Cardiff County Council

Local Development Plan 2006 - 2026

Office Use Only
Date Received
Representor Number

Alternative Site Representation Form

In response to consultation on Cardiff Council's Deposit Local Development Plan (LDP) formal comments have been received for policy boundary modifications, for new site allocations or for the deletion, modification or for a change of use of sites proposed in the Plan. These are known as Alternative Sites (also termed Site Allocation Representations) and are detailed in the Alternative Sites Register. This is your opportunity to support or object to any of the Alternative Sites proposed.

Please use this form to make your comments on the site allocation representations received. Your comments should be about alternative sites only. 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 Friday 4th April 2014** to: LDP Team, Room 132, City Hall, Cardiff, CF10 3ND or email LDP@Cardiff.gov.uk

Please note that these site proposals are <u>not</u> being put forward by Cardiff Council, they have been submitted by the public or by organisations having an interest in Cardiff.

PART 1: Contact details

Your/ your Client's details		**Agent's details** *(if relevant)*
Title:		
Name:		
Job title: *(where relevant)*		
Organisation: *(where relevant)*		
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: April 4 2014

PART 2: Commenting on Alternative Sites

Which Alternative site(s) are you supporting or objecting to? (Please refer to Alternative Sites Register)

Alternative site reference number(s)/name(s)

B5 CWM FARM, RADYR : OBJECT

B6 STRATEGIC SITE NW CARDIFF : OBJECT

A6 MAES Y LLECH FARM : SUPPORT

A8 SOUTHERN BOUNDARY OF STRATEGIC SITE C : SUPPORT

D1 STRATEGIC SITE C – NORTH WEST CARDIFF : SUPPORT

D7 GREEN BELT : OBJECT

I support the position of the NW Cardiff Group which says:

The North West Cardiff Group requests that its comments on these Alternative Sites are seen in the light of evidence we have already presented that the Deposit Local Development Plan (DLDP) is unsustainable and, thus, fundamentally flawed. Any further allocations of land (and the one deletion to which we object) will inevitably make the DLDP even less sustainable.

The vision set out in Cardiff's 'What Matters' Strategy (2010-2020) guides the DLDP and states 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'. We applaud that vision. But, we say that ***what really matters*** is that the adopted LDP helps rather than hinders delivery of that vision. As things stand, we see a gulf between the vision and the actual city that the LDP will create. It is hard to see how the two plans can come from the same organisation.

Cardiff's LDP proposes a total of 11,650 homes in NW Cardiff on greenfield sites that have no existing infrastructure. What little area infrastructure there is lies on the site boundaries: a few congested country roads and an hourly bus service. A little further from the sites is the M4, the City Line rail and other slow bus links to Cardiff. There is no funding in place for the infrastructure needed. The plan is led by developers who argue against contributions to fund infrastructure. The one suggestion for new transport infrastructure for the 5,000 homes at Site C is a new bus service.

We propose an alternative approach which we believe will create sustainable communities that benefit new and existing residents alike and enhance Cardiff as a whole: a phased chain of villages linked by the Metro to be delivered from 2021 onwards or as soon as the Metro is in place, and not before. This is a credible alternative to the current LDP for NWC. Development would be overseen by an independent delivery body that would be responsible for doing its best for new and existing residents, now and in the future. Built along fixed-track public transport with other facilities that offer a realistic alternative to private cars this will help Cardiff reach its 50:50 modal split.

As to the Alternative Sites consultation, we are concerned that the additional sites are being put forward in the hope that they may be allocated and developed in advance of those allocations already in the DLDP. The LDP process appears to be becoming a way for developers to use land in the City as a gaming board. This is definitely not in the public interest. No site should be included as an allocation unless it conforms to a sustainable, integrated strategy.

The alternative sites proposed add to the scale and location of the already allocated sites and threaten to destroy the unique qualities of the City of Cardiff: its green hinterland, verdant river valleys and its historic built and natural heritage. Cardiff deserves an integrated strategy that protects and enhances these qualities for future generations whilst enabling phased, sustainable development which improves rather than detracts from its status as Capital of Wales. It must not be ruined by the proliferation of unsustainable series of housing estates.

If you are objecting to an Alternative Site it would be helpful if you could indicate which Test of Soundness you consider it to fail (Please refer to guidance note).
Primarily CE2 and CE3

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. This will help the Authority 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 indicate if you are submitting other material to support your comments.

Please use the space provided to set out your representation. Please be explicit as to which site your comments relate to.

