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>
<thead>
<tr>
<th>Your/ your Client’s details</th>
<th>Agent’s details (if relevant)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Title:</td>
<td>Mr</td>
</tr>
<tr>
<td>Name:</td>
<td>Richard Price</td>
</tr>
<tr>
<td>Job title: (where relevant)</td>
<td>Darren Parker</td>
</tr>
<tr>
<td>Organisation: (where relevant)</td>
<td>Barratt Homes</td>
</tr>
<tr>
<td>Address:</td>
<td>c/o Agent</td>
</tr>
<tr>
<td></td>
<td>Park House</td>
</tr>
<tr>
<td></td>
<td>Greyfriars Road</td>
</tr>
<tr>
<td></td>
<td>Cardiff</td>
</tr>
<tr>
<td></td>
<td>CF10 3AF</td>
</tr>
<tr>
<td>Telephone no:</td>
<td>02920 668662</td>
</tr>
<tr>
<td>Email:</td>
<td><a href="mailto:darren.parker@rpsgroup.com">darren.parker@rpsgroup.com</a></td>
</tr>
</tbody>
</table>

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: 25th November 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)

Inspector MAC1 Policy KP3 (A): Green Belt  Object

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).

C2, CE2 and CE4

Or as per the August 2015 LDP Manual:

Test 1: Does the plan fit? (i.e. is it clear that the LDP is consistent with other plans?)

Questions

• Does it have regard to national policy and WSP? - No
• Is it compatible with the plans of neighbouring authorities? - No

Test 2: Is the plan appropriate? (i.e. is the plan appropriate for the area in the light of the evidence?)

Questions

• Does it address the key issues? No.
• Is it supported by robust, proportionate and credible evidence? No.
• Can the rationale behind plan policies be demonstrated? No
• Is it logical, reasonable and balanced? No
• Is it clear and focused? No

*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 permanent nature of a Green Belt (Policy KP3(A)) has been presented as a key concern. The permanent nature of a Green Belt or the less permanent Green Wedge designation needs in the first instance to be considered in light of the evidence of need for any such designation. The need has to be justified prior to considering which of the designations would be necessary and the most appropriate.

PPW (7) states:

Both Green Belts and green wedges must be soundly based on a formal assessment of their contribution to urban form and the location of new development and can take on a variety of spatial forms.

Green Belts will not necessarily need to extend in a continuous band around an urban area.

When including Green Belt policies in their plans, authorities must demonstrate why normal planning and development management policies would not provide the necessary protection.

The Deposit LDP at page 8 summarises the Plan. The justification for the Green Belt is stated as The Areas to be kept free from development are made explicit avoiding the current climate of uncertainty created by not having an adopted Plan in place. Protected areas include the designation of Green Belt North of the M4 Motorway together with tight settlement boundaries policy county-wide and protection of river valleys and open spaces.

The Green Belt in summary is required as a result of the historic absence of a Local Development Plan. This gap will soon be filled. Consequently the need for the Green Belt as a result of uncertainty arising from the lack of a Plan will be resolved. In fact with a brand new plan and a plentiful supply of sites the development pressure upon the proposed Green Belt area that the Council has claimed anecdotally was the case should be even less.

The Council provided a schedule of the consequences of the uncertainty arising from the lack of a Plan. This was the detail to demonstrate why normal planning and development management policies would not provide the necessary protection. The normal planning and development management policies would be those within the City of Cardiff Local Plan (1996) and the Unitary Development Plan (2003) not approved or adopted. The schedule presented 71 approvals for 1 or more dwellings within the proposed Green Belt area. By extracting double counting (LBC and full consents), discharge of conditions, conversions and certificates of lawfulness the number of approvals for new build development was 13.
The schedule covered a 15 year period from 2000. During a period when the development plan coverage has been thin there is no evidence to suggest, even when the 5 year housing land supply has been deficient, that such uncertainty has resulted in a substantial amount of development. Quite the contrary a modest amount of development has been approved taking into account the circumstances on a case by case basis.

A Green Belt is not the only policy tool available to the Council to prevent the long term deterioration of this visually prominent land providing a strategic setting to the city. Many of the approvals as per the schedule submitted are conversions, extensions and replacements. These would as per PPW 4.8.16 be permissible in a Green Belt.

