

North West Cardiff Group

Responding to the concerns of our communities

Creigiau Danescourt Gwaelod y Garth Llandaff Pentyrch Radyr & Morganstown St Fagans

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By email

July 3, 2014

Dear Amanda,

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

1. From the 105 documents that have been submitted on this application from Persimmon Homes, it appears that this site will be developed in two equally unsustainable halves:
 - a. The part of the site near to Llantrisant Road will be built as a series of car-dominated low-density housing estates, and
 - b. Junction 33 will be part-developed for retail, just as Culverhouse Cross was a generation ago.
2. The North West Cardiff Group **OBJECTS** to this application based on the fact that the LDP is not yet adopted and the information supplied to date shows the scale and location of this proposal is unsustainable.
3. Whilst the aspirations of the **Design and Access Statement (D&AS) Part A (38 pages)** are commendable, delivery is most uncertain. For example page 1 of the summary states: “the new community will be focussed around a world class rapid transit system....(which) will also serve communities further west including Creigiau and Llantrisant.” This is developer-speak for the bus service proposed to run mainly on the existing congested multi-use city roads. If built without early implementation of a fixed rail public transport system through the core of the community, this development will be almost 100% car dependent.
4. The D&AS refers throughout to a ‘world class rapid transit system’ that does not exist and which is not expected to be running for many years. It also refers to a ‘21st century park and ride’ which, without the Metro, amounts to a bus station where buses will join already congested roads. If the Metro is such an integral part of this proposed development, why is there no station or rail line shown on the Masterplan? Some emphasis is placed on cycle use within the development. Where are the safe routes to allow for cycling between the development and neighbouring communities and beyond to Cardiff?
5. While most of the D&AS refers to site D, pages 32 and 33 show both strategic sites D and E indicating the intention to link them to Creigiau and presumably to “piggy back” on its local school and facilities.
6. We absolutely support the implementation of the Metro but challenge the credibility of retrofitting into communities planned without it. The Cardiff Metro Plan on page 37 shows the likely line skirting this site to the north east at Capel

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Llanillterne, well beyond walking distance from most of the site, let alone access to the park and ride hub. Not to plan to link the Metro with the park and ride is planning for unsustainability.

7. D&AS B Assessing and Evaluating the Context (90 pages)

- Page 50 refers to a pedestrian link with Creigiau, the centre of which is 2kms uphill of the centre of the site and across the Llantrisant Road. To describe the A4119 as a road with 'moderate traffic levels and low vehicle speeds' shows a serious lack of local understanding. We do not agree that many cyclists feel comfortable cycling along this narrow road now, much of it at the national speed limit, let alone after all the traffic to and from this development will have to use the A4119.
8. The isochrone on p51 is centred on the site which demonstrates that at least half, and probably more, will be over the 20-25 minute walk. What facilities would people be walking to except for the bus stops on the A4119?
9. The right-hand photograph on page 52 illustrates the boggy nature of the land, also noted on p60. This is the situation throughout the year. This land is a sponge. Draining this area will lead to greater run-off and flooding elsewhere.
10. Page 62 - "Buses are part of the portfolio of transport choices". We have little confidence that any others will be forthcoming. As the D&AS itself states, the Metro is not expected to reach this part of Cardiff until 2030, after the site is built out.
11. Page 64 states that 'the scheme offers the opportunity to accommodate a route for a world class rapid transit system'. Where? The possible Metro line shown on p37 of D&AS A will run outside the development area. That leaves the park and ride and bus station. We say that the scheme fails to include a world class rapid transit system and gives no confidence that even a UK standard system will be delivered.
12. Page 68 shows Creigiau, Pentyrch and Junction 33 as "one place" around a red heart. If the design philosophy is to recognise three distinctive communities, why does the Masterplan show site D merging with site E which merges with Creigiau?
13. The 2011 Census shows Creigiau with a population of 2,618 in 1,044 households. That existing community is in no position to share its limited facilities with a development of 1,500 households and thus some 3,600 people on site D. Together with Site E with its LDP figures of 650 households and thus some 1,500 people the Masterplan shows Creigiau is being merged with over 5,100 people in 2,150 homes. In such a plan, it is not possible to retain distinctive community identity. The plan on p69 is, at best, misleading.
14. Creigiau has a strong Welsh language heritage of which the community is proud. There is no mention in the D&AS of this vital cultural characteristic which is threatened by this development.
15. Page 73 - movement is claimed to be "a large part of the sustainability credentials" of the site. The aim is to "integrate with rapid transit" and Site E to "overcome the barrier of Llantrisant Road". The pedestrian/cycle link is clearly intended to focus on Creigiau School to reduce the need for the new primary school on the site which would not be a "self-sufficient and sustainable" outcome (page 74).

