

By e-mail to:-  
Amanda Sutcliffe  
Development Management  
Cardiff Council

6 November 2014

Dear Ms Sutcliffe,

**Re: 14/02157/MJR : NORTH AND SOUTH OF LLANTRISANT ROAD**

Llandaff Society is extremely concerned at the long term adverse impacts of the extra pressures the proposed development would generate on all sections of the community of Llandaff and the vulnerable and irreplaceable heritage of our Conservation Areas.

Llandaff is particularly at risk from any increases in traffic congestion along the A4119 which would impact adversely on the health of our residents and our environment generally via further reductions in air quality, already recognised as unacceptably below European standards via designation of the Cardiff Road Air Quality Management Area, and by increases in noise.

As members of the North West Cardiff Group the Society has the same views on this application as they do and urge you to **REJECT** this application on the following grounds:

**1. Summary**

- 1.1 The application is for a total of 630 houses on two distinct sites totalling 28.55 hectares, with an estimated population capacity of some 1,450 people. One site (Parcel 1) lies north-west of the Llantrisant Road/Heol Isaf mini roundabout with access off Clos Parc Radur. The other (Parcel 2) lies to the south-west of the junction, with access off a new junction spur road.
- 1.2 In line with our response to the Deposit Cardiff LDP<sup>1</sup> we believe that the application should be **refused** because it is **premature** and because it would result in **unsustainable** development.
- 1.3 The application is **premature** because it has been submitted only three months before the emerging LDP is subject to independent examination, before the full scale of required infrastructure has been identified and costed and before an appropriate Community Infrastructure Levy (CIL) has been developed let alone adopted.
- 1.4 The CIL Preliminary Draft Charging Schedule (*Report of Director: Strategic Planning, Highways, Traffic and Transportation*, Agenda Item 17, Appendix 1, Cardiff Council Cabinet Meeting 18.9.2014) proposes £100/m<sup>2</sup> for residential development. If we estimate dwelling sizes of 60-70m<sup>2</sup> (assuming a mix of unit types) at £100/m<sup>2</sup> that raises some £6-7,000/dwelling. On a development of 630 dwellings that raises £3.7-£4.4m.
  - 1.4.1 If consent is given to this premature application its S106 agreement should be negotiated under the current broad S106 rules and match what would be raised by the future narrower S106 plus CIL. Any S106 agreement should include contributions to public transport (capital and revenue) including the Metro. This is reasonable since the developers refer to bus and rail transport as part of the sites' sustainability credentials. Neither the City nor the local community can afford nor should it be expected to lose this essential contribution to infrastructure through a premature application that only benefits the developer by avoiding CIL.