Given the evidence there is no immediate need to revise the status of this area especially when a new Plan is about to be set in place. By the time preparation of the next Plan commences the LDP will have been adopted for about 5 years. This would be the juncture to revisit the necessity for a Green Wedge designation.

The Green Wedge designation could hinder the effective use of previously developed land and immediate surroundings. A rigid blanket like approach to such a large area could stifle appropriate development that would make a beneficial contribution to the vitality and vibrancy of the countryside. Besides need any Green Wedge designation should thoroughly take into account:

- prevention of coalescence;
- small scale opportunities for development that will not have a greater impact on the openness of the Green Wedge such as Creigiau Nurseries (candidate site number AS(N)1);
- manage the urban form taking into account the Strategic Site designations north of the M4 motorway. A physical barrier for KP3(A) is being breached for SSD and SSE;
- designations in the surrounding area outside the Cardiff LDP boundary;
- the function of existing settlements such as Creigiau, Pentyrch and Morganstown;
- quarrying works and minerals protection areas and;
- a comprehensive cross boundary landscape and visual assessment of the setting of Cardiff.

At this juncture, it is considered that a Green Belt designation in Cardiff creates obvious cross-boundary anomalies or direct policy conflicts with land immediately to the North of the proposed Green Belt within Caerphilly and Rhondda Cynon Taff. Within Caerphilly, the Caerphilly Mountain Area is all outside the settlement boundaries and a combination of Special Landscape Area and Visually Important Local Landscape designations apply across the whole area. Within Rhondda Cynon Taff, land to the North of the proposed Green Belt carries a Special Landscape Area designation. Future LDP Reviews for these areas or any Strategic Plan which may be introduced in future years could consider the application of a Green Wedge policy. The designation of a Green Belt or Green Wedge now would be premature.

At para 4.73 the LDP states The tightness of Cardiff’s administrative boundaries to the urban area to parts of the West and East, limits scope for a Green Belt designation in these locations. For example, the visually prominent Llwyn Ymmer Escarpment is located in the Vale of Glamorgan but is protected by a Special Landscape Area designation in the Vale of Glamorgan Development Plan. The Deposit Plan goes onto to acknowledge that the SLA designation provides an element of protection to Cardiff’s setting to the West. Similar policies prevail in Caerphilly and Rhondda Cynon Taff.
Conclusion

1. There is no demonstrable need for a Green Belt or Green Wedge designation. Normal albeit significantly enhanced planning and development management policies will provide the necessary protection upon adoption of the LDP.

2. Any future review needs to be conducted on a more comprehensive and analytical basis taking into account all relevant factors.

3. If a Green Wedge is applied the boundary should be reconsidered and/or it should include a provision to support the use of previously developed sites and adjacent land.

Policy KP3(A) to be amended as follows:

In order to strategically manage the urban form of Cardiff and to protect the setting of the urban area, a Green Wedge is proposed on land North of the M4 as shown on the Proposals Map. Within this area greenfield development which prejudices the open nature of this land will not be permitted. Positive biodiversity, landscape, climate change mitigation and informal recreational management and enhancement measures will be encouraged in this area to further enhance the long term role of the area as a key natural resource benefitting the city. The reuse of previously developed sites and associated land would be appropriate development if they maintain the openness of the Green Wedge and do not conflict with the purposes of including land within it.
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. □

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

<table>
<thead>
<tr>
<th>Procedural Tests</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>P1</strong></td>
<td>It has been prepared in accordance with the Delivery Agreement including the Community Involvement Scheme.</td>
</tr>
<tr>
<td><strong>P2</strong></td>
<td>The plan and its policies have been subjected to Sustainability Appraisal including Strategic Environmental Assessment.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Consistency Tests</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>C1</strong></td>
</tr>
<tr>
<td><strong>C2</strong></td>
</tr>
<tr>
<td><strong>C3</strong></td>
</tr>
<tr>
<td><strong>C4</strong></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Coherence and Effectiveness Tests</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>CE1</strong></td>
</tr>
<tr>
<td><strong>CE2</strong></td>
</tr>
<tr>
<td><strong>CE3</strong></td>
</tr>
<tr>
<td><strong>CE4</strong></td>
</tr>
</tbody>
</table>