WG, indicates an intention not to facilitate *National Express and Megabus*.

A new integrated transport hub as an 'economic and social need' requires extra clauses under objective 3: *To deliver economic and social needs in a co-ordinated way that respects Cardiff's environment and responds to the challenges of climate change.*

I propose adding

**** to promote public transport as a means to achieve environmental objectives, to assist in relieving congestion and to encourage social inclusion**

**** to build an integrated transport interchange including a new bus station on Central Sq, which will have capacity to handle all city, regional and long-distance buses/ coaches and accommodate future expansion to meet the increase role for bus transport. It will include space for the various rapid transit systems envisaged in the LDP and be able to operate during 'event' days**

**** to meet the legal obligations of air quality re. the AQMA (Westgate St/St Marys St) by severely limiting new developments in the Central Square area to exclude non-essential vehicle access and parking, except where (more than) equivalent reductions in vehicle parking places and usage of Westgate St are also secured.**

Air Quality. In relation to the third clause to be added on air pollution, I would point out a) that the LTP and LDP lack policy on Air Pollution, b) that the AQMA issue had been raised in relation to the Central Square development but suppressed by the Council (and the developers' masterplan), c) the recent Supreme Court decision that public authorities have a duty to implement an 'action plan' to meet the pollution limits transgressed in the AQMA and d) Cardiff Council has no viable action plan or intent to draw one up. Without a general policy on air pollution or AQMA-related policy as this one, the Council has no planning policies to implement its duty.

** two court cases against the Government have been prompted by a failure to meet EU nitrogen dioxide limit values. The first case, brought by Client Earth, led to a Supreme Court ruling in 2013 that the UK was in breach of its obligations under Directive. The Supreme Court referred the case

to the European Court of Justice. The ECJ ruled on 19 November 2014 that the UK Government should have prepared plans to achieve compliance with limit values by January 2015.

The Environmental Audit Committee's new report *Action on air quality* (8 Dec. 2014) said *New schools, hospitals and care homes must not be built next to air pollution hotspots to help reduce the tens of thousands of deaths currently being caused by nitrogen dioxide (NO2) and particulate pollution (PM 2.5 & PM 10) every year in our cities.*

The EAC seek new planning laws; pending the Welsh Government issuing new laws, the LDP should come up with a policy on Air Pollution that pays heed to their information.

<http://www.publications.parliament.uk/pa/cm201415/cmselect/cmenvaud/212/212.pdf>

ANNEX 2 Manchester Metrolink interchange stations



Manchester Metrolink. Left: St Peter's Square interchange station, reserved space in the middle of the Square. Right: Piccadilly bus station interchange, looking along the platforms from Market St end, with bus station on the right.

