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

Signed: [blank] Date: 22/07/2015
PART 2: Commenting on Matters Arising Changes

Which Matters Arising Changes do you wish to comment on (Please refer to the Matters Arising Changes Schedule)

Matters Arising Changes reference (e.g. MAC 1)

MAC58 ............................... 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).

P1, C1, CE1 and CE2 – Please see Enclosed Correspondence

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 Enclosed Correspondence
Please see Enclosed Correspondence
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 need for Policy C10 to be retained in light of the provision of evidence to address Action Point 6, Hearing Session 11.

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.
SUBMITTED VIA E-MAIL AND POST

LDP Team
Strategic Planning – Policy
Cardiff Council
Room 131
City Hall
Cathays Park
Cardiff
CF10 3ND

Date: 22nd July 2015
Our ref: GH/L0001

Dear Sir/Madam,

On behalf of Cardiff University
Representations to Matters Arising Changes to the Cardiff Local Development Plan – Objection to MAC58

On behalf of Cardiff University, please find set out below representations to the Matters Arising Changes (MAC’s) to the Cardiff Local Development Plan. Cardiff University object to MAC58.

These representations relate to the proposed deletion of Policy C10 Health Employment Non-Strategic Allocation (MAC 58). Specifically, they address the points raised by Action Point 6, Hearing Session 11Action Point 6, Hearing Session 11, in particular, the evidenced need for the allocation.

Over the past eight months Cardiff University has been developing a case for the creation of a Biomedical Life-Sciences Campus co-located with the University Hospital of Wales, creating a world class health related academic and research centre. The case for this Campus relies on Policy C10. Whilst the evidence to support this was not previously available, work which the University has undertaken in the past eight months is now available and addresses the concerns raised by Action Point 6 of Session 11.

Cardiff University and Cardiff Council had significant dialogue regarding the proposed site throughout 2014 and made Cardiff Council aware of the need for Policy 10 as far back as December 2014. As such, it is of great concern to the University that this need was not reflected in their response to Action Point 6. As such, whilst these representations are raising new evidence as far as the LDP examination is concerned, it is not new to Cardiff Council.

We set out below the tests of soundness which MAC58 fails and, on the basis of the 'lack of need' for Policy C10 alleged by the landowner, set out details on why Policy C10 must be retained.

Test of Soundness

We contend that MAC 58 fails a number of the tests of soundness.

Soundness Test P1 – This Matters Arising Changes stage of the LDP in not referred to in the Community Involvement Scheme (CIS). As such, it is not clear how the Council has sought 'consensus' on this stage of amendments to the

Cardiff Leeds London Manchester Newcastle upon Tyne
Representations to MAC’s to Cardiff LDP

LDP as it is clear that the MAC’s are not subject to further consultation with the public before being confirmed, it is down to the Inspector to consider any representations made. Whereas this approach would be understandable for minor amendments to wording of policies, it is not intended for the deletion of allocations where there are potentially huge implications for the public as well as stakeholders. It is clear that ‘last minute’ changes of the nature proposed by the deletion of Policy C10 prevent considered debate and prejudice the numerous parties who were not subject to the dialogue which took place between the Council and the landowner to address Action Point 6 of Session 11.

**Soundness Test C1** - MAC58 demonstrates that the Council has failed to take account of the development plans of Cardiff University, Wales’ largest university and a contributor of almost 10% of the population of the city. The Council has previously been made aware of the University’s aspirations in relation to the Agnes Road site, but this has not been taken into account of by the Council in responding to Action Point 6 of Session 11.

Guidance indicates that representations from bodies that consider the LDP either does or does not have sufficient regard to other relevant strategies for which they are responsible will be significant.

**Soundness Test CE1** - MAC58 will remove the only allocation or reference to the need for the Plan to take account of health related needs beyond the local health infrastructure needs of Strategic Sites. As such, the deletion of Policy C10 will lead to an obvious gap in the Plan.

