

Amgylchedd a Datblygu Cynaliadwy  
Environment and Sustainable Development



Llywodraeth Cymru  
Welsh Government

(James Clemence)  
Local Development Plan Team  
Strategic Planning  
Cardiff Council  
Room CY1  
County Hall  
Atlantic Wharf  
Cardiff CF10 4UW

Our Ref: qA907399  
Your Ref: P/SDP/10.5/GL

13 December 2013

Dear James

**Cardiff County Council Local Development Plan  
Preferred Strategy Regulation 15 Consultation: Welsh Government Response**

Thank you for consulting the Welsh Government regarding Cardiff County Council's Local Development Plan pre-deposit documents.

Having considered all the submitted documents provided by Cardiff County Council under Regulation 15, we acknowledge the amount of work undertaken by the authority to reach this stage, including the regional collaborative working which we commend. We are aware that the authority has been involved in seeking out solutions and good practice as a member of the South East Wales LDP Pathfinder Group.

We support the proposed preferred strategy in principle. The level of growth is considered to be reasonable in the light of Welsh Government projections and the supporting evidence, and the need to enable Cardiff to fulfil its role as the centre of the city region. We acknowledge the brownfield / greenfield split as reasonable and appropriate and recognise that there are significant environmental and capacity issues, including flood risk, best and most versatile agricultural land loss, infrastructure (including transport) requirement, and SSSI loss, when considering the scale of growth proposed. Clearly it will be essential to continue to develop the required robust evidence base to support the deposit LDP and evidence deliverability.

It is vital that you maintain your current momentum and progress to deposit in accordance with the agreed Delivery Agreement timetable. Continued progress to achieve an adopted plan to steer and influence development over the next 15 years will assist your authority in maximising the opportunities and benefits to the community as a whole.

It is for the statutory consultation bodies and their equivalents to contribute to Sustainability Appraisal (SA) including Strategic Environmental Assessment (SEA) and Habitats Regulation Assessment exercises and your expert group to help you assess if they are fit for purpose. As always, we would urge you to seek your own legal advice to ensure that you have met all the procedural requirements, including screening for SEA, because responsibility for these matters rests with your Council.

Under the LDP system, the responsibility rests with the local planning authority to ensure that a submitted LDP is sound in procedural terms and enshrines the principles of early community engagement, transparency, consistency, coherence and compatibility to neighbouring authorities. If these principles have not been addressed adequately at the earliest stages of preparation, then the deposit LDP may be considered unsound and unfit for examination. Front loading the evidence base and making this publicly available at all plan preparation stages will be essential.

Without prejudice to the Minister's discretion to intervene later in the process and to the independent examination, the Welsh Government is committed to helping local planning authorities minimise the risk of submitting unsound plans by making appropriate comments at the earliest stages of plan preparation, and particularly at the Regulation 15 pre-deposit consultation stage.

To do this, the Welsh Government looks for clear evidence that the ten tests of soundness (as set out in 'LDP Wales' and the 'LDP Manual', and explained further in guidance issued by the Planning Inspectorate) are being addressed.

To ensure your authority secures a sound plan in due course, we have carried out a strategic assessment of the Preferred Strategy document (as supported by the other pre-deposit documentation you have published). We have completed the Response Form which is enclosed with this letter and contains the detailed comments of the Welsh Government.

We consider that on-going self-assessment by the authority throughout the process of LDP preparation is important (as recommended at para.6.5.1 of the LDP Manual) and note that your self-assessment to date is provided at Appendix 7 to the Preferred Strategy.

You should document your response to our comments in your Consultation Report.

To assist your authority in taking forward the LDP, we will continue to regularly meet with you and your colleagues over the coming months, including to discuss our response. If you have any queries in relation to the response, please contact Elaine Ancrum (on 029 2082 3710) or myself.

Yours sincerely

**Mark Newey**  
Head of Plans Branch  
Planning Division

***enclosure – Response Form***

# Cardiff Local Development Plan 2006 – 2026: Preferred Strategy



Office Use  
Date Received:  
  
Preferred Strategy  
Reference:

## Response Form

Please use this form to set out your views on the Preferred Strategy. Simply provide your comments to the questions asked. You do not have to answer all questions if you do not want to.

