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

Also available for comment are the Sustainability Appraisal and Habitats Regulations Assessment of the Matters Arising Changes at www.cardiff.gov.uk.

PART 1: Contact details

<table>
<thead>
<tr>
<th>Your/ your Client's details</th>
<th>Agent's details (if relevant)</th>
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<tbody>
<tr>
<td>Title:</td>
<td>Mr</td>
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<tr>
<td>Name:</td>
<td>Kevin G Wright</td>
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<td>Job title: (where relevant)</td>
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<td>Organisation: (where relevant)</td>
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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:__________________  Date:__________________
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)

Matters Arising Changes reference (e.g. MAC 1)

- MAC1 Object
- MAC4 Object
- MAC5 Object
- MAC5 (Appendix 2) Object
- MAC 8 Object
- MAC37-39 Object
- MAC56 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).

<table>
<thead>
<tr>
<th>CE2</th>
<th>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.</th>
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<td>CE3</td>
<td>There are clear mechanisms for implementation and monitoring.</td>
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<td>CE4</td>
<td>It is reasonably flexible to enable it to deal with changing circumstances.</td>
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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.
I support the full response prepared and submitted on behalf of the North West Cardiff Group. I repeat the NWCG's General Comments for emphasis.

I do not want to see development in NW Cardiff until work on a fixed-track link starts.

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. 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)

3. 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')

4. 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)

5. 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)

6. 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) (MAC58 C8-C10).

7. 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.

8. 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
9. 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)

10. 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)

11. 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)

12. 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)

13. The developers say, and Cardiff Council agrees, that 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)

14. 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)

15. 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)

16. 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)).

17. We share Cardiff Civic Society's reservations about Site C north of the A4119 and south of Pentrebane 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))

18. We share Cardiff Civic Society's reservations 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)

References

Appendix 1

Bus Rapid Transit UK : http://www.brtuk.com/
What is Bus Rapid Transit?

"Bus Rapid Transit (BRT) is a term used to describe a wide range of bus based transportation systems. There is still some debate as to what exactly qualifies as BRT. One of BRT’s strengths is that it is flexible and adaptable making it hard to define. It is widely accepted that BRT bridges the gap between an ordinary bus and a light rail transit (LRT) system. There are a number of characteristics which BRT systems should and do feature. The best systems have them all in abundance, most offer a mix appropriate to the situation. They include:-

Segregation: This could be from all traffic or just general traffic. Measures should be appropriate to the environment and the situation. The key thing is ensuring BRT vehicles can bypass congestion.

Flexibility : All BRT systems are different but many allow different bus services to join and leave the routes at different points. Operations can be changed to complement changes to demand in the area.

Priority at intersections: Modern technology allows signals to detect an approaching vehicle and either extend a green light allowing it through or change the signals altogether.

High quality infrastructure: Shelters with real time information, CCTV, lighting, seating, help points, off board ticket machines, made from premium materials in an improved environment.

High demand routes: Occupies a transport corridor along which people want to be transported. Some BRT systems carry up to 40k passengers per hour!

Integration: Forming part of a wider network which may feature trams, ordinary buses, heavy rail and active modes like cycling and walking. Most systems feature large park and rides which many people forget is an interchange in itself.

Distinct branding: Distinctive brand supported by liveries and street furniture help differentiate BRT from a conventional bus system and attract new passengers.

High quality vehicles: Comfortable seating and standing facilities, wifi, multiple access points, level boarding are just a few of the things the best systems have. They should be quiet, low or zero emissions and clean!
High quality stops: Seating, ticket validation machines, real time passenger information, help points, CCTV and where appropriate cycle facilities.

Smart ticketing: Oyster card style systems allowing seamless transition between different services and modes work best. More recently systems have begun to offer contactless card payments and mobile phone 'e-ticketing'.

In addition,

In the report and MAC Very is very little mention of car use and for necessary road provision for dealing with the car journeys that will be undertaken, despite an acceptance that 50% of all journeys will still be undertaken by car.

There is some mention of road improvements, but these are very scant amounting to very minor improvements here and there, to remove pinch points. Is this really enough to deal with the car journeys anticipated in the next 20 years combined with the challenges of the new traffic mix of buses, pedestrians and cycles?