- 1.5 Whilst policies in an emerging LDP can be material to decisions, as the Examination of the emerging LDP draws nearer it gets more likely that applications for whole or part of an LDP Strategic Site could prejudice the outcome of that Examination and should be judged as **premature**. This applies particularly to this application because one of the key representations to the Inspector from the North West Cardiff Group and others is the lack of a robust phasing policy and sound transport/mobility strategy for the North West Cardiff Strategic Sites C, D and E: objections which go to the heart of the emerging LDP.
- 1.6 This application cannot be assessed against a relevant policy framework. The unadopted Deposit LDP and Masterplanning Principles have no status. The extant policies for this site include national policy as contained in the 2008 Wales Spatial Plan, Edition 7 of Planning Policy Wales, the City of Cardiff Local Plan, adopted in 1996, and South Glamorgan (Cardiff Area) Replacement Structure Plan (1991-2011) and related SPG. The UDP is also a material consideration given it was not formally abandoned. Together these do not provide a suitable policy framework within which to assess this application.
- 1.7 Planning Policy Wales (2014) states at paragraph 1.2.1: “The planning system manages the development and use of land in the public interest, contributing to the achievement of sustainable development. It should reconcile the needs of development and conservation, securing economy, efficiency and amenity in the use of land, and protecting natural resources and the historic environment. A well-functioning planning system is fundamental for sustainable development.” We say that an approval of this application would not be in the public interest.
- 1.8 The application form states that there has been consultation with the community regarding the development. This is not true. Developers may have attended consultation events run by Cardiff as part of the LDP process and held some private meetings. There has been no consultation with the community regarding this specific application. The information presented in the application is much more detailed than that for the LDP and the community has had no opportunity to be engaged.
- 1.9 The sites proposed are inherently **unsustainable** because they will result in the development of car-dependent housing estates.
- 1.10 **We request that this application be REFUSED. If it is granted we request that it be subject to conditions requiring the developer to amend the density, layout and orientation of the houses to allow for direct pedestrian routes to the likely Metro alignment. It should also be easier to access existing and future public transport without using a car.**
- 1.11 **There should be substantial S106 contributions agreed after detailed consultation with Community Councils and local groups throughout NW Cardiff. The proposed primary school on Parcel 2 should be built via a S106 agreement, not left as a site allocation.**
- 1.11.1 In the past, sites have been reserved for community use but have been retained by developers and subsequently developed for housing, leading to a dearth of community facilities in many new housing areas. In Radyr & Morganstown sites allocated for a primary school (Radyr Gardens) and for a library (Radyr Sidings) have both gone back to developers for more housing. A residential care home at Radyr Sidings will not be built and the plot’s future is undecided.

- 1.11.2 **The S106 agreement for the application site should stipulate that land allocated for community use but not used for that purpose within five years of grant of planning permission, should revert to Community Council ownership to ensure community use in perpetuity.**

## 2. Reasoning

- 2.1 The covering letter submitted with the application says “even if the wider draft LDP designation (Strategic Site C) is set aside, the sites are sustainably located in relation to existing communities with few environmental or landscape constraints”. This is not the case. The new housing developed in the area in the past 20 years was designed to link into and complement existing settlements. The proposed extensions are totally different in character. They link to Llantrisant Road and comprise separate housing estates far removed from the vision of sustainable communities. The “primary school” on Parcel 2 is simply a land allocation, many previous examples of which have been released later on for yet more housing eg North Pentwyn and Radyr Gardens, Morganstown where land allocated for a primary school became housing.
- 2.2 The application is supported by voluminous material which pays lip-service to the adopted policy framework and massively understates the likely impacts.
- 2.3 The sites feed out onto the sub-standard 2-lane radial route (Llantrisant Road, A4119) with local junction widening. This road already acts as a reservoir for queuing traffic at peak hours. The proposed housing estates will simply generate more of the same. There is no proposal for additional public transport, just the vain hope that people will use the existing services which are already subject to major delay and are at full capacity. Without local facilities within the developments all trips to school, shop, medical facilities, and community provision will require a journey, most by car.
- 2.4 The Environmental Statement (ES) has not been “re-assessed to reflect a cumulative approach” as required by the Council’s revised Scoping Opinion dated May 2014 (A3.7), nor does it take into account the increased traffic flow that will arise from housing currently under construction in the Llantrisant area, many of whose residents will travel to work and to other facilities in Cardiff via Llantrisant Road.
- 2.5 The developer’s consultants seem to think that May and June (D4.2) are typical months, and that the evening peak lasts from 4 to 6pm, when school traffic starts from 2.30pm, and the peak often extends beyond 6.30pm. They also focus their assessment of impacts on the site and its immediate vicinity, whereas the full impact will be felt across a much wider area.
- 2.6 The reality is that this development will simply add to congested roads, buses, trains, schools and other community facilities that are already full or over-capacity at peak and off-peak times without providing any new facilities. The developers have clearly not grasped the scale of the challenge involved in creating a sustainable urban extension.
- 2.7 This application shows that our concerns at the lack of sustainable transport and phasing in the Deposit LDP were fully justified. We fear that this will be one of many applications submitted to pre-empt the LDP process that, if approved, would lead to construction of totally unsustainable swathes of housing and only a very limited contribution to the facilities their residents will require.
- 2.8 The rail crossing at St Fagans brings traffic to a stand-still, throughout the day, for 28 minutes in each hour. This will worsen with the new automatic signalling system

