Matters Arising Changes Representation Form

As part of the Examination into the Cardiff Local Development Plan (LDP) a number of Matters Arising Changes have been proposed to the LDP. These changes are set out in the Matters Arising Changes Schedule. This is your opportunity to comment on the Matters Arising Changes. All comments previously made at Deposit stage have already been considered by the Inspectors and so this form should only be used to comment on the Matters Arising Changes.

All completed forms should be returned by midnight on 23rd July 2015 to: LDP Team, Room 131, City Hall, Cardiff, CF10 3ND, or email LDP@Cardiff.gov.uk

Also available for comment are the Sustainability Appraisal and Habitats Regulations Assessment of the Matters Arising Changes at www.cardiff.gov.uk.

### PART 1: Contact details

<table>
<thead>
<tr>
<th>Your/ your Client’s details</th>
<th>Agent’s details (if relevant)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Title:</strong></td>
<td></td>
</tr>
<tr>
<td>Taylor Wimpey Limited &amp;</td>
<td>Duncan Chadwick</td>
</tr>
<tr>
<td>North East Cardiff</td>
<td></td>
</tr>
<tr>
<td>Landowners’ Consortium</td>
<td></td>
</tr>
<tr>
<td><strong>Name:</strong></td>
<td></td>
</tr>
<tr>
<td>Adrian Siade</td>
<td></td>
</tr>
<tr>
<td><strong>Job title:</strong> (where</td>
<td>Project Director</td>
</tr>
<tr>
<td>relevant)</td>
<td></td>
</tr>
<tr>
<td>Project Director</td>
<td>Partner</td>
</tr>
<tr>
<td><strong>Organisation:</strong> (where</td>
<td>Developer/Landowners</td>
</tr>
<tr>
<td>relevant)</td>
<td>David Lock Associates</td>
</tr>
<tr>
<td><strong>Address:</strong></td>
<td></td>
</tr>
<tr>
<td>Taylor Wimpey Bristol</td>
<td>50 North Thirteenth Street</td>
</tr>
<tr>
<td>600 Park Avenue</td>
<td>Milton Keynes</td>
</tr>
<tr>
<td>Aztec West</td>
<td>Bucks</td>
</tr>
<tr>
<td>Almondsbury</td>
<td>MK9 3BP</td>
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<tr>
<td>Bristol</td>
<td></td>
</tr>
<tr>
<td>BS32 4SD</td>
<td></td>
</tr>
<tr>
<td><strong>Telephone no:</strong></td>
<td>01908 666276</td>
</tr>
<tr>
<td>N/A</td>
<td></td>
</tr>
<tr>
<td><strong>Email:</strong></td>
<td><a href="mailto:dchadwick@davidlock.com">dchadwick@davidlock.com</a></td>
</tr>
<tr>
<td>N/A</td>
<td></td>
</tr>
</tbody>
</table>

Please note that all representations will be made available for public inspection and cannot be treated as confidential. However to ensure data protection we will remove personal details from publically accessible documents.
PART 2: Commenting on Matters Arising Changes

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

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

PLEASE SEE ACCOMPANYING REPRESENTATIONS

MAC5, MAC6, MAC9, MAC14, MAC36, MAC41, KP1 Support
MAC8, MAC38, MAC39, MAC75, KP2(F) in part. Comment
MAC10, MAC13, MAC19, MAC59, KP2(F) in part Object

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 SEE ACCOMPANYING REPRESENTATIONS

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.

PLEASE SEE ACCOMPANYING REPRESENTATIONS
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 WISH TO SPEAK ON THOSE MATTERS ARISING CHANGES UPON WHICH WE HAVE MADE REPRESENTATIONS – COMMENTS AND OBJECTIONS.

WE REPRESENT THE DEVELOPER/LANDOWNERS OF A SIGNIFICANT PART OF STRATEGIC SITE F AT NORTH EAST CARDIFF, WHICH IS THE SECOND LARGEST STRATEGIC SITE IN THE PLAN SO IT IS FUNDAMENTAL TO THE DELIVERY OF HOUSING, JOBS AND INFRASTRUCTURE AND A SIGNIFICANT PART OF THE PLAN.

