

# Cardiff County Council

Local Development Plan 2006 – 2026

## Deposit Plan Comment Form

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:		
Name:	Helena Fox	
Job title:	Clerk and Proper Officer	
Organisation:	Radyr & Morganstown Community Council	
Address:	Old Church Rooms, Park Road, Radyr, Cardiff CF15 8DF	
Telephone no:	02920 842213	
Email:	<a href="mailto:clerk@radyr.org.uk">clerk@radyr.org.uk</a>	

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: November 26 2013
---	------------------------

## Part 2: Commenting on the Plan

The Cardiff Local Development Plan (LDP) will be examined by an independent Inspector appointed by the Welsh Government.

It is the Inspector's job to consider whether the Plan is sound. There is no legal definition of 'sound' but in this context we use its ordinary meaning of 'showing good judgement' and 'able to be trusted'.

The questions or 'tests' which the Inspector will consider in deciding whether the Plan is sound are in Part 6 of this form. It may help you to read them and the guidance in Part 5 before you tell us what you think of the Plan and its policies.

Before you set out your comments in detail, it would be helpful to know whether you think the Plan is sound, or if you think that all or parts of it are unsound and need to be changed.

I think the LDP is sound

I think the LDP is unsound and should be changed

If you think the plan does not meet one or more tests of soundness (see Part 6), it would be helpful if you could indicate here which test(s) you consider it does not meet. Please note if you do not identify a test it will not mean your comments will not be considered.

Coherence and Effectiveness : CE1-4 (P2), and Implementation and Monitoring : CE3. To meet these tests:

- A There must be a sustainable transport strategy that complies with Cardiff's sustainable transport policy before development starts.
- B There should be clear proposals to show how the required infrastructure could be substantially in place before development starts
- C There must be details of how sustainable transport will be achieved. At present there is no robust evidence that essential transport infrastructure can be provided without which the plan cannot be regarded as sound.

### 2a Which part(s) of the Plan are you commenting on?

If you want to add a new policy, paragraph or text, please set out clearly in Part 3 where you think it should go in the Plan.

#### Policy number(s)

- Deposit LDP
- Background Technical Paper No 5 :  
Transportation
- Transportation Technical Paper  
(Background Paper 12
- Infrastructure Plan

- Masterplanning Framework (Paper 16)
- Summary of Cross-boundary Working (Paper 17)
- Final Sustainability Appraisal Report
- Cardiff Capital Region Metro Impact Study October 2013
- Arup North West Study Report
- Masterplanning Site Specific Principles for Site C: North West Cardiff
- SEWTA Rail Strategy Final Report March 2013
- Appendix D: NW Corridor Study Report no maps

(and/or)

**Paragraph or section number(s)**

(and/or)

**The Proposals Map** (please tick ✓) ✓

(and/or)

**Add a new Policy**

(and/or)

**Add a new paragraph or text**

## 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)

<b>Site name</b>	
<b>Site Reference</b>	

### **Part 3: Your comments and suggested changes**

Please set out your comments below using additional sheets as necessary.

If you want changes made to the Plan, please be specific. For example, if you want new text added, please set out the new text and explain where it should go in the Plan.

**If you want changes to the Plan, we will assume you do not consider the Plan to be sound.** However, please note that it is not the role of the Inspector to make an acceptable plan better.

If you do not consider the Plan to be sound and that it should be changed, please explain clearly why you think the changes are needed. If you think a change is needed for the Plan to meet one or more tests of soundness, please tell us which one(s).

Your comments should be set out in full on this form. This will help the Council and the Inspector to understand the issues you raise. You will only be able to submit further information to the Examination if the Inspector invites you to address matters that he or she may raise. Please note that the Inspector will not have access to comments you may have made in response to previous consultations, **you cannot rely on submissions made at previous consultation stages as the Inspector is not bound to consider them.**

If you seek more than one change and consider the Plan fails to meet more than one test of soundness it is not necessary to complete separate forms. However it would be helpful if you used separate forms if you wish to make comments both objecting to and supporting the Plan.

### **Submitting Additional Information**

Please tick this box if you have submitted additional material to support your comments. If submitting additional material please supply both an electronic and paper copy.

