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><strong>Title:</strong></td>
<td><strong>Mr</strong></td>
</tr>
<tr>
<td><strong>Name:</strong></td>
<td><strong>Gareth Williams</strong></td>
</tr>
<tr>
<td><strong>Job title: (where relevant)</strong></td>
<td><strong>Senior Director, Head of Cardiff Office</strong></td>
</tr>
<tr>
<td><strong>Organisation: (where relevant)</strong></td>
<td><strong>Redrow Homes (South Wales) St Fagans No. 1 &amp;2 Trust and St Fagans No. 3 Trust</strong></td>
</tr>
<tr>
<td><strong>Address:</strong></td>
<td><strong>Nathaniel Lichfield &amp; Partners</strong></td>
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<tr>
<td><strong>Telephone no:</strong></td>
<td><strong>02920 435 880</strong></td>
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<tr>
<td><strong>Email:</strong></td>
<td><strong><a href="mailto:gwilliams@nlpplanning.com">gwilliams@nlpplanning.com</a></strong></td>
</tr>
</tbody>
</table>

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.
**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)

<table>
<thead>
<tr>
<th>Matters Arising Changes reference (e.g. MAC 1)</th>
<th>Support/Object (Delete as appropriate)</th>
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<tr>
<td>MAC4, MAC5, MAC8, MAC9</td>
<td>Support/Object (Delete as appropriate)</td>
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<td>MAC10, MAC34, MAC40, MAC41</td>
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<td>MAC38, MAC39</td>
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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).

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<th>CE2, CE3, CE4</th>
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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.

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)

Please see attached document
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 issues raised in this representation, particularly with regards to monitoring targets are complex and of a technical nature which will require thorough examination by way of hearing sessions.

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>Procedural Tests</th>
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<th>Coherence and Effectiveness Tests</th>
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<td><strong>CE1</strong></td>
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<td><strong>CE2</strong></td>
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<td><strong>CE3</strong></td>
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<td><strong>CE4</strong></td>
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Subject: Representations to the emerging Cardiff LDP 'Matters Arising Changes' on behalf of Redrow Homes South Wales, St Fagans No 1 & 2 Trust and St Fagans No 3 Trust (No.2461)

1.1 Cardiff Council is currently consulting on consequential changes to the emerging LDP as a result of the identified action points set out by the Inspector following the close of the examination. These are set out in the 'Draft Matters Arising Changes Schedule', a copy of which is also enclosed. Consultation runs until 23rd July 2015. The following documents have been issued by Cardiff Council for comment:

- MAC Schedule of Matters Arising Changes;
- Revised Final Sustainability Appraisal;
- Revised SA Non-Technical Summary;
- Revised Appendix G;
- New Appendix I;
- MAC Habitats Regulation Assessment.

2.0 MAC4 KP1: Level of Growth

2.1 NLP considers that the proposed amendment to the wording of draft Policy KP1 which seeks to formalise the quantum of growth that the emerging Plan is making provision for (45,415) is necessary to ensure that the emerging Plan has sufficient flexibility to meet the housing requirement figure of 41,415 and enable it to deal with changing circumstances.

2.2 PPW requires that the LPA use the latest household projections as a starting point for assessing housing requirements but that other factors then also need to be taken into consideration.

2.3 The 2011 based WG Household Projections anticipate household growth in Cardiff of 34.8 thousand in 15 years (2,320 per annum) from 142.8 thousand in 2011 to 177.6 thousand in 2026. The equivalent household growth figure over the LDP period (2006-2026) would be 46,000. This is before any adjustments are made for economic and social considerations.

As set out in our previous representations to the deposit LDP, NLP considers that the emerging LDP has been informed by a robust analysis of housing...
requirements and that in this instance a deviation from the projections can be justified, however, it is in our view a minimum. The proposed amendment to the wording of draft Policy KP1 clarifies that the emerging Plan is capable of delivering broadly the defined housing requirement figure. NLP therefore supports MAC4 as the proposed housing requirement figure of 41,415 is not presented as a cap, but rather as a target which is capable of being exceeded. This is particularly important in order for the evidenced social needs of Cardiff to be met and that the role of Cardiff as the driver of the South Wales economy is supported.

2.4

NLP supports the proposed identification of the flexibility sites with defined boundaries on the Proposals Plan. This approach provides certainty to both the promoters of the flexibility sites and also to the local communities in order to bring forward, if required, a form of development that is consistent with the vision and objectives of the emerging Plan.

2.5

NLP supports the proposed amendment to paragraph 4.41 which indicates that the potential release of the identified flexibility sites would be triggered by way of monitoring targets. NLP supports the use of appropriate monitoring targets to trigger the release of the defined flexibility sites in order for the emerging Plan to effectively respond and deal with changing circumstances over the Plan period.

2.6

The flexibility sites’ release has a specific monitoring criterion (OB2 SO26). OB2 SO26 explains that the trigger for the flexibility sites coming forward comprises build rates exceed overall anticipated completions rates at 1st and 2nd LDP review stages. It is unclear whether this means that the flexibility site would only be released if build rates are running ahead of the anticipated completion trajectory after four and eight years (assuming four year LDP reviews). An eight year (minimum) monitoring target is not responsive enough as a trigger should there be a need for additional land releases either through under or over delivery.

2.7

NLP also object to this approach on the basis that an LDP review should be an outcome of monitoring rather than the main mechanism for monitoring itself.

2.8

Under the column ‘Plan Revision Required?’ the following text is set out:

“When a trigger point is activated an assessment will be undertaken to identify the underlying causes and consider necessary corrective actions as appropriate, including plan review, changes to supporting guidance or whether the underlying reasons do not require changes to the Plan.”

2.9

NLP consider the above approach imprecise and contends that as currently drafted the monitoring mechanism for the flexibility sites is contrary to Test of Soundness CE3 as there is not a clear mechanism for implementation or monitoring.
NLP consider that monitoring references OB2-SO1 to OB2-SO4 are more relevant and provide a more precise set of triggers against which the release of flexibility sites should be judged. NLP suggests that in the event that any of the triggers in respect of OB2-SO1 to OB2-SO4 are breached, then all the flexibility sites should be automatically released. This would assist the Council in directly addressing a 5 year land supply shortage and assist in enhancing completions for both market and affordable housing.

