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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<tr>
<td>Title:</td>
<td>Ms</td>
</tr>
<tr>
<td>Name:</td>
<td>Nerys Lloyd-Pierce</td>
</tr>
<tr>
<td>Job title: (where relevant)</td>
<td>Chairperson</td>
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<tr>
<td>Organisation: (where relevant)</td>
<td>Cardiff Civic Society</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.
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 4 and PM2 ............... Support/Object (Delete as appropriate)

...MAC 5 ............................ Support/Object (Delete as appropriate)

...MAC 8 .............................. Support/Object (Delete as appropriate)

...MAC 14 ...................... Support/Object (Delete as appropriate)

...MAC 38 .................... Support/Object (Delete as appropriate)

...MAC 61 ................... Support/Object (Delete as appropriate)

...MAC 81 ................ Support/Object (Delete as appropriate)

...MAC 37-39 ................ Support/Object (Delete as appropriate)

...MAC 41, 49, 51 .......... Support/Object (Delete as appropriate)

...MAC 54-61 ................ Support/Object (Delete as appropriate)

...MAC 75 ................ Support/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).

In each case, CE1, CE2, CE3 and 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)

**CCS RESPONSE TO MAC 4 (APPENDIX 1) AND MAC PM2 WITH REGARD TO THE IDENTIFICATION OF HOUSING ‘FLEXIBILITY’ SITES**

We recognise the urgent need to secure an adopted development plan for Cardiff but we also recognise that there are major external changes pending that will affect the Cardiff LDP in the future, perhaps as early as its First Review. These changes include:

1. Local Government reorganisation, in which Cardiff will become part of a new, larger local authority.

2. The advent of City-Region planning included in the new Wales Planning Bill which will look at the supply and demand for housing in a regional context.

3. Further development of the Metro rapid transit network, including identification of routes and modes of Rapid Transport affecting the city.

Clearly then, the current LDP can only be a provisional plan and a major reconsideration of its major components will be needed in a Review long before the Plan’s end date of 2026.

At that review we shall be pressing for the least sustainable housing sites or parts of sites in the North-West corridor to cease to be allocated for housing development and instead re-defined as Green Wedges, helping to define and maintain the character of the village of Creigiau, existing western suburbs of Cardiff and the new settlements centred on Strategic sites C and D.

We recognise, however, that the current LDP is entering its final stages and that therefore the overall housing target and flexibility allowance and the supply of housing sites to meet that target are unlikely to change.

There is still scope, however, for modifying the Flexibility sites that are proposed in the Matters Arising Changes. We note that all of the flexibility allowance is in the North-West corridor and comprises three elements;

1. Flexibility site A, between Strategic Site C and the M4.

2. Flexibility site B, (Henstaff Court) west of Strategic Site D

3. The final phases of Sites C, which are otherwise anticipated not to be built until after the Plan Period, i.e. post 2026.

The first two sites are now to be defined on the Proposals Map but not the third. This should be rectified if only to achieve consistency. We believe that the least sustainable parts of the Strategic sites – those areas that are likely to be furthest from likely Metro routes – should be the areas identified as ‘flexibility sites’.

For the reasons stated below we believe that Flexibility Site B should be a firm
allocation in the LDP, effectively enlarging and strengthening the viability of, Strategic Site D. In compensation, the (unsustainable in our view) site E should be designated as a flexibility site instead of an allocation, on the Proposals Map. Furthermore the (unsustainable in our view) parts of Strategic Site C - i.e. those parts of Site C that are north of the A4119 and south of Pentrebane Road, should also be identified as 'Flexibility Sites' on the Proposals Map.

If our recommendations are accepted by the inspector, the total housing supply including the 10% flexibility allowance would not be affected. However the character and integrity of existing and proposed settlements and suburbs would be temporarily protected until the status of the flexibility sites could be re-assessed in the First Review of the Plan - in the light of the major external changes described at the beginning of this statement and in particular the overall housing need in a wider geographical context and the finalisation of the Metro route to serve the North West sites.

The Flexibility sites’ relationship to New Settlements

Cardiff Civic Society (CCS) has advocated that growth north-west of Cardiff should take the form of a NEW TOWN developed on modern Garden City Principles along a rapid transit route between Cardiff and Talbot Green in RCT.

