LDP Team, County Hall,
Cardiff CF10 4UW

Additional Matters Arising Changes Schedule

Objection to KP2(A) CARDIFF CENTRAL ENTERPRISE ZONE AND REGIONAL TRANSPORT HUB

- Central, public transport hub providing access to and interchange between rail network, the rapid transit and strategic bus corridors referred to in Policy T2, the city-wide bus network and the strategic cycle network;

Decisions made since the LDP was framed re. business development of Central Square means the transport hub will be unable to function as stated.

# police assessment that there is inadequate space to evacuate buildings in the event of a bomb threat

# Police assessment of security issues, pointing out that large demonstrations or terrorist attacks/bomb scares on the BBC may well require close-down of the rail (and bus stations)

# inadequate capacity to take the necessary rapid transit buses for 10 000 new city centre workers (100—150 per hour) in view of the current congested conditions, expected to worsen with the extra traffic to the planned offices etc.

# poor entrance and egress to the proposed new bus station, meaning congestion delays worse than the old bus station

# event-day closure of the proposed bus station

# impossibility of providing road capacity for rapid transit access to Central Square, seeing that the Council has approved plans for carparking access (and access to the Railtrack land with taxi-rank) from the east (by Gt Western Hotel)

# illegally high NO2 pollution levels in any bus station in confined space, enclosed by buildings

I therefore propose

a) deletion of rapid transit and/or strategic bus corridors from the central public transport hub.

b) adding regional coach and bus services, which are less critical on congestion time

In the reasoning, add that rapid transit buses would need to be accommodated south of the Railway Station and highway space allocated to bus-only lanes on the Penarth Road /Callaghan Square axis.
Objection to

- Provide a central cycle parking hub with associated facilities as an integral component of the regional public transport hub and of a scale befitting its regional and capital function;

This proposal is too specific, has not been subject to financial/business appraisal and inadequately consulted (with an invitation-only Forum run by Sustrans, an interested party only in late November).

The Council has a track-record of failure in hiving-off cycling functions to business; the Oy Bike scheme was disastrous, with the company taking £100k in each of two years and quitting with no assets left. Their joining charges were determingly high. When closing the scheme, the Council promised to come up with another, but did nothing. Nor did they draw lessons and attribute blame.

*I propose a reworded flexible clause (The Cycling Campaign will consider endorsing this by the Hearing)*

**Provide a central cycle hire and repair facility associated with public cycle parking for rail and bus/coach users near to the regional transport hub**

# The major need is for public cycle parking, which is not directly profitable (indirectly for rail/coach use)

# the second need is for a repair facility – in Bristol this is a pop-up factility (van in the square) run by a cycling cooperative whose costs are low, but who could never take on a commerciaql ‘hub’.

# The fees charged by commercial cycle hubs elsewhere has deterred use, Slough in particular had no takers in the first year

# Cardiff shows no inclination to subsidising an affordable ‘hub’, probably frightened to assess it; if figures were known, cyclists might well prefer the money to go for useful infrastructure and cycling promotion.

# the prescription “integral component” of the interchange overly restricts it to the commercial interchange, with its high cost space, yet the location of cycling facilities is not critical

# the planned segregated cycle-route on Wood Street is misconceived (many conflicting uses of this street) in view of many buses, business development and plans not to exclude cars, so poor for access to a ‘hub’ north of the rail station

# cycling repair and parking may well be better provided south of the station (displacing the carparking or on the Brains site), closer to the high density/high cycling design of future Dumballs Road housing.

# cycle hire facilities could be sited north or south of the station, but access to Cardiff Bay is easier from the south, with less trafficked or traffic free routes.

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MAC Policy T9 Cardiff City Region ‘Metro’ network

The Council will seek to facilitate the development of a future regional ‘Metro’ network of integrated public transport routes and services within Cardiff and connecting the city with the wider south east Wales region including the development and/or enhancement of the following on highway and off-highway infrastructure components:

This policy is clearly inadequate, in view of the Council’s failure to safeguard a Metro-tram station in and access to Central Square. It’s part of the approach that ‘waits’ for others to propose developments and even suppresses objections that public transport infrastructure has been way down in the pecking order and even omitted because of road-traffic and business interests. One example is a station at Ely Mill.