NLP therefore suggests that OB2 SO26 should be redrafted as follows:

<table>
<thead>
<tr>
<th>Monitoring Ref</th>
<th>Relevant LDP Policy</th>
<th>Core &amp; Local Indicators</th>
<th>Target</th>
<th>Trigger</th>
<th>Plan Revision Required?</th>
<th>Source</th>
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<tr>
<td>OB2 SO26</td>
<td>KP1</td>
<td>Local</td>
<td>To ensure sufficient land is brought forward for development in accordance with the Plan strategy and to maintain a minimum 5 year supply of land as set out in the JHLs.</td>
<td>Build rates exceed overall anticipated completion rates for two consecutive monitoring years or if the LPA cannot demonstrate a 5 year land supply for two consecutive years. Exceeding the trigger point on two consecutive years will automatically release all three flexibility allocations to meet the increased demand.</td>
<td>No Plan Revision Required. When the trigger point is exceeded or where the LPA cannot demonstrate a 5 year land supply, all three flexibility sites will automatically be released for development.</td>
<td>Council Housing Monitoring Survey</td>
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The revised wording of OB2 SO26 will ensure that the flexibility allocations can come forward immediately if completions are exceeding anticipated completion rates or if the LPA cannot demonstrate a 5 year land supply for two consecutive years. This will ensure that the flexibility allocations can respond quickly to the demand for new housing without having to wait for a Local Plan Review.

MAC5 KP2 (C): North West Cardiff

NLP supports in principle the proposed inclusion of a new policy to deal with each of the Strategic Sites, including the embedding of a schematic framework for the development of the sites. This approach provides clarity and certainty in terms of the development principles that can be expected to come forward, including both physical and social infrastructure.

NLP supports draft policy Policy KP2 (C) in principle as it is broadly aligned with the agreed Statement of Common Ground submitted to the Examination and it therefore provides an appropriate basis for Strategic Site C to come forward for development.
3.3 NLP supports in principle the categorisation of infrastructure requirements under two separate headings of ‘essential/enabling’ and ‘necessary’. Whilst we acknowledge that the above approach seeks to prioritise developer contributions, NLP is concerned that the suggested terminology fails to provide the clarity and certainty required to differentiate prioritisation. In the opinion of NLP, the term necessary with no additional clarification can be read to mean that all such infrastructure is also required.

3.4 This view is shared in the Sustainability Appraisal and Strategic Environmental Assessment of the Cardiff LDP where it states:

“We strongly recommend addition of the quoted text to the plan: without it, it is not clear why ‘essential’ infrastructure is distinguished from ‘necessary’ – the words mean the same thing.”

3.5 NLP therefore suggests, that in line with the SA /SEA, the use of the term ‘supporting’ infrastructure and that additional text in respect of ‘supporting’ infrastructure is included as part of draft Policy KP(2) explaining that the delivery of ‘supporting’ infrastructure items may not be met in full by the promoters of the site. This is vitally important as for viability reasons the developer may not in specific circumstances be able to deliver / fund all the necessary infrastructure listed in the Infrastructure Plan. NLP’s understanding is that the scheme will have to demonstrate that all the essential infrastructure will need to be provided but that elements of the ‘supporting’ infrastructure might not be required in full.

3.6 In respect of Essential Infrastructure relating to Transport & Highways, NLP considers that the following section should be amended to read:

“A proportionate contribution towards off-site infrastructure including bus priority enhancements on the Western Bus Corridor and measures to improve linkages into Rhondda Cynon Taf.”

3.7 NLP considers that it is important for the above amendment to be made as Strategic Site C is one of 3 strategic allocations located along the Western Bus Corridor. In the absence of the suggested amendment the scope of the essential infrastructure would appear to conflict with the CIL Regulations, namely in terms of necessity and being fairly and reasonably related in scale and kind to the development.

3.8 The supporting text should also make it clear that the off-site infrastructure provision and enhancements will be delivered in parallel with the development of site C. NLP suggests the following wording:

“Off-site infrastructure provision and enhancements will be delivered in parallel with the development of Site C. Provision of these corridors is not required in full in advance of development commencing and the works will be funded by a variety of sources, not just the developer, as set out in the Infrastructure Plan.”
3.9 With regard to ‘Education’ under Necessary Infrastructure, draft Policy KP2(C) suggests that that in addition to the delivery of on-site primary schools, a financial contribution would also be required to existing primary schools in earlier phases. NLP considers this position to be unreasonable as a new primary school is currently being proposed to be delivered up-front as part of the first phase of development. NLP therefore suggests the following amended wording:

“Education - 1 new Secondary School, 3-4 Primary Schools located in or adjacent to District/Local Centres, and if required a financial contribution to existing Primary Schools in earlier phases”.

3.10 We note that paragraph 3 appears to be missing from the supporting text to draft Policy KP2(C).

3.11 With regard masterplanning requirements, NLP suggests the following amendment to the wording of draft Policy KP2(C):

“Assessing and effectively addressing potential impacts on the St Fagans Conservation Area (retain woodland/hedgerow buffers together with provision of new planting) and the Listed Buildings (together with their settings) within and adjacent to the site;”

3.12 NLP consider that there is no need to include reference to the woodland / hedgerow buffers given that this is implicit in ‘effectively addressing potential impacts’ and appropriate mitigation will be the subject of further detailed work in due course. A commitment to retaining woodland/hedgerow buffers and the provision of new planting will be determined by a combination of landscape, ecology and archaeological requirements.

**Paragraph 4 - Financial Contributions**

3.13 NLP supports the approach set out at paragraph 4 of supporting text to draft Policy KP2(C) regarding the delivery of infrastructure via s106.

3.14 The delivery of strategic sites is dependent on the provision of necessary infrastructure, whether that be transport, social or community infrastructure. This infrastructure is part and parcel of the development costs that Redrow Homes and Trustees of St Fagans Trust, as promoters of Strategic Site C, are committed to funding. NLP believes that this infrastructure, which needs to be delivered in a timely fashion to ensure the vision for Cardiff’s economic and strategic growth is realised, is best delivered through s.106 contributions rather than CIL.

