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.

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<td>Name:</td>
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</tr>
<tr>
<td>Job title: (where relevant)</td>
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<td>Organisation: (where relevant)</td>
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<td>RPS</td>
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Signed: [Redacted]          Date: 23rd July 2015
PART 2: Commenting on Matters Arising Changes

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

Matters Arising Changes reference

MAC4 – support with observations

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)

Housing Delivery

Support is given to the LDP’s strategy for the allocation of a number of strategic sites and in particular Strategic Site F: North East Cardiff to deliver housing across the City. No concerns are raised over the number of dwellings proposed for the sites or their deliverability over the plan period. It is considered that such sites have been allocated on the basis of sound and robust evidence.
According to the housing trajectory evidence presented within the Council’s Statement (December 2014) the Council outlines that as of 1st April 2016 it expects 645 dwellings across the strategic sites will be under construction and within this the North East Cardiff Strategic Site (F) is subject to 180 dwellings.

Despite planning applications for the first phase of North East Cardiff Strategic Site (F) (known as ‘Churchlands’ and the subsequent ‘Churchlands 2’) being submitted in September 2013, and December 2014 respectively, and pressure being placed on the Council to determine these applications to aid housing delivery in the early years post Plan adoption, to date the Council has failed to determine the applications. As stated during the hearing sessions at the LDP Inquiry it is pressing and important for the Council’s Development Management Team to determine the outstanding outline applications quickly and then the subsequent reserved matters/discharge of conditions submissions in a timely manner in order to deliver the quantum required, as supported by the developer(s), over the Plan period and in particular in the early years of the Plan period.

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

To allow detailed discussion of the relevant issues and to ensure the Inspector can be made fully aware of the circumstances in order to avoid misunderstandings.

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>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...</td>
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<td>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.</td>
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<td>There are clear mechanisms for implementation and monitoring.</td>
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<td>It is reasonably flexible to enable it to deal with changing circumstances.</td>
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Dear Sir/Madam,

Please find attached comments made on behalf of Redrow in relation to the LDP Matters Arising Changes.

I would be grateful if you could confirm receipt.

Kind Regards

Andrew

Andrew Lucas  
Director - RPS Planning & Development  
Park House, Greyfriars Road,  
Cardiff, CF10 3AF.  
United Kingdom  
Tel: +44 (0)29 2066 8662  
Fax: +44 (0)29 2066 8622  
Email: LucasA@rpsgroup.com  
www: www.rpsgroup.com

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RPS Planning and Development Limited, company number: 02947164 (England), Registered office: 20 Western Avenue Milton Park Abingdon Oxfordshire OX14 4SH.

RPS Group Plc web link: http://www.rpsgroup.com
Matters Arising Changes Representation Form

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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

MAC5

........................................ Support/Object (Delete as appropriate)
MAC6

........................................ Support/Object (Delete as appropriate)
MAC8

........................................ Support/Object (Delete as appropriate)
MAC10

........................................ Support/Object (Delete as appropriate)
MAC39

........................................ 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).

Objection to MAC5 which fails tests - C2, CE1 and CE2

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)

MAC5 – New Key Policy KP2 (F)

Redrow agrees with the inclusion of new Key Policy KP2 and the specific references to the North-East Strategic Site (SSF) masterplanning and infrastructure framework therein. Support is provided in particular for the manner in which the infrastructure requirements have been set out such that they are not overly prescriptive and they allow a reasonable degree of flexibility in terms of the exact content of the planning permissions for the site or parts thereof in accordance with the general principles of the masterplanning and infrastructure framework.
Two applications have already been submitted for the first phase of the North-East Strategic Site (SSF) known as ‘Churchlands’. The first application was the subject of a Public Inquiry held in May 2015 in relation to an appeal against its non-determination. The second application, known as Churchlands 2 is currently under consideration by Cardiff Council.

The design, layout and master planning of Site F and the proposals for the Churchlands element of the site are underpinned by the objective of delivering the key masterplanning and infrastructure principles outlined in new Key Policy KP2 (F) and as set out in the Statement of Common Ground (SoCG) prepared in respect of LDP Hearing Session 6.

Specifically and in addition to the Rapid Transport Corridor Spine Road to be provided throughout the site, Churchlands will provide an east bound bus lane along part of Penwlyn Road. It will also provide cycle routes between the site and Eastern Avenue (Llanedym), Roath Park and Pen-y-Lan Road, as well as bus routes to the Heath Hospital and to the City Centre.

The Churchlands proposals also include a community facility and primary school on-site (or contributions thereto), contributions to the NEC SSF secondary school, on-site cricket pitch, football pitches, NEAP, LEAP and informal open space. Contributions towards the allotment and the MUGA proposed within the wider NEC(SSF) will also be provided. As such, it is considered that the development of Churchlands as well as the wider proposals for the NEC site will fully conform to the masterplanning principles and infrastructure requirements outlined by Policy KP2.

