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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<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>David Barnard</td>
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<tr>
<td>Job title: (where relevant)</td>
<td>Clerk</td>
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<td>Organisation: (where relevant)</td>
<td>St Fagans Community Council</td>
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<td>Email:</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 document.

Signed: ___________________________ Date: July 23 2015

St Fagans Community Council: MAC response 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)

- MAC1 Object
- MAC4 Object
- MAC5 Object
- MAC5 (Appendix 2) Object
- MAC 8 Object
- MAC10 Object
- MAC15 Object
- MAC37-39 Object
- MAC41 Object
- MAC49 Object
- MAC51 Object
- MAC52 Object
- MAC54-61 Object
- MAC75 Object

If you are objecting to a change it would be helpful if you could indicate which Test of Soundness you consider it to fail (Please refer to guidance note).

| CE2 | 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. |
| CE3 | There are clear mechanisms for implementation and monitoring. |
| CE4 | It is reasonably flexible to enable it to deal with changing circumstances. |

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)

General Comments

1. St Fagans Community Council is a member of the North West Cardiff Group and supports the comments made by that Group in their response.

2. We fully endorse the NWCG comments that “The Inspector’s 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)

3. Far from answering the questions, we believe that Cardiff Council has demonstrated that they do not have answers: for example their attempt to answer legitimate transport concerns by talking about “bus rapid transit” when what they describe totally fails to meet the basic criteria for a genuine rapid transit system. The MAC amendments to the DLDP do not make the Plan a sound blueprint for development and it is our view that the DLDP remains fundamentally unsustainable and unsound. (Tests of Soundness CE2, CE3, CE4). (MAC37-39 for T1-9; MAC4 KP1; MAC5 KP2)

4. Cardiff have stated many times in the DLDP and related Background Technical papers that they need to deliver a 50:50 modal split and that good habits must be embedded upfront. Yet they persist with transport “plans” that will deliver nothing except greater congestion on the roads. Cardiff has acknowledged 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. We question whether Cardiff has any idea what actually constitutes “bus rapid transit”. The Institute for Transportation & Development Policy (ITDP) is a non-profit making, non-governmental organisation that aims to support cities in developing sustainable transport solutions. They have been instrumental/involved in supporting the implementation of BRT systems in many countries including Argentina, Brazil, China, India, Nigeria, South Africa and USA (and others). ITDP define BRT "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). ITDP define gives 5 standards for true BRT:

- Dedicated right of way: Bus only lanes fully segregated from mixed traffic
- Busway alignment: Bus-only lanes aligned to the middle, not the curb, of a road
- Off-board fare collection: Turnstile-controlled or proof-of-payment fare collection system
- Intersection treatments: Mixed-traffic is prohibited from making turns across the busway
- Platform level boarding: Station platforms level with bus floors when boarding and alighting

What Cardiff is proposing - a conventional bus services on roads with sections of bus lane
- does not come close to meeting even one of the above standards.

At the Hearings we, and many others, objected to the confused and muddled use 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 neither helpful nor clear. We believe this is because Cardiff has no clear strategy or solution to the transport issues raised by the DLDP (MAC37-39 T1-9) (MAC56 C8-C10).

6. The level of involvement with the DLDP, as demonstrated by attendance and representations at the hearings was high. Despite this, and the clear evidence presented, no notice has been taken of the valid representations and no fundamental changes have been made to the Plan. (MAC1, para 1.6 'Consultation')

7. 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 in-phase with development. Instead it appears that Cardiff is being driven by developer representations that minimise the impact of the proposed developments and the infrastructure required. The developer’s transport consultants, Vectos, have told us that “The infrastructure already exists for movement by foot, by cycle, by bus, by rail and by car.” This statement is at best naïve. Vectos also inform us that it is “...not the purpose of planning policy to prioritise protecting the convenience of commuter car drivers”. We have not asked for priority to be given to car drivers, but we do believe that someone needs to recognise that building houses will result in more cars! Lloyd Wright of ITDP states that “Other transport options such as walking, cycling, driving, taxis, and other public transport systems should not be competitors with the BRT system, but rather complementary services that in many cases will interact with BRT as a seamless set of options serving all aspects of customer demands..........Too often, system designers think of other transport modes as competing rather than complementary.” Cardiff needs to learn this lesson. (MAC4 KP1)

8. We share NWCG’s concern that the Plan 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.

9. We accept that there is demand for housing in Cardiff but it is unrealistic to develop a plan that requires Cardiff to build over 33,000 homes during the remainder of the plan period (22,000 new allocations plus the 10,885 in the current land bank). This level of development has never been achieved before. Cardiff has an existing land bank that is not being utilised and the more greenfield land that is released the less likely it is that the less attractive (to developers) brownfield sites will be developed.

One of the key problems in Cardiff is the real need to provide affordable houses in inner city communities where people are now living and want to remain. Greenfield land releases will not solve this problem. (MAC4 KP1)
10. We are aware that some funding for the Metro has now been announced but there is currently no timetable and therefore no certainty of delivery, particularly to North West Cardiff. Until the essential transport infrastructure needed to achieve a 50:50 modal split, or at least a firm and definite plan, is in place, the DLDP remains unsound. (Tests of Soundness CE2, CE3, CE4)

11. At the Hearings Cardiff Bus gave evidence showing that they have no idea as to the number of extra buses that will be required, and therefore do not know the capital and revenue costs of the extra vehicles required. From this it is clear that Cardiff do not know if they can deliver the required transport infrastructure. (MAC37-39 T1-9)

12. The Plan at C7 (MAC56) specifies phasing of education provision: why is it not possible to do the same for transport? We believe that the transport infrastructure must be operational before development commences. Development must be phased in accordance with the transport implementation plans. This should be added to new policy KP2(C-E). (MAC5 Appendix 2)

13. We are concerned that far from proper phased development, Cardiff will allow development of strategic sites in from highway edges towards open country. This will not benefit new or existing residents and is simply the developers preferred way forward. (MAC5 Appendix 2 KP2 (A-H). This will create car-dependent communities in advance of transport infrastructure.

14. We object to the reliance on S106 alone. S106 alone has consistently failed to deliver and Cardiff has not achieved large S106 payments in the past. The new CIL regulations seek to substitute S106 with CIL plus S106. It is important that Cardiff maximises contributions from developers and landowners to fund major on- and off-site infrastructure. (MAC8: KP7)

15. NW Cardiff has seen no major significant investment in improvement of water and sewerage facilities for several decades. We are incredulous that the need for substantial investment in outdated systems with well-known problems is being ignored. (MAC8: KP7)
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 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

We wish to be able to speak to all the points raised above and to participate in discussions on any points raised by other parties to this consultation.

The St Fagans Community Council represents over 2,500 residents, who will be significantly impacted by proposed developments in NW Cardiff, and has been an active participant and contributor to the LDP process to date.

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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