16. Page 77 - a maximum of two-storey (8m) houses "is proposed" - although most new developments are three-storey. A majority of the employment buildings are to be three-storey (15m) - although commercial buildings along motorways elsewhere are taller.
17. Page 80 - the park and ride site is 2.63 ha, 1,000 cars. If this number of cars materialises, with an average of a driver and one passenger going to Central Cardiff, arriving between 7.30 and 8.30am this "world class" park and ride facility would need a bus every three minutes to cope.
18. Page 82 - Consultation on the LDP has triggered "some understandable concern" about traffic and absence of high quality alternatives to car use. Again, this section is considering sites D and E together while this application only refers to site D. Persimmon claims that the "transport strategy is based on improving non-car accessibility - in a way which will benefit all those living in the area dramatically and quickly; whilst new social infrastructure and facilities are built into the scheme." In fact, it demonstrates no realistic prospect of doing so, relying on buses that will simply join the worsened traffic jams on the existing road network which Cardiff Council admits is already at capacity.

Planning Statement A (40 pages)

19. Page 11 2.7.1. Creigiau has a proud Welsh-speaking heritage which is threatened by merging it with a much larger new community.
20. Page 12 2.8.2. This statement is misleading. The "Wales International Business Park" (WIBP) was **not** given permission. The application was called-in in August 2009 by then Minister Jane Davidson and was subsequently withdrawn as is recorded on Cardiff Council's Planning website: 06/02504/W. The circumstances now are not substantially different from those of the WIBP. The quantum of employment is less and there is now residential development and this would give rise to substantial traffic and environmental impacts which are wholly unacceptable.
21. Page 15 3.2 shows that buses are the only public transport available within the site and from the transport hub. When taking into account the huge increase in traffic that the developed strategic sites will bring to NW Cardiff the idea that buses will be an attractive alternative seems fanciful. What guarantees has the applicant secured that bus services will be provided? Our experience is that bus companies do not always want to run through new developments that extend their route times beyond what passengers will tolerate. Nor does the existence of a route now guarantee its presence in future as outlying communities continue to lose services.
22. Page 16 – the site is to be built out in 12 years but the school is excluded from the phasing. This can only mean that local schools and other facilities will be expected to accommodate rapidly rising numbers. This is not reasonable, practical or sustainable.

Planning Statement B (11 pages) - the site layout looks very spread out and disjointed.

23. Page 5 – phase 1 housing is shown accessed via multiple points along a very dangerous section of Llantrisant Road (from the accident statistics provided). A self-sufficient community needs its school and other community facilities in Phase 1. Nothing apart from open space is mentioned: no school, doctor's surgery, chemist etc. A sustainable community cannot be established without these key elements.

24. Page 9 – layout of the Business Park approved in 2009. So this is not relevant to this application.

EIA Non-Technical Summary (12 pages)

25. Page 8 – the site **is not** well placed for sustainable transport between the site and the surrounding communities. It needs substantial investment to make it so, in particular the Metro line into Cardiff. We disagree that a bus hub will outweigh the negative effects of a dramatic increase in road traffic.

26. Page 11 – this is a very casual assessment. This is a site effectively in open countryside. It needs careful consideration from a transport/mobility and community facility viewpoint. The Deposit LDP's Sustainability Appraisal Report raised serious concerns about development of the strategic sites in NW Cardiff. To state that the proposed developments will have significant benefits and no known significant cumulative impacts is misleading and disingenuous. The NW Cardiff Group has commissioned its own transport appraisals, submitted at the Preferred Strategy and DLDP consultations, giving clear information on the cumulative effects of these developments on the transport network in NW Cardiff. Cardiff Council's own transport officers acknowledge that the existing network is at capacity and cannot handle the traffic that will flow from the proposed developments.

EIA Chapter 6 : Transport Movement and Access

27. Page 1 6.5 - without local employment, park and ride linked to the Metro and concurrent development of community facilities with housing there is no chance of delivering on the 50/50 modal split aspiration.

28. Page 3 6.12 – the 30% “acceptable” increase in traffic is taken from a document that is 24 years old.

29. Page 12 6.25 – should acknowledge that Llantrisant Road is a narrow, two-lane single carriageway on a poor alignment for much of its length with a single, narrow non-continuous footway.

30. Page 14 6.32 – the transport hub on the site is to provide “world class cycle parking facilities”. When the rest of the application is so deficient on transportation aspects in general, it is insulting to propose such a tokenistic facility.

31. Page 15 6.36 – Radyr park and ride is not a reasonable option. Any cyclists brave enough to use Llantrisant Road as far as Radyr could reach the city centre just as quickly via the Taff Trail.

32. Page 15 6.40 – Rapid Transit has been elevated to “MASS Rapid Transit”. This only amounts to a bus station! The buses will run on already congested roads. The likelihood that people commuting into Cardiff will choose to sit on a bus rather than their own car in a traffic jam on the A4119 is virtually zero. Page 15 6.41 – the transport hub/park and ride “will enable a paradigm shift towards sustainable travel to and from a number of regional destinations”. A link to long-distance coach services is welcome but is hardly likely to lead to a measurable modal shift.

33. Page 21 6.66 – comparisons with park and ride at Cambridge (pop. 124,000) and Truro (pop. 23,000) are not credible for a site close to a city with 325,000 population in a region of over a million people.