This view is supported by the Council’s response to the Inspector’s question in advance of Hearing Session 16: Miscellaneous Matters, “How Does the Plan Make Provision for Health Related Uses?” In its response, the Council states:

>“Policy C10 (Health Employment Non-Strategic Allocation), allocates 4.07 ha of land for health related uses at Government Offices, St Agnes Road, Heath. The site provides a good opportunity to allow for the future expansion of health related uses associated with University Hospital Wales”.

The Council’s other responses to this matter relate to the provision of health uses as part of the development of Strategic Sites and the integration of such uses through the application of the Council’s “Masterplanning Framework – General Principle, Strategic Framework & Site Specific Framework for Larger Sites (LDP.045). It is clear that this reference relates to health provision to address the localised needs of new resident’s i.e. through new GP surgeries.

As such, the Council’s only response to how the Plan makes provision for health use at a more strategic level is through Policy C10. Deletion of Policy C10, therefore, undermines the Council’s response to the Inspector on how the Plan makes provision for health related uses.

Finally, MAC58 needs to be viewed in the context of the Action Point which lead to it. Following Hearing Session 11, the Action Point relating to Policy C10 was:

>“Action Point 6, Hearing Session 11: LPA to consider the necessity for Policy C10 in terms of evidenced need for an allocation for health related uses. If necessary, LPA to include a reference to the types of acceptable uses (including reference to the Use Class Order). Also, in advance of Hearing Session 18, Council to consider the issue of deliverability in light of the current land-owner intentions/representations.”

The Council’s response to this Action Point is:

>“the Council has held dialogue with the Agents of the site. The aim has been to discuss issues raised relating to the potential future use of the site and address matters of deliverability before the site is discussed as part of Hearing Session 18 on Alternative Sites.”

The Council’s response does not include any reference to a consideration “of evidenced need for an allocation for health related uses” as required by the Action Point. Rather, the Council’s response suggests that they have only had regard to the landowner’s statement about their willingness to sell the site. As such, we contend that the Council has failed to adequately address the Action Point, which in turn leads to a failure to address Soundness Test CE1.
Soundness Test CE2 – We contend that MAC58 is not supported by evidence about how the balance of the competing alternatives for the site have been assessed. It appears that the MAC58 is based solely on a discussion between the Council and the landowner. Moreover, as set out above, MAC58 does not fully address the Action Point from which it arose as there has been no attempt to assess the need for Policy C10.

In support of the above statements, we set out below information which is important to the consideration of the significance of MAC58 for Cardiff University, University Hospital Wales, the people of Cardiff and beyond.

The Background to Policy C10

Cardiff University is a World class teaching and research University located in the heart of Cardiff. It is a member of the Russell Group of Britain’s leading research Universities and it’s vision is to be recognised as a World-leading University with associated benefits for its students and staff, but also the people of Cardiff and Wales.

Cardiff University aspires to be: “A World-leading, research excellent, educationally outstanding university, driven by creativity and curiosity, which fulfils its social, cultural and economic obligations to Cardiff, Wales and the World.”

The University is split into 3 colleges, one of which is the College of Biomedical and Life-Sciences. This college is made up of the number of schools:

- Biological Science
- Dentistry
- Medicine
- Nursing
- Subjects Allied to Medicine
- Pharmacology & Pharmacy
- Physiotherapy
- Psychology
- Radiography

Six of the above schools are ranked in the top 10 in the UK. At present the College has a total of 7,100 students and employs 2,000 staff.

The College comprises five research themes:

- Cancer
- Mind, Brain and Neuroscience
- Immunology, infection and inflammation
- Population Health
- Biosystems

The College’s research focus is on ‘key diseases of our time’, the aim being to deliver life-changing benefits to the population. At present research into the above themes is undertaken in a number of different locations across the University’s estate, including space which the University occupies at University Hospital of Wales. For example, research on cancer is currently undertaken in 14 different laboratories across the University campus. This not only makes collaboration difficult, but also leads to duplication of tasks reflecting from the main focus of activities.

University Hospital of Wales is a 1,000 bed hospital and is the largest in Wales. It is the teaching hospital of Cardiff University and a significant amount of space there is currently occupied by the University. The Hospital is currently over-capacity and urgently needs additional space for treating patients.

