

LLANDAFF SOCIETY LDP EXAMINATION SUBMISSION 20/12/14

SESSION 1:

Plan preparation, Strategy and Objectives; Spatial Strategy

1. PART OF THE PLAN THAT IS UNSOUND

1.1 In terms of **Plan Preparation**, the Plan does not have the robust policy framework for local delivery that the LDP should be in the current “co-managed” system in which Masterplans are produced by developers.

1.2 In our view the LDP is **not sufficiently specific to Cardiff**, so its policies are not capable of delivering a sustainable vision of the future, nor reflecting the aspirations of local communities.

1.3 Whilst Llandaff Society agrees with the Local Development Plan (LDP)’s objectives and aspiration to help create a sustainable city for future generations worthy of the title European Capital, we do not agree that these will be possible with this **Spatial Strategy**. We contend that the LDP is unsustainable and unbalanced, thus fundamentally flawed.

1.4 Moreover the LDP is **not consistent with the Wales Spatial Plan (WSP) nor does it relate appropriately to the LDPs/emerging LDPs of adjacent areas** because it does not capitalise on Cardiff’s unique position in the Welsh economy and psyche, and does not provide sustainably for necessary travel between these inter-dependent areas.

2. WHICH SOUNDNESS TEST DOES IT FAIL?

CE1-4 Coherence and Effectiveness; and P2 Sustainability

3. WHY DOES IT FAIL?

3.1 **Plan Preparation:** Llandaff Society said that the Preferred Strategy was not sustainable. The DLDP strategy marched on unchanged with only in minor adjustments, all in the wrong direction. So we said that the strategy in the DLDP was not sound, and indeed could not be without phasing to ensure development is proceeded by supply of infrastructure. There was a chance for the Council to make focussed changes to incorporate phasing policies, but regrettably this opportunity was not taken. Moreover no notice was taken of the conclusions of the Council’s own Sustainability Appraisal (SA). It is a legislative requirement to undertake an SA to inform decision-making, however the DLDP submitted to Examination without focussed changes has paid only lip-service to both public consultation and the SA process. As a result the DLDP is more vague and even less likely to deliver on its objectives than the Preferred Strategy.

3.2 Whilst the public consultation process has been adhered to in terms of the letter, it has not been in spirit, because developer and landowner views have been given too much weight. We believe that the result is a Deposit Plan that is not in the public interest, ie it is not in accord with the requirements of national planning legislation and Planning Policy. This makes transparent determination and scrutiny - provided in the case of DLDPs by independent Examination by an Inspector - of heightened

importance, as pointed out in the article *“In planning we trust? Public interest and private delivery in a co-managed planning system”* on pp537-540 in *Town and Country Planning* Volume 83 No: 12 (December 2014).

3.3 Specific to Cardiff?: In our view the LDP is full of generic policies that might just as well relate to “Anywheresville” rather than this jewel of a Capital City of Wales “set in a coastal basin, cradled by gentle green hills” as we described it in our response to the Preferred Strategy. The LDP needs to be based on full landscape and historic environment assessments rather than just LANDMAP for its rural context. These should provide a framework within which rational decisions can be made on changes proposed to the existing settlements as well as urban extensions, ensuring that any changes enhance - rather than detract from - Cardiff’s distinctive geography and topography, the glories of its river valleys, parklands, and heritage buildings, and its rich social and economic history.

3.4 Spatial Strategy: One of our key points - going to the heart of the LDP - is that the scale and pace of development cannot be delivered sustainably without significant amendment to the Key Policies and the Proposals Map to include robust phasing and public transport provision. The LDP is based on achieving major increases in jobs and housing by 2026, with no mobility solution that can deliver this sustainably. The scale of building of such a quantum of family housing has no precedent in recent history, and no evidence has been produced of any similar sized city that has achieved a 50/50 modal split from 64/36 for fixed track public transport which will require half of those occupying the projected 240,000 in the City to travel by sustainable modes. In Radyr, even with its rail service to Cardiff City Centre, over 75% of journeys to work are by car.

3.5. Evidence contained in a report by the Passenger Transport Executive Group of February 2005 “What Light Rail can do for Cities” shows that this simply will not happen. Table 8.1 Summary of Evidence in that report states that “..UK LRT Schemes typically transport up to 2,000 people per hour (with the capacity for many more) to and from city centres, efficiently and in relative comfort.....Patronage is steadily increasing on all the UK schemes, with a 52% increase since 1999 despite increasing fare levels.....there are often even more people travelling at weekends than during the commuting peaks.The rate of modal transfer from car to tram at peak times is consistently around 20%. This compares with estimates of between 4% and 6.5% for quality bus investment. Levels of traffic reduction from light rail are typically around six times greater than with bus schemes. Reductions of road traffic of up to 14% after introduction of tram schemes have been recorded.....schemes have had positive effects on the image of the city...(with) benefits in terms of attracting inward investment as well as business and tourist visitors.” Compared with these actual figures the Arup September 2013 North West Corridor Study forecast of bus “rapid transit” attracting the same proportion of trips as Tram-train is thus wildly optimistic. It is reckless to base an entire Plan on achieving these theoretical transfers.