when the crossing will be closed longer than it is open. While the crossing may seem some distance from the application site, current traffic flows along the Llantrisant Road, to Crofft y Genau Road and into St Fagans and via the crossing to Culverhouse Cross. Numbers using this short cut are only likely to increase as a result of this development and 14/02188/MJR: Land South of Pentrebane Road.

- 2.9 We are aware that when the whole of Site C is developed, a potential solution to the problems caused by increased traffic is to close Crofft y Genau between Pentrebane Lane and Llantrisant Road, forcing more traffic onto the Llantrisant Road.

### 3 Housing Land Supply

- 3.1 Technical Advice Note 1: *Joint Housing Land Availability Studies*: June 2006 states (para 8.5) that “Where the current (Housing Land Availability) study shows land supply below the 5 year requirement, the need to increase supply should be given considerable weight when dealing with planning applications **provided that development would otherwise comply with national planning policies**” (our emphasis).

- 3.2 This proviso means that applications for housing should be judged on their merits, notwithstanding the lack of a 5 year land supply. This was illustrated by a recent Inspector’s decision (28 July 2014) **dismissing** an appeal for 48 houses on a site in Danescourt (APP Z6815/A/13/2207479). The Inspector concluded (para 39) that *“there is not a 5 year land supply in Cardiff.....but this does not outweigh the serious deficiencies of the proposed development.”*

### 4 Design and Access Statement

- 4.1 The text of the Design and Access Statement (DAS) could relate to any site in Cardiff. DAS 2.7 states that the two sites are being brought forward to address the “urgent need” for residential development. Clearly Cardiff needs more development, but surely it needs that development to contribute to improving the City’s current woefully inadequate sustainability credentials? There is no sign that these proposals will do that.

- 4.2 DAS 2.7 claims that the sites are “deliverable in isolation from” Strategic Site C and are entirely consistent with emerging Masterplanning principles. This is not true: neither site includes a public transport route as indicated in the LDP Masterplanning framework plan. As our detailed comments which follow demonstrate, these two sites will not produce sustainable communities unless they provide for fixed-track public transport and other essential infrastructure **from the outset**.

### 5 Environmental Statement (ES): Technical Assessments: Chapter C: Socio-economic

- 5.1 The impacts identified are deliberately reduced by referring to the whole of Cardiff for most of this Chapter. For example, C5.47 makes the sweeping assumption that most people who will buy these new houses already work in Cardiff and currently live outside it thereby giving a positive impact by reducing in-commuting. This is clearly nonsense as both the level of housing and jobs are set to increase. The whole LDP is predicated on increasing Cardiff’s population by a third so any generation will be an addition to current commuting. The increase can only have a negative impact unless a substantial number of both new and existing journeys can be made other than by car. Moreover, the comparisons are with Cardiff as a whole, not North West Cardiff, to divert attention from the true level of impact IN THIS AREA.

