

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

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

PART 1: Contact details

Your/ your Client's details		Agent's details <i>(if relevant)</i>
Title:		
Name:	Helena Fox	
Job title: <i>(where relevant)</i>	Clerk and Proper Officer	
Organisation: <i>(where relevant)</i>	Radyr & Morganstown Community Council	
Address:	Old Church Rooms, Park Road, Radyr, Cardiff CF15 8DF	
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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: 	Date: November 26 2013
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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.

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)	
16. Masterplanning Framework : KP4	
(and/or)	
Paragraph or section number(s)	
(and/or)	
The Proposals Map <i>(please tick ✓)</i>	
(and/or)	
Add a new Policy	
(and/or)	

16. Masterplanning Framework : KP4

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

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

Site name	
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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

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.

This response is specific to the Masterplanning Framework for NW Cardiff and Site C in particular. It is submitted in addition to R&MCC's response to the Deposit LDP (DLDP).

Response to Strategic Site C : North West Cardiff : Site Specific Principles

1. **Masterplanning Approach** : We support the Masterplanning approach and applaud Cardiff Council for this innovation; it is a vital stage of the process. We welcome the inclusion of initial information on schools, health care and other community facilities and the protection of woodland and open space.
 - a. We ask that community councils and communities be involved in the masterplan development for the strategic sites affecting them. They have valuable local knowledge that should be considered.
 - b. We are pleased to see that phasing will be organised around delivery of transport routes and neighbourhood centres.
 - i. We want to see development of Site C delayed until the form(s) of public transport have been decided and the finance for at least the first phase has been secured.
 - c. We are pleased that the Masterplan will 'ensure frequent public transport provision in place prior to residential occupation of the site'.
 - i. How will this be ensured when there is, as yet, no secured funding and no agreed public transport option?
 - ii. What is the definition of 'prior to residential occupation of the site'? We hope that this means before the first people move in. We are concerned that it may mean before the last people move in.
 - d. We welcome the suggested new community facilities.
 - e. We want Radyr & Morganstown (R&M) and other existing neighbouring communities to be consulted on the masterplan so that it reflects local knowledge.
 - f. We would like to highlight some key projects in our local area:
 - i. A substantial increase in the number of free car parking facilities at Radyr Station
 - ii. Pelican crossings on Heol Isaf at Min-y-Coed and near Kings Road to encourage walking to school
 - iii. Create a queuing lane on Heol Isaf at Radyr Comprehensive School to remove the traffic bottle neck when traffic comes and goes from RCS
 - iv. Pavement on the bend on Windsor Road to encourage walking to school
 - v. 20pmh speed zones:
 1. between Maes-yr-Awel and Drysgol Road to protect pupils of Radyr Primary School.
 2. between the two entrances into Pentwyn from Caer Craig to protect the children at Bryn Deri Primary School
 - vi. Ffordd Las/Golf Club Lane : consider safety issues short of closure
 - g. 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.
2. **Development Density** : We support the principle of higher densities close to neighbourhood centres within the site.

- a. Density at boundaries between old and new communities should allow a clear demarcation between the two – see 6 below.
 - b. We support the flexible phasing of development to meet the economic and social needs of each phase.
3. **Sustainable Transport Corridors** : We welcome all these principles for Site C.
- a. The scale of provision is such that we want to see development of Site C delayed until the form(s) of public transport have been decided and the finance for at least the first phase secured.
 - b. Connections between the sustainable transport within Site C and in existing communities must be planned to work well.
 - c. Site C has no existing public transport through it and, when developed, must not rely on any services from existing communities.
4. **Sustainable Travel Choices** : We welcome all these principles for Site C.
- a. Will Cardiff Council have a policy on car use and parking to support sustainable travel? We note that the current SPG is likely to be revised before the LDP is examined.
 - b. We have serious concerns about how sustainable travel within Site C links effectively to existing communities and their existing transport problems.
 - i. The provision of bus lanes on the Llantrisant Road will be limited at the south western end by road constraints in existing communities.
 - c. How does the use of the disused railway line as a recreational cycling and walking route fit with the plans to develop it as a new transport corridor linking Cardiff Bay with Creigiau and beyond?
 - d. See R&MCC transport appraisals by Transport Planning Associates (attached with this form) which state:
 - i. There is no realistic solution to resolving the bottleneck experienced at Llandaff.
 - ii. There is no realistic way of mitigating against the impact of additional development-generated traffic along Heol Isaf or Ynys Bridge. There is no additional capacity at Radyr railway station to cater for additional footfall or trips via car.
 - e. The transport appraisals support R&MCC's assertion that the roads and transport (public and private) in existing communities are not adequate now and will not cope with the demand that the LDP strategic sites will place on them.
 - f. 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. **Neighbourhood Centres** :
- a. We and other local communities in Cardiff have experience of s106 agreements that end in a loss of community land and/or facilities. The masterplan must include land for community use that cannot be returned to the developer.
 - b. 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.
 - c. For NW Cardiff, we note that existing schools in R&M are full and could not cope with an extended catchment, however temporary. It is essential that sufficient funds are raised to cover the costs of new facilities and infrastructure ahead of occupation of the housing.