Land at Agnes Road – A Once-in-a-lifetime Opportunity

Land at Agnes Road is located directly adjacent to University Hospital of Wales and represents the ONLY developable site capable of accommodating significant new development associated with the hospital.
Land at Agnes Road is essential to the University's aspirations to develop a World class biomedical life sciences campus. The aspiration of the University as set out in The Way Forward, the University’s strategic direction and focus from 2012 to 2017, is to consolidate the College of Biomedical and Life-Sciences at a single site, the removal of academic and physical boundaries enabling far greater collaboration and efficiencies and with this, the likelihood of medical breakthroughs. It will enable the University to build on successes such as Professor Chris McGuigan’s discovery of what was, at the time, the most potent polymerase inhibitor for hepatitis C — INX189 — which brought about US$1m of investment to the University, supporting four full-time researchers for several years.

A new purpose built facility will enable Cardiff to become a global leader in medical research. In addition, the proposed development at Agnes Road would house a number of national research facilities including:

- Bio Bank;
- The Centre for Cancer Research;
- The Wales Cancer Bank; and
- The Wales Gene Park.

As well as the obvious health benefits associated with this, it will also result in an economic benefit associated with an anticipated research income of £120 - £150m per annum. With the development of a world leading facility, Cardiff will be able to attract the best researchers from around the World. In support of this, there will be a significant up-skilling of employees from apprentice level upwards. As such, the proposals will create highly skilled job opportunities and training, boosting the local and national economy.

The aspirations of Cardiff University reflect those of the Life Sciences Hub Wales, which was set up by the Welsh Government to enable health and life sciences to boost the economy in Wales. As such, we contend that the need for Cardiff University’s aspirations for the Agnes Road site span health, economic and education.

There is no question that there is a need for the health related uses envisaged in Policy C10, but it is also clear that this need is specific to the Agnes Road site. It cannot be accommodated elsewhere due to the adjacencies necessary with our clinical partners for both academic teaching and research.

This is the conclusion reached by work undertaken by the University as part of the comprehensive review of it’s existing property portfolio, which culminated in a Masterplan for the entire University estate, which was presented to Cardiff Council in December 2014. This showed that the research capacity of the University would be vastly enhanced by bringing together all of the schools together, creating a single Biomedical Life Sciences Campus which could focus on research themes without academic or physical barriers.

The University’s conclusions on the benefits of the co-location of research mirrors the findings of The Health Professional Education Investment Review, published in March 2015. The Review, commissioned by the Minister for Health and Social Services, aimed to recommend steps that should be put in place to support the direction of travel for NHS Wales for the next 10-15 years and longer. Amongst many recommendations was a clear message that the NHS in Wales should be the vehicle for developing Wales as a learning culture. Continual development of staff and a greater interaction between Health Boards and Universities was proposed. It recommended that multi-professional and multi-disciplinary training should become the norm, with greater attention given to targeted, continuing, professional development modules and learning within the work environment, plus exposing professionals to the spectrum of care settings that patients will interact within during their journey through the healthcare system.

All of the above themes rely on a strong physical relationship between education, research and the practising of medicine. The delivery of inter-professional training, a key emphasis of the Welsh Government, is very difficult across different physical locations. In addition, early access to patients for both teaching and research is essential to develop skills and research. The current benefit to the development of students, advancing medical research and delivering patient care of the University being ‘embedded’ with the largest hospital in Wales is priceless, however, this would be surpassed with the Agnes Road site developed in line with Policy C10. The development of a co-located single research and teaching facility with direct access to a hospital in line with Policy C10 would place the University and Hospital at the leading edge of patient care, medical research and teaching in the UK. There will
be positive impact on patient experience and the quality of care with access to world leading clinicians and analytic clinical facilities as well as early access to advanced therapies. In addition to the benefit of a leading research facility at the Agnes Road site, the allocation would also enable the University to withdraw from space they currently occupy at the hospital, enabling the expansion of treatment areas.