- 5.2 C5.55 implies that there is available state school capacity in the area but omits to mention that the nearest schools to the proposed sites are already at full capacity, so its residents could displace and disadvantage existing residents' children. The proposed primary school is outside the Radyr catchment area and would not be accessible by children from Parcel 1. Should the catchment boundary be changed to allow that, then the children from Parcel 1 would not be eligible to attend Radyr Comprehensive School, which is a draw for the developer's sales.
- 5.3 C5.62 refers to some capacity of open space and sports facilities "in surrounding wards" without specifying which wards or how to reach them other than by car, and thus seeks to minimise the impact of the residents of 630 additional houses. Cardiff Council faces real significant budget cuts and many area community facilities are likely to close or reduce their services in 2015-16. None of the facilities 'in surrounding wards' can be relied upon for this application.
- 5.4 C5.66 includes a sweeping assessment that there will be "an increase in demand of community facilities" in the area. The very short list given at C4.41 shows how limited provision is in the area at present. Whilst negotiation on S106 contributions is offered, past experience shows that the actual amount of one-off payments agreed will not produce long-term benefits commensurate with the level of negative impacts of these developments.
- 5.5 All applications approved before the adoption of Cardiff's Community Infrastructure Levy (CIL) avoid a CIL and rely on S106 agreements. In our experience, local communities often lose out on S106 projects which are negotiated by well-resourced developers who are not concerned with the long-term interests of the area. The CIL is intended to be a non-negotiable levy to provide essential infrastructure for the wider community with a percentage due to any affected Community Council. At a time of increasing budget cuts and loss of community facilities across the City it is Cardiff Council's obligation to secure as much public benefit from development as it can.

## **6 Environmental Statement: Technical Assessments : Chapter D – Transportation**

- 6.1 This document relies heavily on the methodology set out in the Guidelines of the Institute of Environmental Management and Assessment, rather than any policy of either Cardiff Council or Welsh Government. Whether this input from a quasi-professional organisation has any validity is something to question. Both this document and its accompanying Transport Assessment are unduly long and the content largely otiose.
- 6.2 D2.9 states that "the proposed development will provide (...) and improve existing public transport services." There is no evidence of this being provided by the proposed development, only an unsubstantiated claim that Cardiff Bus has allegedly agreed to extend its 62 service to terminate at the development. This bus service only runs once an hour, however.
- 6.3 D2.13 claims that one of the main priorities is to use existing road capacity with maximum efficiency. As the only road available is Llantrisant Road and it is already accepted by Cardiff officers that this has reached saturation point in the am peak, this is a false claim.
- 6.4 D2.20 correctly states that the SEWTA Regional Transport Plan includes a priority to minimise demand on the transport system and to minimise transport emissions and in D2.21 that it supports development programmes that will not adversely affect the

operation of the highway network. Clearly, then, SEWTA could not support this proposal as it fails all these tests.

- 6.5 Given that any increase in traffic on the already saturated Llantrisant Road will adversely affect the flow of traffic, it can be argued that if Cardiff consents to this planning application it will be in breach of its statutory obligation laid out in S16 of the Traffic Management Act 2004 which requires all highway authorities to secure the expeditious movement of traffic on the authority's road network.
- 6.6 D3.30 claims that there will be only "subtle variations" in the final mode split. Evidence from surveys undertaken by the authoritative Public Transport Executive Group (PTEG) shows that - without a major improvement in public transport - there is no chance of attaining a 50/50 split in north west Cardiff (*Light Rail and the City Regions Inquiry*, All-Party Parliamentary Light Rail Group/Passenger Transport Executive Group, February 2010); (*What Can Light Rail do for Cities: A Review of the Evidence*, Passenger Transport Executive Group, February 2005).
- 6.7 D4.16 refers to bus services. Some 550 new homes were built on Radyr Sidings without a bus service. Cardiff Bus will not run services they consider to be uneconomic and we have little confidence that new residents will choose the bus when it will join a lengthening queue of traffic, occasional bus lanes notwithstanding.
- 6.8 D4.18 refers to Llandaff Station. That station, in the community of Llandaff North, has no relevance to this application. Its inclusion demonstrates the lack of understanding of the locality.
- 6.9 The baseline "does not assume a 50/50 modal split" (D4.21). It cannot do so because the mode split in this part of Cardiff is so clearly different from that: it was 61/39 in the 2011 Census.
- 6.10 D4.22 is not true. The majority of junctions in the vicinity of these sites DO NOT operate "within capacity (at peak hours)" at present. Senior Cardiff Council officers admit that the City's network is at capacity now. PICADY, ARCADY and LINSIG are junction-design computer programmes and here it is claimed that they demonstrate that the majority of junctions are operating within capacity during the am and pm peaks. The difficulty with this statement is that Llantrisant Road itself does not operate in this way. Road capacity is calculated assuming that the traffic on the road is free flowing at its official speed limit. The am peak traffic on Llantrisant crawls along and thus traffic surveys show considerably fewer cars passing the census point in any given period than happens in free flow. The result of this is to wrongly conclude that the lower numbers show the road operating below capacity. The capacity problem with Llantrisant Road is caused by the flow bottleneck in the centre of Llandaff. This is incapable of being improved without the demolition of property in the centre of historic Llandaff which is totally unacceptable.
- 6.11 If the accident rate is below average for the City at present WE WANT TO KEEP IT THAT WAY.
- 6.12 The percentage increase in traffic will be far greater than the figure the consultants assume because there is no justification for the assumption that the modal split will be 50/50, unless by magic. CENSUS EVIDENCE SHOWS THE REVERSE: the further out the private housing estate, the higher its dependence on cars and the LDP acknowledges that.