- d. New health facilities should be ready for new communities as existing ones in R&M are full. It is essential that sufficient funds are raised to cover the costs of new facilities and infrastructure ahead of occupation of the housing.
 - e. We note that the landowner of Site C is already asking to reduce the job number of 3,000 in the DLDP. We are concerned that this will:
 - i. increase commuter travel from the new community.
 - ii. make the new community less cohesive
 - iii. reduce the CIL and S106 funding for community facilities.
6. **High Quality Sustainable Design and Distinctive Character** : An important element of Cardiff's character is its existing neighbourhoods with their own identities. Each strategic site should have its own identity to create a village atmosphere and continue this tradition.
- a. We strongly welcome the suggestion of 'creating a linear open space on the ridge of the land north of the Llantrisant Road'.
 - i. We do not see that shown on the schematic framework, while recognising its conceptual nature.
 - b. We support distinct boundaries between old and new communities. This is in no way to create a sense of 'them and us' but to encourage a local sense of identity and belonging.
 - c. We hope that the masterplans for Cardiff learn from the best examples of greenfield developments, eg Milton Keynes.
 - d. We encourage the use of contemporary design and sustainable materials to create new communities which quickly feel established rather than temporary extensions to existing communities.
7. **Integration with Neighbouring Areas** : We welcome all these principles for Site C.
- a. The strategic sites are big additions to Cardiff. Site C plans for 5,000 new dwellings which is a small town in its own right. It should have its own identity and not be seen as a huge add-on to R&M and/or Fairwater and/or St Fagans. This can be aided by clear boundaries and a new design style for the new community. We must keep an area of green space between the old and new communities.
 - b. Boundaries between Site C and R&M should be distinctive yet cohesive and give a sense of entering and leaving each one. People moving between them should recognise when they have come home. This is in no way to create a sense of 'them and us' but to encourage a local sense of identity and belonging.
 - c. Site C should have its own new facilities and should not be expected to rely on sharing already over-full facilities in R&M. Any shared facilities should be to the benefit of all. Again, this is not about 'them and us' but about ensuring that everyone has what they need where they need it.
8. **Strategic green open space corridors** : We welcome all these principles for Site C.
- a. Cardiff benefits greatly from the large open green spaces in its centre and from the open farmland on its edges. The combined masterplans for the whole of Cardiff should continue this tradition and allow for significant green corridors to continue this important Cardiff tradition.
 - b. The Taff Trail provides a green link between communities and into the city centre. It is an excellent example of a sustainable transport corridor.
 - c. While we recognise that Pontcanna Fields is an exceptionally large open space we would like to see similar space included in and between all strategic sites.
 - d. The masterplans for Strategic Sites must include community land for community use that cannot be returned to the developer.
 - e. We would like to see large and small open spaces included in Site C. These should have a mixed public recreational and sport use.
 - f. Site C should plan to include wildlife corridors to maintain and enhance wildlife populations as far as possible. Plans should avoid islands of green space where species can be isolated.

9. **Landscape, biodiversity and historic features** : We welcome all these principles for Site C.
- a. We support a green belt within and around Cardiff. Managed parks and amenity landscapes are no substitute for open countryside. A green belt preserves valued countryside that is integral to the identity of existing communities and provides long-term protection for vulnerable sites. Views of open countryside extending throughout the city must be protected as a valuable contributor to the quality of life for residents and visitors. We also value the city parks and green riversides which link communities with each other and the city centre.
 - b. We are pleased to see that listed buildings, national monuments, conservation areas and St Fagans National History Museum are referred to.
 - c. We are delighted to see that the Llandaff-Penrhys pilgrim route will be protected. We should be consulted about the exact route and how this will be done.
 - d. Cardiff Council must be resolute and vigilant in its supervision of developments near sensitive sites. Developers do not place as much value on historic sites and flora and fauna as they do on bricks and mortar. Once a tree is felled or habitat destroyed they cannot be replaced. Protection and preservation of these sites must be mandatory and not reduced to tokens by developers.
10. **Resource Efficiency** : This is another issue where Cardiff Council must ensure that the masterplans are detailed and must be resolute in enforcement.
- a. We would like to see accepted ideas like green roofs, grey-water use and water-permeable parking for public buildings at the very least.
 - b. We encourage the masterplans to require developers to meet high standards of energy and resource-efficient buildings. We have heard developers at stakeholder sessions and other meetings say they would not make enough profit building to these standards. A longer view must be taken.
 - c. Cardiff Council is developing a micro-generation scheme at Radyr Weir. We support that project and would welcome other similar projects elsewhere on the Taff.
 - d. We would like Cardiff Council and the developers to consider local micro-generation schemes from renewal energy on suitable sites, provided they do generate energy and are not tokenistic.

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

	Procedural Tests
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.
	Consistency Tests
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).
	Coherence and Effectiveness Tests
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.