Forms should be received by no later than **Friday 14<sup>th</sup> December 2012** and can be returned in the following ways:

**By email:** [ldp@cardiff.gov.uk](mailto:ldp@cardiff.gov.uk)

**By post:** LDP Team, Strategic Planning, Cardiff Council, Room CY1, County Hall, Atlantic Wharf, Cardiff CF10 4UW

You may photocopy this form or obtain further copies from the Council.

### Contact Details (If you are using an agent please also complete Agents Details)

	Personal Details	Agents Details
Title	Mr	
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Organisation/Company Name (if relevant)	Welsh Government	
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## MANAGING FUTURE GROWTH

**Q1.** The Preferred Strategy sets out a strategy to deliver 45,400 new homes and 40,000 new jobs to meet expected housing and jobs needs over the plan period (2006-2026). What is your view on this level of growth?

Too low

About right

Too high

YES

**Q2.** Please give reasons to support your answer to Question 1 including, if you don't support the proposed level of growth, what level of growth you would like to see and why. (Please use a separate box for each point made).

The chosen **strategy** (both growth and spatial aspects) needs to be firmly founded on a **robust evidence base** including that the key elements can be **delivered within** the plan period (to 2026).

We note that **Option B is the preferred growth option** and is based on 27% increase in population for plan period (i.e. less than WG '08 projections increase, extrapolated for plan period, of 33%) (PS para.7.4).

We note that the scale of growth is dependent upon the **successful delivery of Strategic Sites** as well as a **significant increase in build rates** (see response to Q.23).

*(We note information in the **Pre-Deposit Documents**, principally: **Strategic Growth Options (PS ch5) + PS App3** (consideration of growth options) + **BTP7** (Report of Collaborative Officer Working group; PS 5.7) + **BTP9** (Pop & Hsg - 5.5ff))*

*We note the independent expert analysis undertaken - PS para 5.15 & App5. However, the **Edge Analytics Report** was not included in the published pre-deposit documentation (see response to Q.23 on evidence base availability for the Deposit LDP).*

The latest Welsh Government's population and household **projections** should be considered as the starting point for assessing **housing** requirements (PPW ed.5, para.9.2.2). Currently these are the 2008-based projections.

The proposed growth options A, B and C are presented in section 5 of the **Population & Housing Technical Paper (BTPNo.9, Oct 2012)**. When read in conjunction with Appendix 4 of the Technical Paper the approach used for all three options is to re-run the Welsh Government **2008-based population and household projections** for years 2006 to 2026, constraining them to the revised mid-year population and household estimates for Cardiff up to 2008, then applying fertility, mortality, migration and household formation assumptions for the years thereafter. Only the migration assumption appears to vary across the three options. The other assumptions appear to be the same as those used in the Welsh Government projections.

As indicated in paragraph 5.4, the projection under Option B provides the closest results to the **published Census figures for 2011**. This paragraph attributes the lower household figure from the 2011 Census to lower household formation than was projected under the

2008-based projections.

From analysis our Statistical Directorate (now Knowledge & Analytical Services - KAS) has carried out on the 2011 Census results it is clear that the population figures are higher than projected whilst household figures are lower than projected in the 2008-based projections for most authorities, including Cardiff. As yet KAS has not been in a position to investigate by how much household formation has been lower than projected. Neither has KAS been able to explore the extent to which migration affects household formation. It should be noted though that the Option B results have been obtained by lowering the net migration assumption and not by adjusting household formation rates.

The proximity of the Option B projection results to the 2011 Census would appear to support the approach used. As the results are slightly higher though it is possible they would be even closer to the 2011 Census if it were possible to make some adjustment to assumed household formation trends based on more recent data.

**N.B. in BTPNo.9** – at paragraph 4.5 there is a small factual error: the mid-year population estimates for 2010 were released on 30<sup>th</sup> June 2011 not 2010. (The background analysis of demographic trends affecting Cardiff is very useful though and this error does not affect this or the strategy put forward.);

- at paragraphs 4.18 and 4.19 typographical errors in (should refer to Table 6 rather than Table 5);

- at paragraph 4.18 the land bank dwelling figure is 11,092 whilst Table 6 has 11,092.