We are pleased to see that although this approach is not acknowledged as such and that there is no proposal to establish a New Town Corporation or similar agency, the basics of our suggested approach is emerging through the LDP process.

In particular we envisaged a string of new largely self contained mixed use settlements being created along the rapid transit route.

We conceded at the Hearing sessions that there were many positive features of the developer’s proposals for Site C ‘Plasdrw’, including a grid layout rather than culs de sacs, a substantial belt of woodland and greenspace within the new settlement, a design brief that specified a varied built environment and a substantial internal network of foot and cycle paths. We note that promoters of the development are referring to it as a ‘Garden City’ and with a likely eventual population of some 20,000 it will indeed be Wales’ largest new settlement since Cwmbran New Town. We retain our objections to the parts of Site C north of the A4119 and south of Pentrebane Road which are unlikely to relate to the potential new town and will surely develop as car dependent commuter outer suburbs. We note in this regard that a substantial part of Site C (1,500 houses) is anticipated to be developed beyond the Plan Period or developed as a third ‘flexibility site’.

We were less enthusiastic about the proposals for sites D and E between M4 J33 and Creigiau. While site D also has several positive features in its masterplan it is much smaller than site C and so is less self contained in terms of shops, schools and leisure facilities. There was also more uncertainty over its relationship to the NW rapid transit route. Site E we still maintain will develop as a car dependent suburb of the car dependent commuter village of Creigiau rather than part of a larger entity with site D. Sites D and E are separated by the very strong barrier of the A4119 which not only separates the two sites but also is a strong incentive for residents of site E to commute along that road by car.

By contrast Expansion site B, which now has defined boundaries, could form an integral part of a larger more self contained settlement if developed together with site D - only a hedge separates these two sites. Moreover the two sites could potentially
be linked by the most likely rapid transit route linking to the growth areas of southern RCT around Talbot Green.

We have therefore suggested changes to the ‘flexibility sites’ in the Plan in order to help create more sustainable new settlements and avoid expanding car-dependent commuter suburbs.

We would have liked to see the unsustainable parts of Site C and the whole of Site E omitted from the LDP altogether and redefined as ‘Green Wedges’ but we anticipate that this will not happen due to the primacy of the (in our opinion unrealistic) growth requirements of the Plan. We also consider flexibility site A, which is a substantial distance from all of the feasible rapid transit routes, as totally unsustainable and a candidate for omission from the Plan altogether.

As an alternative therefore we advocate that, together with Flexibility site A, these areas* be designated as the ‘flexibility sites’ required in the plan, to be developed only if building rates exceed the already unbelievable targets in the LDP. In compensation we propose that flexibility site B be included as a full commitment in the Plan to be developed in a phased relationship with site D under a common masterplan for them both.

*(Site E, site C north of the A4119 and site C south of Pentrebane Road).

**CCS RESPONSE TO MAC 5 (STRATEGIC SITE REQUIREMENTS EMBEDDED IN POLICY KP 2)**

CCS welcomes the expansion of Policy KP2 to include specific requirements for each of the Strategic Sites. This is a major step towards ensuring that the infrastructure required to develop these sites is required as part of a statutory plan rather than being the subject of an informal agreement between the Council and developers that could be changed at any time.

We also welcome the more detailed schematic plans accompanying the Strategic Site requirements which now show protected routes for a future Metro rapid transit and/or bus based rapid transit corridors that could be developed for rapid transit at a future date. In particular the Site A Schematic Framework is far more comprehensive than its predecessor and at last identifies the ‘Regional Transport Hub’ at its core, though it does not protect routes specifically for the Metro, unlike other schematic frameworks.

Having said that, the ‘Essential’ transport infrastructure identified in the Strategic Site policies is still expressed in vague terms such as ‘enhance’ and ‘improve’ facilities and crucially is not linked to development by identifying thresholds, trigger points or phases of development that need to be supported by new or expanded public transport provision. This is in contrast to the lower priority ‘necessary’ infrastructure such as schools and playing fields which is more specifically defined and in some case linked to housing completion figures.