As such, by enabling alternative forms of development to come forward at the site, MAC58 not only removes the prospect of health-related uses being developed, it threatens a once-in-a-lifetime opportunity for Cardiff to become a World leading medical research centre, with the associated health, education and economic benefits. The deletion also means that the hospital will not be able to expand and will continue to operate over-capacity.

Whilst Policy C10 was not explicit in the form that the development at Agnes Road would take, it would safeguard the site for health use. Crucially, it would provide Cardiff University and University Hospital of Wales with the confidence to continue to develop their proposals for the Agnes Road site and the existing hospital site. Whilst the Council argue that deletion of the allocation and the treatment of the site as ‘white land’ would not prevent health uses coming forward, the role of the LDP is as a land use policy framework “to provide for an adequate and continuous supply of land to meet society’s needs in a way that is consistent with overall sustainability principles and objectives.” Not including such important strategic land uses in the Plan must been seen as a failure to fulfil this role.

The significance of the development which would be facilitated by Policy C10 both in terms of health, employment, education and economic benefits for Cardiff, Wales, the UK and potentially the World, warrants a specific allocation in the LDP. Moreover, the allocation of the site for such use would not, as it is alleged, sterilise the site, the LDP monitoring and review process would ensure that if the allocation was not being taken up and other development pressures were more pressing, then the allocation could be reviewed. Crucially, however, the allocation of the site in line with Policy C10 represents a ‘once-in-a-lifetime’ opportunity for Cardiff to become a leading light in medical research and in so doing, delivering a hugely beneficial impact on the medical treatment, health and education of its resident population.

The significance of the development which would be facilitated by Policy C10 both in terms of health, employment, education and economic benefits for Cardiff, Wales, the UK and potentially the World, warrants a specific allocation in the LDP. The case against the allocation appears to simply be that the University has not made representations in support of the allocation and the landowners claim that they are ‘unlikely to sell’ the site to University Hospital of Wales.

These representations address the need for the allocation and the absence of any representations to date. In relation to the landowners claims that they would be ‘unlikely to sell’ the site to University Hospital of Wales, which the Council appear to have placed significant weight on, it is Cardiff University not University Hospital of Wales who would develop the site. Furthermore, discussions have taken place between the landowner and the University about purchasing the site and these continue. As such, whilst the University do not currently control the site, there is a reasonable prospect that they will be able to do so and the allocation of the site for health use will make this more likely.

Moreover, the allocation of the site for such use would not, as it is alleged, sterilise the site, the LDP monitoring and review process would ensure that if the allocation was not being taken up and other development pressures were more pressing, then the allocation could be reviewed. Crucially, however, the allocation of the site in line with Policy C10 represents a ‘once-in-a-lifetime’ opportunity for Cardiff to become a leading light in medical research and in so doing, delivering a hugely beneficial impact on the medical treatment, health and education of its resident population.

**Land at Agnes Road – A Realistic and Deliverable Opportunity**

These representations are based not on an aspiration, but on a realistic, feasible and deliverable proposal, which is currently being refined by Cardiff University and University Hospital of Wales.

The Masterplan for the entire University estate shared with Cardiff Council in December 2015 included details on the redevelopment potential of the site including an assessment of the capacity of the site to accommodate the needs of the University. Following the engagement with Cardiff Council on the Masterplan, a number of University
projects have been taken forward to the feasibility stage. This included the Agnes Road site where a team was assembled to take forward a more detailed review of the site and its feasibility.

This team included project managers Capita, masterplanners Moses Cameron Williams, cost consultants, AECOM, accessibility consultants WSP, space planning consultants Kliner Planning, engineers Arup and planning consultants DPP. Whilst this feasibility work is currently being refined through dialogue with the proposed users, it has already concluded the following:

**The site is large enough**

The Agnes Road site (as delineated by Policy C10) can accommodate 83,000 sq. m. (GIA), which with the utilisation of underdeveloped space at University Hospital of Wales, can accommodate the needs of the entire College. This would enable the provision of the Bio Medial Life Science campus with direct physical access to the University Hospital of Wales. The estimated capacity of the site has taken account of the need for

Through discussions with the users of the site, it has been confirmed that the respective research themes of the college can be accommodated in such a way which maximises cross-working.

