

Wednesday, 25 March 2015

Carl Sargeant,
Minister for Housing & Regeneration
Welsh Government
5th Floor Tŷ Hywel
Cardiff Bay
CF99 1NA

Monday, 27 April 2015

Dear Minister

URGENT – Request for call-in of planning application to redevelop Cardiff Bus Station

I am writing to you in your capacity as Planning Minister on behalf of Cardiff Civic Society. The Society takes an active interest in planning issues in the capital city and its representatives appeared at eleven of the recent hearing sessions into the Cardiff LDP.

We are concerned about the possible consequences of planning application ref 14/02405 on Land to the North of Cardiff Central Railway Station for a new 'Media centre' (BBC Wales HQ). This planning application is to be put to a Special Meeting of the city council's planning committee on Wednesday 29th April.

We ask you to call in the application for determination by yourself for the following reasons:

Ethical reasons – The city council are owners of the application site and thus have a vested interest in approval of the planning application because of the capital receipt it would generate for the Council. Determination by Welsh Ministers would remove any doubt that this high profile application was being considered on purely planning, rather than financial criteria.

Timing - The Inspector at the Examination into the Deposit LDP requested the City Council to respond to over 150 'Action Points' including more details on the proposed Central Transport Interchange and Metro routes, by 30th April. Many of the action points will result in changes to the Deposit Plan's transport proposals but the application is to be determined the day before these proposals become known rather than at the next regular planning committee meeting on 13th May. The application should be determined after, not before proposed and relevant changes to the LDP are published.

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Strategic reasons - We realise that a call-in can only be justified if the application in question

- is in conflict with national planning policies or
- could have wide effects beyond their immediate locality or
- may give rise to substantial controversy beyond the immediate locality.

We maintain that the application qualifies under all three of the above criteria.

The application, located in the heart of the city's Central Business District and Enterprise Zone, is potentially in conflict with national planning policies by prejudicing Cardiff's role as a transportation hub for the South East Wales Region, contrary to the Wales Spatial Plan. This will certainly be the case in the short term as the development will (very controversially) destroy the central bus station with no replacement provided for at least two and a half years. The location could hardly be more strategic but by destroying the central bus station and adversely affecting the operation of the Central Railway Station it will have an adverse effect not just on the rest of Cardiff but throughout the region. The Developer's own Master Plan states that an inadequate transport infrastructure would constrain economic development, and that the Metro must not be compromised – a concern that we share.

Practical Planning Reasons - The application does not provide for a replacement bus station by the developer but assumes that one will be built on adjacent land by the city council 30 months later. We believe that the suggested replacement bus station is too small to accommodate both existing bus services and the many additional services that the LDP anticipates will be needed to serve the 20,000 new houses to be built on the city's periphery under the provisions of that Plan. Moreover the replacement facility is proposed to be more than a bus station and function as an Integrated Transportation Interchange for the entire region. The lack of information about this hub was one of the most pressing concerns raised at the LDP Examination. A separate application for the Interchange is promised 'later in the year' but we argue that sound planning principles require that the development and interchange applications should be considered at the same time so that their interrelationship can be assessed.

The application includes Wood Street, which is currently the main approach to the existing and proposed transportation facilities. We believe that Wood Street is not wide enough to accommodate all of the demands that the development will impose upon it (not least the demand generated by the proposed media centre's 300 parking spaces) and accommodate a future metro (possibly tram) line. Indeed the application suggests that it could accommodate cycleways or tramlines but not both, thus undermining from the start the concept of the 'Integrated Transport Interchange'.

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The Metro has not been taken into account at all by the proposed development as 'no details are known'. The absence of provision for the Metro, which is essential to the future viability of the whole region, was another major concern raised at the LDP Examination and one which the Council was required to address through several 'action points'.

We believe the development should be capable of being integrated with whatever options for the Metro that the transport Ministry is presumably looking at. If a preferred route is not known then all the options being considered should be protected.

Finance and Delivery - We are astonished that the proposed S106 agreement to accompany planning consent makes provision only for a contribution to public realm works and not a penny towards transport infrastructure. We would have expected the replacement bus station to be required by the S106 in order to ensure that it is implemented. Instead it is up to the Council to provide this facility out of its capital funds at a time when it is required to make cuts of over £40m to its budget. Particularly disturbing is the observation in the officers' report on the application that 'Council's are not statutorily obliged to provide a bus station'. That is true but this is not any old bus station but part of a transport hub serving half of Wales.

Network Rail has made clear its concerns about the development, particularly during the construction phase but its request for S106 contributions to mitigate the effect on Central Station has been rejected in favour of a separate legal agreement to be considered 'later'.

In conclusion – this strategic application is being hurried through without due regard to the wider planning context and is more appropriately dealt with at Welsh Government level.

I look forward to your reply on this pressing matter.

Yours Sincerely

A handwritten signature in cursive script that reads "Nerys Lloyd-Pierce".

Nerys Lloyd-Pierce, Chair Cardiff Civic Society