1. **TPA Transport Appraisal : December 2012 in response to Preferred Strategy**
2. **TPA Transport Appraisal update : November 2013 in response to Deposit LDP**
3. **Joint letter from Cardiff Community Councils**
4. **Joint letter from NW Cardiff Group**

## **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.

### **1. Introduction**

- 1.1. We appreciate the aims and vision of the LDP and accept that Cardiff needs an LDP to grow and sustain its major economic role as the capital city. We want that development to improve the quality of life for existing and new communities.
- 1.2. We support the Masterplanning approach and look forward to being consulted on Strategic Site C where our local knowledge can be a positive contribution. We welcome the inclusion of initial information on schools, health care and other community facilities and the protection of woodland and open space.
- 1.3. We support the proposal from Cardiff Civic Society to treat the strategic sites in NW Cardiff as a new town with all the legislative support that that would bring.
- 1.4. Our concerns about the LDP involve its phasing, infrastructure and sustainability. Having read and compared the many policy documents and reports, it is clear that phasing and infrastructure are key to successful implementation of a sustainable LDP and to the development of the strategic sites in particular. The Deposit LDP (DLDP) has not identified phasing requirements for any of the strategic sites and without this, new and existing communities will be left incomplete, poorly functioning and unsustainable.
- 1.5. We have serious concerns about the DLDP which can be summarised as:
  - 1.5.1. the transport strategy cannot provide sustainably for the scale of development proposed in North West Cardiff;
  - 1.5.2. the housing is unlikely to be delivered in the 13 years remaining of the current plan period and could well result in an unsustainable pattern of development;

- 1.5.3. the plan's details on new transport infrastructure required by the scale of development are vague, lack an adequate evidence-base and provide no certainty of delivery;
- 1.5.4. the apparent reliance on bus rather than rail transport does not solve the existing, let alone future, road problems.

## 2. Infrastructure : overview

- 2.1. In a recent BBC4 television programme (*Dreaming the Impossible: Unbuilt Britain: Glass Houses*) the architect Norman, Lord Foster said, "The most important thing about a city, the most important thing about the way people come together, is infrastructure. The infrastructure of a city is infinitely more important than the individual buildings. Think of it as the urban glue that binds the buildings together. It's the quality of the infrastructure - the public spaces, the boulevards, the bridges, the public transport, the squares - that's the experience that we, whether we live in the city or whether we visit it, carry with us; that determines the quality of life."
- 2.2. The DLDP makes many references to Cardiff's quality of life. The LDP vision, as set out in the ten year 'What Matters' Strategy (2010-2020) is that 'by 2020 ... Cardiff will be a world class European capital city with an exceptional quality of life and at the heart of a thriving city-region'.
- 2.3. That is an exciting and laudatory aspiration. It cannot happen without delivering an equally aspirational infrastructure which must also be realistic and achievable.
- 2.4. We know that the funding for big infrastructure projects is complex and cannot be wholly Cardiff Council's responsibility. Now that the Welsh Government has been granted borrowing powers from 2016 to increase capital investment and will have the power to levy stamp duty, it will be in a stronger position to fund and support regional infrastructure plans.
- 2.5. Developer contributions to infrastructure are an essential element of the complex funding. An ineffective infrastructure plan will create congested, poorly serviced areas of Cardiff where people do not want to live and developers do not want to build.
- 2.6. The document Applying Lessons Learnt in England to the Production of Local Development Plans, Wales PINS, July 2010 states, 'It is essential that the key infrastructure elements on which delivery of the strategy is dependent are embedded in the LDP itself'. We are concerned that the DLDP does not meet this recommendation and does not, therefore, answer the question, 'How does the LDP advance the delivery of needed infrastructure?'
- 2.7. We are convinced that development in the NW Cardiff strategic sites should be delayed until the funding is in place for supporting infrastructure and the Rapid Transport Corridor scheme is delivered. The proposal to establish temporary bus links is inconsistent with the clear evidence of the current road system's capacity.

## 3. Phasing : overview

- 3.1. We are concerned that the timing of the LDP process risks being out of alignment with the development of SE Wales and the Cardiff city region.
- 3.2. The DLDP references the coming regional approach but does not include explicit planned provision to cater for the transitional period that makes sense in a sub-regional context.

