



**Cardiff County Council**  
Local Development Plan 2006 – 2026

**Deposit Plan Comment Form**

Office Use Only
Date Received 18/11/2013
Representor Number 1882.

Please use this form to make your comments on the Deposit Plan. If you are unable to complete the online form you can photocopy this form or download copies from the website at [www.cardiff.gov.uk](http://www.cardiff.gov.uk)

All completed forms should be returned by **midnight Tuesday 26 November 2013** to: LDP Team, Room 227 County Hall, Atlantic Wharf, Cardiff, CF10 4UW or email [LDP@Cardiff.gov.uk](mailto:LDP@Cardiff.gov.uk)

**PART 1: Contact details**

Your/ your Client's details		Agent's details <i>(if relevant)</i>
Title:	MR	
Name:	S P MONAGHAN	
Job title: <i>(where relevant)</i>		
Organisation: <i>(where relevant)</i>		
Address:		
Telephone no:		
Email:		

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:	Date: 15 Nov 2013
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## 2b Alternative Sites

The Council must consult on all site allocation representations received which seek to change the Deposit Plan by either adding a new site, altering or deleting a proposed site. This will ensure that all information related to site allocation representations has been treated the same as the Deposit Plan.

**It is therefore essential that you clearly indicate if you are submitting a site allocation representation below.**

Are you proposing to: [Tick all that apply]

Add a new site

Alter a proposed site

Delete a proposed site

If you want to suggest a new site please attach a site plan identifying the boundaries of the site you wish to be included in the Plan with a red line and provide details of its proposed use. On this plan please also identify other land in your ownership using a blue line.

If you are proposing a new site it should be accompanied by a sustainability appraisal. The appraisal should use the same sustainability framework as set out in the Council's Sustainability report on the Deposit Plan. This information must be consistent with the scope and level of detail of Cardiff's sustainability appraisal.

It should also refer to the same baseline information in identifying the likely significant effects of the revised policy or new site.

Please follow the link below to view the Council's Sustainability Appraisal.

[www.cardiff.gov.uk/localdevelopmentplan](http://www.cardiff.gov.uk/localdevelopmentplan)

***If you want to add, amend or delete a site, did you submit the site as a Candidate site? If so, please give the Candidate Site name and reference (if known). The Candidate Site Register can be viewed at:***

[www.cardiff.gov.uk/localdevelopmentplan](http://www.cardiff.gov.uk/localdevelopmentplan)

Site name	SOUTH OF CREIGIALL AND NORTH OF JUNCTION
Site Reference	33 ON M4 SITES E AND D RESPECTIVELY ON LDP

**The Local Development Plan (LDP) in its current form is not “fit for purpose”, as it fails to address key issues.**

The proposed scale of house building is out of proportion to the actual future needs of Cardiff.

**There is no provision for development to be undertaken in Phases, to prevent piecemeal and haphazard construction.**

The “brown field” sites currently identified should be used before any of the identified “green field” sites are. There is also an underestimation of the number of “brown field” sites that will become available in future years; the contribution that the land freed up by these windfalls should be used as part of the overall housing requirements.

**Again, unless there is a phased release of land for building, there is a risk of developers cherry-picking the best sites, which is likely to result in strains on the present transport and infrastructure arrangements, as improvements to these are unlikely to have been implemented beforehand.**

The LDP makes no mention of the renovation of empty houses in Cardiff as making a contribution to the overall number of houses identified as being required in the future.

**The present infrastructure (roads, transport, energy and sewerage provisions, schools, health facilities such as doctors’ surgeries and local hospitals, even policing resources) are barely able to cope with present needs, yet a very substantial extra burden is to be imposed through the LDP.** The primary school in Creigiau already causes congestion at start and finish times; it is already difficult to obtain appointments within a reasonable timescale at the local GPs’ surgery; the two major routes into Cardiff on the west of the city, the A4119 and M4/A4232, already have significant “pinch points” (Llandaff in the case of the former and Junction 33 and Culverhouse Cross for the latter), causing congestion at busy times: Creigiau isn’t even currently served by Cardiff Bus! Without substantial improvements to roads and transportation measures before development, there is a high probability of gridlock occurring at peak times.

The area north of Junction 33 of the M4 (Area D on the LDP map) does not include any indication how this would link to the existing road network; we are only informed that this development (including a new primary school) would not be connected to the M4 i.e. it would most likely be accessed from the A4119.

The LDP appears to propose significant housing development to the west of the city, with commercial and industrial development (i.e. employment generation) to the east, without addressing the problems of travelling between the two areas on an already busy M4. **The LDP, however, anticipates substantial travel inwards towards the City Centre, along a Rapid Transport Corridor (RTC), which is not, however, consistent with the areas expected to generate most jobs.** I note that there is no proposal for a station at Creigiau on the RTC. The station(s) on the RTC shown north of the M4 have a Park and Ride facility attached; unfortunately, the main access to this would be by an already congested M4 – or through the nearby new estates. No other major road access is shown on the LDP.