ANNEX 1

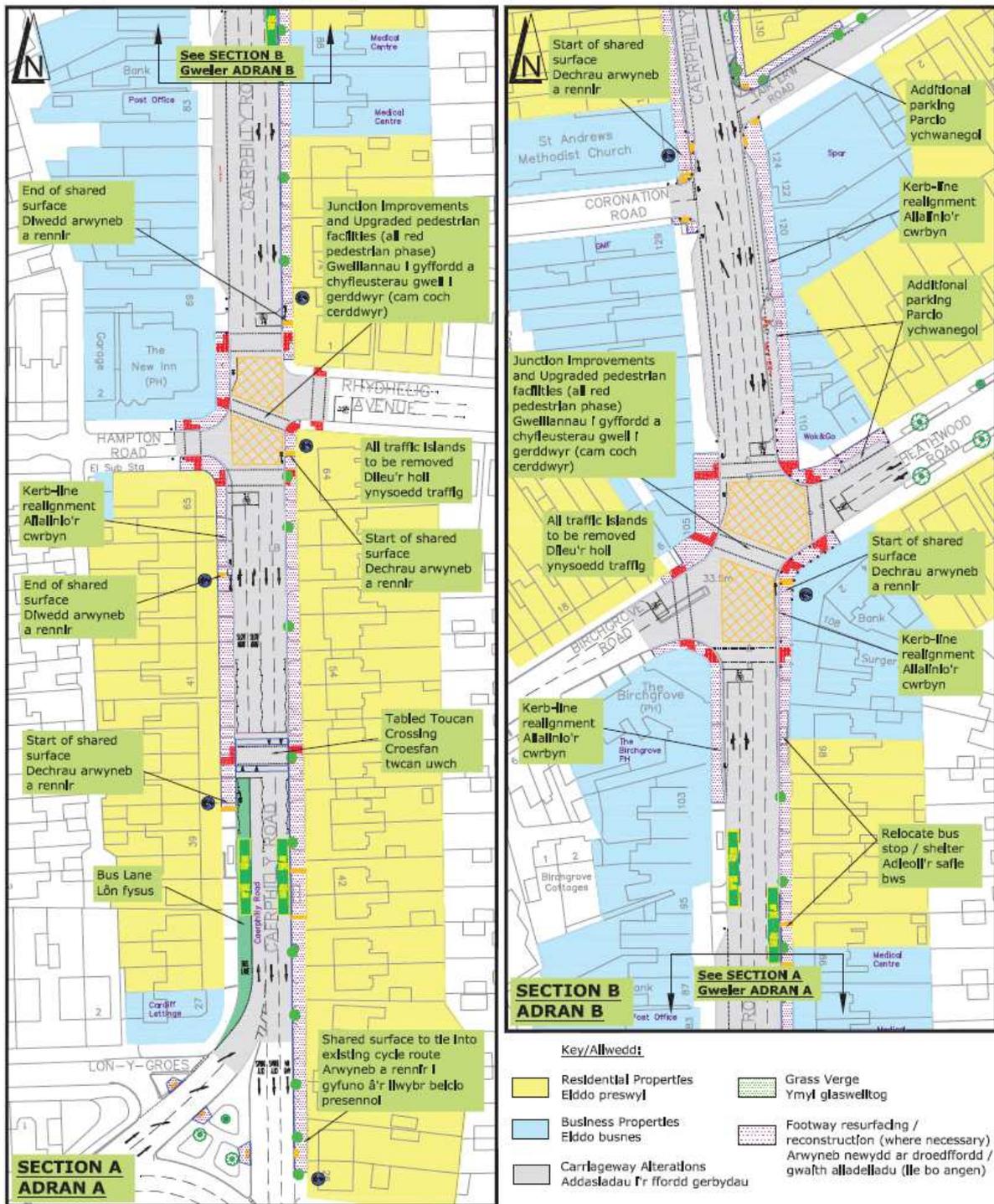
A469 (Caerphilly Road) - Transport And Accessibility Improvements October 2014

Description of Scheme Proposal [official terms, with the plan below]

The scheme involves road safety improvements on the A469 (Caerphilly Road) from Lon Y Groes and St Georges Road to Tair Erw Road. The primary aims of the scheme are to improve pedestrian and cyclist access to and within the Birchgrove shopping community.

This scheme is supposed to provide for pedestrian and cycle access to the shopping area on a busy through road. Instead of traffic calming and giving space to pedestrians and cyclists, they ignore the Active Travel Guidance and set out to put cyclists onto the pavements, by re-designating them as 'shared space'. They claim to improve safety, but do not consider the safety of pedestrians or the hazards to cyclists of jumping on and off pavements, and do nothing for safety of commuting cyclists on the roadway.

To provide for cycling on the Caerphilly Road, the AT design guidance (6.13) prescribes: *Full consideration should be given to options for the suitable provision for cyclists on the carriageway or in a separate space for cycling – either through motor traffic speed / volume reduction, junction treatment and reallocation of carriageway space – before considering taking space away from pedestrians to create cycle tracks or shared use paths.*



Plans of the Caerphilly Rd/Birchgrove proposals for changing pavements to 'shared paths'.