- 3.3. We ask that development of the strategic sites in NW Cardiff be delayed and phased to align with the coming regional plans, or, if that is not possible, phased so that housing is not occupied until a sustainable rapid transit service is provided.
- 3.4. The Welsh Government accepts now that a regional approach is needed, illustrated by the £62m budgeted for Cardiff Capital Region Metro over the next three years as part of a new integrated public transport system.
- 3.5. The Ministers for Housing and Regeneration and for Economy, Science and Transport have both confirmed that a cross-boundary regional approach is needed.
- 3.6. The Metro, the Planning Reform and Planning Consolidation Bills and future rounds of European funding emphasize the importance of planning strategically for the whole of the new Cardiff city region.
- 3.7. The Cardiff Capital Region Metro Impact Study October 2013 states that 'Of all the Metro interventions proposed, the project to connect Cardiff Bay via the City Centre to NW Cardiff and Llantrisant/Talbot Green has been identified ... as the highest priority'. The scheme affects five strategic development sites, will enhance regional connectivity and enable the sustainable expansion of Cardiff. The study estimates it will cost £400M, and could be complete by 2022, bringing potential economic benefits from jobs and construction of £1.6Bn by 2030.
- 3.8. The South East Wales Economic Forum reported that the Metro is the 'flagship' and 'backbone' of the city region with businesses concerned that progress is slow. The new South East Wales City Region board has called for a 10 year investment plan in people, transport and places.
- 3.9. The LDP should embrace this huge opportunity by carefully and strictly phasing development to enable strategic sites to work with and benefit from the Metro and other regional initiatives.
- 3.10. We have demonstrated through our transport appraisals by Transport Planning Associates (TPA) (attached) that the existing road network in NW Cardiff cannot accommodate the traffic that the strategic sites will generate. Any resident will corroborate that and many have told us how concerned they are about this issue. Cardiff Council officers accept that there is almost nothing that can be done to improve local roads in Radyr & Morganstown, Llandaff and St Fagans.
- 3.11. The obvious solution is to improve public transport, to take people out of their cars and to create a system that is fast, convenient and competitively priced.
- 3.12. We support the idea of Cardiff Civic Society (endorsed by Mark Drakeford AM and Kevin Brennan MP) that five-yearly assessments of the phasing are made so that development takes place at a rate appropriate to the economic and social needs of the time rather than being tied to an out-dated schedule.
- 3.13. This is a time for bold planning, for looking 50 or 100 years into the future. To miss such an opportunity due to the constraints of the time line of the LDP would not be acting in the best interests of Cardiff's population, now or to come.

#### **4. Inconsistencies between Deposit LDP documents**

- 4.1. We are extremely concerned that the DLDP does not present a consistent case when it is read in conjunction with the Final Sustainability Appraisal Report (SAR), Transport Plan and Infrastructure Plan. The SAR notes at its points 1.10 and 9.5 that the language of the DLDP leaves the effectiveness of enlightened policies uncertain. We agree.

4.2. In the Preferred Strategy it was explicit that infrastructure must be in place before development started. In the DLDP that has been weakened and replaced with 'timely provision' which, in the context of a plan of this magnitude, is close to meaningless. Yet there is a commitment in the Masterplanning Site Specific Principles for Site C: North West Cardiff to 'ensure frequent public transport provision is in place prior to residential occupation of the site'. If there was a dispute about delivery of an infrastructure project, which policy document has priority? We consider that reliance on subsequent assessment and data to resolve the provision of elements essential to key policy means that the plan clearly fails to meet the soundness test.

4.2.1. It is vital that this wording is strengthened following discussions with the Welsh Government, SEWTA, adjacent unitary authorities, Network Rail, transport operators, and landowners so that the final LDP provides greater certainty.

4.3. The SAR asks in Table 8.2 for a segregated bus or tram/railway line to the city centre from NW Cardiff to be in place before the first house on any part of the site is occupied. This links to Policy KP8 of the DLDP on Sustainable Transport to achieve a 50:50 modal split. On page 67 of the SAR it states that "The key sustainability aim of reducing the need to travel remains as DLDP Objective 1(j) (p28) but there is no policy or supporting text explicitly directed to achieving it."

4.4. The Transportation Technical Paper (Background Paper 12) concludes (6.1.3) that all major development sites will need to be supported by significant new transport infrastructure and improvements to existing transport facilities in advance of beneficial occupation but the DLDP refers to 'timely provision'. This paper refers to the electrification of the S Wales Valley Lines as a basis for a future Cardiff Metro network by 2020 but the Masterplanning Framework (Paper 16) has no mention of the Metro.