This remains a fundamental weakness of the LDP affecting its soundness. As it stands all 7,000 houses in Site C for example, could be constructed before any of the vaguely ‘off site’ transport improvements in policy KP2 (C) are actually paid for and implemented. Yet the detail of such off site proposals is known and was contained in the recent planning application for the bulk of site C in a document entitled ‘North West Cardiff Transport Strategy’.

In this respect the Council’s Matters Arising Changes fail to respond adequately to Action Point 2 of Session 8 of the Hearings, which demanded that proposed
infrastructure have “more specific timescales to ensure deliverability” and “clear timescales for delivery as well as identified costs and potential funding streams”.

CCS remains firmly convinced that a Metro Rapid Transit route linking the strategic sites in the North West Corridor is absolutely essential, not a ‘nice to have’ option if the tens of thousands of dwellings planned in the open countryside are not to have a catastrophic impact on the City’s traffic and general environment. We therefore maintain that the failure of MAC 2 to define house building limits linked to stages in the Metro planning, funding and implementation will still result in an ‘unsound’ Plan.

**CCS RESPONSE TO MAC8, NEW INFRASTRUCTURE**

CCS welcomes the amendments to KP6 and the creation of a Cardiff Infrastructure Plan ‘living document’. The recent announcements on the Metro project that create a steering group of business leaders, and the announcement of a second tranche of funding are illustrations of the speed that this project will evolve, and highlights the lack of co-ordination between the activities of Welsh Government and the council and the inconsistency between the timetables of the LDP in the Delivery Agreement and the transport projects. This presents a moving target for the council and puts immense responsibility on the council and its relationship with developers to ensure maximum speed of response to incorporate new project developments into site plans, and to avoid changes to road /bus changes that are redundant in the context of Metro. Much as in HS1/AP2 the council needs to show how new information will be accommodated in the plan, to ensure developers utilise the Metro project to maximum effect.

The relationship between the Infrastructure Plan and the Monitoring Framework set out in Para. 4.90 is not sufficiently clear in how this dynamic will be managed. CCS envisages a rapid disclosure of the Metro project over the next year or two, considering the public debate and exposure given to Infrastructure provision in the UK. The Infrastructure Plan will need to be a frequently updated document, and the fast and frequent update of site development plans will be a challenge that can only become possible if the Monitoring Framework is updated and actioned equally quickly. We would expect to see more information on how this evolving situation will be managed.

**CCS RESPONSE TO MAC14 – CLIMATE CHANGE**

The references in KP15 use the term ‘carbon reduction’ but later comments relate to mitigation only. CCS believes that an active policy of reduction with precise commitments and projects is urgently needed. EU funding requirements specifically identify carbon reduction as a criterion, and since EU funding is an expected source of funds for Metro, this needs recognition. The words ‘carbon reduction’ in the list of policies must be expanded to identify how, when and to what standards it should be judged so that remedial actions can be initiated by the Monitoring Process; in this respect there is a gulf between the detail provided on, say, housing numbers and the arguably more important environmental standards.

At the Cardiff Transport Interchange roadshow showing the plans for Central Square and the interim bus arrangements in the city on 15th July 2015 we raised the question of air quality at the new bus station. The new bus station is situated underneath a building with a narrow entry lane and vents above and towards Wood St. The responses were unconvincing and lead to the conclusion that the already poor air quality in Westgate St. is not going to be resolved. The added complication of increased bus movements due to the need to vacate the slot between dropping and
collecting passengers, was explained at the roadshow as a means of keeping dwell times short to maximise capacity. This makes for more rather than less pollution, and raises questions over the ability of the bus station to handle peak traffic. The commitment to air quality improvement to todays’ standards is essential, and must be specified in the Planning Application for Central Square.

Cardiff is performing poorly in carbon reduction towards the challenging targets set by WG and EU, and only an explicit reduction policy will deliver the goals required. Similarly with air quality, NO2 and particle pollution improvements are behind schedule, and Cardiff is named (the Times 16th July 2015) as being slow to achieve targets and will remain in arrears until 2025; the Supreme Court has asked the government to strengthen plans to accelerate improvements. This exposes the city to financial penalties, and some humiliation in a country planning to be a world leader. Poor air quality is now regarded as a much greater threat to public health than road traffic accidents according to Kings College London research.