WE ATTENDED THE HEARING SESSIONS IN JANUARY AND FEBRUARY 2015 AND MADE AN IMPORTANT CONTRIBUTION TO THE EXAMINATION AND DEBATE ON THE PLAN AND WISH TO TAKE PART IN ANY FURTHER SESSIONS TO ASSIST THE INSPECTORS IN ESTABLISHING THE SOUNDNESS OF THE PLAN AND THE SUITABILITY OF STRATEGIC SITE F FOR MIXED-USE DEVELOPMENT IN THE PERIOD 2006-2026.
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

<table>
<thead>
<tr>
<th>Procedural Tests</th>
<th>Consistency Tests</th>
</tr>
</thead>
<tbody>
<tr>
<td>P1 It has been prepared in accordance with the Delivery Agreement including the Community Involvement Scheme.</td>
<td>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.</td>
</tr>
<tr>
<td>P2 The plan and its policies have been subjected to Sustainability Appraisal including Strategic Environmental Assessment.</td>
<td>C2 It has regard to national strategy.</td>
</tr>
<tr>
<td></td>
<td>C3 It has regard to the Wales Spatial Plan.</td>
</tr>
<tr>
<td></td>
<td>C4 It has regard to the relevant community strategy/ies (and National Park Management Plan).</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Coherence and Effectiveness Tests</th>
</tr>
</thead>
<tbody>
<tr>
<td>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</td>
</tr>
<tr>
<td>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.</td>
</tr>
<tr>
<td>CE3 There are clear mechanisms for implementation and monitoring.</td>
</tr>
<tr>
<td>CE4 It is reasonably flexible to enable it to deal with changing circumstances.</td>
</tr>
</tbody>
</table>
Planning and Compulsory Purchase Act 2004

Environmental Assessment of Plans and Programmes (Wales) Regulations 2004

Town and Country Planning (Local Development Plan) (Wales) Regulations 2005

Cardiff Local Development Plan 2006-2026

Consultation on Matters Arising Changes to the Local Development Plan

Representations on behalf of Taylor Wimpey Limited and North East Cardiff Landowners’ Consortium

By

David Lock Associates

July 2015
1.0 Introduction

1.1 These representations have been prepared by David Lock Associates (‘DLA’) on behalf of Taylor Wimpey Ltd and the North East Cardiff Landowners’ Consortium, developer/land owners respectively for a substantial part of Strategic Site F at North East Cardiff, which is included as a proposed allocation within the Cardiff Local Development Plan 2006-2026 (‘the Plan’).

1.2 These representations relate only to the ‘Matters Arising Changes’ published for consultation in June 2015; they primarily cover matters relating to our clients’ land and interests at North East Cardiff (Strategic Site F) but where necessary also cover general issues and policies in the Plan.

1.3 The representations should be read in conjunction with the Joint Statement submitted by DLA and RPS on behalf of Taylor Wimpey/North East Cardiff Landowners’ Consortium, Redrow Homes and South Wales Land Developments in relation to Strategic Site F. This Statement set out the agreed position of the above parties having regard to the Matters and Issues Agenda set by the Inspector for Hearing Session 6 – Strategic Site F: North East Cardiff (West of Pontprennau). These representations should also be read in conjunction with the Statement of Common Ground (SoCG) (December 2014) agreed by DLA and RPS on behalf of the respective landowners/developers with the Council (ED009.6) following a request made by the Inspector in a letter to the Council dated 2nd October 2014 (ED004).

1.4 The purpose of the representations is to set out the position of Taylor Wimpey and the North East Cardiff Landowners’ Consortium in relation to Matters Arising Changes’ (MAC) so as to assist the Inspectors in reaching conclusions in relation to the suitability, achievability and deliverability of Strategic Site F and the overall ‘soundness’ of the Plan. The representations refer to the MAC numbers in the ‘Matters Arising Changes’ Schedule published by the City of Cardiff Council (‘the Council’).