The health of the economy of Cardiff is vital to the success of the Preferred Strategy, both for Cardiff itself and to the wider region. The level of population and housing growth must be matched by a growth in job opportunities, with the provision of housing land matched by provision of **appropriately located deliverable employment land**.

The level of growth should have regard to the **Wales Spatial Plan (WSP)** and to **national policy**. The “national & regional policy framework” (at PS App1) includes **WSP Update 2008**, including reference to the South East ‘Capital Network’, networked city-region, capital functions, transport, compatibility of housing in coastal area with health of housing markets in Heads of Valleys & Connections Corridor.

PS paragraphs 5.19 & 5.20 indicate due regard to the WSP, placing Cardiff at the centre of a networked city region; and the following statement at para.5.20 appears reasonable: “*Option B proposes a level of growth which is considered to strike the appropriate balance. It maximises Cardiff’s role as the centre of the cityregion, providing a sufficiently strong ‘economic powerhouse’, but not to the extent that may result in investment being too focused on Cardiff at the expense of other areas*”.

We consider that the contribution from the **regional collaborative working** (summarised in Background Technical Paper No. 7: Report of Findings of Collaborative Officer Working Group; and also in the PS at paragraph 5.21ff) assists in the provision of robust evidence base and commend this work. We note that this working; “*produced a degree of consensus regarding levels of growth. The general agreed view was that, based on the evidence of need and in order to meet its vision, Cardiff should go for a level of growth at the higher level of the range set out in the Edge Analytics report. This would be between Options A and B in the 2011 consultation. The neighbouring authorities recognise the benefits to them of a relatively high level of growth in Cardiff. They will provide for their own growth in their individual LDPs, and support a high level of growth in Cardiff to provide spin-off benefits for the region.*”

*Neighbouring authorities tended to support Option B whilst the House Builders Federation support Option A as a minimum.” (from PS paragraph 5.7)*

It is the role of the LDP and its evidence base to consider competing needs and policy interests and to propose a balanced solution informed by assessments including sustainability appraisal (including SEA). The PS acknowledges that the preferred level of growth has significant **environmental and capacity issues**; it involves major **greenfield land** release, with significant impacts on the **countryside** and **agricultural land**. Indeed, the **magnitude of the scale of the loss of best and most versatile agricultural land (BMVA)** will require the relevant justification. Sustainable **transport** solutions are vital. **Deliverability** is fundamental. Whilst these matters are recognised within the pre-deposit documentation, it is also recognised that **further work** will be necessary to provide the robust evidence base required for the Deposit LDP.

*See our response at Q.23 for more detail on several of these matters.*

**Q3.** The Preferred Strategy protects large areas of countryside and the river valleys but does not propose a Green Belt which would impose strict limits on development during and beyond the plan period. Do you think Cardiff should have a Green Belt?

**Yes**

**No**



**Q4.** Please give reasons to support your answer to Question 3 including, if you support a Green Belt, where you think it should be. (Please use a separate box for each point made).

Consideration of a Green Belt must be made with due regard to national planning policy on is at PPW ed.5 section 4.5.

### **STRATEGIC SITES: LOCATIONS**

**Q5. Strategic sites** are those which could accommodate more than 500 homes or offer significant employment opportunities. The following strategic sites have been proposed in the plan to help deliver new homes and jobs . Do you agree with their inclusion in the plan?

<b>Site</b>	<b>Yes</b>	<b>No</b>	<b>No comment</b>
A. Cardiff Central Enterprise Zone and Regional Transport Hub	YES		N.B. see response at Q.23 and Q.8 – relevant points
B. Former Arjo Wiggins Works, Canton			
C. Former Gas Works, Ferry Road			
D. North West Cardiff			

E. North of Junction 33 on M4			apply
F. South of Creigiau			
G. North East Cardiff (West of Pontprennau)			
H. North East Cardiff (East of Pontprennau)			
I. Porth Teigr (Roath Basin South)			
J. South of St Mellons Business Park			

**Q6.** If you are for or against the inclusion of any of the above **strategic sites** A-J, please specify which site(s) and give your reasons why.