Redrow however object to the inclusion of the following text set out on page 160 of Appendix 2 in relation to policy wording of New Key Policy KP2 (F):

- Reference to ‘enhancing the disused railway line’ should be removed. We believe this has been included as an error as the site does not include such a feature.

  **Required Change - Reference to the disused railway line should be removed.**

- The policy refers specifically to ensuring that there is no detriment to the favourable status of the dormice on the site. It seems unreasonable to specify a particular species on the site given that there will be a requirement under other EU and UK legislation to ensure that ecological interests are respected and that appropriate licenses have been sought, where necessary, before development can commence. It is therefore considered that the policy should remain generic in terms of ecological protection and any requirement for any appropriate mitigation and/or compensation that may need to be incorporated in the development proposals.

  **Required Change - All references specific to dormice and other species should be removed.**

- The policy states that no development should take place in Flood Zone C2. This unnecessarily duplicates national legislation and could lead to future problems if there are changes to national policy that are not reflected in the adopted LDP and also if more detailed, site-specific flood modelling proves that land shown within Flood Zone C2 on Development Advice Maps is not actually at risk of flooding.

  **Required Change - Remove the reference which prohibits development within Flood Zone C2.**

- The supporting text to the policy states that most of the land is owned by two landowners. This is not correct as a number of landowners hold an interest in the site.

  **Required Change - Amend text to reflect that there are multiple landowners.**

**MAC6 – Policy KP4**

Support is given to the more succinct reasoned justification wording for Policy KP4.

As set out in Redrow’s response to MAC5, the design, layout and master planning of Site F and the proposals for the Churchlands element of the Site are underpinned by the objective of delivering the
key masterplanning and infrastructure principles outlined in new Key Policy KP2 (F) and as set out in the Statement of Common Ground (SoCG) prepared in respect of LDP Hearing Session 6.

Support is also provided for the manner in which the infrastructure requirements are set out such that they are not overly prescriptive and therefore allow for flexibility in provision in accordance with the general principles.

MAC 8 – Policy KP6

It is noted that a new paragraph is to be inserted after existing paragraph 4.90 to read:

"With regard to Strategic Sites, policies KP2(A)-KP2(H) provide clear guidance on the Council’s infrastructure and masterplanning requirements. This information will be cross-referenced to the Cardiff Infrastructure Plan which is a ‘living document’ sitting alongside the LDP. The Infrastructure Plan is directly linked to the LDP Monitoring Framework and will be regularly updated, so as more details are established they can be incorporated into the document”.

Again support is given to the manner in which the infrastructure and masterplanning requirements are set out such that they are not overly prescriptive and therefore allow for flexibility in provision in accordance with the general principles.

MAC10 – Policy KP8

The design, layout and master planning of Site F and the proposals for the Churchlands element of the site are underpinned by the objective of delivering the key masterplanning and infrastructure principles outlined in new Key Policy KP2 (F) and Policy KP6. It is considered that the proposals for the Churchlands Site which forms the first phase of the wider North East Cardiff site (SSF) and the transport related infrastructure that the Churchlands proposals will provide are in fully accordance with the policy provisions of Policy KP6 and the proposed amendments to the supporting paragraphs to Policy KP8.

MAC39 – New Policy T9

Support is provided for the manner in which the new Policy T9 is set out, such that it is not overly prescriptive and therefore allows for flexibility in provision in accordance with the general principles. Whilst it seeks to provide a regional ‘Metro’ network it clearly establishes that this will be formed by a network of integrated public transport routes and services which could be delivered via any combination of heavy rail, light rail, tram, conventional or guided buses (segregated or on the existing highway) and bus priority measures and that the important aspect of strategic developments as they come forward is that they do not prejudice the future development of such a network.

Two applications have already been submitted for the first phase of the North-East Strategic Site (SSF) known as ‘Churchlands’. The first application was the subject of a Public Inquiry held in May 2015 in relation to an appeal against its non-determination. The second application, known as Churchlands 2 is currently under consideration by Cardiff Council.

The design, layout and master planning of Site F and the proposals for the Churchlands element of the site are underpinned by the objective of delivering the infrastructure principles outlined in new Policy T9.

Specifically and in addition to the Rapid Transport Corridor Spine Road to be provided throughout the site, Churchlands will provide an east bound bus lane along part of Penwyt Road. It will also provide cycle routes between the site and Eastern Avenue (Llanedryn), Roath Park and Pen-y-Lan Road, as well as bus routes to the Heath Hospital and to the City Centre.
PART 4: What Happens Next?

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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 wish to speak about all of our representation which we consider necessary due to the urgent need to deliver housing in Cardiff and this strategic site in particular and especially due to the fact that the Churchlands part of the site is to be the first phase.

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
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