2.0 Comments on ‘Matters Arising Changes’ (Soundness test reference in brackets)

MACS (CE4)

2.1 Our clients support the reference in MAC5 to the fact that estimated costs of infrastructure provision and details of estimated square footages of facilities are referenced within the Infrastructure Plan based on current considerations, requirements and information available at a point in time so represent indicative figures. We also note that future updates to the Infrastructure Plan will allow such information to be regularly updated.

2.2 Our clients support the reference in the MAC to infrastructure requirements for these sites (i.e. the Strategic Sites) being primarily delivered through planning obligations/section 106 agreements.

2.3 Our clients support the masterplanning principles set out in Policies KP4 and KP5 and their use as a framework for the consideration and determination of planning applications, with specific masterplanning requirements for each site being identified within Policies KP2(A) to KP(H) and depicted, where appropriate, on the indicative Schematic Frameworks. A key issue which is

David Lock Associates
July 2015
relevant to this site is the need for comprehensive master planning to avoid piecemeal proposals coming forward. Whilst this is required in quite an implicit way in Policy KP4(i)1 a clearer statement in Policy KP2 would provide an unambiguous requirement for collaborative and comprehensive masterplanning. There is otherwise a risk that piecemeal proposals could undermine the capability of development to meet masterplanning principles.

2.4 We suggest that the general masterplanning principles set out in the Plan and under Policy KP4 could cross-refer to the recently adopted Cardiff Liveable Design Guide (which also supersedes the detail set out in the Masterplanning Framework).

MAC6 (CE4)

2.5 Our clients have no objection in principle to the change aimed at embedding more masterplanning details for the Strategic Sites into the Plan.

2.6 As indicated in relation to MAC5 above, we agree with the Council that it would be premature and unhelpful to include overly prescriptive directions in the Plan especially when detailed matters are more appropriately considered and dealt with through the Development Management process following the submission of a planning application, with supporting information, including an Environmental Statement, where necessary. We also agree and support this approach as a basis for preparing Parameter Plans and Master Plans for major new development proposals, which will then in turn be considered on their own individual planning merits having regard to the Development Plan and other material considerations. Any large scale proposal will also be considered against the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999 (as amended).

MAC8 (C1,C2 and CE4)

2.7 We consider that ‘infrastructure’ should be more clearly defined, as it is open to interpretation given the Community Infrastructure Regulations 2010 (as amended) and the Council’s Infrastructure Plan (Updated November 2014), which does not include affordable housing. In addition, there is no reference to affordable housing being subject to site or development viability (see Paragraphs 10.4, 10.6 and 12.3 of Planning Policy Wales Technical Advice Note 2 “Planning and Affordable Housing”. This should be included in the Plan to avoid any misunderstanding or provide clarity and precision in the Plan.

2.8 It is also suggested that the term ‘Planning Policy Guidance’ is qualified, for the avoidance of doubt, as it appears in a number of places in the Plan; it could be that it cross refers to the Welsh Government’s ‘Index of Planning Policy Guidance for Wales (May 2013)’ for example.

2.9 We support the shared use of community buildings, services and management resources to promote social cohesion and integration, aid viability, enhance sustainability and reduce overall provision, operating and maintenance costs.

MAC9 (C1, C2, CE4)

2.10 The changes to the Plan are supported.

MAC10 (CE3, CE4)

2.11 A firm relationship between the density of development and proximity to transport corridors should be stated as being necessary in Policy KP8 as this would reinforce the importance of

David Lock Associates
July 2015
the masterplanning principles in Policy KP4 and underpin the importance of specific requirements for sites such as Strategic Site F.

2.12 The other changes to the Plan are generally supported. However, the changes to Paragraph 4.117 are unclear and we suggest the following amended wording:

‘For planning applications relating to the LDP strategic sites, the Council will seek to secure the on-site and off-site transport infrastructure identified within Policy KP2 subject to and following a detailed Transport Assessment, with phasing and any necessary financial contributions controlled via planning obligations/s106 agreements.’