4.5. The Infrastructure Plan makes clear that there are huge existing commitments for capital investment in other parts of south-east Wales and we have referred to the regional approach earlier. The scale of the funding needed to deliver the infrastructure for NW Cardiff suggests that it cannot be done without significant private sector funding. None of the preparatory transport studies has a clear recommendation for public transport and a lot more work needs to be done before a viable funded project stage is reached for any of these. The Infrastructure Plan refers to the Metro only once (in relation to park and ride sites) yet the Metro in NW Cardiff is seen as a major priority. Further work is needed to reflect the conclusions of the Metro report in the LDP.

## 5. Deposit LDP Document

### 5.1. Summary of DLDP

#### 5.1.1. 4 : Bringing forward new infrastructure

5.1.1.1. Second bullet point : The phrase 'timely provision' of new infrastructure is too loose and is a significant weakening from the Preferred Strategy which stated that infrastructure should be in place before development starts. It is also at odds with the third bullet point.

5.1.1.2. We suggest that the point read : *The Plan requires the planned phasing of development to enable contemporaneous provision of new infrastructure including community facilities, transportation and other services.*

5.1.1.3. The phrase 'timely provision' should be qualified in all references to infrastructure throughout the Deposit LDP so that, in each case, implementation clearly matches development.

5.1.2. 8 : Respecting Cardiff's environment and responding to climate change : We support the inclusion of a Green Belt.

5.1.3. 9 : Main changes since the Preferred Strategy

- 5.1.3.1. We are pleased at the overall reduction in housing numbers but concerned that all the flexibility allowance is earmarked for NW Cardiff. We do not want this to be released prematurely before the need is demonstrated. We hear that Plymouth Estates are already discussing applications for this 'overflow' land before the LDP is adopted.
- 5.1.3.2. We are concerned by the lowering of the percentage of affordable houses on both greenfield and brownfield sites. We understand that the 'viability of affordable housing schemes' refers to the cost to developers of developing different sites rather than to the need for affordable housing in specific areas. This is a lost opportunity to meet more of the need for affordable housing in Cardiff and does not reflect the range of profitability of different sites.
- 5.1.3.3. Cardiff's previous completion rates were 1,450 new dwellings/year between 2001-2012 with only 1,186 between 2007-2012 and a maximum of 2,368/year in 2006-07. The Deposit plan gives a completion rate of 2,055 dwellings/year. With the LDP running late this leaves some 24,000 dwellings (strategic and non-strategic sites, windfall assumptions and consented but not started at March 2013) to be delivered in the last half of the plan at a rate of, say, 2,400/year. This is strong evidence in favour of carefully phased development.

## 5.2. LDP Vision and Objectives

- 5.2.1. 3. To deliver economic and social needs in a coordinated way that respects Cardiff's environment and responds to the challenges of climate change : 3e : We support the phasing of development so that brownfield sites are completed before greenfield sites start. This will allow any adjustment for changes in demand.

## 5.3. KP2 : Strategic Sites

- 5.3.1. Phase release of housing land in the North West Cardiff so that it follows substantial completion of the transport and other essential infrastructure needed to serve the new population. These should be subject to phasing, eg
  - 5.3.1.1. KP2: STRATEGIC SITES : Strategic Sites are allocated as set out below to help meet the need for new dwellings and jobs ...*and will be phased to ensure that major transport infrastructure required to serve the area is substantially complete before occupation of the first houses* (additions in italics).
  - 5.3.1.2. We understand that Plymouth Estate, owners of Strategic Site C, are already asking for job numbers to be reduced from the 3,000 set out in the DLDP. We are concerned that if more jobs are sited in the east and centre of Cardiff, this will increase commuting traffic from the north west.

## 5.4. KP4 : Masterplanning Approach

- 5.4.1. See our separate response to the Masterplanning Framework

## 5.5. KP6 : New Infrastructure

- 5.5.1. This includes the phrase 'timely provision' to which we objected above.
- 5.5.2. 4.94 : We know that community councils will be involved in the development of the CIL policy since they will receive a capped share of any CIL raised in their wards. This will enable community councils to spend CIL on behalf of their residents.