3.15 S.106 contributions allow for required infrastructure to be delivered in line with the appropriate phases of a development via triggered thresholds. This can ensure that all necessary infrastructure is in place when required, to both facilitate development and ensure any negative impacts of the development are mitigated. In contrast, evidence produced on behalf of the Home Builders
Federation (HBF)\(^1\) indicates that CIL does not allow for necessary infrastructure to be delivered in a timely manner to aid development, with the report stating:

"The key issue is ultimately that the CIL model relies on the delivery of development to raise funds. A 'Catch 22' is subsequently created, as in many cases development cannot commence until the necessary infrastructure is delivered. Similarly, without housing completions Charging Authorities cannot secure CIL receipts".

This problem is further compounded by the fact that the CIL raised against a development is only ever likely to make up a small proportion of the infrastructure funding gap and that CIL receipts from further developments will also be required to allow necessary infrastructure to be delivered to facilitate developments.

Consequently, the research conducted on behalf of the HBF has demonstrated that increasingly, Local Authorities are pursuing a "developer-led" approach, based on a zero CIL rate and site specific Section 106 mitigation. The report indicates that out of a total of 52 Local Authorities that have implemented a CIL charging schedule to date, over 30 Local Authorities have published a Charging Schedule that includes a zero CIL rate for strategic sites or key growth areas. This suggests that Section 106 is the preferred mechanism for delivering large-scale development.

Therefore, to ensure that the delivery of strategic sites is not undermined by infrastructure not being in place in appropriate timescales, NLP believe that it is necessary for the strategic sites to provide infrastructure requirements through s.106 contributions as opposed to CIL mechanisms.

**Paragraph 5 – Transport**

As set out in respect of the specific wording of draft Policy KP2(C), Strategic Site C is one of three strategic allocations along the Western Bus Corridor and therefore financial contributions sought towards infrastructure enhancements along the Corridor need to be necessary and proportionate in scale. As currently drafted, paragraph 5 implies that Strategic Site C would be responsible for the delivery of the entirety of all off-site bus priority infrastructure measures. This would appear unreasonable and contrary to CIL Regulations. NLP suggests that for clarity, the following text is included in paragraph 5:

"Contributions towards the delivery of off-site bus priority measures will be sought where it is necessary and proportionate in scale to Strategic Site C."

\(^1\) CIL is it delivering? November 2014 - A report from Savills Research, sponsored by the Home Builders Federation.
Paragraph 10 – Flexibility Option

3.20 NLP disagrees that including the flexibility site north of Llantrisant Road in KP2(C) as part of the schematic framework is premature. Seeking to embed key development principles at this stage would assist in delivering a comprehensive approach to the design and masterplanning of the wider area. NLP considers that at the very minimum the schematic framework in KP2(C) should demonstrate that it does not prejudice the future development of land north of Llantrisant Road. The schematic framework should identify an access point to Strategic Site C from Llantrisant Road that does not preclude access to the site north of Llantrisant Road from also being accessed from Llantrisant Road.

3.21 NLP considers that there is a disconnect between Paragraph 10 of KP2(C) and paragraph 4.41 (paragraph number crossed out) of Policy KP1. Para 4.41 states when discussing the flexibility allocations that:

"The Masterplanning of adjoining Strategic Sites will ensure that suitable access is secured and future Plan monitoring will trigger any future detailed consideration of infrastructure and masterplanning requirements should the need for the early release of the identified Search Areas be triggered within the Plan period."

3.22 The above text requires that the Strategic Sites should be masterplanned to make provision for the flexibility sites. NLP considers that Paragraph 10 of KP2(C) and the schematic framework should be revised to better reflect Para 4.41.

3.23 The reference in paragraph 10 to the flexibility site release only being triggered by plan review should be deleted as paragraph 4.41 of KP1 makes it clear that early release can be triggered within the plan period. Without this change these additional sites would not be capable of coming forward quickly in response to an identified housing land supply problem and the plan would not have a flexibility allowance.

Schematic Framework: Strategic Site C

3.24 NLP considers that the most effective mechanism to protect the setting of St Fagans Village, St Fagan’s Castle and the Museum is to expand the proposed allocation of Strategic Site ‘C’ to encompass all land to the south of Pentrebane Road and west of the linear woodland block up to the boundary of St Fagans Village. Within the Schematic Framework this land should then be identified as strategic open space buffer, to be used only for formal and informal recreation with no built development other than in association with recreational use.

3.25 The above proposed approach would also ensure that the network of green spaces link beyond the proposed development into existing communities and that access to these are maintained, improved and where necessary new connections created. This approach clearly presents benefits to both the
existing communities of West Cardiff and the new occupants of Strategic Site C.

3.26

NLP notes that the schematic framework appears to illustrate a cycle route running the length of Llantrisant Road and connecting to the wider cycle network south east of strategic site C (close to Heol Islaf). This cycle route does not reflect the collaborative ongoing masterplanning process with the Council and may simply be a drafting error.

3.27

Whilst the shared masterplan for the site does include strategic cycle connections to the wider network, particularly towards the city centre, they do not follow the exact alignment as currently shown on the schematic framework and NLP request that the schematic framework is reviewed to ensure consistency with the on-going masterplanning work.

4.0

MAC 8 KP6: New Infrastructure

4.1

NLP note that the LDP now has two Policies that deal with Infrastructure (KP6 and the site specific policies for the strategic sites). NLP is concerned that conflict could arise between the two policies when considering applications for strategic sites. Text should be inserted into KP6 to ensure that infrastructure at the strategic sites is delivered in accordance with the site specific policies for the strategic sites where the two policies do not align in terms of aspiration. NLP suggests the inclusion of the following text:

"With regard to strategic sites and where policy KP6 does not align with KP2 (A) to KP2 (H) priority will be given to the site specific policies (KP2(A) to KP2 (H)) in the determination of planning applications for strategic sites."

4.2

NLP welcomes the proposed amendments to draft Policy KP6 which seeks to prioritise developer contributions under two separate categories: ‘essential/enabling’ infrastructure and ‘necessary’ infrastructure.

4.3

However, NLP is concerned that the suggested terminology fails to provide the clarity and certainty required to differentiate prioritisation.

4.4

NLP is of the view that the use the term ‘necessary’ as a category for the purposes of prioritisation is unhelpful as it simply implies that all items listed as ‘necessary’ are also ‘essential’. NLP therefore suggests that ‘necessary infrastructure’ should be amended to read ‘supporting infrastructure’.