The standard of the existing highway network for current and future use is largely overlooked. Yet it would appear that these roads adjoining and passing the development would be key to the infrastructure as they would be required to accommodate more traffic of mixed modes.

Failings in the existing network are massively apparent even from a short visual inspection, with many sections significantly below desirable design minimum standards in numerous respects. There are blind bends, blind ridges, blind entrances, carriageway widths at or below absolute minimum, vegetation encroachment, narrow footpaths, sections with one or no footpath, lack of verge and direct proximity to stone walls and large trees. Surely some improvement ought to be outlined as it is highly questionable whether these roads are suitable for the mix of traffic proposed.

I would challenge anyone promoting these roads as suitable, to try them using each of the different modes of transport promoted here. Would you allow members of your family to cycle down lengths of the existing highway network in the morning and evening peak? Worse in winter, hours of darkness and poor weather.

Cardiff has a poor track record of addressing highway issues in new developments. There are some glaring examples of failure of the development process which have never been adequately addressed. In NE Cardiff, Pontprennau was largely built 15 – 20 years ago. There are many significant highway oversights and obvious errors left over from this development and never addressed further by CCC.

One of the most used roads linking Pontprennau is St Mellons Lane. This has become a rat run across NE Cardiff, as it has been left unimproved as a single track rural lane. Yet it now serves as a major link between the communities of Lisvane and Pontprennau and it provides an additional function as a link between Lisvane and Thirnhill, the A48 and M4 to the east. Cardiff CC have neglected this road.

Church Road in Pentwyn runs between Pontprennau and Pentwyn to the A48 Junction at the Pentwyn Link road A4232. It is highly dangerous and substandard, as half of it was reconstructed to modern standards during the development of Pontprennau 20 years ago, the other 250m has been left in its original state. It’s possibly the worst case of urban highway ever seen. There is even a footpath crossing at the interface
between the new and old carriageway. Is this what Cardiff propose for the road network in the new LDP?

In NW Cardiff are they really proposing to leave the link between St Fagans and Culverhouse Cross, Michaelstone Road, in the current state and expect pedestrians and cyclists to use it? The failings are obvious but within all the documentation I see little to comfort me that the many highway issues will be corrected in line with the new traffic mix.

The report makes reference to supporting evidence. Yet there is no evidence referenced that would support the core aim of achieving a 50/50 modal mix. Perhaps Cardiff would find it embarrassing to refer to certain cities where such a mix has been achieved. A comparison with the infrastructure and infrastructure planning in places such as in Amsterdam would just confirm how Cardiff’s proposed efforts appear even more far-fetched than most people already believe.

As such I would recommend that the inspector refuse the LDP and request that the obvious highway defects are addressed in the proposals in line with the anticipated traffic mix.

Regards

Kevin G Wright

MICE C. Eng

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

The Matters Arising Changes Schedule is available on the Council website at: 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

<table>
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<tr>
<th>Procedural Tests</th>
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<tr>
<td>P1</td>
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<td>It has been prepared in accordance with the Delivery Agreement including</td>
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the Community Involvement Scheme.

<table>
<thead>
<tr>
<th>P2</th>
<th>The plan and its policies have been subjected to Sustainability Appraisal including Strategic Environmental Assessment.</th>
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<td><strong>Consistency Tests</strong></td>
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<tr>
<td>C1</td>
<td>It is a land use plan which has regard to other relevant plans, policies, and strategies relating to the area or to adjoining areas.</td>
</tr>
<tr>
<td>C2</td>
<td>It has regard to national strategy.</td>
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<tr>
<td>C3</td>
<td>It has regard to the Wales Spatial Plan.</td>
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<tr>
<td>C4</td>
<td>It has regard to the relevant community strategy/ies (and National Park Management Plan).</td>
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<tr>
<td></td>
<td><strong>Coherence and Effectiveness Tests</strong></td>
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<tr>
<td>CE1</td>
<td>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</td>
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<tr>
<td>CE2</td>
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</table>
Dear Sir / Madam please find attached my comments and objections to the current LDP.

Best Regards