

Executive summary/introduction

Few third sector bodies in Cardiff have the track record or experience of the Cardiff Civic Society to prepare inputs or commentary on the subject of the Local Development Plan. Our over the past 6 ½ years attention to the progress of the LDP, which we regard as of vital significance to the city, has been focussed on helping the council deliver the vision of a thriving European city.

This commentary has been written after the series of hearings run by Welsh Government Inspectors to examine the 'soundness' of the plan submitted by Cardiff Council. This word 'soundness' relates not to how good it is but how it aligns with government policy, and how it uses evidence to define an approach to development of the city. 'Soundness' is thus not a qualitative measure early one of compliance to a process.

We have attended most of these sessions, providing input to each hearing (our submissions are listed at the end of the report, and indicates how they can be accessed) and contributing a substantial proportion of the discussion on the issues raised. We summarise the inputs and conclusions we have reached as we near the final stages of the process.

First amongst these areas is transport, encompassing public transport and traffic around the city. We are strongly critical of the lack of adoption of the Metro trams system to resolve the issue of congestion in the city. We believe that this is essential for Cardiff to deliver its ambitious vision. We conclude that development should be restricted to sites and time periods that can be supported by a future Metro, to avoid what we describe as catastrophic congestion as the city grows. Further consequences of this conclusion are the need to redesign the central transport hub at the station to allow it to be a multi-modal hub fit for purpose in the 21st century with better traffic/walking/cycling routing around the city. There is an urgent need to commence serious joint planning with neighbouring local authorities in relation to both housing development and commuting, perhaps with a city-region approach.

Our second theme is the need to do far more to deliver the jobs planned; they will not turn up because the council says so. This is a competitive world and business needs to be persuaded to cross the Severn to Cardiff to deliver the jobs and growth and jobs identified as government priorities.

Our third theme is the need to preserve essential features of the city in the face of massive housing growth, primarily by establishing a green belt to keep development to the strategic corridors identified in the Wales Spatial Plan, but also by valuing the heritage features of the built environment.

The LDP is important to Cardiff and to Wales, the observation that it is 'too big to fail' underlines the risks to the city in poorly planned and/or inappropriate development. We need a sound plan but also a good plan, and offer a shortlist of changes needed to deliver just that.

Summary

The LDP Examination has led to the Plan's extensive review through 150+ Action Points listed by the Inspectors. With a further public consultation now planned on these changes there is an unexpected opportunity to make this a good and sound Plan that can deliver success for the city.

Background to the hearings

Inspectors highlight 150 'action points'
Final opportunity to address shortcomings in LDP
Complex, unhelpful policy environment
Council rejected consideration of 3500+ suggestions

The Cardiff Civic Society has submitted documents to and attended eleven Hearing sessions in the series examining the Cardiff LDP. These Hearings and our submissions are listed in the attachment.

The Inspectors have given us every opportunity to expand upon our ideas and debate the views of other attendees, and these discussions have resulted in a series of actions on Cardiff Council. The inspectors have announced that the report on the Deposit LDP is unlikely be completed before Autumn 2015, following consideration of the Council responses to more than 150 action points developed during the Hearings.

This briefing note is our summary of the outstanding issues to be resolved before adoption. These issues are very significant; planning applications are likely to be submitted for the strategic sites before the LDP is adopted, and the shortcomings of the Deposit LDP are likely to be quickly exposed.

The policy circumstances affecting this LDP are complex and not at all helpful. The Williams report on Local Authority mergers conflicts with the city-region policy, the timescale for the LDP overlaps with the Planning Bill introducing regional planning, and the Capital City-Region Board report in February 2015 builds on the Metro project development which is a central part of the National Transport Plan, currently out for consultation but is not embedded in the LDP. The document 'Powering the Welsh Economy' creates an alternative vision for South East Wales that makes the Deposit LDP obsolete already. An urgent decision by Welsh Government on implementation of the tram-based Metro project is the action that would most help to unblock progress and help deliver the four themes of Connectivity, Skills, Innovation and Growth.

