



## **Radyr & Morganstown Community Council Cyngor Cymuned Radur a Threforgan**

Amanda Sutcliffe  
Development Control  
Cardiff Council

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**By email**

August 15, 2014

Dear Amanda,

### **14/00852/DCO Development of Strategic Site D in the LDP north of Junction 33 on the M4 “Gwernybwlau”**

#### **Comments on the Parsons Brinckerhoff Transport Assessment Review**

1. The report was commissioned and paid for by Vectos and is thus not independent.
2. However it does confirm inadequacies in the Vectos' Transport Assessment including:
  - a. reliance on the “ambitious” [consultant-speak for impossible] 50/50 modal split assumption and lack of sensitivity testing of more likely scenarios. The Deposit LDP itself recognises that Strategic Sites like D on the edge of Cardiff may never achieve a 50:50 split. The transport planning should be based on a realistic split for this specific site to avoid future congestion and unsafe highways.
  - b. underestimate of off-site car trips
  - c. assumption of low or no traffic growth from existing and committed developments on the basis that the Metro system will be delivered - despite current uncertainty on its delivery,
  - d. inadequate current accident data to inform road safety works
  - e. lack of clarity on the proposed contribution to sustainable transport provision and phasing,
  - f. lack of consideration of impacts on Air Quality Management Areas in Llandaff and Ely Bridge,
  - g. lack of consideration of impacts of rat-running on Fairwater and St Fagans,
  - h. lack of assessment of A4119 link capacity,
  - i. lack of resolution of severance effects of Llantrisant Road.
3. Similar deficiencies to those listed above were identified in paras 5.57 and 5.58 of the Formal Scoping Opinion on the Environmental Statement by Cardiff Council Transportation (CCT). However, whilst the report makes some suggestions for technical work it does not complete this work itself, so takes us no further forward.
4. The report does not question many of Vectos' omissions and unrealistic assumptions including:
  - a. the lack of consideration of cumulative effects of trip generation from all NW Cardiff sites where some 11,650 new dwellings are proposed.

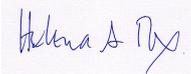
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- b. lack of any data on the number of trips generated by the housing and employment and accessed via Llantrisant Road that would head to the City Centre, and those to RCT/the M4.
  - c. lack of modelling of several important highway junctions between the site and the A4119, no modelling of the M4 J34/A4119 junction to take the extra traffic generated by the development and no consideration given to junctions of the A4119 and roads south of the proposed development to St Fagans, Pentyrch, Radyr and Danescourt.
  - d. the assumption that 1 in 4 trips generated in the proposed development will be internal to the site - a clear impossibility when people living there will be almost totally reliant on schools, shops and medical facilities elsewhere,
  - e. the assumption that almost 40% of trips from the development will be by bus - a percentage unlikely in inner suburbs leave alone this relatively isolated rural location. The proposed bus frequency is quite inadequate for the scale of the development and a good bus service depends on free-flowing traffic on its route. We have consistently argued that the NW Cardiff Strategic Sites will cause severe congestion on a transport network that is at capacity now.
  - f. the assumption that modal shift can be secured simply by adding to the existing bus service and producing travel plans. See 2a above. Vectos respond to the review on its final page and state that they have assumed cycling and walking percentages for journeys to work to be the same as in the 2011 Census (3% and 1% respectively). This is not good enough. The facts show that trams are needed to effect real change, see 'What Light Rail can do for Cities, A Review of the Evidence, Final Report', February 2005 by Passenger Transport Executive Group.
  - g. that phasing of public transport provision is a "detail" that can be dealt with by bi-lateral agreements with Cardiff Council. Without well-functioning public transport in operation as people move in to the site, it is highly likely that they will rely on cars and continue to be so. We already have experience of new developments being left without a bus service because the bus company says it would be uneconomic to run.
5. In summary, Site D is probably the least sustainable of all of the Strategic Sites. The Deposit LDP acknowledges that it may never reach a 50/50 modal split and without provision of a Metro tram-train link from the outset that target seems quite unrealistic. Without this it will only be feasible for two-car families to live there as residents will have few if any facilities within walking distance, including food shops. The employment sites will attract employees from a wide catchment, most of them without practical alternatives to car use. Travel Plans - however well crafted - cannot in themselves deliver changes in modal split in the absence of alternative travel options.
6. We **conclude** that the Parsons Brinckerhoff report does not add to our knowledge or resolve any of the major deficiencies in the application for development of Site D at Junction 33. We find it vague, leaving too many important issues unresolved.
7. We urge Cardiff Council to **refuse** this application unless all the deficiencies identified in its Scoping Opinion are resolved and assumptions are replaced with evidence.

Yours sincerely,



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