Site name	Reasons in support or against proposals (please use bullet points)

**Q7.** Are there any other **strategic sites** you think should have been included? If so, please state where and give your reasons why below.

Site name	Reasons (please use bullet points)

## STRATEGIC SITES: MASTERPLANNING

In coming months, the Council will be carrying out a masterplanning process on strategic sites. This will set out guiding principles and provide a general framework for the development of the sites should they be included in the Deposit Plan.

Your views are sought to help inform this masterplanning process. In this way, the views of local communities can be considered at an early stage and feed into this process.

**Q8.** If any of the strategic sites listed in Question 5 are included in the Deposit Plan, what things do you think should be done or provided (on or off the sites) as part of these developments to help address their impacts and to meet local community needs? (Please specify which site and give your answer in bullet points).

Site name	Things which should be done/provided
Strategic Site J - South of St Mellons Business Park	<b>Strategic Site J - South of St Mellons Business Park / Land at East Cardiff (PS para.6.46-6.58 &amp; Policy 2):</b> The PS document notes that the proposed strategic employment site on the Wentloog Levels is within a <b>Site of Special Scientific Interest</b> (99 hectares within the SSSI), it also meets the qualifying criteria for LANDMAP Special Landscape Status and is a Registered Landscape of Outstanding Historic Interest (PS para.6.47); reference is also made to the adjoining estuary being

	<p>a European designated site.</p> <p>The justification for the loss of part of the SSSI and the economic opportunities at this location need to be thoroughly justified and the detail of the mitigation measures proposed expanded for the Deposit LDP. It is noted that in taking forward this site account will be taken of the CCW guidance booklet on how to bring forward sensitive development in the Wentloog Levels, however more detail is needed on the mitigation measures to balance the narrative on this site.</p>
General Points	See response at Q.23 below in relation to “Deliverability - Masterplanning approach”

## STRATEGIC POLICIES

**Q9.** The **economic policies** seek to:

- Provide a range and choice of land for employment uses, including a Central Enterprise Zone focussed on financial and business services, and protect existing employment land;
- Support the city centre and the bay business area by focusing office development there, and support new and improved retail facilities in the central shopping area;
- Protect mineral reserves and potential resources and maintain a landbank;
- Manage waste arisings.

Do you agree with this general approach?      **Yes**      **No**      **No comment**

YES           

**Q10.** Please give your reasons to support your answer to Question 9. If you said ‘No’ please include what your alternative approach would be. (Please use a separate box for each point made).

<p>Providing for a <b>range and choice of land for employment</b> uses accords with national planning policy. <b>Deliverability</b> needs to be evidenced (– see response at Q23).</p>
<p>The pre-deposit documents provide an <b>economic strategy</b> with clear economic <b>objectives</b> (PS paras. 4.13.1, 7.25ff, and BTP11: Economic Technical Paper) which need to be translated down to clear <b>strategic policies</b>.</p> <p>There should be more clarity concerning the implications of the Cardiff Central Enterprise Zone for Cardiff.</p> <p>We note that preparation of the Preferred Strategy largely preceded the recent introduction of revised PPW (edition 5) Chapter 7 Economic Development; this needs to be taken fully into account in preparation of the Deposit Plan.</p>

**Q11. The social policies seek to:**

Provide a range and choice of housing that meets the full range of housing needs;  
Develop sustainable neighbourhoods, tackle deprivation and improve quality of life;  
Make Cardiff a healthier place to live.

	Yes	No	No comment
Do you agree with this general approach?	<input type="checkbox"/> YES	<input type="checkbox"/>	<input type="checkbox"/>

**Q12. Please give your reasons to support your answer to Question 11. If you said 'No' please include what your alternative approach would be. (Please use a separate box for each point made).**

The aims of the social policies appear to accord with national planning policy; **deliverability** needs to be evidenced (– see response at Q23).