(Continue on a separate sheet/expand box if necessary)

Proposed Alternative Sites – Boundary Amendments

B5 CWM FARM, RADYR *for Waterstone Homes – Include within settlement boundary. Submission requests:-*
• Settlement Boundary is amended to coincide with Mineral buffer zone

I support the position of the NW Cardiff Group which says:

We strongly object to the inclusion of B5. It would not be sensible to squeeze housing right up to the buffer zone in particular because the previous rail formation provides a sense of enclosure and protection to the existing modern estate. Even with the existing exclusion zone current residents find the Taffs Well Quarry's frequent blast vibrations alarming. The remaining green space abuts a SSSI and is of increasing local importance and should not be reduced further. The extent of existing housing is already too dominant in this location.

B6 STRATEGIC SITE NW CARDIFF *for Plymouth Estates. Strategic Site C, North West Cardiff. Amend boundary to exclude Site. Submission requests:-*
• Exclusion of Site in ownership of Radyr Farm

I support the position of the NW Cardiff Group which says:

We strongly oppose the attempt to enlarge Strategic Site C by addition of a 'detached' piece of land adjacent to the Radyr community. We also oppose the implication that further increases in the scale of development can be achieved without advance investment in infrastructure. Our view on the need for advance infrastructure is supported by the findings of the independent Strategic Environmental Assessment of the LDP which have not been given sufficient weight in influencing the Deposit Plan.

Plymouth Estates have used the opportunity to put forward proposals for their Plasdwr development in a 222 page submission. They argue in favour of early release of land both within Site C and on further land in their ownership and identified in the DLDP for 'flexibility' in case demand for housing is higher than expected. They argue that developers may not be able to meet the housing completion rates required by the DLDP. Their solution to that is to open up more land to development.

Close reading of the developer's submission suggests that this Alternative Site submission may be an attempt to 'soften up' the opposition in advance of an early planning application. We object very strongly to this land coming forward now, or at any stage in future, as it would be entirely contrary to the sustainability principles enshrined in Planning Policy Wales and the LDP.

We strongly oppose early development before adequate infrastructure is in place and we oppose the development of the 10% 'flexible' overflow sites before the Strategic Sites are completed. Cherry-picking by developers of sites that best meet ***their*** needs, and not those of the existing and new communities, threatens to create disjointed unsustainable communities.

Plymouth Estates also argue that Strategic Site C should be zero charged for Community Infrastructure Levy and propose the use of s106 agreements for provision of infrastructure. Sporadic development of small sites will not produce adequate community return via s106 agreements or CIL, nor will it provide a fair and necessary contribution towards the major transport and other infrastructure required to support major expansion of the City. A piecemeal approach through developer-led early applications will not deliver the ambitious outcomes set out in the DLDP's Masterplanning approach.

The Plymouth Estates' Masterplan includes a dual carriageway linking Llantrisant Road and St Fagan's Road. It passes through the district shopping centre and caters for traffic within the new estate and accessing the new shopping centre. This shows little understanding of existing traffic conditions. It would clog surrounding access roads. Plymouth Estates assess St Fagan's Road as capable of being widened to accommodate a single bus lane with two lanes of general traffic. They do not mention that this would create adverse conditions for current and future pedestrians, cyclists and bus users. Their bus-based public transport solution uses St Fagan's Road and Western Avenue to link with the already congested Cowbridge Road East. The existing bus lane from Western Avenue to Victoria Park results in narrow lanes for other vehicles and cyclists. Additional buses using this lane, plus back-up of general traffic, will mean deteriorating travel conditions in future.

The bus travel times quoted from Creigiau to the City Centre are unrealistic. Actual bus travel times – even with some sections of bus priority – will not provide any motivation to use public transport. It frequently takes up to 45 minutes to travel from the City Centre to Llandaff at peak hours and thus 60 minutes or more to reach Creigiau. The Plymouth Estates' proposals include an express bus for later phases. However, buses would need to use the same bus lanes as regular buses beyond the site on roads that are already congested and hard to improve.

The only realistic option is early delivery of this phase of the Metro, coordinated with delivery of housing and other facilities on this and other sites in North West Cardiff. Provision of a new, high-speed Metro service would be the only way to change people's travel behaviour from the outset and achieve a 50/50 modal split. The quality of outcome envisioned is very unlikely to be achieved

through the conventional planning application process, even with the benefit of a Masterplan. It needs a purpose-built independent delivery vehicle to ensure proper coordination of development.

Proposed Alternative Sites – Amend Site Allocation Policy/Change of use

A6 MAES Y LLECH FARM – *Retain farm and omit from Strategic Site C. Submission requests:-*
• retaining Maes-y-Llech Farm in agriculture by removing from Strategic Site C North West Cardiff

If change accepted would require:-
• changes to the boundary of Strategic Site C to exclude site Policy.

