Cardiff County Council
Local Development Plan 2006 - 2026

Additional Matters Arising Changes October 2015
Representation Form

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).

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**PART 1: Contact details**

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<th>Your/ your Client’s details</th>
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<tr>
<td><strong>Title:</strong></td>
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<tr>
<td><strong>Name:</strong></td>
<td>David Barnard</td>
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<td><strong>Job title: (where relevant)</strong></td>
<td>Clerk</td>
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<td><strong>Organisation: (where relevant)</strong></td>
<td>St Fagans Community Council</td>
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<td><strong>Email:</strong></td>
<td><a href="mailto:stfaganscc@aol.com">stfaganscc@aol.com</a></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:** David Barnard  
**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)

General Statement

St Fagans Community Council is a member of the North West Cardiff Group (NWCG), and in this capacity has contributed to the Group’s response. We wish to state that we fully support the comments made by the NWCG. We are submitting a separate response because of the importance we attach to the issues involved and to emphasise the strength of our support for NWCG comments. We have purposely not repeated all the comments made in the NWCG response but have confined our response to emphasising what we regard as the key points.

MAC 1 KP 3(A)

1. We stated at the Hearing that we support Cardiff Council's proposal for a Green Belt and object strongly to any change to that proposal. We believe Cardiff Council made strong and sound arguments in support of a Green Belt. We note that Cardiff Council have now given unanimous all party support in favour of a Green Belt. In doing this Cardiff Council is recognising the views of residents. At the Preferred Strategy Consultation 82% of the
Citizen Panel and 91.8% of the LDP Consultation supported a Green Belt. Given this, we object to the pressure being brought by Welsh Government to change from Green Belt to Green Wedge and the disrespect this shows to the residents of Cardiff.

2. Cardiff Civic Society provided evidence at the Hearing to show 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. The significant difference between Green Belt and Green Wedge is that the former is protected beyond the LDP period: Green Wedge protection ends with the plan period (Planning Policy Wales). This inevitably creates a degree of uncertainty that benefits no one. Any delay in implementing a new LDP (whether for Cardiff or the proposed City region) when the proposed plan ends will put the land at risk of development. The Green Belt offers protection for 50 years, giving time to consider Cardiff and the City Region’s future strategic sustainable development.

4. 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. It is illogical to speak of making Cardiff a world class capital city and then failing to give long term protection to a valued natural feature.

5. The Non-Technical Summary of the Final Sustainability Appraisal Report of the DLD (October 2015) effectively acknowledges the adverse impact to the Cardiff landscape by codes red for Landscape in Table 1 for Strategic Sites C-G. This will reduce the attractiveness and appeal of Cardiff, and makes it vital the Green Belt is implemented to prevent further irretrievable damage to Cardiff’s environmental heritage.

6. 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.

7. We support the argument presented by Cardiff Council at the Hearings that the Green Belt will help to reduce urban sprawl in the areas between Cardiff, Llantrisant and Caerphilly. These are areas with no possibility of viable public transport in the future. The proposed rapid transit system (Metro) will not serve the area. Development in areas lacking transport is not consistent with the objective of a 50:50 modal split.

8. We join NWCG in supporting the argument made by Mark Drakeford, AM and Kevin Brennan, MP that a Green Belt is consistent with the objectives set out within Planning Policy Wales, is essential to manage the urban area and is consistent with the policies of neighbouring authorities. We believe their submission makes their arguments convincingly and are not repeating the detail in our submission.

MAC 4 KP 1 Para 4.42

We strongly object to any increase, albeit slight, in housing provision. We repeat our previous argument that 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, even during periods of economic growth. We submit that Cardiff needs to concentrate on delivering sustainable development and not chase numbers that are unlikely to be achieved.

MAC 5 and KP 2

1. We support the comments made by NWCG,
MAC 8 and KP 6 Para 4.89-90

1. We repeat our comments at the hearing that the updated Infrastructure Plan (IP) should be included in the LDP so that its contents have Development Plan status. This has the significant benefit of making the IP subject to consultation and scrutiny. The IP is absolutely vital to the LDP's success. At the Hearing Cardiff Council repeatedly spoke of the IP as a "living" document. We do not disagree with this, but we believe that Cardiff Council is missing the key point. We agree that parts of the plan will evolve over time - timescales for some infrastructure will depend on the rate and actual level of house building. But the core infrastructure requirements for critical areas - transport, water, sewerage, etc. - are known now and will not change. Development in NW Cardiff will not be sustainable without a rapid transit system. This is not a "detail" to be added later, it is a given now. There should be no room for manoeuvre over what the Council term Category 1 infrastructure nor the deliverables for Category 2. Giving the IP Development Plan status removes uncertainty for all stakeholders.