MAC13 (CE3, CE4)

2.13 We consider that the target for the provision of affordable housing in the City is too ambitious and not deliverable given that provision in the period 2001-2014 was just 2,600 according to the Background Technical Paper No.1 ‘Population and Housing’ (Updated May 2014). This is generally supported by the additional paragraph to be inserted after Paragraph 4.149, which states that the Cardiff LHMA assessment sets a target of providing 19,945 affordable units between 2013 and 2018. We consider that this new paragraph is unnecessary and should be deleted.

MAC14 (C1, C2)

2.14 We support the changes as they are consistent with the Technical Advice Note No.15 ‘Development and Flood Risk’.

MAC19 (C1, C2, CE2 and CE4)

2.15 We object to the amended wording to Policy H3 on ‘Affordable housing’ on the basis that it is not consistent with TAN2 which states ‘when setting site-capacity thresholds and site specific targets local planning authorities should balance the need for affordable housing against site viability’.

2.16 We consider that the reference to site and financial viability for the scheme should be included in the Policy not just in the supporting justification. In addition as with other policies, for example Policy EN5, we suggest that the TAN is referred to in the justification and explanation for the policy.

2.17 In addition, the Viability Study undertaken by Peter Brett Associates was high-level, generic and did not take into account the other infrastructure requirements of the Strategic Sites so is not a reliable guide to affordable housing viability on such sites. The PBA Study and assessment was, we consider, based on unsupported assumptions regarding benchmark site value, sales values, site opening up costs and an assessment of base land cost that did not take account of the costs of acquiring over 50% of the site area. Hence, we do not feel that it adequately evidences that the viability of strategic sites such as Site F has been demonstrated.

2.18 In addition, it may be that the affordable housing need is more severe in other parts of the City; hence it may be appropriate to deliver the affordable housing off-site rather than on-site to deal with more acute affordability issues elsewhere in Cardiff.

David Lock Associates
July 2015
2.19 We support the changes as they are consistent with the Technical Advice Note No.15 ‘Development and Flood Risk’.

MAC38 (CE3, CE4)

2.20 The changes do not appear to have significantly altered the intention or direction of the Deposit Plan policy. As we understand it, the four Rapid Transit corridors are in addition to, though may utilise elements of bus corridor enhancements and Rapid Transit is defined as faster than conventional bus-based travel, which suggests that bus corridor improvements could make conventional bus services “rapid”. The Rapid Transit routes are still undefined and awaiting further technical work, however S.229 now suggests that the form of rapid transit will be informed by strategic site masterplanning, which seems at odds with the likely technical difficulties of route alignment that will be much more constrained outside the strategic sites (within the developed core of Cardiff) than within them. For example the requirement to fund off-site infrastructure to connect between Strategic Sites G and H from Site F is duplicated in all three sites. These are not detailed in their definition and would be subject to S106 negotiations between sites and within sites once proposals come forward and are determined through the Development Management process (albeit that much of Strategic Site G already has the benefit of planning permission, which will also inform S106 negotiations).

MAC39 (CE3, CE4)

2.21 We note that this new Policy seeks to incorporate the regional Metro system. In terms of the strategic development sites, there is an apparent additional consideration that the Council will secure and safeguard the alignment through the site(s) and potentially require the developer to fund any related infrastructure. The influence of the Metro is not clear as the original routes proposed by the Cardiff Business Partnership/Metro Consortium included a rapid transit link crossing east-west on Strategic Site F from Cardiff Gate to the station at Radyr, however the element that crosses Strategic Site F is not shown on the more recent documentation we have seen.

MAC41 (C1, CE4)

2.22 This amendment is generally supported albeit that in order to produce sustainable neighbourhoods within the Strategic Sites it may be beneficial to support a balance of homes, employment and services that there is scope within the Policy to enhance the retail function of the Strategic Site. This will support viability but also encourage a degree of self-containment to avoid unnecessary travel and reduce traffic and carbon emissions. We consider that this is not reflected in the Policy as drafted, which should be corrected.