4.5

This view is shared in the Sustainability Appraisal and Strategic Environmental Assessment where it states:

4.6

“We strongly recommend addition of the quoted text to the plan: without it, it is not clear why ‘essential’ infrastructure is distinguished from ‘necessary’ – the words mean the same thing. NLP also considers that additional text in respect of ‘supporting infrastructure’ is required explaining that the delivery of ‘supporting infrastructure’ items may not be required in full by the promoters of the site owing to development viability. This is important in respect of items
such as public art, district heating systems, local employment and training opportunities where the Council’s priorities will influence their delivery. NLP also notes that the proposed amendment to KP6 states that

"New development will make provision for, or contribute towards all essential, enabling and necessary infrastructure...in accordance with Planning Policy and having regard to planning policy guidance”.

Infrastructure Plan

4.7 NLP supports the additional paragraph added to Policy KP6 regarding the Cardiff Infrastructure Plan. NLP supports the fact that the Infrastructure Plan comprises a ‘living document’ because this will ensure that changing circumstances can be captured over the life of the Plan.

5.0 MAC9 KP7 Planning Obligations

5.1 NLP supports in principle the amendment of draft Policy KP7, but seeks amendments to the wording of the Policy.

5.2 The purpose of the LDP is to effect a change in behaviour within Cardiff to allow growth to occur in such a way that the liveability of the City does more than just stand still, but improves. NLP is concerned that KP7 is not sufficiently clear. KP7 could be interpreted in some situations to mean that developers must ‘prove’ that travel impacts, calculated crudely on the basis of historical and traditional methods, can be ‘mitigated’ through delivery of infrastructure, otherwise the development is not acceptable.

5.3 NLP consider that the meaning of the LDP goes well beyond this, and is not so inflexible. NLP is of the opinion that design, choice and behaviour are all reasonable aspects to be given material weight in the transport planning process. Strategic Site C does much more than simply create “impacts” to be mitigated, it would drive the change in behaviour, and should be approached as much in a positive light of benefit and improvement as impacts and mitigations.

5.4 Our representations in respect of MAC8 regarding planning policy and planning policy guidance also apply here.

5.5 The narrative following the policy is clear about current planning policy in this respect, and it is not specific to impacts and mitigation. NLP propose no change to the following narrative.

5.6 NLP propose the less specific wording for KP7:

“Planning obligations will be sought on a case by case basis in line with Planning Policy and having regard to any planning policy guidance”
MAC10 KP8: Sustainable Transport

6.1 NLP consider that the premise underpinning MAC10 is flawed and simplistic. NLP is concerned that there is a risk that KP8 may be interpreted by members of the public and Officers of the Council in a way in which the policy makers did not intend. This has been the case at the on-going Churchland’s appeal inquiry (Strategic Site F).

6.2 At the Churchlands appeal inquiry, post the issue of the Council’s LDP Action Point responses, the Council made representations on the S106 legal agreement, interpreting the emerging LDP and policy to mean that the development itself must achieve a 50:50 modal split or pay a penalty. This interpretation of KP8 is incorrect in the context of other parts of the emerging LDP, and a hindrance to the beneficial growth of Cardiff. NLP is concerned that with the wording as proposed the Council may perpetuate this approach, to the detriment of growth and the City.

6.3 There are a number of issues that we take with the proposed wording of KP8:

1. It is not about ‘mitigating transport impacts’. It is about designing for community, creating Choice for mobility (including virtual mobility, and new infrastructure, which may often be more subtle than simply building bigger) and achieving a particular behaviour (or behavioural change). It is also about managing the transport networks as they exist to get the best from them, in terms of the transport hierarchy that transport policy promotes. Only in the loosest sense may this be described as ‘mitigating the impacts’. NLP prefer to consider it in terms of fitting with, and acting as the catalyst for, appropriate, and better, mobility throughout the City.

2. The Council has used the phrase 50:50 as a concept for reducing reliance on the private car. NLP agree with the concept. However, it is wrong to use it as an empirical target. This danger was highlighted by the Council’s approach at the Churchland’s public inquiry where a specific target of 50% by car (driver and passenger) for the specific development was used as the basis of an argument.

As an empirical target it is meaningless in the context of the LDP’s approach. It is designed on the basis that achieving ‘50:50’ as an average across the entire City results in no more average inconvenience across the City to ‘private car commuters’ i.e. it is predicated on the convenience of the private car commuter. The zero change to private car commuter inconvenience is the target. This is wrong. It is not consistent with the general tenor of, or other specific references within, the emerging LDP. The private car commuter occupies the lowest priority in terms of planning weight in the transport context. It is a crude and out of date approach.

3. 50:50, even across the City, is further meaningless, because it is also based on assumptions about numerical car occupancy, and assumptions
that multi car occupancy is not a sustainable movement. Car occupancy is one of the central targets for sustainable travel across Europe, and there are currently a number of research, development and demonstration projects, funded by the EU that seek to promote and increase the propensity for car sharing (CHUMS (2.5m Euro investment) and SOCIALCAR (8m Euro investment, involving 24 organisations across 14 countries) to name two).

The 50:50 adopted by the Council assumes 33% car driver. This is the critical figure to the concept, and to the Council's target of no average increase in car driver inconvenience between 2010 and 2026.

The Council is not clear that the 50:50 it uses is an average across the City, and not specific to any one area or place. This lack of clarity is relevant because of the Council Officer approach at the Churchlands appeal inquiry, where it sought to place a target of 50% by car (including passenger) and 50% by non car, or penalties would be paid.

6.4 NLP therefore propose that the new paragraph inserted as a result of MAC10 is amended as follows:

"In order to mitigate transport impacts and achieve the 50:50 modal split target across the city as a whole by the end of the plan period, the development of strategic sites...."

6.6 Likewise, we propose that the sentence inserted before para 4.117 is amended as follows:

"Policies KP2 (A) to KP2 (H) list the ‘Essential’ and ‘Enabling Infrastructure’ required to support the development of each strategic site and the delivery of the 50:50 modal split target across the city as a whole by the end of the plan period"

6.8 We have appended at Appendix 1 an informative note by Vectos Transport Planning seeking to demonstrate the effectiveness of the LDP transport strategy.