I propose deletion of the words “to facilitate” so as to make clear that the Council is required to positively seek funding, routes and infrastructure.

Second I propose adding “and stations” to subsections (i-iv). Probably (iii) should read tram routes, likewise (iv).

Max Wallis
Objections relating to the Monitoring Framework

**Monitoring framework** [OB1 EC14 KP2, KP6, KP8, T1-T8]

**LOCAL**

Achievement of 50:50 modal split for all journeys by 2026

Increase the sustainable travel proportion of the modal split by 1% per annum for each journey purpose:

Failure to achieve an annual increase of 1% for each journey purpose for two or more consecutive years

I object this differs from the defined objective ‘at least 50% of all trips on Cardiff’s transport network ... made by sustainable modes by the end of the Plan period in 2026’

First, it’s not clear if and how far “Cardiff’ transport network” includes Network Rail’s lines, and passengers travelling through Cardiff or just those alighting in Cardiff’s stations. Likewise, does it include the M4 and other trunk roads?

Second, “on Cardiff’s transport network” includes journeys made by residents outside Cardiff (~25% of jtw journeys), yet there are no proposals to survey these trips in the AskCardiff survey or elsewhere.

The AskCardiff figures are not fit for the purpose of assessing progress on the stated objective. As evidence, I cite annual figures provided in October 2015 by the Council to the Cycling Campaign:

They say they will use data from annual traffic counts for all modes, and mode split data for journeys to work from the Ask Cardiff Survey. The latest data are

**Figure 1. Central Area 12hr 2-Way Trends (5yr Rolling Averages), Cardiff Annual Surveys**
<table>
<thead>
<tr>
<th>Cycle Flows</th>
<th>Traffic Flows</th>
<th>Bus Patronage</th>
<th>Rail Patronage</th>
</tr>
</thead>
<tbody>
<tr>
<td>2004</td>
<td>2,990</td>
<td>148,500</td>
<td>56,900</td>
</tr>
<tr>
<td>2005</td>
<td>3,120</td>
<td>146,400</td>
<td>56,200</td>
</tr>
<tr>
<td>2006</td>
<td>3,270</td>
<td>142,000</td>
<td>56,600</td>
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<tr>
<td>2007</td>
<td>3,380</td>
<td>139,100</td>
<td>55,100</td>
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<tr>
<td>2008</td>
<td>3,390</td>
<td>135,100</td>
<td>55,800</td>
</tr>
<tr>
<td>2009</td>
<td>3,620</td>
<td>129,200</td>
<td>56,100</td>
</tr>
<tr>
<td>2010</td>
<td>3,810</td>
<td>123,300</td>
<td>56,600</td>
</tr>
<tr>
<td>2011</td>
<td>3,820</td>
<td>120,500</td>
<td>56,800</td>
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<tr>
<td>2012</td>
<td>3,940</td>
<td>116,900</td>
<td>57,000</td>
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<tr>
<td>2013</td>
<td>4,170</td>
<td>113,500</td>
<td>56,600</td>
</tr>
<tr>
<td>2014</td>
<td>4,460</td>
<td>110,300</td>
<td>55,300</td>
</tr>
</tbody>
</table>