MAC59 (CE4)

2.23 We do not consider it appropriate or necessary to specify the phasing of provision of nursery, primary and secondary school places and sites within the justification to Policy C7 ‘Planning for Schools’. This should be properly considered following a detailed site specific assessment as part of the Development Management process and then secured through planning obligations/s106 agreements. We also consider it appropriate to state in the policy and/or justification that in appropriate circumstances it may be preferable for the obligation to comprise the transfer of land in lieu of part or all of a financial payment towards education provision.
Appendix One

KP1 (P2, C1, CE2)

2.24 We support the amended Policy KP1 and the provision for 45,415 dwellings in the Plan Period, which includes a 4,000 dwelling flexibility allowance aimed at delivering a housing requirement of a minimum of 41,415 new homes by 2026. This should assist to deliverability of the housing target and support the soundness of the Plan.

2.25 To achieve this we consider it vital – based on the figures included in Table 1 ‘Housing provision over the Plan Period’ – to include the Strategic Sites to deliver the bulk of the housing (and jobs) required (total of 13,950 excluding Site A) in the City with Strategic Site F earmarked for a minimum of 4,500 new homes, the second largest Strategic Site in the Plan.

KP2(F) – NORTH EAST CARDIFF (WEST OF PONTPRENNAU) (C1, C2, CE1, CE2, CE3 and CE4)

2.26 We generally support Policy KP2(F) since it largely incorporates the Site Specific Principles and Schematic Framework previously included in the Masterplanning Framework document (November 2014) that set the broad planning framework for the Strategic Sites. The proposed change seeks to embed such principles within a Policy and the Plan to give greater clarity and certainty but also to help inform development proposals and the preparation of more detailed masterplans as part of planning applications considered and determined through the Development Management process.

2.27 There is a key overarching issue regarding density and then a number of individual comments that we wish to make:

Density

2.28 The policy is now quite specific in that it states that the development shall be undertaken in a comprehensive manner and accord with a number of ‘key masterplanning requirements’ including a number of density ranges. These density ranges elaborate on the general terms expressed in the previous Masterplanning Framework and seek to set minimum ranges for high and medium density development but rather inconsistently do not specify what ‘lower densities’ should be, which we consider is an undesirable omission and should be remedied. The ranges suggested differ from the densities agreed between our clients and Redrow Homes/SWLD and presented at the Examination Hearing Session 6, although we note that the densities proposed are minima, except for development around the edge of Lisvane which is simply to be to be “lower” than 35-45+ dwellings per hectare in the medium range. The differences are set out in the table below:

<table>
<thead>
<tr>
<th>Location</th>
<th>Densities agreed for the Examination</th>
<th>Densities proposed in Proposed Modification Policy KP2(F)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Lower Density around the edge of Lisvane</td>
<td>Circa 30 dwellings per hectare</td>
<td>Lower (than 35-45+ dwellings per hectare)</td>
</tr>
<tr>
<td>Medium Density around the edge of Lisvane</td>
<td>Circa 37 dwellings per hectare</td>
<td>Minimum 35-45+ dwellings per hectare</td>
</tr>
</tbody>
</table>

David Lock Associates

July 2015
### Pontprennau and to the north of the site

| High density in the centre of the site near to the new neighbourhood centres and along public transport corridors | High density at around 55 dwellings per hectare with highest at circa 100 dwellings per hectare | Minimum 45-50+ dwellings per hectare |

2.29 The minimum density ranges suggested are open to interpretation and could encourage a development that fails to realise its potential capacity of a ‘minimum’ of 4,500 dwellings. This would be undesirable in terms of establishing the deliverability of the new homes on this Strategic Site and the soundness of the Plan. Capacity testing has been undertaken by DLA based on a development plan framework exercise. The framework plan includes parcels based on the agreed revised Schematic Framework but with a cautious approach toward potential constraints – as yet untested as there is no overarching master plan for the Strategic Site – which could possibly reduce the site’s capacity to a degree.

2.30 Densities agreed prior to the Examination Hearing Session 6 in January 2015 have been used as a benchmark to inform a more detailed density structure across the site, as categorised in the table below.