**The site can enable the expansion of the hospital and will not impact on its operation**

It is feasible that the development of the Agnes Road site will enable the embedded University functions from the University Hospital of Wales;

The Agnes Road site will enable the creation of a ‘health garden’ which will promoted prevention rather than cure.

The use of the current DWP car park at the Agnes Road site by NHS staff can adequately be re-accommodated across the extended site. As such, there would be no displacement of car parking in to the surrounding residential areas;

**The site is accessible**

The site would enable the creation of a further access to the University Hospital of Wales via St Agnes Road. This would relieve significant pressure at the King George V access and would enable greater segregation and prioritisation of emergency vehicles. It would also reduce pedestrian and vehicular conflict within the site.

The Agnes Road site is within walking distance of 26% of the College’s current students. It is also within cycling distance of 86% of the current students.

There are five existing bus routes serving the hospital and a further five which could be extended to take in the site.

**There are no physical or utilities constraints**

There are physical constraints to the redevelopment of the site, nor are there any no existing utilities running across the site which would prevent redevelopment.

**Ownership**

Guidance acknowledges that the delivery of the allocations in LDP will largely be down to the actions of others. It should be noted that the potential use of the site for health was originally proposed by the landowner. As such, they themselves acknowledge the significance of the site for such a use. Whilst there may not be consensus between the parties on the potential use of the land,

The demonstration through the feasibility work that the Agnes Road site can create the biomedical and life-sciences campus that the University needs means that they have been able to commence discussions with the current landowner about acquiring the site. At the time of writing this discussions are on-going, but the fact that this discussions are taking place indicates that it is realistic to suggest that the site could be acquired within the Plan Period to enable the proposals to come forward.
Summary on Deliverability

In summary, the feasibility work on the site by the University has shown that there are no physical constraints to the development of the site in line with Policy C10. It has shown that the University’s proposals can be accommodated at the Agnes Road site and that they can physically deliver the benefits associated with the co-location of the research themes of the college as well as the Hospital. The Hospital has confirmed that the proposals will enable the expansion of its facilities improving care. Crucially, discussions with the landowner have commenced and the University is confident that they can agree the purchase of the site.

Whilst the University are not yet in control of the site, Policy C10 is entirely realistic and deliverable. The only barrier to the delivery of a world class health related academic and research centre is the risk that the landowner will not sell the site to the University. However, as indicated earlier in these representations, this risk is limited as it is not proposed that the site is allocated for any alternative use. Moreover, should the proposed development not come forward as envisaged by the allocation, it would be reviewed as part of the required LDP monitoring and review process. Finally, the potential impact of land ownership on deliverability of the site should be balanced with the significance of the allocation, which represents the only strategic health allocation in the LDP and is a key facilitator to a nationally significant proposal.

What We Ask

Examining Local Development Plans Procedure Guidance (July 2014) makes clear that where the Inspector identifies the need for changes these will, where possible, be fully discussed at the hearings. However, it goes on to highlight there may be occasions where an Inspector only concludes that a change is necessary having considered all the evidence submitted to a hearing.

The Guidance makes clear that if the Inspector considers that the LDP should and can be changed after submission to make it sound, he/she must be satisfied that requirements for public consultation and sustainability appraisal have been met with regard to the changes.

At this MAC stage, the proposed deletion of Policy C10 is proposed by the Council not the Inspector and represents a significant change to the Plan, which has not been subject to discussion at a hearing session. The Guidance is explicit that changes to the Plan at this stage should be limited to minor amendments. It is clear from the outline of the proposals for the site at Agnes Road and the implications of MACS8, that the deletion of Policy C10 cannot be considered ‘minor’.

The Guidance is clear that the Inspector may seek additional written clarification of any matters and issues raised during the hearings part of the examination. In addition, he/she may hold further sessions during the reporting period.