I support the position of the NW Cardiff Group which says:

We support the removal of AS(A)6 from Strategic Site C. This amended site allocation is not simply to protect open space but a working farm in the middle of Strategic Site C. The land should be retained for agricultural use and the farmstead retained even if development of the site changes in future. It will be important for the woodland blue bells (for which the UK has international responsibility) to be kept and protected as public open space.

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.

Agriculture is vital to the economy of Wales and the Cardiff area. Cardiff is planning waste disposal facilities that will produce slurry by-products that can best be disposed of on land. Local farms will be the most carbon-lite and cost-effective solution for this.

We believe that Strategic Site C should be removed from the LDP (see comments below). But aside from this we support the proposal to retain Maes Y Llech farm in agriculture.

A8 SOUTHERN BOUNDARY OF STRATEGIC SITE C – *Retain as Green Corridor and omit from Strategic Site C. Submission requests:-*
• southern boundary of Strategic Site C is moved to provide a green corridor around St. Fagans Village

If change accepted would require:-
• changes to the boundary of Strategic Site C to exclude site

I support the position of the NW Cardiff Group which says:

We strongly support this. Retention of this green corridor will protect the unique character of the area including woodland and important ecological habitats. The area is close to the Wales National History Museum, an attraction visited by many locals and thousands of visitors every week. The setting and environment of the museum adds to its attraction and should be preserved, particularly as the museum is now benefiting from substantial investment by Welsh Government, aimed in part at increasing visitor numbers.

This area includes woodland with a strong landscape value. The escarpment overlooking St Fagans Road is important and its loss would destroy the visual entrance to the Ely Valley.

Proposed Alternative Sites – Delete Site Allocation

D1 Strategic Site C – North West Cardiff : Delete

I support the position of the NW Cardiff Group which says:

We strongly support this. We continue to argue that the DLDP will create unsustainable suburban sprawl in NW Cardiff unless a new approach is taken that can deliver the vision so clearly stated in the LDP by Cardiff Council.

This area of fields and woodland gives a rural experience to local residents from several communities including Pentrebane, Fairwater, Rhydlafar, Radyr and St Fagans. Local people tell us that much of this land has not been ploughed since the end of WW2 and is a reservoir of biodiversity. It provides recreation for local communities and quick easy access to open spaces so beneficial to health, wellbeing and economy of the area (as detailed in the National Ecosystem Assessment and the March 2012 NHS Wales Report "Green space, reduction of health inequities, and cost effectiveness of interventions"). The area provides physical separation from existing large housing areas which are much newer than most of St Fagans.

Site C is of considerable environmental and historic importance being close to the historic area of and around St Fagans where it is described as "rich in biodiversity" (St Fagans Circular Walk leaflet.) It includes and is close to SINCs, SSSIs and habitats for protected flora and fauna (including some on the European Protected Species list.). It is fatuous to suggest that these will not be damaged by such large scale destruction of green fields.

The roads in and around St Fagans and, therefore, the proposed development are already unable to cope with the volume of traffic. The local rural infrastructure is totally unsuitable for an urban development. A significant issue is not simply the number of cars but the severe interruption of traffic movement by a level crossing that stops traffic moving for 28 minutes in every hour on the main thoroughfare to Culverhouse Cross and the A4232. Development on Site C should be delayed until new infrastructure is in place.

Site C development is proposed when Wales' most popular tourist attraction, St Fagans National History Museum, is undergoing a major development, with public money, to increase visitor numbers by up to 400,000 a year. This will create further traffic congestion. A recent study showed that approximately 50% of visitor cars enter or exit via St Fagans village. We know that some visitors have difficulty getting to the museum now and some give up trying (the latest example being the 2014 St David's Day event.)

As an alternative to the current plans for Site C, we propose that NW Cardiff is developed as a series of new discrete communities linked by the Metro and separated by green spaces. The creation of each new community should be based on evidence of its need and centred on a Metro station along a rail line that links Cardiff to RCT.

Planning for the Metro is still at an early stage and reports suggest that the first stage will run from Cardiff Bay to central Cardiff so there is little prospect of the Metro running through NW Cardiff by 2026. We argue, therefore, that development in NW Cardiff should be delayed until the Metro is in place. Even then, it alone cannot solve all the transport and general infrastructure problems already faced by the area.