The LDP should enable the implementation of improvements to Carbon reduction at a minimum of 3% per annum, starting with a visible and aggressive de-carbonisation of the council estate, through both energy reduction and renewable generation.

A solution to air quality issues is more complex but because of the public health impact must be addressed with urgency; there are many ‘hot spots’ in the city, and growth will create more. The achievement of the 50/50 modal split by changes to transport patterns is the way forward, and the inspectors’ request for a time line of specific achievements to non-car travel is vital. This should reach its peak at the time of completion of the new bus station, since the interim arrangements are unlikely to make any improvements whatsoever. This subject should be a top priority for the council and the Monitoring Process.

**CCS RESPONSE TO MAC38 - STRATEGIC RAPID TRANSPORT AND BUS CORRIDORS**

CCS welcomes the clear and explicit identification of the 5 Strategic Rapid Transit and Bus Corridors. We further recognise the short term need to deliver the transport capacity to these corridors by improvements to the bus network capacity. However the importance of the achievement of a 50/50 modal split is at risk of being lost in the use of expressions like ‘where these are necessary’, ‘helping to make sustainable travel’ and ‘seeks to address’. This is additionally referred to in MAC10/KP8. Further, MAC37 refers to encouragement of ‘active travel’, but offers no analysis of how it will be achieved or to what standards it is to be judged. The criticality of travel to the successful growth of the city demands the provision of a frequent and reliable journey to work.

Further, the inputs given by RCT in HS7 referred to in AP6 were that enhanced volumes needed to be accommodated down the NW Corridor. This information will have substantial impact on commuter volumes yet has not been analysed further, and the adequacy of current plans is therefore in severe doubt. The conclusion that the Metro route alignments are not yet known is reluctantly acknowledged, but since the bus capacity is not specified, and the roadway changes to ease bus passage are not justified by any traffic flow analysis, we do not accept that the plan can be regarded as sound in this respect. The acceptance by the council of phasing of development to manage the additional volume of travellers is therefore a necessity. The reallocation of road space that is vaguely referred to will cause severe delays to traffic in general in sections of the corridor, and will thus have drastic impacts on the quality of life of residents; these ideas should be much more explicit and justified in the LDP if it is to be seen a sound.
AP7 of HS14 requested the need for much more detailed analysis of bus capacity on each corridor, and in particular of the Central Bus Hub; this is not provided and thus throws doubt on the capability of the network proposed to deliver a transport solution in the short to medium term.

Also not provided as requested in HS14 and HS19 is the planned evolution of modal shift by type of transport. The criticality of walking and cycling to commuting from distant sites was clear and is recognised, but widely regarded as unachievable amongst the population at large, and was demonstrated as such by the charts on distances affected shown in the hearings. This throws down a challenge to public transport that is not reflected in the plan as it stands.

In the discussions at HS5 on the Central Transport Hub we sought assurance that the traffic flows around Central Square were coherent and would not lead to congestion. There are no details in the amendments to the LDP, yet at the Cardiff Transport Interchange road show in the city centre on 15th July 2015 we learnt that consideration was being given to restricting access along Wood St., an admission that traffic flows are indeed at critical levels, and that rerouting of traffic around the edge of the zone was under consideration. We are therefore still of the view that the capability of the Central Hub to deal with all the bus traffic consequent upon the expanded bus network is not demonstrated.

CCS therefore concludes that the following additions to the MAC schedules should be made.
1. Produce a time phased schedule of modal shift by mode, for use in the Monitoring Process. This should achieve the 50/50 goal as the new bus station is completed.
2. Clarify the consequences of increased patronage of buses, and give the commitment to increase services accordingly.
3. Produce a traffic flow analysis of the city centre to allow conclusions to be reached about traffic routing changes.
4. Active measures to reduce car use in the city centre, and therefore of travel by car to the city, by reducing parking and restricting access to critical areas like Wood St., Westgate St. and St. Marys St.
5. Accelerate Metro to the maximum extent.
6. Phase development of housing to levels supported by a coherent public transport network.