## 5.6. KP8 : Sustainable Transport

- 5.6.1. The DLDP relies on a massive switch in travel mode for existing and new residents from car to other forms of transport from an average 65/35 (NW Cardiff) to 50/50 modal split. We have not seen any evidence that this scale of change has been achieved anywhere without prior investment in new rail or tram infrastructure and there is no evidence presented that it can be achieved in Cardiff.
- 5.6.2. Transport Planning Associates (TPA) (November 2013) show figures for UK cities with 50/50 splits, or better. Most have developed tram/metro systems in the last 10 years or have an established city culture of walking and cycling supported by dedicated routes.

- 5.6.2.1. In Cambridge, the switch from car to bus rapid transit corridor use was 28% rising to 50% for busway halt users because of segregated busways avoiding traffic.
- 5.6.2.2. In Karlsruhe, Germany, patronage rose on the first ever tram train system by 44% between 1996 and 2010. The system is now the region's primary form of transport. (TPA, November 2013, attached).
- 5.6.3. TPA state that the proposals for a bus rapid transit system in NW Cardiff are fundamentally flawed because of the lack of road space on heavily congested routes.
- 5.6.4. The Cardiff Metro Impact study (October 2013) states that introduction of the Metro would increase public transport use regionally by 65%.
- 5.6.5. The size of Site C makes a realistic plan to link all residential areas with public transport essential. TPA state that the proposed partially segregated bus ("rapid transit") route is not a practical or sustainable solution. People will not change between services unless there is no other option or use 2 or more public transport services unless it reduces travel time and interchange is seamless. The proposed bus routes are impractical, tortuous, indirect routes to the station in an apparent effort to demonstrate that most of the site is served. The rapid transit system needs to provide quick, cheap, direct services and link to core transportation hubs.
- 5.6.6. Specify the means of achieving the 50:50 modal split : Replace KP8 with :
- 5.6.7. Ensure that:
  - 5.6.7.1. sustainable transport services including rail, Metro, express bus park and ride and local buses are substantially in place before housing land is released to encourage more active, safe and integrated travel, with provision for access for all;
  - 5.6.7.2. require travel plans for all new developments of 50 houses or more and 5,000 square metres floorspace;
  - 5.6.7.3. improve provision for freight, including access to rail and shipping services.

#### 5.7. KP18 : Natural Resources

- 5.7.1. 4.181 : We are concerned at the loss of high quality agricultural land in NW Cardiff. There is no up to date map of agricultural land quality so how can the Plan be certain that what will be lost permanently is justified and will not cause problems in the food supply in the future? Local people tell us that much of this land has not been ploughed since the end of WW2 and is a reservoir of biodiversity which must be properly surveyed before any development.

#### 5.8. EN13 : Air, noise, light pollution and contaminated land

- 5.8.1. Cardiff Road, Llandaff is identified as an Air Quality Management Area. We are concerned that the level of development in NW Cardiff and the uncertainty of public transport to reduce traffic through Llandaff will make this area much more polluted.

### 6. **Background Technical Paper No 5 : Transportation**

- 6.1. In consultations with local people, transportation is the paramount concern. We want any new development to bring benefits to new and existing communities alike. We think that this can be achieved with tightly planned phasing, well-drafted S106 and CIL agreements and secured finance for contemporaneous infrastructure. The wording of the plan is too loose and should be tightened to ensure that developments are not built without the necessary sustainable infrastructure to provide a good quality of life for all.
- 6.2. We commissioned a transport appraisal of our area as part of our response to the Preferred Strategy. That is resubmitted now. We have also asked our consultants, Transport Planning Associates, to revisit their appraisal in the light of the Deposit LDP and we submit that too. Their key findings are:
  - 6.2.1. None of the transport and infrastructure issues raised in our report on the Preferred Strategy has been addressed in the DLDP.

