As part of the Examination into the Cardiff Local Development Plan (LDP) additional Matters Arising Changes have been proposed to the LDP. These changes are set out in the Matters Arising Changes Schedule (October 2015). This is your opportunity to comment on these proposed Matters Arising Changes (MACs). All previously submitted comments have already been considered by the Inspectors and so this form should only be used to comment on the October 2015 Matters Arising Changes.

All completed forms should be returned by **midnight on 26th November 2015** to: LDP Team, Room 422, County Hall, Cardiff, CF10 4UW 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](http://www.cardiff.gov.uk).*

### PART 1: Contact details

<table>
<thead>
<tr>
<th>Your/ your Client’s details</th>
<th>Agent’s details <em>(if relevant)</em></th>
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<tbody>
<tr>
<td><strong>Title:</strong></td>
<td>Mrs</td>
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<tr>
<td><strong>Name:</strong></td>
<td>Frances Lewis</td>
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<td><strong>Job title: (where relevant)</strong></td>
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<td><strong>Organisation: (where relevant)</strong></td>
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<td><strong>Telephone no:</strong></td>
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<td><strong>Email:</strong></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: [Redacted] | Date: 26.11.2015
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)

MAC 1 KP3(A)      Object
MAC 4 KP1         Object
MAC 5 KP2(C, D&E) Support
MAC 8 KP6         Object
MAC 10 KP 8       Object
MAC 61 M2         Object
MAC 75 and Monitoring Framework 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).

CE1
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)

As a member of St Fagans Community Council I have been actively involved in the preparation of the Council’s response. I, obviously, fully support the comments made by St Fagans Community Council in their response. I also wish to add my personal support to the response submitted by NWCG of which St Fagans Community Council is a member.

I share the concern of NWCG over the LDP preparation process. From the initial public “consultations” it was feared by residents that little account would be taken of their views. This has been confirmed throughout the process where views expressed by anyone other than developers and landowners, with their clear vested interests, have been largely ignored.

The independent Examination process was established to ensure that the LDP meets the statutory tests of coherence and sustainability. Unfortunately, the Deposit LDP (DLDLDP) with the FMAC fails to meet those tests by a wide margin. One reason for this is the precedence given to views of some stakeholders - developers and landowners - who have consistently played down the level of new infrastructure required in order to
deliver sustainable communities. In particular, the off-site infrastructure has received
too little attention.

I support NWCG in asking the Inspectors to amend the DLDP to include policies to
require phasing of strategic transport and other infrastructure in advance of
development, funded by contributions from S106 and/or CIL.

MAC 1 KP 3(A)

1. I strongly support Cardiff Council's proposal for a Green Belt and object to any change to
the proposal. The Green Belt is a topic on which there is near unanimity among residents:
at the Preferred Strategy Consultation 82% of the Citizen Panel and 91.8% of the LDP
Consultation supported a Green Belt. Cardiff Council have now given unanimous all party
support in favour of a Green Belt, recognising the views of residents. The views of residents
should count for more than pressure from the Welsh Government.

2. I support the comments made by Cardiff Civic Society, NWCG and St Fagans Community
Council and submit that the Green Belt is justified by strategic work carried out jointly by the
10 local authorities that make up the City Region. Without a Green Belt, Cardiff's LDP does
not pass soundness tests CE1 and CE2.

3. I do not wish to simply repeat the comments made by the Groups mentioned immediately
above but do wish to mention the following:

   a. The land designated for Green Belt is a distinctive natural feature that adds to the
environmental appeal of the Cardiff area. There are many reasons why people
choose to live in a particular area. Environmental factors, including easy access to the
countryside, are one factor.

   b. The designated land contains some of the best quality agricultural land in Wales. Wales
is desperately short of quality agricultural land. The protection afforded by
Green Belt will ensure that the land remains available for agriculture to the benefit of
the Welsh economy.

   c. The Green Belt will help to ensure that urban sprawl does not happen in the areas
between Cardiff, Llantrisant and Caerphilly. These are areas with no possibility of
adequate public transport in the future. The proposed rapid transit system (Metro)
will not serve the area. Development in areas lacking good public transport is not
consistent with the objective of a 50:50 modal split.

   d. The Green Belt designation gives certainty: in comparison Green Wedge designation
creates uncertainty. Cardiff residents deserve certainty on a major environmental
feature.

MAC 4 KP 1 Para 4.42

I object to any increase in housing provision. The proposed housing numbers cannot be delivered
in the remaining 11 years of the plan. Cardiff Council has not achieved or sustained the required
level of housing delivery at any time in the past. Cardiff needs to concentrate of delivering
sustainable development and not chase numbers that are unlikely to be achieved.

MAC 5 and KP 2

1. I support the comments made by NWCG.

MAC 8 and KP 6 Para 4.89-90

1. I strongly support the request for the updated Infrastructure Plan (IP) to be included in the
LDP so that its contents have Development Plan status. The IP is crucial to the LDP's
success. The plan may evolve/change over time but the critical infrastructure requirements
are known now and will not change. For example, development in NW Cardiff will be
unsustainable without a rapid transit system. Giving the IP Development Plan status removes uncertainty for all stakeholders.