**Q13. The transport policies seek to:**

Reduce the need to travel and reduce car use and dependency;  
Maximise the proportion of journeys made by sustainable modes of travel e.g. rail, bus, walking and cycling;  
Achieve a 50:50 split between trips made by car and non-car modes;  
Extend and improve the public transport network so it can better meet the everyday travel needs of existing and new residents;  
Increase opportunities for people to make journeys on foot and by bicycle;  
Ensure that new development is supported by sustainable transport infrastructure;  
Provide strategic bus corridors, new park and ride sites and a regional transport hub incorporating a bus station adjacent to Central Rail Station.

	Yes	No	No comment
Do you agree with this general approach?	<input type="checkbox"/> YES	<input type="checkbox"/>	<input type="checkbox"/>

**Q14. Please give your reasons to support your answer to Question 13. If you said 'No' please include what your alternative approach would be. (Please use a separate box for each point made).**

The aims of the transport policies appear to accord with national planning policy **deliverability** needs to be evidenced (– see response at Q23).  
*Also see our response at Q.23 regarding Transport.*

**Q15. The infrastructure policy seeks to:**

Set a Community Infrastructure Levy which will require financial contributions from developers to help fund infrastructure provision.

	Yes	No	No comment
Do you agree with this general approach?	<input type="checkbox"/> YES	<input type="checkbox"/>	<input type="checkbox"/>

**Q16.** Please give your reasons to support your answer to Question 15. If you said ‘No’ please include what your alternative approach would be. (Please use a separate box for each point made).

**CIL** (Policy 22 & PS para.7.18) – We note that a CIL is to be progressed in tandem with the LDP (PS 7.18).  
 Considerable work is still to be done to flesh out the funding requirements and CIL delivery. National planning policy on CIL and on planning obligations is in section 3.7 of PPW ed.5; and in Policy Clarification Letter CL-02-2010.

**Q17.** The **environmental policies** seek to:

- Mitigate against the effects of climate change and adapt to its impacts;
- Protect, positively manage and enhance Cardiff’s natural heritage and built heritage;
- Designate special landscape areas and maximise accessibility;
- Safeguard land for River Valleys and the Coastal Path;
- Protect natural resources and minimise pollution.

Do you agree with this general approach?      

<b>Yes</b>
YES

<b>No</b>

<b>No comment</b>

**Q18.** Please give your reasons to support your answer to Question 17. If you said ‘No’ please include what your alternative approach would be. (Please use a separate box for each point made).

The aims of the environmental policies appear to accord with national planning policy.

**Q19.** The **sustainable neighbourhoods policy** seeks to:

- Ensure that all development will be accessible by sustainable transport and of a high quality, sustainable design that makes a positive contribution to the creation of distinctive communities, places and spaces.

Do you agree with this general approach?      

<b>Yes</b>
YES

<b>No</b>

<b>No comment</b>

**Q20.** Please give your reasons to support your answer to Question 19. If you said ‘No’ please include what your alternative approach would be. (Please use a separate box for each point made).

The aim of the sustainable neighbourhoods policy accords with national planning policy; **deliverability** needs to be evidenced (– see response at Q23).

**Q21.** There are 27 **Strategic Policies** in the Preferred Strategy. Do have any comments on individual policies? If so, please give your comments below.

Policy number	Comments
1 to 27	See response below to Q.23 on 'Strategic Policies'

**Q22.** Do you have any comments on the **Initial Sustainability Report**? If so, please give your comments in the boxes below.


**Q23.** Do you have any other comments on any other aspect of the Preferred Strategy? (Please answer in bullet points)

<p><b>i. Growth Strategy:</b> See response at Q.2.</p>
<p><b>ii. Spatial strategy:</b> Spatial growth options have been considered (PS ch6 &amp; App6). We note that spatial options are based on candidate site contributions; and that a 4 stage assessment was conducted (including flood risk, infrastructure &amp; deliverability, environment, transport, SA/SEA/HRA) (PS 6.10ff). We have already referred to the major Greenfield land release in the PS (see at Q.2).  The soundness of this spatial strategy will be determined largely by the evidence that it can be delivered (see below regarding 'deliverability').</p>
<p><b>iii. Deliverability:</b>  <b>Deliverability - General:</b> We would wish to support the aspirations of the plans strategy to deliver growth for Cardiff</p>

based on evidenced need and with due regard to national planning policy. Strategic sites are proposed, many requiring major Greenfield land release, significantly increased build rates and significant infrastructure improvements or additions. The Deposit LDP and its supporting documentation will need to provide convincing evidence that the strategy in general, and the strategic sites in particular, are deliverable within the plan period (to 2026), with clear consideration given to the risks to delivery.