- 6.2.2. We do not consider the DLDP to be sound because it does not present a coherent strategy capable of delivering sustainable and economic development.
- 6.2.3. Cardiff Council has a 'once in a generation' opportunity to build the foundations for long-term sustainable growth. It should incorporate the Metro concept into its LDP, signaling that it aspires to provide a public transport system like those operating in other leading UK and European cities. This is key to making the city region work, providing good economic prospects and social justice for its citizens, and unlocking the full economic potential of the North West Cardiff area.
- 6.2.4. Identifying the Metro line from Cardiff Bay through North West Cardiff should be a top priority for public transport in the LDP and the CIL Schedule. It makes sense in operational, financial and sustainability terms. It makes sense in economic terms.
- 6.2.5. We recommend the following amendments to deliver the foundations for long-term sustainable growth for the whole city region. Robust policies should:
- 6.2.5.1. deliver the optimum transport system for this part of the City region;
  - 6.2.5.2. deliver the Metro tram-train between Llantrisant, Cardiff Central and Cardiff Bay through the North West Cardiff strategic sites to cater for existing and new demand;
  - 6.2.5.3. phase delivery of development in North West Cardiff to ensure that the new public transport infrastructure is in place before housing is occupied;
  - 6.2.5.4. fund advance infrastructure from public funds, with future CIL payments contributing to repayment of the investment;
  - 6.2.5.5. ensure that the CIL Schedule is produced in parallel with the LDP, so that it can be adopted at the same time as the LDP;
  - 6.2.5.6. develop the employment hub at Junction 33 on the M4 with good quality public transport links to reduce City Centre commuting; and
  - 6.2.5.7. provide new links to the strategic road network and selective road improvements to reduce congestion in existing residential area.
- 6.2.6. We argue that these points are strong self-evident reasons in favour of delaying development in North West Cardiff until such time as a plan worthy of the Capital City of Wales can be implemented.
- 6.3. We assert that TPA's reports are strong evidence that roads and transport (public and private) in existing communities are barely adequate now and inadequate to cope with the demand that the LDP strategic sites will place on them. Mitigation is demonstrably very limited.
- 6.3.1. TPA anticipate that even with a modal split of 50/50 1,690 vehicles would be added to the local network at peak periods from Site C. The DLDP has no agreed sustainable infrastructure solution to deliver and accepts that NW Cardiff might never achieve 50/50 levels.
- 6.4. The case for aligning the LDP with the Metro and city region plans is strong.
- 6.5. We asked a number of questions about the transport needs in NW Cardiff in our response to the Preferred Strategy but do not see that they have been addressed in the DLDP. These were fundamental questions about the road capacities through Radyr, Morganstown, Llandaff and St Fagans.
- 6.6. We welcomed the inclusion of a Rapid Transport Corridor in NW Cardiff in the Draft LDP. Our local experience tells us, and our independent transport appraisals support our view, that the existing road system in NW Cardiff cannot cope with the expected increase in road journeys from the strategic sites.
- 6.6.1. The Cardiff Capital Region Metro Impact Study October 2013 states that 'Of all the Metro interventions proposed, the project to connect Cardiff Bay via the City Centre to

NW Cardiff and Llantrisant/Talbot Green has been identified ... as the highest priority'. The scheme affects five strategic development sites, will enhance regional connectivity and enable the sustainable expansion of Cardiff.