7.0 MAC34 EN12: Renewable Energy and Low Carbon Technologies

7.1 NLP objects to MAC34 which seeks to amend the wording of Policy EN12 to include:

"Development proposals are required to maximise the potential for renewable energy."

7.2 PPW (4.4.3, 4.7, and 4.12) sets out the Welsh Government's land use planning policies in respect of planning for sustainable buildings in development plans and development management. It does not establish a higher national building standard than Building Regulations.
7.3 Paragraph 4.12.5 of PPW advises that LDPs may also include site specific development principles, which could incorporate sustainable building standards higher than Building Regulations for particular locations. However, this should be evidence based and viable.

7.4 NLP objects to MAC34 as the proposed amendment to Policy EN12 is not in accordance with PPW as it seeks to ‘maximise’ sustainable building standards over and above Building Regulations without any firm evidence base, including development viability work.

7.5 MAC34 is considered inconsistent with the remainder of the emerging Plan because the Policy requirement to ‘maximise’ implies that renewable energy is a priority ahead of other infrastructure requirements. Policy EN12 as currently drafted could preclude acceptable forms of development coming forward. It is vitally important that the strategies, objectives and priorities of the emerging LDP are consistent and that policies such as EN12 are more specific and based on robust evidence.

7.6 NLP supports the Council’s aspiration to secure energy generation from renewable and low carbon technologies at major and strategic sites. However, this should not be prioritised over essential infrastructure. NLP considers that Policy EN12 (Deposit version) already strikes an appropriate balance between the desire to secure renewable energy and the need to address the future evidenced needs of Cardiff. NLP questions the national planning policy basis upon which the above onerous assessment is required. In addition, the proposed amendment fails to set out a threshold to identify the types of development the above proposed assessment would be required for. This reflects the absence of any viability work in pursuing sustainable building standards beyond Building Regulations.

7.7 NLP suggests that the text added as a result of MAC34 should be amended as follows:

“Development proposals are required to maximise fully consider the potential for renewable energy.”

8.0 MAC38 T2: Strategic Rapid Transit Bus Corridor

8.1 NLP welcomes the added clarity that MAC38 brings to Policy T2, particularly the Western Bus Corridors. With regard to Rapid Transport Corridors, this appears to reflect the latest known position but it is important that there is consistency in terminology throughout the Plan.

8.2 NLP support the fact that the proposed rapid transit routes are not shown on the proposals map. This is because details of the routes have not been finalised.
MAC39 Policy T9: Cardiff City Region ‘Metro’ Network

9.1 NLP welcomes Policy T9 which provides much needed certainty and commitment to the delivery of the ‘Metro’ Network. The shared vision between the promoters of Strategic Site C and the Council mean that the Schematic Framework ensures that the potential future alignments of the ‘Metro’ route are safeguarded.

9.2 Whilst the ‘Metro’ would not be deliverable within this Plan period, recent announcements by the Welsh Government in terms of its financial commitment and leadership are helpful in demonstrating the clear direction of travel.

MAC40 and MAC41 Policy R1: Retail Provision within Strategic Sites

10.1 NLP considers that the new policy inserted (MAC40) referenced R1 should be amended to read:

“Retail proposals, (including changes of use, redevelopment and extensions) will be considered in accordance with the retail hierarchy which comprises Central Shopping Area (CSA) at the head of the regional hierarchy supported by a range of district centres, smaller local centres as identified on the Proposals Map and the retail centres defined on the schematic frameworks for the strategic sites. Retail proposals outside centres identified on the Proposals Map and the schematic frameworks will be assessed against Policy R4 (Retail Development).”

10.2 NLP also objects to MAC41 which amends Policy R1 (Retail Provision within Strategic Sites). The additional text which we object to is highlighted in bold:

“Retail development which forms part of the allocated housing led Strategic Sites will be assessed against Policy R4 (Retail Development - Out of Centre)”

10.3 NLP considers that it is not appropriate for retail development which forms part of the allocated housing led Strategic Sites to be considered against Policy R4 because they will not be out of centre sites. Criteria are already set out in Policy R1 to deal with retail provision within strategic sites. NLP does not consider it reasonable for retail provision within strategic sites to have to accord with both R1 and R4. In any event criterion i) of both R1 and R4 are very similar.

10.4 Forcing retail provision within strategic sites to accord with Policy R4 might create difficulties going forward as proposals will have to demonstrate accordance with the sequential test. Proposals will not be able to do this because the proposed centres within strategic sites will not have any retail designation.

10.5 If the LDP proceeds with this approach, NLP considers that Policy R1 (Retail Provision within Strategic Sites) should be amended to read:
“Retail development which forms part of the allocated housing led Strategic Sites will be assessed against Policy R4 (Retail Development - Out of Centre) but only with regard to the impact test.”

10.6 In order for retail provision within the Strategic Sites to come forward successfully there needs to be planning policy to support this. MAC41 is not helpful in this regard and NLP is concerned that it will impact on the creation of sustainable places that are made up of a mix of different uses.

10.7 NLP supports the fact that the following change has been made:
“It is of appropriate scale which satisfies an identified local need;”

10.8 The removal of the word ‘local’ from Policy R1 is a positive amendment that will ensure that retail proposals within Strategic Sites are assessed against the wider population that the Strategic Site will support as well as any deficiencies in adjoining communities.
Appendix 1 – Informative Note prepared by Vectos Transport Planning
Cardiff LDP Submission

Achieving Transport Change

Effectiveness of Transport Measures

Introduction

1. Cardiff Council plans for, and has confidence that, travel behaviour will continue to change for movement within, into and out of, the City.

2. It’s DLDP policy concept of at least 50% mode split of mobility by non car means by 2026, compared with a base that it says is higher than this at present, means a shift away from use of the car and car driving.

3. It has good reason for this confidence.

4. Less reliance on the private car, which is the result of this concept, is largely delivered by a shift in culture. It is a shift in the way in which people choose to live, work and expect to be able to travel.

5. It is people exercising choice and minimising their inconvenience. It is people choosing healthier lifestyles. By and large the result is more interactive communities and a greater capacity for movement within the City without building more or bigger roads.