- 6.13 D5.35, Table D5.3 suggests that no traffic will turn right, ie west, out of Clos Parc Radur. There is no mention of traffic turning left, ie west, out of Parcel 2. How can that be realistic?
- 6.14 D5.35 shows the percentage change in highway use as a result of the development. However, we notice that the baseline figures for Waterhall Road (7,467) are very different from the baseline figures for the same road quoted at D5.35 in application 14/02157/MJR: North and South of Llantrisant Road (10,665). This is a key route in the area yet one number is 43% greater than the other. Which is right?
- 6.15 “Rule of thumb” is simply not a good enough basis for assuming (D5.36) that only Clos Parc Radur will have a problem with extra traffic. If Llantrisant Road is expected to experience increases greater than 10% east of the two site accesses, how can that increase not propagate further, particularly at pinch-points into the City at Llandaff and also through Radyr along Heol Isaf to Ynys Bridge towards the A470 and M4.
- 6.16 D5.37-39 are typical of the arrogant, dismissive and superficial nature of this chapter. The issue is not whether pedestrians have room to move on the footway, but whether encouraging the vulnerable young and elderly to walk alongside a heavily trafficked radial road is “beneficial” to either their health or safety.
- 6.17 Generation of 37 cycle trips is said to represent an “increase in street activity and social inclusion”. This is clearly a naïve and preposterous claim. The current ‘cycling environment’ is dangerous and will become more so with the acknowledged (D5.36) increase in traffic. There is judged to be an “adverse medium” risk of pedestrian severance/delay at Clos Parc Radur (D5.43) but only a “very low” adverse risk on Llantrisant Road, when half the school children who live there may have to cross that road twice daily, as will bus passengers on one leg of their journey.
- 6.18 There is no mapping of acceptable walking and cycling distances and times, waiting times for public transport or discussion on containment of trips within the site. In reality a high modal share by walking/cycling can only be achieved where local shops and services are within 800m of all residents and bus stops within 400m. The applicant should measure and assess this. Rail stations referred to are beyond standard distances of 1200m (15 minutes walk) but are said to be easily accessible. Radyr Station is 1400m from the site and Danescourt 1600m (Appendix D1 1.69, 1.70)
- 6.19 D5.42 gives predicted increases by 52 morning peak and 84 evening peak bus trips. Rail is predicted to increase by 21 morning and 34 evening trips. How can that possibly contribute to a 50:50 modal split from a development of 630 new homes when Appendix D1 3.4 states that 25% of the Radyr population work in the City?
- 6.20 Parking is only considered within the estates (D5.55 as “negligible”), when the clear impact is adding to serious parking problems elsewhere, including overflow on-street rail passenger parking in Radyr village which spreads half a mile from the station forecourt.
- 6.21 This application is for two separate parcels of land which are part of Strategic Site C of the emerging LDP. It is generally known that the application for the major part of Site C is expected shortly. This application refers to Site C but does not present its assessment data in the full light of that much larger site. We note that Cardiff changed its mind about the requirement for cumulative assessment. Originally, in December 2013, it was not considered necessary. In May 2014 this view was revised in letters to the applicants that required them to prepare an Environmental Statement