2. The IP must ensure that essential/enabling infrastructure, both off- and on-site, is in place before developments on the strategic sites. The wording should be amended to require the Council to ensure that the infrastructure precedes development on the strategic sites otherwise the LDP will fail soundness tests CE1 and CE2.

3. I support NWCG’s proposal that “Category 1” should be called “Advance Infrastructure” - to be provided in advance of occupation - and “Category 2” called “In-Phase Infrastructure” to describe the infrastructure needed during the course of development.

MAC 10 KP 8 Para 4.105

1. I support the comments made by NWCG and St Fagans Community Council and have concerns that Cardiff Council is attempting to “water down” its commitment to a 50:50 modal split.

2. A 50:50 modal split has been described by Cardiff as essential for the LDP to succeed but there is no plan as to how this will be achieved. The LDP is unsound without the 50:50 modal split.

3. Cardiff is currently not achieving a 50:50 modal split, has stated that the objective of a 50:50 modal split applies to the city as a whole but will not require new developments to deliver a 50:50 modal split. So how will this objective be achieved?

4. Developers are content to discuss on-site infrastructure but try to deflect attention from the critical issue of off-site transport infrastructure. Achieving the 50:50 modal split depends on what happens when both new and existing residents leave their housing sites. Development must be phased to ensure that off-site infrastructure is in place before occupation. Failure to implement adequate phasing will not only ensure that strategic sites do not deliver a 50:50 modal split, but will add to the congestion already affecting existing residents.

MAC 75 and Monitoring Framework

1. I support the comments made by NWCG and St Fagans Community Council. In particular, that the LDP should include a phasing policy with the requirement for formal public consultation. Consultation with the local communities has been inadequate, both by Cardiff Council and developers.

2. I support the NWCG suggestion for a programme of monitoring as stated in their submission:

“...monitoring congestion on all key corridors, radial and arterial routes and in the City Centre by means of traffic and passenger counts, length of peak periods, travel times and queue lengths for both weekdays and weekends, with regular publication of comparative measurements for the same day/period in previous years. This work should be paid for by pooling contributions from developers with the work done by consultants appointed by Cardiff Council. Local communities, including Community Councils, could be involved in monitoring local congestion – it does not have to be solely down to Cardiff Council.”

Involving local communities will make an important contribution to improving consultation with residents.

3. OB1 EC19, EC20: I support the concerns expressed by St Fagans Community Council. Improvement objectives must be such that people will be persuaded to change their habits.

4. OB2 SO26: I agree with the comments made by NWCG.

5. I agree with the NWCG that the wording of the framework should require the Council not
only to ‘consider’ but to ‘consider and implement’ changes to the plan in support of the original objective.

6. I support the comments by NWCG, Mark Drakeford, AM, and Kevin Brennan MP regarding the need to give greater emphasis to the local community.

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.

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 (October 2015) is available on the Council website at: www.cardiff.gov.uk Hard copies are also available for public inspection during the consultation period at: 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 422
County Hall
Atlantic Wharf
Cardiff
CF10 4UW

Telephone: 029 2233 0983
E-mail: LDP@cardiff.gov.uk

Tests of Soundness

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<tr>
<th>Procedural Tests</th>
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<tbody>
<tr>
<td>P1</td>
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<tr>
<td>It has been prepared in accordance with the Delivery Agreement including</td>
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<tr>
<td>the Community Involvement Scheme.</td>
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<td>P2</td>
</tr>
<tr>
<td>The plan and its policies have been subjected to Sustainability Appraisal</td>
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<td>including Strategic Environmental Assessment.</td>
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<tr>
<th>Consistency Tests</th>
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<td>C1</td>
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<td>It is a land use plan which has regard to other relevant plans, policies, and</td>
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<td>strategies relating to the area or to adjoining areas.</td>
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<td>C2</td>
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<td>It has regard to national strategy.</td>
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<td>C3</td>
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<tr>
<td>It has regard to the Wales Spatial Plan.</td>
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<tr>
<td>C4</td>
</tr>
<tr>
<td>It has regard to the relevant community strategy/ies (and National Park</td>
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<td>Management Plan).</td>
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<th>Coherence and Effectiveness Tests</th>
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<tr>
<td>CE1</td>
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<tr>
<td>The plan sets out a coherent strategy from which its policies and allocations</td>
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<td>logically flow and/or, where cross boundary issues are relevant, it is</td>
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<td>compatible with the development plans prepared by neighbouring authorities</td>
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<td>CE2</td>
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<td>The strategy, policies, and allocations are realistic and appropriate having</td>
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<td>considered the relevant alternatives and/or are founded on a robust and</td>
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<td>credible evidence base.</td>
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<td>CE3</td>
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<td>There are clear mechanisms for implementation and monitoring.</td>
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<td>CE4</td>
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<td>It is reasonably flexible to enable it to deal with changing circumstances.</td>
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