<table>
<thead>
<tr>
<th>Densities agreed prior to Examination</th>
<th>Densities interpreted from Proposed Modification Policy KP2(F)</th>
<th>Lower Scenario</th>
<th>Medium Scenario</th>
<th>Upper Scenario</th>
</tr>
</thead>
<tbody>
<tr>
<td>Lower Density Around the Edge of Lisvane</td>
<td>30</td>
<td>30</td>
<td>30</td>
<td>30</td>
</tr>
<tr>
<td>Medium Density around the edge of Pontprennau and to the north of the site</td>
<td>37</td>
<td>35</td>
<td>35</td>
<td>40</td>
</tr>
<tr>
<td>Medium density in remaining areas not immediately adjacent to Lisvane, Pontprennau and adjacent to the M4 Corridor</td>
<td>40</td>
<td>40</td>
<td>40</td>
<td>45</td>
</tr>
<tr>
<td>Medium density adjacent to the key east west and Cardiff Gate</td>
<td>50</td>
<td>45</td>
<td>45</td>
<td>50</td>
</tr>
<tr>
<td>Higher density adjacent to public transport corridors</td>
<td>55</td>
<td>45</td>
<td>50</td>
<td>55</td>
</tr>
<tr>
<td>Higher density for neighbourhood</td>
<td>75</td>
<td>50</td>
<td>55</td>
<td>65</td>
</tr>
</tbody>
</table>
2.31 Applying the proposed density ranges strictly within the ranges suggested across the site (the ‘Lower Scenario’) creates a shortfall of 678 dwellings. An increase of densities to an ‘Upper Scenario’ demonstrates that over 4,500 new homes could be delivered. With a modest increase in density around the edge of Pontprennau and to the north of the site, it would be possible to reduce the density of development in mixed use neighbourhood centres and along public transport corridors to a level that could be achieved with a wider housing mix whilst maintaining a density high enough to maximise the walkable catchments of public transport corridors and local centres.

2.32 These scenarios suggest that appropriate density ranges to be included in the Plan should be:

- Low (less than 35 dwellings per hectare (dph))
- Medium (35-50+ dph) – lower towards the edge of Pontprennau and north edge
- High (50-75+ dph) – highest in the mixed use centres

2.33 A more detailed and comprehensive master planning process would allow for a robust appraisal of constraints and the development potential of the site. The net developable residential areas could be increased if there is a less cautious approach towards the retention of all hedgerow features among other more detailed findings that would inform this process, which would afford some flexibility with the density of development. This flexibility should be reflected in the Plan and Policy KP2(F). It also underpins the importance of developing a comprehensive masterplan for the entire site as envisaged in the Masterplanning Framework document and the emerging Policy KP2(F) of the Plan.

**General Comments**

2.34 At this stage, in the absence of a comprehensive masterplan and in advance of a Transport Assessment and an outline planning application with supporting technical assessments we consider it is inappropriate and premature to try and seek to identify ‘Essential/Enabling Infrastructure’ and other ‘Necessary Infrastructure’.

2.35 Whilst these are generally as set out in the ‘Site Specific Principles’ within the Masterplanning Framework they were caveated (as indicated above) as being based on current best available evidence and representing the position (as at November 2014) in terms of information provided by Council service areas, infrastructure providers, landowners, agents and developers. Whilst it was agreed that they were sufficiently detailed to underpin the proposed allocation of Strategic Site F, it was also agreed that it was not a definitive statement of requirements, estimated costs, delivery methods and funding sources.

2.36 In light of this, we object to the wording of the Policy in a number of respects, which deviates from the Masterplanning Framework in failing to qualify or quantify the necessary provision.