**Deliverability - Masterplanning approach** (PS para.7.13 etc):

We note the intention with regard to Masterplanning of strategic sites, and that the Council intends that a master-planning process will follow the current consultation period and will work up the detailed aspects of potential of new development areas including the provision of necessary infrastructure. We note the Council's intention to use the master planning process to establish robust design principles but to also recognise the need to allow some flexibility and managed capacity for change, particularly in larger development areas.

The LDP preferred strategy is clearly reliant on key strategic sites coming forward. Masterplans / Development Frameworks for these sites will be essential to guide developers and future applications.

The Deposit LDP will need to provide essential information and clarity concerning the strategic sites, including for example, mix of uses, costs/viability assessments, delivery trajectories, key access points, and with indicative / concept diagrams included within the LDP written statement.

**Deliverability – Infrastructure:**

It is vital that the Deposit LDP provides clarity and robust evidence in relation to how key infrastructure requirements (including water, sewerage and drainage infrastructure) will be funded and delivered, including for the strategic sites and the sustainable transportation solutions.

See above at Q.15 with regard to the Community Infrastructure Levy (CIL).

**iv. Housing:**

**Housing - need:**

See response to Q.2 relating to the Welsh Government's household projections.

**Housing - provision:**

The strategy aims to provide a range and choice of housing land.

PS Table 2 (PS after para.7.13) sets out housing provision over plan period proposed by the strategy: Total provision for **45,358 dwellings**; comprising a landbank (17,674 including 8,299 completions at 01/04/12), brownfield (9,434 in 2012to2026), and greenfield at 5 strategic sites (18,250 in 2012to2026).

Rows 3-5 of PS Table 2 indicate that there are a total of 10,250 unimplemented permissions or permissions awaiting s106 agreements, with a 16% reduction allowance (i.e. minus 1694). It needs to be evidenced that this reduction allowance is appropriate given that many of these permissions have been unimplemented for many years and that, as indicated in the Population & Housing Technical Paper (BTPNo.9, figure 8 on page 9), 90% of the landbank comprises flats (80% 1&2bed flats).

We note that the current landbank is inadequate with provision for only **2.3 years** at 1 April 2012; the LHMA 2012 has not yet been published although it appears to have informed the

contents of the PS documentation (BTPNo.9 – paras4.17 & 3.14) (see Q.23 response on evidence availability).

#### **Housing – completion / build rates:**

The PS considers that the proposed housing provision is both realistic and deliverable (e.g. PS para.7.7). Whilst we support the aspirations of the plans strategy to deliver growth for Cardiff based on evidenced need and with due regard to national planning policy, we note that the level of growth translates to a significant increase in **build rates**. The required completion rate for the PS for 2012 to 2026 is given as **2,614 dwellings per annum** (PS para.5.39 compares this to past completion rates; (e.g. 2006-12 = 1,186; 2001-06 = 1,811pa; 1991-2001= 1,122pa; 1991-2006 = 1,322pa). The claim is that this rate of completion is achievable, and the Council considers that recent low and declining completion rates are to be blamed mainly on the national economic situation, and also on the current lack of greenfield opportunities which would have lower development costs (BTP9 paras.4.11 & 7.3). The Deposit LDP and its supporting documentation will need to provide evidence that the required build rates are deliverable within the plan period (to 2026), with clear consideration given to the risks to delivery.

#### **Housing - flexibility allowance:**

We note that the Council considers the strategy to be sufficiently flexible to respond to changing conditions (PS para.7.19ff); with the sequence of provision to be established by the strategy).

We note that the Council considers it inappropriate to allocate for a flexibility allowance of up to 10% given the national economy and required higher completion rates (PS para.7.20); that greater need would be identified in the AMR & LDP review process; and that the **Key Diagram includes an arrowed direction for any additional housing needed i.e. land beyond NW site** (PS para.7.21).