to “address the potential cumulative effects of the whole of site C, and also sites D and E where necessary, to allow the application to be properly considered.” (Letter to Nathaniel Lichfield & Partners from Head of Planning, 28 May 2014). We do not see that the applicants have followed this requirement and, therefore, how can Cardiff assess this application? The applicants should be asked to comply with the requirement.

6.22 NW Cardiff's three Strategic Sites, C, D and E, all have direct access to the A4119 and only the A4119. To consider this comparatively small application without recognizing its part in a much larger and wider context is irresponsible and contrary to the advice of Council Officers (EIA Scoping Opinion letter dated May 2014).

6.23 With so much under-estimation of impact it is hardly surprising that “mitigation” appears limited to 3 Toucan crossings on Llantrisant Road, a pedestrian phase at traffic light-controlled junctions and “improvements” (unspecified) to existing bus services “after completion”: far too late to establish sustainable travel patterns. This is totally unacceptable.

## **7 Environmental Statement: Technical Assessments : Chapter I**

7.1 The assessment that effects on air quality will be “insignificant” is pure fiction and a new, independent assessment should be carried out to establish the true picture. This assessment only used two points within the existing Llandaff AQMA (Table I3.1), and assumed a 50/50 modal split and current speed limits (13.29). Yet Cardiff Council acknowledged problems had worsened in its *June 2014 Further Assessment Llandaff AQMA* with current low and expected lower speeds and increased stationary traffic (in queues at lights, pedestrian crossings and because of limited capacity) in the day, not just two hours in the morning and evening.

## **8 ES Chapter D : Appendix D1 Transport Assessment**

8.1 1.12 states, "Good design and Masterplanning is the fundamental structure for this transport approach". If this is correct, then where is all this in this application?

8.2 1.14 states, "By design, motor vehicle movement will be facilitated and prioritised appropriately", but 1.26 declares that the LDP states "therefore it is essential to achieve a 50:50 car-based to non-car-based split". These two statements contradict each other and nowhere is it explained how this 'essential' 50:50 modal split will be achieved. Nonetheless, the LDP has no status, so Cardiff Council cannot currently dictate this need. Consequently 1.14 could only be satisfied by appropriate highway improvements.

8.3 1.77 claims that "on Llantrisant Road, average annual daily flows (AADF) have remained stable for the last 6 years" and this is demonstrated by Graph 1.1 which reveals flow levels past the BBC.

8.4 1.78 then concludes that "therefore the evidence does not support a premise that new development means an increase in practical traffic flow". This misses the point that for design purposes the peak periods are of paramount consideration and that at the BBC Llantrisant Road is at saturation point in the am peak for inbound traffic. It is incapable of allowing any increase in flow, which is why for the last 6 years it has not altered. Graph 1.3 then clearly shows that the junctions of Llantrisant Road/Bridge Road and Cardiff Road/Western Avenue, also Waungron Road/Western Avenue do not work adequately in the am peak because their RFCs (Ratio of Flow to Capacity) are at or exceed 1. The rule of thumb for design purposes is that no junction should

have an RFC greater than 0.85 if it is to work as the average person would reasonably expect.

8.5 1.99 talks about choices leading into 1.100 which states that "the effects of all of these (choices) is that people act to minimise inconvenience, the theoretical journey time increases will not be (.....) significant." In other words, the developer is advising here that the proposal will permanently inconvenience all the residents of the area in forcing them to rethink their options.