**CCS RESPONSE TO MAC 61 – QUARRY EXTENSIONS**

The revised Policy M2 attempts to apply the ‘sequential approach’ to proposals for quarry extensions but we must question whether this is appropriate in the unique circumstances of an expanding capital city. Already it is proposed to modify the presumption in favour of deepening quarries as opposed to lateral extensions to provide exceptions in the case of Creigiau and Ton Mawr quarries, so that the exception is now the rule in that part of the sequential approach.

Similarly the extreme environmental sensitivity and appalling access to Blaengwynlais quarry surely points to a new quarry with more direct access to the trunk road or rail network being preferable to any further extension at Blaengwynlais.
While the sequential approach as suggested in MPPW might usually be appropriate in rural areas of Wales it is plainly not very helpful as a guide to quarrying in the environs of the Capital City where a more general criteria based policy would be more appropriate.

Policy M2, if it is to be retained as a criteria based guide to decision making on new mineral workings should therefore be recast as follows;

Proposals to extend existing quarry workings will be considered against the following criteria;

i) The extent of existing and proposed reserves at the quarry

ii) The impact on the natural environment

iii) The suitability of the access from the quarry to the main road or rail network

In relation to the 'environment' consideration should be taken not only of the natural environment but also of the environment of residential properties that may be affected by the operation of the quarry.

CCS RESPONSE TO MAC81/KP2

CCS view expressed at HS5 was that the success of the Central Enterprise Zone and the Central Transport Hub were the most important factors in the successful growth of the city. MAC81 brings the background papers into the LDP, a welcome development but with insufficient new detail. We suggest the following need to be included to ensure it delivers all its declared contributions to the city.

1. The creation of a continuous river walk along the Taff is identified, yet at the Cardiff Transport Interchange road show on 15/7/15 the Media Advisor (Ian Lloyd-Davies) confirmed that he did not recognise it as a part of the plan, this should be rectified. This should be shown on the Proposals Map for Strategic Site A.

2. Upgraded access to Central Square is identified, yet no new access to the south side is planned. This means that the access to the planned mixed use development on the Brains site from the Millenium Stadium will only be made via the existing, and poor quality, rail underpass. A detour of many 100's of metres that will disadvantage this area of development. A new access under the railway should be shown on the Proposals Map for Site A.

3. Whilst an over-prescriptive approach is not appropriate as is stated, it is clear that plans are needed to integrate the intentions of Network Rail and Brains with those of the council.

4. As has been noted elsewhere, we questioned the capacity of Wood St. and other roads and junctions in the region of the planned bus station. The admission during the 15/7/15 road show on the interim bus service arrangement that further work needs to be done is an admission that we were correct, and more work needs to be done on this topic; congestion at this critical point in the network will seriously degrade the capability of public transport. The addition of Metro to this complex mix needs to be clarified before the development is approved, and protected routes should be shown on the Site A Schematic Framework as they have for sites C and D.

5. There is no traffic volume analysis included in the plans for Central Square, nor analysis of the operational capacity of the bus station or surrounding junctions. The request for capacity analysis at HS14/AP7 applies to this location more than any other. This is not proposed to be presented until the planning application; by which time it will be too late. This traffic analysis should be
included in accordance with the action point.

OTHER CHANGES
Cardiff Civic Society also objects to the MACs listed below but rather than repeat what others have submitted we confine ourselves to supporting the objections of the North West Cardiff Group on this group of changes.

MAC 37-39,
MAC 41, 49, 51
MAC 54-61
MAC 75
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

MAC 4 / PM2, MAC 5, MAC 8, MAC 14, MAC 61, MAC 81 - to explain our alternative proposals and to debate with the Council what further information is required to provide a sound Evidence Base for the LDP.
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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<td>P1</td>
<td>It has been prepared in accordance with the Delivery Agreement including the Community Involvement Scheme.</td>
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<td>P2</td>
<td>The plan and its policies have been subjected to Sustainability Appraisal including Strategic Environmental Assessment.</td>
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<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>
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<td>C2</td>
<td>It has regard to national strategy.</td>
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<td><strong>C3</strong></td>
<td>It has regard to the Wales Spatial Plan.</td>
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<td><strong>C4</strong></td>
<td>It has regard to the relevant community strategy(ies) (and National Park Management Plan).</td>
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**Coherence and Effectiveness Tests**

| **CE1** | 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. |
| **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. |