The Cardiff Civic Society has contributed formally to every consultation offered by the Council for the past 6½ years and has made a substantial investment in contributing to this LDP. Although the consultation process, which we criticised very heavily last time, has been much improved we are disappointed that none of the 3500 or so suggestions made by the public were deemed worthy of an alteration to the text, and the Plan went through unaltered. Consequently we have been forced into a damage limitation exercise, and to make our points in the public forum of the Examination.

Acknowledgements

*Support from NW Cardiff group of community councillors
Constructive engagement by communities
AM, MP engaged
Guidance and support from TCPA and IWA*

We would like to acknowledge the help and support of the NW Cardiff Group of City and Community Councillors and residents in developing our proposals for a Garden City development in the north west of the city. With support for the Metro we agreed this was the only way to provide sustainable transport solutions for the City, especially in this critical and strategic sector of the City as identified in the Wales Spatial Plan. It is to this group's credit that they have not joined the chorus of 'No development in my back yard' in favour of a constructive engagement on how it might be achieved sustainably and without undue impact on existing communities.

We have received support and encouragement from others including Cardiff West AM Mark Drakeford and MP Kevin Brennan (who attended with CCS vice-chair Peter Cox the parliamentary presentation by the Town and Country Planning Association on the development of new garden cities.) The TCPA has been a rich source of guidance and inspiration and the Institute of Welsh Affairs provided much support for the joint public review held at the RWCMD in October 2013.

Issues

Traffic congestion

*City roads at capacity - air quality breached or close to being illegal
Forcing motorists onto buses: gridlock likely
Knock-on effect on housing, employment
Growth in RCT will be curtailed*

Despite the recognition that Cardiff's roads are at capacity now, and that a rail-based transport solution is the only way to resolve this issue the LDP plans to expand the City without delivering the transport network needed because the plans for the Metro have not been approved. Further, the Air Quality has breached, or is close to breaching, legal limits in many parts of Cardiff, and sustainable transport is the principal means of staying within the law.

The solution planned is to create obstacles to car traffic, through delays on key routes and parking controls/pricing, to force commuters onto an expanded bus network. Our view is that this will not happen until travellers have explored all other routes, work flexibility and journey timings. By then the City will be at gridlock, with the risk that the housing market and business growth will have been choked off. Most of the strategic sites are between 5 and 10 km from the centre, so there is limited opportunity for much extra walking/cycling: a mass transit system is the key enabler.

The creation of traffic queues along the A4119, for example, bus lanes around Llandaff and a bus lane along Cathedral Road in place of half the on-street parking (and trees, we

suppose) will be no more popular than the already rejected bus lane along Cowbridge Road East. Such planned congestion and delay sits ill with the vision of a forward-looking, thriving city with a high quality of life. Thousands of car users are unlikely to transfer to buses to get to work, particularly when there will be no central bus station for 2½ years.

The journey times for commuters from RCT will be severely impacted, and growth plans in that area curtailed unless joint planning is improved and better solutions developed – a concern voiced by RCT officers at the LDP Examination.

Central Square

*Bus station plans short sighted, lacking interconnection
Re-specification as multi-modal hub needed*

The developer's design for Central Square shows a small bus station to be developed on the site of Marland House, with no connection to the planned Metro link down to the Bay, no route under the railway, no thoughts on how the future Metro lines will interconnect with the bus and rail, and no traffic routing plans to ensure this important junction remains accessible. This is a short-sighted, narrow view of what is needed for 21st century Cardiff. Between June 2015 and December 2017 there will be no bus station at all, with temporary bus termini spread throughout the central area. This is far too long. A re-specification of this multi-modal interchange needs urgent action.

Enterprise Zone (EZ)

*EZ planning at arms length and does not integrate with LDP
No economic strategy in place to inform LDP*

The economic success of this LDP, of Cardiff and of Wales depends on the success of the EZ more than any other factor, yet it is the aspect of the plan we know least about. The delegation of planning to an arms' length body has resulted in little public disclosure or consultation, and its contribution to the LDP understated. The contribution to housing is a net zero, despite the obvious opportunities along Lloyd George Avenue and the Taff embankment, and the 10,000 jobs a massive understatement of the potential for this prime site. Both of these shortfalls put pressure on green field site development.

