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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<tr>
<th>Your/your Client’s details</th>
<th>Agent’s details (if relevant)</th>
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<tr>
<td><strong>Title:</strong></td>
<td>Ms</td>
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<tr>
<td><strong>Name:</strong></td>
<td>Kay S.Powell</td>
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<tr>
<td><strong>Job title:</strong> (where relevant)</td>
<td>Planning and Conservation Advisor</td>
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<tr>
<td><strong>Organisation:</strong> (where relevant)</td>
<td>Llandaff Society</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: Kay S. Powell  
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)

The Llandaff Society fully supports the North West Cardiff Group response to the Further Matters Arising Changes (FMAC). Additional points of particular relevance to Llandaff are as follows:

MAC 10 50:50 Modal Split: Major planning applications already submitted for each of the North West Cardiff Strategic Sites promise a few extra buses, cycle paths and footways within the developments and bus-served Park and Ride (P&R) at Junction 33. Achieving the 50:50 aspiration will require tens of thousands of existing and new residents to use non-car modes. There have been major bus service cuts in the City in the past year and these have led to a further large fall in patronage as stated in the recent Hearing. The existing bus-based Park and Ride scheme in East Cardiff operates at a huge loss to the Council, and only caters for a few hundred cars each day. Adding another bus P&R will be a drop in the ocean. In the context of ever increasing car use and multiple non-central destinations, it is very risky to plan on the basis that there will be sufficient incentive from increased congestion for car users to switch modes.
unless there is a robust framework for action when that strategy falls. The Monitoring Framework proposed does not provide for this (see MAC 75 comments).

**MAC 10** NWCG argued in its submission on MAC that the terms used for the 2 categories of infrastructure should be revised to ensure clarity. The wording the 3rd line from the bottom of MAC 8 on page 18 should read "essential/enabling.." not ".essential, enabling." The last line of MAC 10 on page 22 also appears to indicate 3 categories of infrastructure provision; it should be amended to read ".. ‘Essential/Enabling infrastructure’.. rather than .. 'Essential' and 'Enabling infrastructure'..".

**APPENDIX 2** We also consider that the following should be added to the last line of the 1st para of the text in Appendix 2 re Policy KP2: “Part of the uplift in land value arising from the allocations in the LDP will contribute to the cost of strategic infrastructure following adoption of the CIL Schedule.”

**MAC 39 METRO:** We welcome the inclusion of a reference to Metro in T9. However, the proposed wording of Policy T9 “The Council will seek to facilitate.....” offers no certainty of delivery of a viable route and mode of the new link needed to serve development in North West Cardiff and adjacent areas of RCT. Examples elsewhere demonstrate that fixed track public transport to serve North West Cardiff will be vital to achieving the required 50:50 modal split. Thus T9 should match changes to KP2 and be re-phrased as "The 'Metro' will be developed comprising an integrated network of public transport routes and services within Cardiff and connecting ..... to include a fixed track link to north-west Cardiff linking to Rhondda Cynon Taf; .....".

Unfortunately, recent Council decisions do not give confidence that they can deliver an effective and integrated public transport network. The current regional transport interchange in Central Cardiff has been destroyed by grant of permission for an office block which has led to demolition (from 1/8/15) of the bus/regional coach interchange in Central Square, scattering of bus and coach termini, and major disruption to passengers interchanging with rail services for at least the next 3 years. And there is still no plan or timescale for delivery of a replacement.

**MAC 75 MONITORING FRAMEWORK:** OB3 EN14 specifies a trigger of more than the current 4 Air Quality Management Areas (AQMAs). With such a low bar there could continue to be dangerous levels of air pollution throughout the City including in Llandaff. Thus Cardiff Council is likely to continue to fail in its statutory duty to improve air quality. The European Commission has already warned the UK Government that air pollution is above mandatory levels in many of our cities and may impose fines if the situation does not improve. Despite the claims of developers and landowners we know from experience that housing and retail development always leads to more traffic congestion.

**APPENDIX 3 COMPLETE:** The “Response” section on page 94 in this Appendix does not provide for rapid and appropriate remedial action when monitoring reveals problems. We support a 3 phase “traffic light” system as put forward by the North West Cardiff Group.

Finally please note the spelling error on line 1 of 6.1 – for “principle” insert "principal"
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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