We have sympathy for this stance and support this approach in Cardiff, especially given that allocation of a further 10% housing land would represent a large figure and implicate greater areas of greenfield land. In this respect, the use of the Key Diagram to indicate the arrowed direction for any additional housing needed does provide an element of clarity for plan users. However, it is crucial that this stance is fully justified and linked to a monitoring / implementation framework if it is to be continued the Deposit LDP.

#### **Housing - phasing & infrastructure:**

We note that it is intended to provide a full phasing & infrastructure plan with a trajectory of provision over the plan period to be provided for the Deposit LDP (PS para.7.14ff); also that phased release is likely to start with NE & NW strategic sites based on infrastructure needs (7.16).

#### **v. Affordable Housing**

There is very limited information in the PS documentation on Affordable Housing (we note PS para.3.1, Policy 8 and App2 para.2.8).

#### **Affordable housing - need:**

We note that the documents indicate a significant need for affordable housing, with over 10,000 people on combined housing waiting list, and the Local Housing Market Assessment indicating a need for over 3,700 affordable dwellings for each of the next 5 years to address need. However, although this is based on the 2012 LHMA, it has not yet been published (see response below to Q.23 on evidence availability).

Whilst Policy 8 says the Council will seek 40% AH on new housing development subject to need & viability, there is no supporting information to clarify how this percentage has been

arrived at. The Deposit LDP documentation will need to be clear on these matters. Evidence from recently adopted LDPs would suggest the 40% requirement may prove optimistic.

**Affordable housing – target & thresholds:**

LDPs must include an authority-wide target for affordable housing for the plan period to be provided through the planning system based on the housing need identified in the LHMA and identify the expected contributions that the policy approaches identified in the development plan will make to meeting this target (PPW ed.5 para.9.2.16 & TAN2 ‘ Planning and Affordable Housing’, para.9.1).

Affordable housing delivery continues to be a Ministerial priority and it is important that the LDP target should reflect the Council’s attempt to optimise the opportunity for affordable housing, minimising thresholds to maximise delivery.

**Affordable housing – viability & deliverability:**

The Deposit LDP will need to evidence viability and deliverability of the target and thresholds.

**vi. Gypsies and Travellers**

The PS documentation (PS para.3.1, Policy 8 and PS Appendix 2 para.2.9) advises that the 76 existing Gypsy and Travellers pitches at Rover Way and Shirenewton will generate future needs which the plan must address; that the 2008 study found need for 198 pitches and 10 transit additions to 2018; that a further study is being commissioned. Policy 8 merely provides a statement of intent that provision will be made for Gypsy and Travellers, but provides no detail.

With regard to the requirement for an up to date Accommodation Needs Assessment to inform the Deposit LDP, we note that the LDP website advises: *“In order to inform the preparation of the Deposit LDP the Council have appointed Opinion Research Services/Peter Brett Associates to undertake a Gypsy and Traveller Study (now commenced, due to be completed by May 2013). The key outputs of the study will be to assess the accommodation needs of Gypsy and Travellers for the plan period 2006 to 2026; develop a site selection criteria for identification of sites to accommodate this need; use the agreed criteria to identify suitable sites to accommodate this need”*.

Sections 225&226 of the Housing Act 2004 place a duty on local authorities to consider the needs of Gypsy Travellers. If unmet need is identified through the Accommodation Needs Assessment then there needs to be a strategy for providing sustainable caravan sites for Gypsies and Travellers, with identification of any resultant permanent and transit pitches in the Deposit LDP, together with a criteria policy for assessment of any new site applications (see paragraph 25 and Annex B to WAG Circular 30/2007).

**vii. Transport**

We support the aspirations of the plans strategy to deliver sustainable transportation solutions for Cardiff. We note the aim to secure a 50% car 50% non-car modal split is considered by the Council to be both necessary & achievable *“without unmanageable levels of road congestion and large scale expansion of the city’s road network”* (PS para.7.40).