The marketing drive to get new business into Cardiff is selling the Metro concept but the sales pitch is far ahead of reality and investors will be disappointed until the project gets approval. There is no economic strategy in place to inform the LDP, so the priorities of jobs and growth depend on the attractiveness of the city as a destination for business. The City-Region board report posits that we are on the cusp of a third industrial revolution underpinned by communications technology and the internet. Despite some progress towards a digital city strategy, Cardiff is described as underweight in jobs in these sectors and GVA is poor by UK standards.

Masterplanning

*If master planning delegated to developers focus will be limited to sites not city
Lack of clarity of Metro diminishes application of transport oriented planning
Sites too distant from transport
Need to plan Garden City in north west of city*

The delegation of all Masterplanning to site developers focusses the transport arrangements and services within the site boundaries, when the big problems are exterior to the sites. Delivering a sustainable transport structure within a site does not contribute to the commuter, hospital or secondary school traffic, and contributions through CIL will not be available in time to fund this other than by taxation. Similarly, the capacity of the City's sewers was declared close to peak capacity and no investment is planned; central health facilities are stretched and requiring a reported £10m investment to cope with growth.

The lack of clarity over Metro routes and mode mean that the internal design of sites does not follow Transport Oriented Development principles, and many parts of the strategic sites (and the whole of site E) are too distant from transit routes to be easily usable. This method of anchoring the design and densities of these communities is well established within the planning profession, and has the benefit in these examples of separating new from existing communities with green spaces (see our Garden City proposal in Hearing No. 1).

The preservation and enhancement of heritage assets is also not encouraged by this narrow focus, and we hope that the policy is strengthened to ensure these are retained and valued appropriately as part of the 'characterisation' (a Civic Trust initiative) of each development.

Green Belt

*Widespread support by public for Green Belt at risk from objections by WG and developers
Development focus needs to be on strategic corridors*

The LDP inclusion of a green belt to the north of the City has widespread public support, yet was subject to combined objections by Welsh Government and developers on a series of technicalities.

We believe the overwhelming public support should carry significant weight on this issue, and the City-Region will benefit from the focus of development along the strategic corridors rather than in visible and desirable locations on the ridges of Caerphilly Mountain and the Garth.

Conclusions

*Inspectors' 'Action Points' give scope for beneficial changes
Essential to have good - and sound - LDP*

The Inspectors at the LDP Examination have published an extensive list of Action Points that the Council must address by the end of April 2015 in order to deal effectively with these issues. We are convinced that substantial change is essential, and there is now a window of opportunity to make this a good and sound Plan that can deliver success for the city.

Links to Hearing documents

The list of actions published by the Inspectors for resolution by the end of April 2015 can be viewed [here](#)

List of hearings attended with links to CCS submissions (click on title to open web page/pdf document)

- 1 [Plan preparation; vision and objectives; spatial strategy](#)
- 2 [Infrastructure and delivery](#)
- 3 [Housing Provision](#)
- 5 [Strategic Site A](#)
- 7 [Strategic sites D and E](#)
- 8 [Strategic site C](#)
- 10 [Employment](#)
- 12 [Green Belt](#)
- 13 [Historic and Natural environment](#)
- 14 Transport matters - there are nine documents in all at ref 2518 [here](#)
- 19 [Monitoring and Implementation](#)

Note: these are links to the Cardiff Council LDP website and are correct at Monday, 9 March 2015. In case of difficulty go to their website at www.cardiff.gov.uk and to the LDP/Examination section

This paper has been produced by the CCS LDP team. Please send comments to chair@cardiffcivicsociety.org

Cardiff Civic Society is a charity dedicated to improving the built and natural environment of the city. Its role is to provide information and support, research and debate and, where necessary, to lobby local authorities, government and private interests to ensure the achievement of its aims. It runs conferences, workshops, education events and acts as a catalyst for other organisations with similar objectives to exchange ideas and develop skills.

For membership and other information see www.cardiffcivicsociety.org