David Lock Associates
July 2015
from Strategic Site F, for example towards education provision. There is also no reference to the contribution required from Strategic Site G towards education provision. We therefore request that similar wording is included within the Policy, as follows:

"3 New 2FE Primary Schools (it is currently estimated that 5.5 FE additional primary provision is required for West of Pontprennau Strategic Site F, taking account of 0.5 FE surplus available at East of Pontprennau – Strategic Site G)

New Secondary School (estimated to be on circa 10 hectares of land) in conjunction with East of Pontprennau Strategic Site – Site G. It is currently estimated that Land at West of Pontprennau (Site F) will generate 3.9FE + 6th form and that East of Pontprennau Strategic Site (Site G) will generate 1.1 FE + 6th form; Existing development will generate 5FE + 6th Form after September 2018. Therefore it is currently estimated that there is a need for a 10FE + 6th form Secondary School, with about 39% attributable to West of Pontprennau Strategic Site F), to be provided through on-site provision, contribution through land and contributions from other developers/ developments."

2.37 In light of the deletion of Policy C5, we now question the justification for 2 x 50 allotments on the site. There is also no justification or quantification of the financial contribution indicated as being required towards the upgrading of Pentwyn and Pontprennau Leisure Centres; hence this requirement is in danger of not only being misleading but also contrary to the legal test of the CIL Regulations 2010 (as amended).

2.38 The reference to employment provision is unclear, whilst the Use Classes should be extended to include B1, D1 and D2 within and adjoining the District Centre and a broader range of other employment uses or activities (e.g. motor dealerships) at Cardiff Gate Business Park to widen its attraction to the market, occupiers and investors.

2.39 The policy highlights the provision of off-site infrastructure including the Eastern and Northern Corridors – see plan MAC PM39 showing these routes. The off-site requirements for helping bus priority / improvement schemes on the Eastern and North Eastern Corridors are overlapped with Strategic Site G (KP2 (G), much of which already has the benefit of planning permission. This will no doubt inform negotiations on this matter when development proposals come forward and are determined through the Development Management process.

Appendix Five (CE3, CE4)

2.40 Appendix 5 (MAC75) provides the Council’s monitoring and implementation target and triggers, although we note that there is no detail on what changes will happen if a transport modal share target is not met.

3.0 Conclusion

3.1 In conclusion, whilst we support the principle of a specific policy for the Strategic Site (F) and embedding the masterplanning principles within the policy and the Plan generally, we have a number of specific concerns about the wording of the policy, particularly in relation to density, affordable housing and infrastructure requirements (especially transport, education, leisure), which we consider are unjustified or unable to be established at this stage for the reasons set out in these representations. This is related to other related concerns about the wording of other policies in the MAC and supporting justification.
3.2 Our clients are committed to delivering the Strategic Site F and providing a high quality, sustainable, integrated new community at North East Cardiff, which will make a substantial contribution towards the delivery of the Plan but also towards meeting housing need, providing jobs, services and sustainable travel in the City.

3.3 Whilst some master planning work has been undertaken to establish that the likely level of housing (4,500) will be achievable on site, this work has yet to be completed taking account of the site constraints and the necessary infrastructure to support the new community. The detail will emerge through subsequent planning applications, site master planning work, community consultation and further collaborative working between the Council, infrastructure providers, landowners, agents, developers and other stakeholders. It is therefore inappropriate and premature to be too specific and prescriptive at this stage in the drafting of Policy, which requires the flexibility and provisos set out in the Masterplanning Framework.

3.4 These representations are made without prejudice to other matters or details that we and our clients may wish to raise during any further Hearing Sessions at the Examination.
Dear Sir/Madam

Please see attached representations and completed representation form relating to the Council’s Matters Arising Changes proposed to the Cardiff Local Development Plan (LDP).

The representations have been prepared on behalf of Taylor Wimpey Ltd and the North East Cardiff Landowners’ Consortium, developer/land owners respectively for a substantial part of Strategic Site F at North East Cardiff, which is included as a proposed allocation within the LDP.

We would be grateful if you would take these representations into account and also forward them to the Inspectors undertaking the examination of the LDP, for their consideration.

We would be grateful if you would acknowledge receipt and note that we would wish to attend any further hearing sessions arranged to discuss the Matters Arising Changes.

If you require anything further please do not hesitate to contact me.

Regards

Duncan

Duncan Chadwick
Partner

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