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# Cardiff County Council

Local Development Plan 2006 - 2026

Office Use Only  
Date Received  
21/7/2015  
Representor  
Number 2519

## 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](mailto: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](http://www.cardiff.gov.uk).

### PART 1: Contact details

Your/ your Client's details		Agent's details (if relevant)
Title:		
Name:	Mark Drakeford AM for Cardiff West and Kevin Brennan MP for Cardiff West	
Job title: (where relevant)		
Organisation: (where relevant)		
Address:	395 Cowbridge Road East, Canton, Cardiff CF5 1JG	
Telephone no:	029-2022-3207	
Email:	<a href="mailto:Mark.Drakeford@Assembly.Wales">Mark.Drakeford@Assembly.Wales</a> <a href="mailto:BrennanK@Parliament.gov.uk">BrennanK@Parliament.gov.uk</a>	

Please note that all representations will be made available for public inspection and cannot be treated as confidential. However to ensure data protection we will remove personal details from publically accessible documents

Signed:	Date:
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## **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)

- ..... Support/Object (Delete as appropriate)
- ..... Support/Object (Delete as appropriate)
- ..... Support/Object (Delete as appropriate)
- ..... 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).**

*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)*

**We remain of the view that, while the Local Development Plan can be rendered sound, it is not yet sound. The response of the local authority to the matters arising identified by the inspector does not sufficiently close the gap between the plan as it now is, and the plan which ought finally to be approved.**

**There are two matters which remain of key significance to our constituents, in Cardiff West.**

**We have argued, from the outset, for an explicit phasing of new housing development in the North-West of the city. Everything we have learned during the examination, and the local authority's response to the matters arising, serve only to reinforce that conclusion.**

**In asking for a more explicit policy of phasing, we are asking only that the council has confidence in its own plans. The council are clear on their intention to ensure that the supply of new housing does not outpace the delivery of the facilities and services needed by the communities who will live in these areas. We would urge the inspector to make binding recommendations that fully incorporate these commitments into the Local Development Plan, to place them on a statutory footing. Such an approach is necessary to secure the public interest.**

**The two central shaping factors which we have identified both in writing and in oral evidence remain true.**

**In the first instance, the context within which the plan has been drawn up is too dynamic to proceed without a powerful sense of phasing. Even within the last few weeks the Welsh government has published very important new information in relation to the Metro and a map of potential new local authority boundaries in Wales. Both of these will have a shaping influence on future development, during the lifetime of this Local Development Plan.**

**In the second place, the transport arrangements set out in the local authority's response to matters arising fail to provide a convincing sense that infrastructure will precede development in a sufficiently**

orderly fashion. Both the local council and the developers continue to ask for citizens of Cardiff to take them at their word, in this regard. That by the time the houses come to be occupied the necessary infrastructure, both within and beyond the development sites themselves, will be in place. We think that their assurances have to be made a mandatory part of any approved local development plan, for it to pass a test of soundness.

No single factor is of greater importance, both to our constituents and to the future of the capital city of Wales, than that the transport aspect of the plan is made secure. Without it, the predictions that the plan will prove to be unsustainable – on an economic and an environmental basis – are only too likely to be realised. It follows entirely from the council's own evidence base and key policies that without this in place, the levels of housing will put overwhelming pressure on services, on physical infrastructure, and on other community facilities.

We would also like to add our support to the proposals, that have been supported by a number of other representors, that align the expansion of the city more closely with the proposed rapid transit routes, and the proposed Metro network.

We would like to argue that Strategic Site E should be removed as a primary site and that flexibility site B at Henstaff Court becomes a primary site in its place. The inclusion of flexibility site B provides an opportunity to create a coherent settlement in this area. This is in contrast to the current plans for site E, which is separated from site D by the A4119, with heavy traffic forming a barrier between the two sites. It remains our view that site E should be removed from the plan entirely, primarily because the infrastructure in this part of the city is already inadequate for the existing population. We also feel that the LDP has failed to take into account the impact on the Welsh language. The inclusion of site E unnecessarily eliminates green space and creates the risk of urban sprawl.

If this site cannot be removed entirely, it should be included instead as part of the flexibility allowance, and only allocated for development once the primary sites have been fully realised. By the time this stage is reached, it would seem highly likely that the housing allocations will be revisited on a regional scale. Removing site E from the early stages of the plan will also give greater

opportunity for the council to take action to help to preserve the Welsh-speaking character of Creigiau village into the future.

We would also like to offer our support to the view that the areas of site C North of the A4119 and South of Pentrebane Road be removed from the plan. The inclusion of these areas fundamentally damages the sustainability and soundness of the plan, as their remoteness from the potential routes of the Metro will inevitably make them more highly dependent on cars, thus undermining efforts to achieve the necessary 50:50 modal split.

We have had sight of the North West Cardiff Group response to the Matters Arising Changes schedule consultation, and feel there are many sensible and well-argued points within it, points that reflect the concerns of many local residents living in this part of the city. We trust that the inspector will attend carefully to each of the points they have made.

#### **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**

***We would be very grateful for the opportunity to speak at the hearing to put forward the views of our constituents.***

***We would be very keen to speak about the overall strategic direction of the plan, and the basis on which the plan is to be reviewed over time.***

***We would also wish to make representations at any sessions that discuss the development site and infrastructure in the North West of the city specifically.***

The Matters Arising Changes Schedule is available on the Council website at: [www.cardiff.gov.uk](http://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](mailto:LDP@cardiff.gov.uk)

### **Tests of Soundness**

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

P2	The plan and its policies have been subjected to Sustainability Appraisal including Strategic Environmental Assessment.
	<b>Consistency Tests</b>
C1	It is a land use plan which has regard to other relevant plans, policies, and strategies relating to the area or to adjoining areas.
C2	It has regard to national strategy.
C3	It has regard to the Wales Spatial Plan.
C4	It has regard to the relevant community strategy/ies (and National Park Management Plan).
	<b>Coherence and Effectiveness Tests</b>
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.