The overarching transport policy appears to revolve around access to the City Centre via the RTC (the spokes of a wheel), rather than any movement around the circumference (around the edge of the wheel), thus presuming that this system will i) be built and ii) be cheap enough for people to use in preference to their cars. In reality, it is probable that the RTC will only be successful if Cardiff achieves the road gridlock its Council appear to favour – and will only be constructed after this gridlock occurs, if at all.

Regarding the route of any RTC, it would be far better to use the line of existing old railway lines north of the M4, rather than use green field land, as i) most of the route has not been built on and ii) the old railways directly served the areas that the LDP proposes to development (e.g. Creigiau).

**The infrastructure improvements to transport and other services must be in place before any significant development is allowed.** This then raises the important question: “**How is this to be funded?**” Paid for by the developers or by local people through an increased Council Tax? I note that Cardiff Council is closing libraries as a cost-cutting exercise! ***It would seem that the RCT is a theoretical concept only, purely to help sweeten the LDP, and is highly unlikely to materialise.***

The LDP also fails to consider the plans of neighbouring councils, such as the Vale of Glamorgan (who have proposals for a development at the old Bosch site near Junction 34 of the M4), Rhondda Cynon Taf and Caerphilly, which are very likely to affect routes into Cardiff significantly. Planning needs to be done on a regional basis, rather than a purely local one, to ensure that the affects of development are fully integrated and not likely to enhance problems. This would appear to require substantial input from the Welsh Assembly to facilitate and steer.

The scale of the LDP introduces specific problems for Creigiau, which has historically been a separate entity to Cardiff. The scale of the development in the west of the city would produce a conurbation that would encompass the village and rob it of its present identity. I believe that Creigiau boasts a high concentration of Welsh speakers and has a thriving Welsh section in the local primary school. It is highly probable that the scale of development proposed by the LDP would dilute the “Welshness” of the village as it became little more than another suburb of Cardiff.

**It would seem that the LDP has not addressed the requirements of Technical Advice Note 20 (TAN 20), which specifies that an assessment must take into account the needs of the Welsh language where this is an integral fabric of the community.**

The LDP makes provision for a Green Belt; I note that most of this is centred on high ground which would not provide much suitable land for development. **The overarching principle of a Green Belt is, however, to protect countryside (“green fields”) from urban sprawl and, taking this into account, it would sense to extend the area of Green Belt to include land north of the M4 in west Cardiff.** Even a cursory viewing of the map of the Development Plan would show that the Green Belt finishes abruptly, short of Creigiau. Continuation of the Green Belt westward, encompassing the village of Creigiau, would form a complete “green boundary” for Cardiff. This measure would also relieve the impression that the whole area of Cardiff from Fairwater to Creigiau is to become a “concrete jungle”, whereas at present it provides Cardiff’s western rural aspect.

The LDP accepts that building on “green fields” will have an environmental effect and cause an increase in air pollution (attributable in no small part to the high numbers of cars associated with the new households). A logical extension of the designated Green Belt would help to ameliorate this unwanted impact.

## Your Comments

Please state your representation, including how you would like to see the Plan changed, with your reasons. Do not forget to enclose any relevant documentation (for example a sustainability appraisal for an alternative site) with this form.

SHEETS 1 AND 2  
ATTACHED

## PART 5: Guidance Notes

1. The Planning and Compulsory Purchase Act 2004 states that the purpose of the Examination of a Local Development Plan (the Plan) is to consider whether it is “sound”. This means that anyone who wants to comment on or object to the Plan should seek to say how it is unsound and what is needed to make it sound. Sound may be considered in this context within its ordinary meaning of “*showing good judgement*” and “*able to be trusted*”. To assess the Plan 10 tests are used. These tests are set out in Part 6 of this form.
2. Where you propose a change to the Deposit Plan it would be helpful but not necessary, to make clear which test(s) of soundness you believe the Plan fails. The tests are in 3 groups – ‘procedural’ (2 tests); ‘consistency’ (4 tests); and ‘coherence and effectiveness’ (4 tests). If you wish to comment on the way in which the Authority has prepared the Plan, it is likely that your comments or objections would fall under one of the procedural tests. If you wish to comment on or object to the content of the Plan, it may help to look at the ‘consistency’ and the ‘coherence and effectiveness’ tests.
3. Failing to identify a test will not mean that your comments will not be considered, providing it relates to the Plan (or part of the Plan) and it is clear what change(s) you are seeking. You should include all your comments on the Plan and set out your full case on the form, using accompanying documents where necessary. If you seek more than one change and consider that the Plan fails to meet more than one test of soundness it is not necessary to complete separate forms. It would help if you use separate forms if you wish to make comments objecting to part of the Plan and in support of other parts of the Plan, but again only one form is necessary to express support for different parts of the Plan.
4. Where a group shares a common view on how it wishes the Plan to be changed, it would be helpful for that group to send a single form with their comments, rather than for a large number of individuals to send in separate forms repeating the same point. In such cases the group should indicate how many people it is representing and how the representation has been authorised.

