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.

PART 1: Contact details

<table>
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<tr>
<th>Your/ your Client’s details</th>
<th>Agent’s details (if relevant)</th>
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<tbody>
<tr>
<td><strong>Title:</strong></td>
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<tr>
<td><strong>Name:</strong>  Mark Drakeford, AM for Cardiff West; Kevin Brennan, MP for Cardiff West</td>
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<td><strong>Job title:</strong> (where relevant)</td>
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<td><strong>Organisation:</strong> (where relevant)</td>
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<tr>
<td><strong>Address:</strong> Cardiff West Constituency Office, 395 Cowbridge Road East, Canton, Cardiff, CF5 1JG</td>
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<td><strong>Telephone no:</strong> 02920 223 207</td>
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| **Email:** Mark.drakeford@assembly.wales  
Kevin.brennan.mp@parliament.uk |
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.

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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)

Support/Object (Delete as appropriate)

Support/Object (Delete as appropriate)

Support/Object (Delete as appropriate)

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).

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)

We are going to take this final opportunity to reiterate a small number of points that we have made consistently during the LDP process, where the position has either changed or remains in discussion. The bulk of our response, however, focuses on the issue of the Green Belt.

We would begin by making the following observations:

- MAC 4 and KP 1 – We remain firmly of the view that the overall number of houses anticipated in the plan is too high. Ultimately, the levels of projected house building are not deliverable, leaving open the prospect of piecemeal development.

- MAC 5 and KP 2 – We restate our previous support for the proposal to swap Strategic Site E for Search Area B, for the reasons set out in our previous
consultation response.

- MAC 8 and KP 6 – The inclusion of greater detail on the proposed infrastructure is welcomed as, with the inclusion of site specific requirements in the plan as proposed in MAC 5, this does strengthen the council's commitment to ensure that infrastructure is delivered in a timely and coordinated manner. However, we are still of the view that the wording of the changes does not go far enough, and should be amended to require the council to ensure that essential/enabling infrastructure, both off- and on-site, is in place before housing developments on the strategic sites are occupied.

- MAC 75 and Monitoring Framework – We welcome the council's decision to include a direct reference to the Infrastructure Plan in the Monitoring Framework. However, the confidence of the public would be considerably strengthened if the wording of the framework required the council not only to 'consider', but to 'consider and implement' changes to the plan in support of the original objective. The area of particular concern to our constituents is that of transport - the sustainability of the plan rests on a significant shift in the use of public transport and active travel, and the council have now included additional detail within the Monitoring Framework that tracks this shift over time. For the plan to be sound, and for it to gain the confidence of our constituents, the council must provide assurance that it will be responsive to the rate at which this ambitious change in travel habits can be achieved. Similarly, the council should also be clear about the need to take action in circumstances where the build rates of new housing do not reach the levels anticipated in the plan, or where the delivery of infrastructure does not keep pace with the delivery of housing. It is vital that the council has a basis for rebalancing its proposals in favour of the sustainability policies of the plan, to which it has made a commitment throughout the plan's development. Our fundamental position remains unchanged: houses should not be allowed to be built and occupied unless there is the infrastructure there to support them.

- MAC 75 and Monitoring Framework – Furthermore, the Monitoring Framework does not make adequate reference to the democratic oversight of the plan, and we consider this to be deficient, considering the level of interest demonstrated by the active participation of so many individuals and community groups in the inspection process. A reference to the relevant council committees, to community councils, and to other interested parties, should be included as a minimum.

We turn now to the issue of the Green Belt and Inspector MAC 1 / KP 3.

We are very disappointed to see the change in this area from that originally espoused by the local authority.

We remain firmly of the view that a Green Belt is consistent with the objectives set out within Planning Policy Wales. The local authority's original proposals for a Green Belt would have secured an ability to:
• prevent the coalescence of large towns and cities with other settlements;

• manage urban form through controlled expansion of urban areas;

• assist in safeguarding the countryside from encroachment;

• protect the setting of an urban area; and

• assist in urban regeneration by encouraging the recycling of derelict and other urban land.

The key additional safeguards which a Green Belt as opposed to a Green Wedge policy, provides are:

• Firstly, that it fully reinforces the message to developers that only land identified for housing is available for that purpose.

• Secondly, it secures that position for the full lifetime of the plan, and beyond.

By contrast, a Green Wedge policy encourages developers to believe land not identified in the plan for building purposes might yet be made available to them and dilutes the length of time for which protection is available to less than the duration of the plan itself.

In more detail, we believe that:

• The planning applications that have been granted in the area covered by the proposed Green Belt are the result of the lack of an appropriate designation to protect the countryside within Cardiff’s boundaries. This is directly apparent to us from our work as representatives of the Cardiff West constituency.

• The inclusion of the Green Belt is a strategic decision for the local authority to make, and they do so in order to:

  o prevent the coalescence of Cardiff with the urban areas North of the local authority boundaries;
  o manage the urban form of Cardiff through controlling the city’s expansion;
  o protect the setting of the Cardiff urban area;
  o protect the countryside from encroachment;
  o assist in urban regeneration by encouraging the recycling of derelict and other urban land.

• The Green Belt designation would provide the stability necessary to allow for the long-term planning of initiatives to address climate change, promote biodiversity and to deliver landscape-scale green infrastructure. This is essential to enable the city to promote sustainable development and the wellbeing of its citizens.

• The Green Belt designation is entirely consistent with the underlying principles of the
LDP process – it is based on the protection of a highly prominent distinctive local feature, based on its importance to the community and the need to promote sustainable development. It does so more effectively than a Green Wedge designation for the reasons set out earlier in this submission.

- There is a need in planning policy to minimise the need for travel – the Green Belt designation encourages development within urban areas in Cardiff and neighbouring authorities (including encouraging re-use of urban land), and the position of the Green Belt in this case steers housing development towards key public transport routes along the North West corridor, thus minimising travel demand. Given our consistent belief that the LDP overstates the extent to which house building will be possible over its lifetime, there is no realistic prospect, we believe, that a Green Belt would lead to more intensive house building beyond the Green Belt boundary.

Finally, we also put on record our support for a series of further arguments which have been made by Cardiff Council and others in support of its original case for a Green Belt designation. These include the argument that:

- A Green Belt designation is appropriate in this case because it provides strategic management of urban form, it safeguards the setting of the city, and it covers a wide area along the urban boundary in a way consistent with environmental policies of neighbouring authorities. In contrast, a Green Wedge would be more appropriate if it was simply a means of safeguarding green spaces between settlements within the county boundaries, something not relevant in this case.

- Designations in neighbouring authorities that would border this area are consistent with a Green Belt designation, and those neighbouring authorities have made no objections to these proposals.

- If a Green Belt is not designated now, this could undermine the arguments for a Green Belt in the future if the ‘openness’ of the area is compromised by development. It is therefore in the interests of the present and future citizens of Cardiff for the local authority to make this designation now.
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.

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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 (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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