6. The opportunities for mobility, where mobility includes accessibility of friends, services, facilities, workplace, school and other places, includes these, in hierarchical order, with highest priority first.
   - Using technology at home (video calls, internet shopping etc)
   - Walking and cycling
   - Public transport
   - Multi occupancy cars
   - Single occupancy cars

7. The lowest capacity network for travel, ie, that which takes up most space per person mobility, is the single occupancy car. The highest capacity networks, ie those which take up least space per person mobility, are walking and cycling, and of course ‘stay at home’ mobility.

8. The DLDP initiatives, and the initiatives provided by the DLDP strategic sites, will deliver designs, infrastructure and education to accelerate and encourage greater mobility in the context of transport as a whole, rather than in the narrow field of car traffic.
9. The consequence is less importance placed on creating convenience for commuting cars, and more importance on the overall opportunity for mobility across the whole transport spectrum.

10. That this is a reasonable expectation, and that the Council is right in its approach, is reinforced by a plethora of advice and observed effect.

11. I have summarised some of that advice and observed effect below.

**Other Cities**

12. Cardiff may be thought by some to be at the ‘junior’ stage of City car travel inconvenience.

13. Driver congestion and inconvenience has not yet reached the epic proportions that other cities have seen, and are recoiling from.

14. Cardiff is in an excellent position to take action now to short circuit and maintain a pleasant, vibrant and liveable city, with plenty of opportunity for mobility and growth. This is what the Council is designing for, and articulating in, amongst others, the DLDP.

15. Cardiff’s vision is encapsulated by its statement\(^1\) “*We will encourage a proactive approach to defining a sustainable transport vision within the wider region, to enable Cardiff to demonstrate a step change in travel behaviour*”

16. Other towns and cities in the UK already do better than Cardiff in terms of mode split. Other places have already achieved what Cardiff aspires to, providing confidence that Cardiff has a realistic expectation.

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\(^1\) Cardiff: Delivering the most Liveable European Capital City – September 2014
17. Graph 1 compares mode split for travel to work, and is based on 2011 census data.

18. Graph 2 compares morning peak period mode split based on the following general assumptions:
   - Travel to Work data applies to the morning peak period
   - 50% of travel in this period is education related, and the mode splits are as per 2011 census data
   - The remaining journey purposes have the same mode splits as 'travel to work'

19. Other Cities in Europe have achieved much more than Cardiff aspires to in terms of mode split of all journeys. Some examples, which are by no means exhaustive, are summarised below.
Cycling

20. There is opportunity for a lot more cycling in Cardiff.

21. Cardiff is flat, and has more green space than any other UK core city.\(^2\) According to the CTC, Cardiff has the potential to grow up to become the Amsterdam of the UK.\(^3\)

22. According to the Ask Cardiff Survey (ACS)\(^4\):
   - Fewer than half of those surveyed reported being satisfied with cycling facilities\(^5\)
   - About 11% of people shopped in the City Centre using a bicycle, and about 17% used a bicycle to get to leisure activities\(^6\)
   - 22% of people cycle to work at least one day a week\(^7\)
   - 25% of people identified better cycling facilities as a priority for investment\(^8\), the second highest priority after ‘reducing congestion’

23. Therefore, there is a demand for cycling, and an environment to provide for it within. There is a relatively easy win to convert this demand. Providing better routes and facilities, together with awareness campaigns and a shift in culture, will release this opportunity.

24. Other places already achieve much more than Cardiff in this respect, and there is good opportunity for Cardiff to emulate or match some of these.

25. Malmo in Sweden, a town of a similar size and precipitation days as Cardiff is achieving a 22% mode split by cycle for all journeys, with at the same time just 42% of journeys by car.\(^9\)

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\(^2\) Cardiff Cycle City Manifesto, January 2015  
\(^3\) Gwenda Owen, CTC Councillor, 29th January 2015  
\(^4\) Ask Cardiff Resident Survey 2013  
\(^5\) ACS p51  
\(^6\) ACS p55  
\(^7\) ACS p56  
\(^8\) ACS p64  
\(^9\) Civitas – SMILE Study
26. About 60% of all journeys in Groningen, Holland, are by cycle. These cyclists are not enthusiasts or sports junkies. They are simply Dutch.

27. In Copenhagen 50% of all citizens commute by bike every day, and there are more bikes than inhabitants. Of families with two kids, 25% have a cargo bike.

28. Seville, in Spain, has undergone a cycling revolution. In the City of Dreams, they built it and they came!

29. Bike trips multiplied 11 fold in a few years as a direct result of new cycle infrastructure. From 6,000 cycle trips to 70,000, and 10 bike shops to 50 bike shops, Seville has been phenomenally successful. Cycling has become a ‘deeply everyday activity’.10

30. Closer to home, Bristol has been pursuing a cycle city strategy. Between the census years of 2001 and 2011, Bristol experienced the most rapid rise in commuter cycling of all core cities outside London, with a 94% increase. On Wednesday 2nd October 2013, 16% of Bristol commuters cycled to work, and just 35% of people drove on their own.11

31. At the moment, 3% of all journeys in Cardiff are by cycle12. In our view it is not at all unreasonable to aspire to at least 20% of journeys by cycle by the end of the DLDP Plan period in 2026.

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10 How Seville transformed itself into the cycling capital of southern Europe – Appendix A
11 Bristol’s Big Commuter Count 2013 Results. Produced by Bristol City Council
12 Personalised Travel Planning in Cardiff, September 2014
Buses

32. The new public transport element of the DLD is bus based.
33. People already use buses.
34. The observed effect is that buses already perform a valuable function in Cardiff, with, for instance 45% of people using the bus for shopping in the City Centre.\(^{13}\)
35. Over 50% of people from some wards well served by bus, use the bus to get to work in the City Centre.

36. The observed effect in other cities is also that buses are well used.

\(^{13}\) ACS p55
37. Bristol is currently developing a Metro Bus, bus rapid transit scheme for the City and region, which it says will reduce emissions, support economic growth, promote accessibility, provide for better safety and health, and improve quality of life.

38. Therefore, the evidence is that buses are, and can be, a practical and attractive means of travel.

39. Therefore, it is reasonable for Cardiff Council to expect, as it does in the DLDP, that buses will continue to be an important part of the overall transport offer. It is reasonable for the Council to expect that with bus route, facility and quality improvements, coupled with limited capacity on the road for private cars, that patronage will rise. It is reasonable for it to conclude that in general, bus travel is both a better option for society, and a higher priority for investment, than capacity for the private car.

