

## **LLANDAFF SOCIETY LDP EXAMINATION SUBMISSION 20/12/14**

### **SESSION 2: Infrastructure and Delivery**

#### **1. PART OF THE PLAN THAT IS UNSOUND**

1.1 The DLDP does not specify, nor secure provision of, the strategic infrastructure which is essential if Cardiff is to achieve its vision of being a “world-class European Capital City”. The implementation mechanism and the LDP are not linked closely enough and are not consistent in their descriptions of what is to be provided.

1.2 The DLDP and the Infrastructure Plan are incomplete and need clarity, with the addition in policy and on the Proposals Map of the Metro, so that there is certainty about its location, project specification, and operation, and its relationship with the CIL Charging Schedule.

1.3 The need for infrastructure - and in particular fixed track public transport infrastructure - to be provided in advance of development is clear. This is the model invariably adopted on mainland Europe - in Cardiff's twin city Nantes, in Freiburg, Strasbourg, Montpellier etc. It is a model that used to be routine in Britain, and still is in the most enlightened UK city regions.

1.4 As far as Llandaff Society is aware there has been no assessment of the overall infrastructure requirements updated to include the preferred Metro option, nor how the elements are to be delivered. There is almost complete abdication of delivery to the private sector, with no guarantees exist to deliver certainty. Delivery appears to be a process that is being made it up as time progresses.

1.5 An assessment has been undertaken of the potential CIL, and a recommendation made by the Council's consultants that this be set at £260/sqm of housing on greenfield strategic sites while still remaining viable “with a healthy safety buffer”. We calculate that this could raise some £316m from all such sites, assuming an average dwelling size of 90.5sqm. However the Council is currently proposing to charge only £100/sqm.

1.6 As a result of the above we have no confidence that the DLDP will provide an implementation mechanism providing certainty for developers, current or future residents and businesses about how much development will happen where and when. There is no certainty about when the essential infrastructure will be delivered as this depends on the required levels of funding becoming available and is not linked at present with a robust phasing mechanism.

1.7 Delivery depends on funding streams being available. Cardiff's Local Transport Plan 2015/6-2019/20 submitted to the Welsh Government in December 2014 shows the first phases of Metro linking the City Centre to the Bay as starting in 2019/20. However, there is currently no development plan basis for the North West Cardiff section of the Metro route - which has been announced as the Welsh Government and Cardiff Council and the City Regional Board's top priority. Delivery depends on the route for this link being protected in an adopted development plan. It is extremely difficult to retrofit this type of infrastructure, and a further risk is that it will

not be possible to progress the necessary Compulsory Purchase Orders without such designation to give it a precise legislative context.

## 2. WHICH SOUNDNESS TEST DOES IT FAIL?

2.1 The DLDP fails tests CE1-4 Coherence and Effectiveness; and P2 Sustainability.

## 3. WHY DOES IT FAIL?

3.1 There is no evidence to back up the claim that what is described as essential - achieving a 50/50 modal split - can be delivered by the DLDP unless it is modified before adoption to include reference to heavy rail reinstatement or a Metro tramtrain between North West Cardiff, the City Centre and the Bay, to tie in with development of the surrounding areas.

3.2 The fixed rail Metro link features in Cardiff's Local Transport Plan (LTP), and is a strategic priority for the Welsh Government and City Region Board. Unless it's route is protected in the LDP, it will not be a key focus for development of the Strategic Sites C, D and E. And unless it features in the CIL Schedule, there will be little prospect of funding its capital and operating costs. The LDP must be amended to include it in both Policy and the Proposals Map otherwise the opportunity to integrate it will be lost.

3.3 The aspiration is that the new Garden City in North West Cardiff will become part of the City. If so there needs to be access to it from the rest of the region. This can only be provided sustainably if there is a much more integrated overall mobility strategy in place **before** the Strategic Sites are released for development.

3.4 Since work started on the LDP, the Welsh Government has recognised that developing the Metro concept is crucial to the economic regeneration of the Capital Region, and has commissioned substantial work to develop the concept. The Council and the City Region Board has backed the project, but there appears to be a lack of progress that may mean it is felt that it can await preparation of the Strategic Development Plan. Unfortunately this is akin to shutting the stable door after the horse has bolted. It is very difficult, if not impossible, to retro-fit such a significant piece of engineering into the urban fabric, an example is the Edinburgh tram system. It cannot be done without disruption, however if construction is left until a time when even more residents will be affected, it become well-nigh impossible.

3.5 Also since the start of work on the LDP the UK has been slow in coming out of the deepest recession since the 1930s. Petrol and diesel prices have reduced substantially in the past 6 months due to a combination of recession, lack of world demand, and increased supply through such measures as fracking. However, public transport fares have not reduced in step, and are due (for rail) and are likely (for bus) to continue to rise because they are more heavily dependent on other factors with costs that **are** increasing such as the price of electricity, wages and capital costs. This will make it more difficult to persuade people to use alternatives to the car unless they are quicker and just as convenient - neither of which is true of rail and bus services in Cardiff.

3.6 The larger and more affluent the city region, and the more joined up the layers of Government, the easier this is. We need to overcome organisational complexity and

devise much more effective alternatives to the car, as envisaged in the Draft National Transport Plan issued for consultation in December 2014. At the moment the rhetoric and reality are very far apart.

#### **4. HOW CAN THE PLAN BE MADE SOUND?**

By including policy to support implementation of Metro.

#### **5. WHAT IS THE PRECISE WORDING BEING SOUGHT?**

Addition of Metro - heavy or light rail - from North West Cardiff to the Cardiff Central Station and Cardiff Bay as the new Policy T7(iii), and inclusion of the route on the Proposals Map.