D7 Green Belt : Delete

I support the position of the NW Cardiff Group which says:

We strongly support the introduction of a Green Belt, and object strongly to the proposal to delete it from the DLDP. The Welsh Government's own Planning Division claims that "other policies can be used to refuse inappropriate proposals" (Letter reference P:SDP:10:05/GL: Welsh Government dated 26 November 2013) however these policies are not as strong as Green Belt designation which would give permanent protection to an area and help to define and shape the City. The same letter envisages the Green Belt being "addressed outside of the LDP" in the proposed Strategic Development Plan for the City Region which is proposed in the draft Planning (Wales)

Bill. However, it would be many years before such a Plan could come into force.

In the meantime, these green areas and open spaces, vitally important to local health of the area and the City as a whole, to the quality of life of its residents and recognised by Cardiff Council through its LDP designation as Green Belt would be at risk from development. The Green Belt was included in the DLDP after extensive public consultation which showed overwhelming support for it. The Summary of Preferred Strategy consultation findings, March 2013, shows a 'particularly high level of support for a Green Belt in Cardiff'. In the Preferred Strategy public consultation 91.8% supported a Green Belt and within the Citizen Panel it was 82%.

The Green Belt would make Cardiff a more attractive place to live and work as its inclusion in the LDP intends. Leaving land north of the M4 at risk of development is contrary to Cardiff Council's own vision for a green backdrop to the city which is part of its distinctiveness.

PART 4: What Happens Next?

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

However, everyone who seeks a change to the Plan can appear before and speak to the Inspector at a 'hearing session' during the public Examination. If you are objecting to the inclusion of an alternative site you will be considered to be a supporter of the Plan and you will not be entitled to speak at a hearing.

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. ☐

Please note the Inspector will attach equal weight to written representations as to those representations heard in person.

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

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to attend the Examination.

Cardiff County Council
Local Development Plan 2006 - 2026

Alternative Sites Consultation Guidance Notes

Purpose of consultation

In response to consultation on Cardiff Council's Deposit Local Development Plan (LDP) formal comments have been received for policy boundary modifications, for new site allocations or for the deletion, modification or for a different use of sites proposed in the Plan. These are known as **Alternative Sites** (also termed "Site Allocation Representations").

The Town and Country Planning (Local Development Plan) (Wales) 2005 Regulations state that Site Allocation Representations that seek to change the Deposit LDP should be advertised for a six week period. During this time, anyone can make comments about these representations and submit them to the Local Planning Authority.

The Alternative Site Representations included in the Alternative Sites Register were received during the Autumn 2013 consultation on the LDP Deposit Plan which finished on 26th November.

There are four types of Alternative Site Representation:

1. Add a new site for a specified land use to the Deposit LDP
2. Alter the boundaries of a site allocated in the Deposit LDP
3. Delete a site allocated in the Deposit LDP
4. Amend site allocation policy/change of use

The Alternative Sites Register lists each site in relation to the above criterion.

The Alternative Sites Register is available on the Council website at: www.cardiff.gov.uk/localdevelopmentplan. Hard copies are also available for public inspection during the consultation period at: City Hall, Cathays Park and County Hall, Atlantic Wharf, Monday to Friday between 9.00am and 4.30pm. They will also be made available at all local libraries and at the public meetings outlined in the letter.

Important - Please note that any comments you make at this stage should relate only to the Alternative Site Representations that have already been made during the Deposit LDP. They should not propose further changes to the LDP, or suggest new sites. Any such representations will be disregarded as they should have been made during the earlier stages of plan preparation.

Please provide your full details so we can contact you regarding your representation and at future stages of the development plan.

Tests of Soundness:

Cardiff County Council's Local Development Plan (LDP) will be examined by an independent Inspector appointed by Welsh Government. It is the Inspector's job to consider whether the LDP is sound. There is no legal definition of 'sound' but its ordinary meaning is 'showing good judgement'. The questions or 'tests' which the Inspector will consider in deciding whether the plan is sound are in **Annex 1** of this form. If you are objecting to an Alternative Site it would be helpful if you could indicate which Test of Soundness you consider it to fail. In due course representations on Alternative Sites will be submitted to the Inspector together with a position statement from the Council.

What will happen to your representation?

All representations will be made available to the public to view. A summarised list of these will be posted on Cardiff Council's website with details of where they can be viewed.

All representations received during the consultation period will be considered at an Examination in Public held by an independent Planning Inspector, who will decide on any amendments that should be made to the Deposit Plan.

It is important to note that although the Council will inform the Inspector of its views on the issues raised through this consultation, only the Inspector is able to make changes to the Plan.

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 132
City Hall
Cathays Park
Cardiff
CF10 3ND

Telephone: 029 2087 1297
E-mail: LDP@cardiff.gov.uk

Annex1: 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 strategy.
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.