2. The IP will be a meaningless document if it does not 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. Paras 4.89-90: We support Cardiff Council's new infrastructure categories but believe that the wording proposed is neither definitive nor clear. We remain concerned that the infrastructure issues have still not been adequately addressed and the wording proposed by the Council confirms this. There should be no doubt as to when "Category 1" infrastructure must be provided. We support the suggestion 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. We support the comments made by NWCG and are concerned that Cardiff Council is attempting to "water down" its commitment to a 50:50 modal split. There certainly seems to be a lack of clarity and inconsistency in the approach being taken.

2. There is no plan for achieving the 50:50 modal split that has been described as essential for the LDP to succeed: by definition this must mean that the LDP is unsound without the 50:50 modal split.

3. Cardiff is currently not achieving a 50:50 modal split. Developers are not required to deliver a 50:50 modal split from the strategic sites, and have stated at hearings that this will not be possible to achieve on sites, at least from the outset. Yet Cardiff Council has stressed the importance of embedding good habits upfront. This requires transport infrastructure to be in place before occupation. So why will the Council not commit to this in the LDP?

4. The 50:50 modal split applies to the whole of Cardiff. If strategic sites do not deliver the 50:50 split existing residents will need to change their habits. But there are no plans for achieving that.

5. Developers are keen to concentrate on on-site infrastructure but the critical issue is the off-site transport infrastructure. This cannot be left to developers' Masterplans. 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, with the consequent impacts on air quality due to more standing traffic. Congestion has an economic cost. Studies by numerous organisations, including OECD and CBI have estimated the cost of congestion as in excess of 2% of GDP. Cardiff
cannot afford not to tackle congestion - and we believe this must include requiring all new strategic developments to deliver a 50:50 modal split.

6. We strongly support NWCG objections to the new paragraph after the existing para 4.105: this undermines the LDP’s commitment for a 50:50 modal split for all journeys. This commitment was clearly repeated in the recent Hearings - and should be strengthened, not weakened.

7. Developers have already submitted planning applications for parts of strategic sites in NW Cardiff. These highlight the issues that we and the NWCG have raised, particularly with regard to off-site infrastructure. The proposed traffic measures are inadequate, and are based on inaccurate and misleading data: for example a traffic survey was conducted during July when traffic is known to be lighter than during school terms.

8. Cardiff Council should require developers to provide independently verified plans for how they will achieve a 50:50 modal split on all new developments and also how they will contribute to Cardiff’s objective of a 50:50 split on all journeys. If these plans are not provided their planning applications should be refused.

9. Cardiff will need statistically reliable data capture and city-wide transport modelling analysis to allow accurate monitoring. This must be independently verified and not rely on developers’ consultants. Developers should contribute to the cost of this work.

MAC 75 and Monitoring Framework

1. We support the comments made by NWCG.

2. We strongly believe that the LDP must include a phasing policy with the requirement for formal public consultation. We have stated at the Hearings that we do believe that consultation with the local communities has been inadequate, both by Cardiff Council and developers.

3. We 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.

4. OB1 EC19, EC20: While we support the comments from NWCG, we question whether an improvement of 1% is adequate. For a journey time of 30 minutes this requires an improvement of just 36 seconds over 2 years. We are not convinced that this will be enough to persuade people to change their habits.

5. OB2 SO26: We agree with Cardiff Civic Society’s suggestion that the flexibility sites’ trigger should be amended to read “if more than 13,910 dwellings are built between 2016 and 2026”. As it stands the target has already been achieved in terms of completions since 2006.

6. We welcome inclusion of direct reference to the Infrastructure Plan in the Monitoring Framework and agree with 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.

a. If build rates do not reach the levels anticipated in the plan, or infrastructure delivery does not keep pace with housing delivery, Cardiff Council must have a strategy to redraw plans in order to achieve the sustainability policies of the LDP. If sustainability cannot be delivered the whole plan is unsound.

b. As members of NWCG we confirm that our base position remains unchanged: houses should not be allowed to be built and occupied unless there is off-site and on-site infrastructure in place to support them.

7. We 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 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 be able to speak to all the points raised above and to participate in discussions on any points raised by other parties to this consultation.

The NWCG represents over 24,000 residents in NW Cardiff and has been an active participant and contributor to the LDP process to date.

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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