- 6.6.2. The reference to a 'rapid transit corridor' in NW Cardiff in the Draft DLDP has been replaced by a 'new sustainable transport corridor' in the DLDP. The Masterplan refers to a 'rapid transport corridor'. Is there a difference? We are concerned that it may signal that the proposal has been watered down to a looped bus route which may be subject to the same delays as general traffic when it rejoins a main radial.
- 6.6.3. We would favour any proposal to reopen the rail link from Fairwater to Creigiau, Beddau and beyond into RCT. We are concerned that the Arup North West Study Report finds no conclusive evidence to support a specific option out of the three it considered.
  - 6.6.3.1. The SEWTA Rail Strategy Final Report March 2013 describes in detail the issues of reopening the old line from Waterhall Junction in Fairwater, through Strategic Site C, up to Creigiau. Its conclusion is that while reopening is possible, the issue of compulsory purchase of peoples' houses plus the construction of a new M4 crossing may prove unacceptable.
- 6.6.4. We understand a new rail line would be a huge undertaking. Its cost, links with RCT, the relationship between Network Rail and Cardiff Council and the Welsh Government suggest to us that such a scheme needs a regional approach as part of the Cardiff Metro scheme as supported by the Welsh Government. This new rail link needs to be built in this LDP period if NW Cardiff is to be developed sustainably in line with Cardiff's aspirations. Yet, the DLDP gives no indication of when the necessary investment in public transport infrastructure will be funded or delivered.
- 6.6.5. Appendix D: NW Corridor Study Report no maps: The case for funding of the NW Cardiff corridor is further strengthened by the inclusion and favourable appraisal of a route on this corridor in the recent South East Wales Integrated Transport Task Force report to the Minister for Economy, Science and Transport on proposals for the delivery of the future public transport network. (9.4, p54)
- 6.7. T5 : Strengthen and refocus T5 (vi-viii) and reword as:
  - 6.7.1. T5 MANAGING TRANSPORT IMPACTS : Minimise the impact of passenger and freight vehicles by careful siting of car parking and servicing areas, and traffic management on the main freight routes.
    - 6.7.1.1. Para 5.247 which relates to this Policy should be augmented to refer to the need to minimise the impact of air pollution on people, so as to avoid increasing mortality rates due to high levels of pollution in Llandaff, Fairwater and residential areas nearer the City Centre such as Pontcanna and Canton: NB Cardiff Road, Llandaff is already one of 4 Air Quality Management Areas in the city. This paragraph currently only covers adverse impacts on internationally designated (ie ecological) sites, as if these are more important than impacts on people.
  - 6.7.2. Create a new policy for part of the former T5, deleting "Where necessary" and rewording as:
    - 6.7.2.1. T8 LOCAL MOBILITY AND ACCESS : Ensure safe and convenient provision for pedestrians, including those with prams and/or children, people with mobility and access needs, cyclists, horse-riders and those using powered two wheelers.
  - 6.7.3. Renumber T8 as T9.
- 6.8. T6 : IMPACT ON TRANSPORT NETWORKS AND SERVICES: define the word "unacceptable" by reference to a known standard (eg air pollution above a certain level).
- 6.9. T7 STRATEGIC TRANSPORTATION INFRASTRUCTURE (iii) replace by (iii) Cardiff Central to Creigiau Rail Link OR (iii) North West Cardiff Bay Link

6.10. The Cardiff Central to Creigiau Rail Link (or North West Cardiff Bay Tram/Rail Link) and all other transport proposals be included on the Proposals Map with an explanation of its constraints. It is not clear to members of the public why this route is on the Constraints Map although we now understand that this is because of land ownership issues outside strategic sites.

6.11. All existing Conservation Area Appraisals be added to Appendix 5 List (1) SPG to be submitted prior to/at examination, and reference to this fact added to paragraph 5.159 in the Written Statement.

R&MCC urges the Council to have the courage of its aspirations and work with the Planning Inspectorate, Welsh Government and other key players to make these changes to the LDP. The LDP should be a framework to support development of Cardiff as “a world class European Capital City with an exceptional quality of life and at the heart of a thriving city-region”.

## PART 4: What happens after Deposit?

At this stage, you can only make comments in writing (these are called 'written representations').

However, everyone that wants to change the Plan can appear before and speak to the Inspector at a 'hearing session' during the Public Examination.

But you should bear in mind that your written comments on this form will be given the same weight by the Inspector 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 of the Public Examination?***

*(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.***

We wish to speak to the Inspector about development in the NW of Cardiff with particular focus on transport infrastructure and Masterplanning.

We wish to represent the views and experiences of the 6,600+ residents of Radyr & Morganstown. The proposed development in NW Cardiff will have a dramatic effect on R&M and we believe that local knowledge is relevant to assessing the effectiveness of the LDP.

## **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.

## PART 6: Tests of soundness

	<b>Procedural Tests</b>
P1	It has been prepared in accordance with the Delivery Agreement including the Community Involvement Scheme.
P2	The plan and its policies have been subjected to Sustainability Appraisal including Strategic Environmental Assessment.
	<b>Consistency Tests</b>
C1	It is a land use plan which has regard to other relevant plans, policies, and strategies relating to the area or to adjoining areas.
C2	It has regard to national policy.
C3	It has regard to the Wales Spatial Plan.
C4	It has regard to the relevant community strategy/ies (and National Park Management Plan).
	<b>Coherence and Effectiveness Tests</b>
CE1	The plan sets out a coherent strategy from which its policies and allocations logically flow and/or, where cross boundary issues are relevant, it is compatible with the development plans prepared by neighbouring authorities.
CE2	The strategy, policies, and allocations are realistic and appropriate having considered the relevant alternatives and/or are founded on a robust and credible evidence base.
CE3	There are clear mechanisms for implementation and monitoring.
CE4	It is reasonably flexible to enable it to deal with changing circumstances.