34. The proposal is to build 1,500 homes but it is postulated that only 80 residents could work at the development (TA pg.18). The vast majority will therefore need transport to work elsewhere. On the assumption that some homes will only offer one worker whilst others will offer two workers and that a mean result would be one and a half workers per home, that would equate to a total of 2,250 workers being resident at the development. Given that 80 of these will work on site, that leaves 2,170 who will depart from the development each morning peak to get to their place of work.
35. Whether these 2,170 people will turn towards Cardiff or Miskin when they get to the A4119 is anyone's guess and the only indication available would be the existing habits of those currently leaving Creigiau in the morning peak. According to the Transportation Assessment (TA) supplied, however, no one leaves Creigiau to join the A4119 in either direction during the am peak (TA pg.146). Because of this data omission an informed estimate has to be made. This is a significant flaw in the TA that should be corrected.
36. Assuming 75% of the 2,170 people travel towards Cardiff that would be an additional 1,628 persons travelling along Llantrisant Road each morning peak period. 50% would give 1,085 persons. It is stated in the TA that twelve or thirteen buses will leave the development during the morning peak (TA pg.14). It is simply not credible that such a costly level of service would be provided by the developers and there is no likelihood that it would be provided by either Cardiff Bus or Stagecoach as a commercial proposition.
37. The TA indicates that Llantrisant Road at Danescourt will only be at 72% theoretical capacity by a base date of 2030 and that with traffic from the development this will rise to 81% of capacity (TA pg.21). The TA also indicates (TA pg.96) that Llantrisant Road at Danescourt will only be at 41% capacity by a base date of 2026 and that with traffic from the development this will rise to 44% of capacity. Clearly, both sets of figures cannot be correct.
38. The fundamental flaw in the Transport Assessment is the statement that Llantrisant Road at Danescourt is only at something less than its theoretical capacity. In reality, and because of the congestion caused in the city of Llandaff, the traffic on Llantrisant Road at Danescourt and all the way to the centre of Llandaff is actually at a standstill. Adding additional traffic from any development at any future date will only worsen this existing situation. Cardiff Council's own transport officers have acknowledged that the roads in NW Cardiff are already at their maximum capacity now (meeting April 23 2014, NWCG with Cllr R Patel and officers).
39. The suggestion that providing twelve or thirteen buses an hour will accommodate the 50:50 modal split is only correct arithmetically. If these buses travel along Llantrisant Road they will not be able to progress once they get to Danescourt. Travelling to Radyr Station (TA pg.116), the buses will be stuck in the heavy traffic through Radyr where their passengers will find am peak trains already all fully loaded, as they are now. Providing a 'bus gate' onto the M4 at junction 33 (TA pg.127) would probably fall foul of the Equality Act 2010 which introduced a public sector Equality Duty which came into force on 5th April 2011. The Duty requires public bodies to play their part in making society fairer by tackling discrimination and providing equality of opportunity for all. Also there is no indication contained within the TA whether Welsh Government, the Highway Authority for the M4, would contemplate such a junction.
40. The only way this development could be accommodated without causing severe disruption to travel arrangements for huge numbers of people would be for it to be

built after the provision of the Cardiff Metro, providing the Metro route can pass through the proposed development. Without the Metro, this development would be premature and unsustainable.

41. We consider that our comments are remarkably similar to those made by Cardiff Council's own transportation officers in the EIA Scoping Opinion (13.6.14). The Scoping Opinion required a rigorous examination of the transportation aspects of this development, including realistic cumulative impacts, underlining our concerns about its likely impact.
42. A mechanism must be found to fund and construct the Metro link from Cardiff Bay to beyond Site D before any development on this site commences. This mechanism must include a major contribution from this and other development sites in the region via S106 and/or CIL.

Opinion of the scope of the Environmental Statement

43. We note that the formal opinion of the scope of the Environmental Statement was issued on June 13 2014. This opinion raises fundamental problems in the transport section with the applicant's proposed Environmental Statement. To date we have not seen any evidence that these have been addressed.

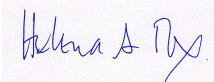
Other Points

44. We are concerned that the area outlined in blue to the east of the site has been shown as 'other land in the applicant's ownership'. We are concerned that this could come forward as a future extension even though this is not in Site D in the LDP. We note that the area shown on the Masterplan for this application includes new road layout and yet another access point onto Llantrisant Road.
45. This application appears to be being rushed and the process for producing the environmental statement is over-lapping consultation on the outline application. We are very concerned that this means that the application may be considered before the Environmental Statement (ES) is complete. Cardiff Council's opinion of the scope of the ES was 'initiated in April' and the application was submitted on April 2. At best this is confusing and at worst it flouts the regulations. We will expect the ES to address all the issues raised in the Scoping Opinion. The applicants cannot possibly have taken the Scoping Opinion into account in the short time between it issuing and them submitting. No wonder the ES they submitted has gaping holes.

Conclusion

46. We wish to emphasise the strength of our objection to this premature application. It is a retrograde plan that will create a community reliant on cars. The application focuses on sustainability within the site but fails to address its role in the sustainable development of the wider area. All the fine words about sustainability are tokenistic without the integration of the development with the Metro. This application neither aligns with the Cardiff Council's vision for our capital city nor with the goals of the LDP.

Yours sincerely,



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