**Education and Awareness**

40. There is already greater variability in travel patterns than is often thought. For instance, in London, only 24% of people reported making the same journey the same way every day. About 46% of people said that they try to make journeys the same way, but would adjust if necessary. In a local authority survey, 20% of respondents did not know how many days they would work in their main office in the following week, and 30% were not sure that they would stick to their current plans.¹⁴

41. There are many reasons for variability, with the most frequently reported being the actions of family, friends, colleagues, pets or other people, rather than transport disruption.

42. The Flexi-Mobility research reports that there is a willingness and acceptance by people of the need to do things differently some of the time. The researchers judge that doing things differently is inevitable, and learning to do it is beneficial. They found that the most multi modal people are the best at coping with change and disruption.

43. They found that owning the understanding, the skills and the knowledge to make choices is important to behaviour change.

44. So, a most significant part of changing approach and culture is education. As with the wearing of seat belts, or not drinking and driving, sometimes there needs to be a greater awareness and encouragement before any change is unwaveringly asserted into the collective psyche.

45. The evidence is that, plans providing this have an enormous effect on travel habits.

46. Cardiff already has the means for wide travel choice, and this will be accentuated with the measures in the DLDP. The awareness of these, the benefits of these, and increasing propensity for these to be chosen is influenced by travel planning and personal travel planning.

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¹⁴ Flexi-Mobility: Unlocking Low Carbon Mobility Opportunities
47. Where Liftshare\textsuperscript{15} has implemented personal travel planning for the office population, it has achieved mode shift away from car driver of up to 26\%, with an average mode shift of 17\%.

48. Sustrans has reported on the results of implementing personal travel planning schemes to households in a number of locations. The results are summarised below.

![Graph showing mode shift](image)

49. The results are overwhelmingly positive, with reductions in 'car as driver' and increases in walking, cycling and public transport across the targeted households.

50. This demonstrates that the confidence Cardiff Council places in effecting behavioural change has a solid foundation.

**Summary**

51. Cardiff Council wants to improve the quality of life in the City and accommodate growth. It says that it will achieve this by considering the transport and mobility networks holistically. This means considering transport in terms of mobility across all modes, and not in the historical and outdated way of traffic impact first.

52. In fact, the Council has embraced the policy approach where traffic impact is often the least important part of providing for mobility.

53. The Council’s expectation that the increasing demand for mobility can be taken up by networks other than that of the private car is well founded.

54. The City has an enormous potential for more cycling. It punches below its weight in this respect at the moment given its compact size, topography and pleasant surroundings. It is reasonable for the Council to design for, and expect, much greater things in this respect.

55. Observed effect elsewhere reinforces confidence in the achievability of a step change in cycling.

\textsuperscript{15} www.liftshare.com
56. Buses are the mainstay for new public transport demand within the DLDP period. Buses are already used extensively in the City. The principle of bus use is established. More buses, of better quality, on faster and more reliable routes, will only perpetuate and expand this as an option for travel.

57. The observed effects elsewhere reinforce this judgement.

58. Travel planning, including personalised travel planning, has a major role to play at this time. It will help to accelerate travel culture change for many, from infancy to maturity. The observed effect is that, at the moment, it has a substantial and material effect.

59. Taken together, Cardiff City is in a good place in terms of its potential for travel habit shift, and greater mobility without either bigger roads or the likelihood of greater congestion. The DLDP puts in place measures to influence and achieve this, and it is reasonable to expect them to be successful.
How Seville transformed itself into the cycling capital of southern Europe

Spain remains far from a paradise for bikes - yet cycling has increased 11-fold in Seville in the space of a few years. Is this proof that any city can get lots of people riding by building an ambitious network of connected, segregated bike lanes?

Peter Walker in Seville
Wednesday 28 January 2015 14.01 GMT

Manuel Calvo bumps his Brompton folding bike along the last few metres of a quiet cobbled street in Seville's old town, then though a narrow passage and on to a broad ringroad encircling the district. Suddenly, several lanes of cars and buses are zipping past, but Calvo pays no heed - we are on a smooth, green-tarmacked bike lane, separated from motor traffic by both a raised kerb and a waist-high fence.

"Here we are," says Calvo, pedalling unhurriedly along the network he played a key role in designing. "I'd do a few things differently next time, maybe try and make the lanes a bit wider. But they work. People use them."

And people do, in large numbers. They do so to such an extent that Seville, the capital of Andalucia in the far south of Spain, has become something of an unlikely poster city for sustainable transport. It is, proponents say, living proof that more or less any urban area can get lots of people on the bikes by the relatively straightforward means of building enough connected, safe lanes on which they can ride.

Such has been Seville's success - the number of bike trips multiplied 11-fold in a few years - that municipal officials have just started extending the model to other cities in the region.

It's an unusual tale, marked by the right people being around at the right time, as well as an amount of luck.

Unlike the Netherlands and Denmark, the usual European exemplars of mass cycling, Spain remains far from a paradise for the two-wheeled. According to EU statistics a mere 1.6% of Spaniards nominate the bike as their main mode of transport, even less than in the UK. Almost half say it is a car.

For many years Seville had only about 0.5% of journeys made by bike, with roads choked by four rush hours a day, due to siestas.

A small group of cycle campaigners spent years vainly pushing for change, among them Ricardo Marques Sillero, who recalls first arguing for bike lanes in 1992. "I've been doing this so long my hair was a completely different colour when I started," the silver-
thatched university academic says.

His campaign eventually gained support from the United Left (IU), a political alliance led by the Communist party. In 2003 elections the UI won enough council seats to jointly govern with the Socialists, and managed to get the cycling plans in the coalition agreement.

Empowered by the new administration, Seville’s head of urban planning, José García Cebrián, himself a long-time cyclist, set to work. He hired Calvo, who describes himself as sustainable mobility consultant, to design a hugely ambitious network of completely segregated lanes, a full 80km (50 miles) of which would be completed in one go.

Segregation - separating bikes by a physical barrier like a raised kerb or fence - is something of a holy grail for campaigners, who argue it makes cycling accessible to people of all ages, allowing them to trundle along at slow speeds in everyday clothes. This is in contrast to the scene in most UK cities, where mainly young, generally male riders speed alongside motor traffic dressed in helmets and luminous high-vis jackets.

