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

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<thead>
<tr>
<th>Your/your Client’s details</th>
<th>Agent’s details (if relevant)</th>
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<tr>
<td>Title:</td>
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<tr>
<td>Name: Tom Holmes</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: [Signature] Date: 19 July 2015
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)

MAC 38 ......................... Object (Delete as appropriate)
MAC 39 ......................... Object (Delete as appropriate)
MAC 61 ......................... Object (Delete as appropriate)
MAC 62 ......................... Object (Delete as appropriate)

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).

CE3, CE4

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.

Please use the space provided to set out your representation. Please be explicit as to which 'matters arising change' your comments relate to.
(Continue on a separate sheet/expand box if necessary)

MAC 38

The North West Cardiff Group which includes the Pentrych Community Council and Save Creigiau, emphasised repeatedly at the numerous public hearing in January and February 2015 of the deficiencies in the LDP in relation to transport. The council response to this matter fails to address any of the points that they have raised. The number of houses proposed will need a lot more transport infrastructure connecting across the city. The points were not in relation to transport within sites themselves alone. The massive increase in demand for transport provision will not be met by a bus lane into the city centre. Indeed it is likely to only make the problem worse for residents who have no other options presented to them; for example, families where both parents work and have to drop their children to childcare before then travelling to work. If the level of traffic increases, as it will in the proposals, then it will be impossible for such parents to fulfil their childcare obligations whilst managing to arrive at work and depart at reasonable times.

As someone who drives, cycles, and carries out multi-modal transport depending upon the day of the week according to my ever-changing childcare arrangements, I think it is a lovely notion to ‘...use a range of tools and measures to change travel behaviour by helping to make sustainable travel an attractive choice (5.230).... [through]...‘ensuring the bus is a more attractive and practical travel option is crucial to reducing car dependency, improving accessibility and effecting modal shift. (see, 5.231).

However, it is simply not practical for many, many residents, for the reasons I set out above, in relation to having to drop off children in one place, then travel to work in a completely opposite direction.

I really cannot see how through using public transport I could drop my children to the childminder using the inadequate public transport provisions we have in one direction, then find another mode of public transport to travel to work, and do the same on the way back. The reality would be that: a) I would not manage to collect my children on time, and b) I would get penalised at work for being continuously late to work, or having to leave early to use public transport.

What are the exact plans for the A4119 for example, and other key transport corridors from the North West, that reflect the plan to put so much expansion in the area? We need to know specifics about what could be included such as the Metro, and if the developments will be phased to meet the progress of the Metro (which it is appreciated is not in the full remit of the Council alone).

Furthermore, in relation to J33 of the M4, this also needs more specifics. This junction is at absolute gridlock during rush hours already, with traffic queuing not only along the M4, causing a potentially very dangerous situation, but up the A4119 into Talbot Green. A similar situation occurs on the North section of the A4232 onto the M4 which frequently tails back towards Culverhouse Cross.

So again, the only solution is to feed the traffic onto the A4119 but without offering any improvements to the road network itself which is a narrow, single lane, winding road. The MAC also refers to improved walking routes and cycling routes. Will these be of an adequate level like the Taff trail, which is off-road and a great resource in Cardiff. Or, will they simply be some ‘red painted’ narrow lanes added to the existing roads, which are dangerous, giving cyclist very limited room on the carriageway?

MAC 39

The Metro is essential to NW Cardiff if the situations outlined in MAC38 are to be avoided. Even if the Council did propose a dual carriageway for the A4119, it would need public transport support in the form of a metro. Protecting the routes within the sites is welcome but it is a concern that supporting transportation may never actually be built. The changes document uses language such as ‘will seek to facilitate the development of a future regional ‘Metro’ network’......’ which in my mind leaves plenty of room to ignore this in the future, as no serious commitment is being made.

This also relates to earlier calls in public hearings for a phased approach to building new developments in areas such as NW Cardiff which have such poor public transport and road provision.
MAC 61 and 62

References are made in MAC 61 and 62 to using sites such as Creigiau as they allow for ‘deep mining’ rather than lateral extension. The statement is made that ‘such an approach will not cause unacceptable harm to the environment’; what about the environmental noise that will be created and affect the tenants in the surrounding areas such as Pentyrch due to mining and blasting, as well as the vibrations, and increased heavy road traffic, which will drop stones/quarry material onto the roads. The latter point has implications for MAC 38 and 39, where increased transport modality is encouraged for residents to cycle and walk. Anyone who actually cycles on the road will understand how dangerous it is to hit quarry material when cycling downhill on a road bike with thin tyres. How can you increase road traffic, debris, and then suggest more people cycle? There will be increased road accidents for motorists and cyclists.

We need also to ensure that quarrying does not happen, and that at the very least explicit statements should be made that the quarry will not be expanded to a net larger square footage.

Generally to be welcomed:
1. Major elements of the Strategic Site Masterplans have been brought into the Plan, giving more certainty on the overall infrastructure required.
2. Clear statements on levels of infrastructure: enabling necessary, and essential infrastructure.
3. The new Policy T9 Cardiff City Region ‘Metro’ network, which whilst recognising the difficulties specifying a regional network within this LDP before fundamental decisions on routes, funding and timing have been made by Welsh Government.
4. Potential Metro routes/corridors are now protected from development by the plan. However, to be of any real value the corridors protected from development need to be wider and to form a complete network within the city.

Still of major concern:
1. Phasing of development is not included in strategic infrastructure delivery.
2. Evidence is not robust of the need to deliver over 41,000 new homes by 2026.
3. General consensus that the rate of construction can actually be achieved.
4. By working to these early and high growth targets the LDP cannot be based on delivery of essential transport infrastructure like the Metro.
5. Development on the scale proposed cannot lead to sustainable communities in NW Cardiff which the principal mode of public transport is buses, and the roads will be gridlocked.
6. Development of Strategic Sites should be phased to align with infrastructure, particularly public transport, to avoid the creation of unsustainable communities.
7. Despite the immeasurable amount of work that the NW Group has done to add constructively to what is required in this LDP, no fundamental changes have been made to the Plan.
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.

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

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<th>Coherence and Effectiveness Tests</th>
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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.
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<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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