8.6 7.10 refers to the separate proposal by Cardiff Council to possibly introduce a 300m bus lane on Llantrisant Road at the BBC for in-bound traffic. 7.11 predicts that this will save of 2-3 minutes travel time. Given the am peak traffic queues at this location now, no time saving is likely to be achieved by this crazy idea, but the quantum of road rage generated amongst the other road users who are inconvenienced by it will certainly grow. How this proposal can be said to comply with S16 of the Traffic Management act 2004 is a mystery.

8.7 13.62 is at odds with 1.14 on prioritising motor vehicle movement; again, a statutory duty in S16 of the Traffic Management Act 2004. It states that "the objective is to reduce dependency on the private car, so it is not conducive to design the highway network to accommodate predicted demand".

8.8 The only conclusion to be drawn from this, in the absence of any included scheme for achieving 'the essential 50:50 modal split', is that this development can only lead to a worsening of the traffic congestion and a worsening of the air quality we all suffer from in the am peak, especially in the AQMA Llandaff. It is also clear that the developer has no intention to finance a solution to these problems, which can only be described as a cop out.

8.9 Appendix A contains traffic flow data. On page 145, the 2013 in-bound am base flow on Llantrisant Road approaching the Bridge Road junction is shown as 657 vehicles (presumably per hour, but this is not stated). Interestingly, on page 146, the corresponding base flow prediction for 2019 reduces to 587 vehicles, which has to be wrong: the base flow is the existing level of flow without any predicted flow from the development. Page 148 reveals that the two sites will contribute 181 vehicles onto Llantrisant Road in the am peak and that most of these will travel in-bound towards Cardiff. Nearly all are shown to turn right at Waterhall Road, however, so that the only additional in-bound flow on Llantrisant Road at Bridge Road is shown to be an additional 14 vehicles. This analysis seems highly unlikely and amounts to another avoidance of reality. The 630 houses will generate many more trips than the here predicted 181 vehicles each am peak.

8.9.1 If most vehicles do indeed turn down Waterhall Road, has this increase been factored into the transport assessment for 14/02188/MJR: Land South of Pentreban Road?

## **9 ES Chapter D : Appendix D1 Transport Assessment : Appendix F**

9.1 This is a Travel Plan which the developer presumably believes will deliver the 50:50 modal split.

9.2 5.4 Table 5.1 shows 66% of current residents of Radyr and Fairwater drive to work. Oddly it says that 17 people use 'underground, Metro, light rail or tram' none of which exist in these areas.

9.3 As it contains no incentives to residents to make the shift it is unlikely to work. Even if it did work, it will only be monitored for a period of three years, after which it is likely to be abandoned anyway.

We will make additional comments on this application when the Masterplan for Site C is received.

The lengthy documents attached to this application show that the developer has not taken into account the wider context of Site C. They do not show a good understanding of the reality of the site's locale. The questionable methodologies and figures do not convince us that reliable data has been submitted.

This response is itself very long. That we have so many concerns and see so many discrepancies in the application speaks to its unreliability.

This application should be refused to allow time for a sustainable plan for NW Cardiff to be developed with the Metro, as suggested by the NWC Group and Cardiff Civic Society.

Yours sincerely,

Geoffrey Barton-Greenwood FRICS  
Chairman. Llandaff Society

**Foot Note:**

1. The response of the North West Cardiff Group stated our view that the Deposit LDP *"is fundamentally flawed because: (i) the transport strategy cannot provide sustainably for the scale of development proposed in North West Cardiff; (ii) that 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; (iii) the plan's details on new infrastructure required by the scale of development envisaged are vague and provide no certainty of delivery; (iv) the apparent reliance on bus rather than rail transport does not solve the existing, let alone future, road problems – construction of a new rail line from Cardiff Central to Beddau and other sustainable transport is vital, and must be provided **in advance of development in North West Cardiff.**"* (November 2013)