3. 6 The unsustainability of the Strategic Sites is further evidenced by statements in documents supporting major planning applications on Sites D and C in North West Cardiff where some of the details of what is planned are starting to emerge. These

contain reassuring words and visions of 'sun-lit uplands', but gross under-estimates of adverse and cumulative impacts from:

- multiple highway accesses onto Llantrisant Road which are to be turned into a series of car reservoirs awaiting discharge through 2 lane sections of Cardiff Road, Llandaff; Bridge Road, Llandaff North; and Waterhall Road, Fairwater;
- impractical and awkward public transport solutions based on extending bus services which provide insufficient reliability or certainty, and unrealistic expectations of increased cycling and walking for long-distance trips, even though analyses show that existing residents in Cardiff and Penarth use cars for most journey purposes. Moreover competition means that provision of local shopping no longer guarantees local usage, and there may not be room for children occupying the new houses to attend the nearest school or health services;
- the under-estimate of the scale and cost of the level of bus services needed to reach a 50/50 modal split on the site, leave alone beyond it;
- no mechanism for stopping development if monitoring demonstrates it is actually IS unsustainable;
- complete denial of any impact on the existing suburban and rural roads or on the Air Quality Management Areas in Llandaff and Ely that - on Cardiff Council's own transport assessments - will suffer increased motorised traffic;
- no assessment of off-site road works and traffic management scheme impacts on adjacent communities and those lying between the Strategic Sites and the City Centre;
- no guarantee of delivery of education, health and community facilities, although no doubt early delivery of the superstore (as has happened elsewhere in Cardiff), with the inevitability that this will draw in car trips from a wide catchment;
- cursory assessment of environmental impact, and none of landscape impact;
- no systematic assessment of cumulative impacts, even though this was specifically required by each EIA Scoping Opinion.

3.7 The Masterplanning approach - which is also a fundamental part of the strategy underpinning the LDP - has failed already. The Masterplan for Site C was made public when the outline planning application for up to 5,970 houses on that site was registered in December 2014. It has been prepared by consultants for the developers, who have every incentive to justify planning for what will sell in the short term, not what will prove sustainable in the long term. This Masterplan does not constitute a robust or independent assessment framework for taking decisions on such a major development applications with huge potential impacts.

3.8 Without phasing, opening up the possibility of using large tracts of greenfields without the transport and facilities to connect them sustainably, creates the risk that neither these - nor the more sustainable brownfield sites - will be developed in a timely fashion. Moreover, unless the LDP is amended to include strict phasing of the Strategic Sites, large areas of best and most versatile agricultural land - and

people's livelihoods - could be sacrificed without delivering the required outcomes and with no mitigation of adverse impacts.

3.9 Finally, and leading them to be out of accord with the Wales Spatial Plan 2008 Update, the DLDP policies do not provide certainty for provision of the major infrastructure, particularly extensive public transport, to serve the development needs of the Cardiff Capital Region in the period to 2026, leave alone to provide a foundation for sustainable strategic planning beyond 2026. This is a key omission as the Priorities for the Capital Region (on page 98) start with: "The area will function as a networked city region on a scale to realise its international potential, its national role and to reduce inequalities" followed by: "A fully integrated high quality transport system is necessary for this to happen. Over the 20 years ...(to 2028) all the Area's key settlements should be linked to Cardiff or Newport by suitable high capacity public transport" The Llantrisant/Talbot Green/Newtown Llantwit/Beddau area can only have such a link via fixed track systems that will give capacity in the thousands per hour not just hundreds. That capability depends on one or more tracks being built through North West Cardiff, and providing services for new housing and employment there - a fact acknowledged by all key public authorities.

4. HOW CAN THE PLAN BE MADE SOUND?

4.1 The LDP key policies need to be amended to introduce a policy requiring fixed track public transport between North West Cardiff and Cardiff Bay to be in place before development proceeds on Strategic Sites C, D and E. This route is to be part of the Metro and should provide through services with connections to a multi-modal (walk/cycle/bus/tramtrain/rail) transport interchange at Cardiff Central Station.

4.2 In addition, the LDP must include a key policy to enable strict phasing of housing and community facilities, so that the sites develop after the Metro is in place, and are developed in a way that is orientated to facilitating sustainable mobility, maximising the use made of local facilities by local people, and of all forms of sustainable transport both within and outside each site.

4.3 The supporting policies in the LDP need to specify that the layouts of new development in all areas of the City must take their cue from, and facilitate convenient use of, the Metro fixed track public transport, to maximise regeneration benefits for the region as a whole, and minimise cumulative adverse economic, social and environmental impacts.

5. WHAT IS THE PRECISE WORDING BEING SOUGHT?

5.1 The specific wording changes sought in relation to the issues in Session 1 are in italics below:

KP2: STRATEGIC SITES

Strategic Sites are allocated as set out below to help meet the need for new dwellings and jobs ...and will be phased to ensure that major transport and other essential infrastructure for each area is complete before occupation of the first buildings, and to ensure that each phase is reasonably self-sufficient.

and

T7 STRATEGIC TRANSPORTATION INFRASTRUCTURE

Replace (iii) by (iii) a *Cardiff Central Station to Creigiau electrified heavy rail service, or Tramtrain service between Cardiff Bay, Cardiff Central Station and Creigiau*

plus

Inclusion of the route of T7(iii) on the Proposals Map.