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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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>Title:</td>
<td>Mr</td>
</tr>
<tr>
<td>Name:</td>
<td>Jason Price</td>
</tr>
<tr>
<td>Job title: <em>(where relevant)</em></td>
<td>Strategic Land Planner</td>
</tr>
<tr>
<td>Organisation: <em>(where relevant)</em></td>
<td>Persimmon Homes East Wales</td>
</tr>
<tr>
<td>Address:</td>
<td>Llantrisant Business Park, Llantrisant Rhondda Cynon Taf, CF72 8YP</td>
</tr>
<tr>
<td>Telephone no:</td>
<td>01443 445432</td>
</tr>
<tr>
<td>Email:</td>
<td><a href="mailto:jason.price@persimmonhomes.com">jason.price@persimmonhomes.com</a></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.

Signed: [Redacted] Date: 27.07.15
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)

MAC4, MAC8, MAC19,  Support/Object (Delete as appropriate)
MAC9 & MAC13  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).

CE2 & CE4

Please note if you do not identify a test it will not mean your comments will not be considered.

PART 3: Your Response

Your comments should be set out in full and relate to the Matters Arising Changes only.

Please use the space provided to set out your representation. Please be explicit as to which ‘matters arising change’ your comments relate to.

(Continue on a separate sheet/expand box if necessary)

Please see separate attached response.
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.
- [x] 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 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>
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<tbody>
<tr>
<td>P1</td>
<td>It has been prepared in accordance with the Delivery Agreement including the Community Involvement Scheme.</td>
</tr>
<tr>
<td>P2</td>
<td>The plan and its policies have been subjected to Sustainability Appraisal including Strategic Environmental Assessment.</td>
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<tr>
<th>Consistency Tests</th>
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<tbody>
<tr>
<td>C1</td>
<td>It is a land use plan which has regard to other relevant plans, policies, and strategies relating to the area or to adjoining areas.</td>
</tr>
<tr>
<td>C2</td>
<td>It has regard to national strategy.</td>
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<tr>
<td>C3</td>
<td>It has regard to the Wales Spatial Plan.</td>
</tr>
<tr>
<td>C4</td>
<td>It has regard to the relevant community strategy/ies (and National Park Management Plan).</td>
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<tr>
<th>Coherence and Effectiveness Tests</th>
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<tbody>
<tr>
<td>CE1</td>
<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 authorities</td>
</tr>
<tr>
<td>CE2</td>
<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>
</tr>
<tr>
<td>CE3</td>
<td>There are clear mechanisms for implementation and monitoring.</td>
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<tr>
<td>CE4</td>
<td>It is reasonably flexible to enable it to deal with changing circumstances.</td>
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MAC4 - KP1: Level of Growth

Whilst we support the provision of 45,415 new dwellings (including a 4,000 dwelling flexibility allowance) to deliver a housing requirement of 41,415 new dwellings over the plan period, we have reservations surrounding the assumptions that inform Table 1: Housing Provision over the Plan Period, namely the inclusion of Council Tax data. Whilst we note the Council's explanation for the use of these figures, their inclusion in support of the assumed land supply is unique when compared to the approach adopted by other local planning authorities in Wales and serves to increase the assumed land supply by 2,699 (as stated in the Council's response to Housing related Action Points).

The impact of these additional units would become more apparent in the event of the adoption of the plan as the annual study required by Technical Advice Note 1: Joint Housing Land Availability Studies and Planning Policy Wales are informed by the housing requirements of the local development plan which have been arrived at having regard to the Council Tax data. Its inclusion will therefore, enable the authority to artificially inflate the housing land supply figure using data that is not recognised by Technical Advice Note 1: Joint Housing Land Availability Studies and Planning Policy Wales to the detriment of the need to ensure that land is genuinely available or will become available to provide a 5 – year supply of land for housing which is essential to the realisation of the aims and objectives of the plan.

Based on the above, we consider that the inclusion of Council Tax data in support of the assumed land supply undermines the plans strategy for the delivery of its housing requirement as it is not founded on a robust and credible evidence base which undermines the coherence and effectiveness of the plan, and specifically the coherence and effectiveness (CE2) test of soundness. To overcome this shortcoming and address perceived vulnerabilities in the Council's methodology for calculating its future housing

Matters Arising Changes Representation Form – Persimmon Homes East Wales
land supply, we would welcome the opportunity to promote the inclusion of a range of smaller housing allocations to address the 2,699 unit shortfall that might emerge as a result of the substitution of the Council Tax data with Joint Housing Land Availability data. The inclusion of a range of smaller housing allocations would help ensure a 5 year housing land supply upon the adoption of the plan and the subsequent early years and supplement the overall number of units anticipated from the strategic sites, whose units are more broadly distributed over the plan period.

We believe that the aim of embedding flexibility within the plan would be further strengthened through the inclusion of smaller housing allocations which would supplement the improvements proposed as part of the MAC4 changes and contribute to a greater range and distribution of housing which in turn enable the plan to deal with changing circumstances in accordance with the coherence and effectiveness tests of soundness.

For completeness we would welcome a revision to the flexibility allowance to ensure that it reflects and is equal to 10% of the overall housing requirement, as the flexibility allowance in its current form falls short of this as acknowledged by the Council in response to action point 9 of hearing session 3.

**MAC8 4 KP6: New Infrastructure Paragraphs 2.4 & 2.5**

We would welcome a clearer distinction between infrastructure that is considered necessary and desirable as the policy in its current form includes infrastructure that could reasonably be regarded as desirable under the necessary infrastructure. We believe that the wording of the policy would benefit from a clearer distinction between the two, and indeed a reference to its relationship with the Community Infrastructure Levy.

**MAC9 9 KP7 Planning Obligations Paragraphs 4.98 and 4.101**

We welcome and support the inclusion of the caveat proposed in MAC9 which
will ensure that the need for Planning Obligations is assessed on a case by case basis in line with Planning Policy.

**MAC13 4 KP13: Responding to Evidenced Social Needs**

We welcome the insertion of the paragraph proposed after the existing paragraph 4.149.

**MAC 19 5 H3 Affordable Housing Paragraphs 5.11, 5.12, & 5.13**

We are concerned that the amendments proposed to do not provide sufficient clarity and certainty with respect to the ability to negotiate affordable housing provision where viability concerns exists. We would therefore welcome the inclusion of a form of wording that facilitates discussions and negotiation in such circumstances.