**Figure 2. Travel to Work by Mode (Cardiff Residents). Ask Cardiff Survey**

<table>
<thead>
<tr>
<th>Car</th>
<th>Train</th>
<th>Bus</th>
<th>Bicycle</th>
<th>On Foot</th>
<th>Other</th>
</tr>
</thead>
<tbody>
<tr>
<td>2004</td>
<td>63%</td>
<td>2%</td>
<td>17%</td>
<td>4%</td>
<td>12%</td>
</tr>
<tr>
<td>2005</td>
<td>65%</td>
<td>2%</td>
<td>13%</td>
<td>4%</td>
<td>14%</td>
</tr>
<tr>
<td>2006</td>
<td>62%</td>
<td>2%</td>
<td>9%</td>
<td>6%</td>
<td>15%</td>
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<tr>
<td>2007</td>
<td>56%</td>
<td>6%</td>
<td>13%</td>
<td>6%</td>
<td>14%</td>
</tr>
<tr>
<td>2008</td>
<td>56%</td>
<td>4%</td>
<td>13%</td>
<td>6%</td>
<td>17%</td>
</tr>
<tr>
<td>2009</td>
<td>52%</td>
<td>5%</td>
<td>15%</td>
<td>7%</td>
<td>18%</td>
</tr>
<tr>
<td>2010</td>
<td>59%</td>
<td>5%</td>
<td>11%</td>
<td>6%</td>
<td>17%</td>
</tr>
<tr>
<td>2011</td>
<td>57%</td>
<td>5%</td>
<td>14%</td>
<td>6%</td>
<td>16%</td>
</tr>
<tr>
<td>2012</td>
<td>56%</td>
<td>6%</td>
<td>10%</td>
<td>10%</td>
<td>17%</td>
</tr>
<tr>
<td>2013</td>
<td>57%</td>
<td>7%</td>
<td>10%</td>
<td>8%</td>
<td>16%</td>
</tr>
<tr>
<td>2014</td>
<td>55%</td>
<td>6%</td>
<td>11%</td>
<td>11%</td>
<td>16%</td>
</tr>
</tbody>
</table>

The AskCardiff figures are insecure, as is shown by the %ages jumping up and down (for bus and bike); the bus patronage numbers in Fig 1 are pretty steady (till dropping in 2014). The officers’ response was to say the rolling average figures are “robust”, but no statistician would accept that the AskCardiff bus figures are close to the patronage smooth rolling average. If the officers wish to claim accuracy for the AskCardiff survey, let them compare with the individual year patronage.

**Why do the AskCardiff figures fluctuate and have biases**

The survey response rate is low ~15% (2500-3500) so people using sustainable modes (good!) may be over-represented; also east and west of the city centre appear to respond more.

The AskCardiff figures are not consistent with 10yr Census or SocialData/Sustrans

64% jtw by car (Census 2011) not the claimed 56.9% (Sustainable Modes: 43.1% 5-yr rolling av 2014)

The 11% above [12-13% of bicycle jtw- and all-trips are claimed] do not check with other data. The Manual Counts Central Area average ~ 8% by bike. SocialData/Sustrans has 2%, 6% jtw- and all-trips

The latter data include Penarth, a virtual suburb of Cardiff, so would differ from purely Cardiff but may be representative of the outlying green-field developments intended by the LDP. They are more reliable as more intensive a survey with reasonable response rate (~70%)

**Why are traffic flows so poor in respect of cyclists?**
Only 4% cyclists in central area traffic counts (above, Fig.1), implying 2% of j-t-w in central area including train and bus. That this is so low implies the counts miss the majority of j-t-w cycle trips. No trend is evident in jtw on foot in Fig. 2, though the text claims increasing walking by purpose.

The Council uses traffic survey points at junctions, which cyclists tend to avoid, as evident on their map Figure 14.10.2 [in response to Action Point 9 of Hearing Session 14].

False Target: achieve linear trajectory of 50 percent of journeys to work by sustainable travel*

The LDP monitoring goes for 50% for jtw trips, so NOT all-trips as in the definition. All-trips have smaller sustainable mode %age than jtw trips (see SocialData/Sustrans 34:66; 20% of all-trips are for work in that sample, 24% in Cardiff generally)

Cycling Target

OB1 EC16 [ KP2, KP6, KP8, T1-T8]
An annual increase of journeys made by bike for each journey purpose:
1) Work = 10.6% (2014)
2) Education = 9.5% (2014)
3) Shopping (City Centre) = 5.9% (2014)
4) Shopping (Other) = 5.7% (2014)
5) Leisure = 10.1% (2014)

The AskCardiff annual cycle fractions fluctuate more strongly than the bus figures: 6,10,8,11%. One can expect the separate journey purpose figures to be even less robust, so these baseline figures set in the LDP are unreliable to +/- 20-30%.

In no way are such figures useful for the year by year monitoring and 2-yearly action triggers.

Max Wallis
(personal and Cardiff Cycling campaign)
Cardiff Cycling Campaign, campaigns manager