We contend that not only does MACS8 make the Plan unsound, it would deny Cardiff a once-in-a-lifetime opportunity of developing a world-leading biomedical life-science research facility with the associated medical treatment, health, education and economic benefits. MACS8 has not been subject to public or stakeholder discussion and the deletion of Policy C10 is based solely on the landowner’s objection. These representations outline the need for the allocation, which the Council suggest was absent when suggesting the deletion of the allocation.

As such, we request that given the lack of public consultation on this significant change and the concerns raised about the soundness of the Plan with MACS8 in place, that a further hearing session is convened in order that the proposed change can be fully discussed by all parties.

Welsh Government Intervention

Finally, whilst the Inspector will consider these representations to the MAC’s and will decide an appropriate course of action, we have also had regard to PPW which states that:
"As a final resort, the Welsh Government will consider intervening in the plan process by means of its powers to direct modifications to the plan or to call in all, or part, of a plan for its own determination. Such intervention will generally only be considered where an LDP:

- raises issues of national importance, or
- has implications beyond the area of the plan-making authority (except to the area of joint plans where a joint LDP is being prepared by two or more local planning authorities).

Given the significance of Policy C10 for the future of University Hospital of Wales, Wales’ largest hospital, and for the ground breaking aspirations of Cardiff University, it is clear that the proposed deletion is of national importance. In addition, the significance of what Policy C10 would enable also means that the deletion of the allocation has implications beyond the plan-making area. As such, should MAC58 be taken forward, Cardiff University will seek intervention by the Welsh Government to ensure that Policy C10 is retained.

The Timing of the These Representations

It is acknowledged that no representations were made by Cardiff University in support of Policy C10. However, this should not be interpreted as a lack of support for the allocation or the evidence in support of it. Rather, the aspirations of the University in relation to the St Agnes Road site have taken some time to develop to such a stage that they are able to confirm the need for the use of the site.

In December 2014 Cardiff University presented the findings of its Masterplan to Cardiff Council. This comprehensive review of the University’s existing property portfolio examined how the University could, working with its partners, deliver the aspiration to become a World-leading, research excellent, educationally outstanding university. The Masterplan concluded that the aspirations of the University and University Hospital of Wales, as well as the recommendations of the Health Professional Education Investment Review, require the development of the St Agnes Road site for health related uses.

Following the publication of the Masterplan in December and dialogue with Cardiff Council in early 2015, a feasibility study to guide development was commissioned in June 2015. As such, it is only at this MAC Stage of the LDP that the University has been in a position to register its written support of Policy C10. Whilst we acknowledge that earlier engagement in the LDP process would have been preferable, this should not detract from the need for Policy C10 to be retained. It should also not divert attention from the fact that the proposed deletion of Policy C10 following the public examination into the Deposit LDP, has seemingly come about only through discussions between the Council and the landowner. As such, Cardiff University, University Hospital of Wales, and the people of Cardiff have been prejudiced by this ‘last minute U-turn’.

Summary and Conclusions

Land at Agnes Road represents a once-in-a-lifetime opportunity to deliver a biomedical and life-sciences campus which will put Cardiff at the leading edge of medical research globally whilst delivering a hugely beneficial impact on the medical treatment, health and education of its resident population. In addition, the proposals would enable University Hospital of Wales to expand relieving some of the space constraints it currently experiences. As such, the significance of Policy CP10 for the future of Cardiff should not be underestimated.

In light of the evidence for the proposed health related uses now being available, the reasons given by the Council for MAC58 have now fallen away. Accordingly, to proceed with the proposed change would make the Plan unsound. We therefore request that an additional hearing session be convened to enable a full discussion on the need for Policy C10 to be retained in the LDP.

I trust these representations are clear, but please do not hesitate to contact me if you have any queries about them.

Kind regards.
Representations to MAC's to Cardiff LDP

Yours sincerely,

Gareth Hooper  
Chief Executive Officer  
DPP  
D: 02920660265  
M: 07850542846

Enc. Matters Arising Changes Representation Form

Cc. Dev Biddlecombe  
Director of Estates, Cardiff University