But segregation necessarily involves removing space from another group, usually motorists. In London, even a mayor with the political clout of Boris Johnson is currently struggling to push through plans for a pair of new bike routes against fierce opposition from business and driving lobbies.

In Seville one of the paradoxical reasons for the success of the bike lane project was that so few people believed it would happen at all.

“In Spain there’s been a lot of planning about cycling, but then the plans get put into a drawer,” Cebrián says. “So there was no opposition during the planning process, as everyone thought the same thing would happen. The opposition only started when the infrastructure was being built, and by then there was no way back.”

In fact, so surprised were some of Cebrián’s Seville council colleagues when the work did start that on the first day officials from the transport department, separate from his urban planning section, tried in vain to get the construction crews to halt.

They didn’t, and the demand for the network soon became clear. Even before lanes were finished some cyclists squeezed between fences to use them, an unlucky few crashing into barriers marking the end of completed sections while riding at night.

Cebrián says he was always confident the lanes would be well used: “I’d spent many years riding round the city and looking at it with a cyclist’s eye.

“As soon as the building work was finishing and the fences were removed the cyclists just came. The head of the building team, who’d been very sceptical about the process, called me and said, ‘Where have all those cyclists come from?’ That’s when I knew for sure it was going to work. The came from all over the city.”

The completed lanes are narrower than a Dutch cyclist might expect, and occupy what space they can, with riders very occasionally having to steer around a small tree or other obstacle. They also run along just one side of the road, making the lanes two-way. While this was the product of necessity, Calvo says he now likes this: “I think it makes people
ride a bit more slowly and carefully.”

When the paths meet a road junction they curve gently on to a controlled crossing where, officially, cyclists are supposed to wait for a green bike symbol. In practise most pedal across if the way is clear, Calvo among them.

However, unlike London’s much criticised “cycle superhighways” - where riders are protected by little more than blue paint - Seville’s cyclists enjoy a kerb and a fence. Much of the space, Calvo says, was actually taken from bus or parking lanes but the kerb was raised to pavement level to offer more protection. He adds: “This also made it harder to give the space back to cars if a new government changed their minds.”

The net result is not Dutch or Danish levels of cycling, but nonetheless impressive. The average number of bikes used daily in the city rose from just over 6,000 to more than 70,000. The last audit, about a year ago, found 6% of all trips were made by bike, rising to 9% for non-commuter journeys.

With this has come notably lower pollution levels and a more human-friendly environment. The lanes are also designed for wheelchair users. “We suddenly made a lot of the city easily accessible,” Calvo says with pride.

A tour around the network reveals fewer cyclists than normal, mainly due to what is, for local standards, something of a cold snap (it is sunny and 11C, a temperature at which Sevillans seemingly require down jackets, thick gloves and hats).

But plenty of cyclists are out and what is noticeable to a British eye is both their variety and the ordinariness. The variety comes from the riders themselves - a seemingly equal gender split, with ages going from children to people well into their 70s.

The ordinariness comes in their approach. These are not the UK-style traffic-battling gladiators. Seville’s cyclists mainly ride upright old clunkers and wear everyday clothes. Helmets are almost never seen, even among under-16s, despite a new, if loosely enforced, Spanish law compelling this group to wear them.

The overall sense is of cycling not as a pursuit, or a sport but, in the Dutch style, a deeply everyday activity, little more than a more efficient means of walking.

Seville now has 75 miles of segregated lanes, with other routes radiating out from the loop around the old town. It also has a municipal bike hire scheme, like those in Paris and London, called SEVici, with 2,500 bikes and 250 docking stations.

It is additionally trying to link cycling with public transport. Passengers arriving at the city’s main bus station can use their ticket to borrow one of nearly 200 separate rental bikes, free for the whole day. The city’s university has yet another scheme, in which students are provided with bikes for the academic year.

Seville’s cycling project is now at a new metaphorical crossroads, facing big decisions on how, and if, it can be augmented by policies which don’t just promote cycling but make driving less convenient, a politically difficult decision in a place where the car still dominates.
The current right-wing city administration has reversed previously imposed parking restrictions in the old town, meaning the cobbled streets are often choked with cars. They are also not keen on traffic-calming measures in other residential areas.

Cebrián agrees that Seville’s cycling has reached something of a plateau: “There’s lots more things that could be done, and which were on the cycling masterplan, but just haven’t been done yet.”

And yet at the same time, Seville’s vision is being exported. Cebrián, who trundles around the bike lanes he helped devise on a sturdy, Swedish-made Pilen bike, has moved from the city hall to the offices of the regional government, where he is overseeing the grandly titled Plan Andaluz de Bicicleta.

Under this, ever city in Andalucia with more than 100,000 people has signed up to build segregated lanes (“Apart from Jaén,” notes Cebrián of the municipality north of Granada. “Because they’re really old-fashioned.”) Early building work has started in three places, Jerez, Algeciras and Almería.

Back in Seville the effects are arguably greater than the 6% cycling share would indicate. For instance, there has been a small but appreciable mini-boom in a bike-related economy, a particular benefit in a city with an unemployment rate of about 30%.

Before the lanes were built, Calvo says, Seville had about 10 bikes shops. Now it has around 50. One shop in the old town, Santa Clela, which lends me the bike on which I follow Calvo, runs courses for unemployed locals to become trained cycle mechanics.

Other fledgling industries have begun, including electrically assisted cargo bikes which trundle through the old town, delivering goods which used to be carried in vans.

The effect is also being felt in Seville’s vital tourism industry. On Tripadvisor, the traveller-recommended rankings of attractions and activities in the city are littered with bike tours.

One of the curiosities of Seville’s success is how few other Spanish cities have sought to copy it. Other places have built bike lanes, notably Barcelona, but these are not fully segregated and the cycling share remains lower. “We’ve had more visitors from the rest of Europe looking at what we’ve done than we have had from Spain,” says Calvo.

But the main lesson seems clear. In a continent where policymakers are struggling to tackle a public health disaster caused by inactivity, which a study this month said kills almost 700,000 Europeans every year, active travel is seen as a key part of this.

Cyclists are active, and Seville shows they can be tempted out, even in a city which, while flat, has almost no cycling culture and a far from ideal summer climate, with temperatures hitting 40C. If you build the right bike lanes, it appears, people will want to use them.

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