**Network Management:** Throughout the Transportation Technical Paper (BTPNo.12, Oct2012) reference is made to traffic modelling work that has already been completed. This modelling demonstrates that demand will exceed capacity such that already congested transport networks would be severely effected without a significant modal shift away from single occupancy cars coupled with the provision of significant new/innovative mechanisms to

enforce this change. In addition, the provision of alternative transport systems are also referred to and are expected to be delivered before any development happens. A significant unanswered question is whether 'before' means in advance of beneficial occupation or prior to commencement of construction. These are significantly different scenarios. It is not clear from the information provided in the Preferred Strategy and supporting technical documentation how Cardiff Council proposes to ensure these vital changes are delivered, and are delivered at the right time.

The Deposit Plan must evidence considered mechanisms for delivery of the future transport systems and the likelihood of them being achieved in the plan period.

### **Transport Schemes:**

The Transportation Technical Paper (BTPNo.12, para.5.6) considers transport funding possibilities and says that all potential funding options for transport need to be investigated in detail. The Deposit LDP will need to evidence the feasibility of infrastructure to support the scale of, and locations for, development, and any required phasing.

We note the stated desire to pursue delivery of the Eastern Bay Link and the Ely Spur Road (RTP schemes) with WG & others (PS para.7.50). We understand that further work needs to be undertaken in pursuing these two schemes in terms of their sustainability, delivery and benefits; and that subject to the outcome of the assessment processes the Council's intention is that they be taken forward in the Deposit LDP. The Council considers they deliver considerable transportation benefits and create additional capacity on the strategic highway network and help address the additional traffic arising from the level of growth proposed in the Plan.

### **viii. Agricultural Land**

The magnitude of the scale of the loss of best and most versatile agricultural land (BMVL) requires careful explanation. Strategic Site proposals (Policy 2) affect approximately 288 hectares of BMVL, and an additional 21 hectares is affected if Site D is extended north to the motorway.

The loss of BMVL is an issue for the emerging LDP and its loss needs to be minimised. BMVL is recognised as a potential constraint to development in the Council's Candidate Site selection process; the findings consider the case for development in all instances to outweigh the agricultural interest.

The Deposit LDP will need to justify the loss of BMVL in the light of national planning policy. PPW (ed.5, section 4.10) permits the development of BMVL, but subject to full justification and in recognition of the need to give considerable weight to protecting such land from development. Overriding need for the development should be clearly established and how / what alternative means of achieving the development objectives have been fully explored and are considered inappropriate.

- **Evidence base** - The Council has in its possession up to date Agricultural Land Classification (ALC) information covering the majority of the agricultural land affected by the Preferred Strategy proposals. This information is not comprehensive but considered to be adequate as a basis for assessing the loss of BMVL resulting from development of the identified strategic sites.

The preferred strategy acknowledges that best and most versatile agricultural land is a key environmental issue, and is identified for protection at Policy 25(i): Natural Resources, in the interests of the long term sustainable development of Cardiff.

**- PS Policy 2 (strategic sites to deliver growth):**

Six of the ten strategic development sites identified by Policy 2 affect agricultural land:

- **Sites D, G and H** involve significant amounts of BMVL (ALC grades 2 and 3a);
- **Sites E, F and J** involve agricultural land of moderate to poor quality (ALC grades 3b and 4).

The approximate amount of BMVL affected by these proposals is as follows:

- **Site D North West Cardiff, Pentrebane** - 144 hectares (43% of total agricultural land). Proposals state that there may be the need to extend Site D northwards up to the motorway; this would affect approximately a further 21 hectares (45% of total agricultural land).
- **Site G North East Cardiff, West of Pontprennau** - 112 hectares (60% of total agricultural land).
- **Site H North East Cardiff, East of Pontprennau** - 32 hectares of land surveyed (70% of agricultural land surveyed). Whilst the main body of the site (46 hectares agricultural land) has been surveyed in detail, to our knowledge, two areas of land within Site H are not covered by ALC survey, namely, the land in the immediate vicinity of Llanedeyrn and the land lying to the east of the Rhydney River.

**ix. Flood risk & climate change**

We note that the PS documentation addresses the issues of flood risk and climate change (PS para.6.47ff, 7.56, Policy 21, Appendix 2 para.2.41ff); that there is significant fluvial and tidal flood risk and that the strategy claims to seek to avoid locating development in areas of unacceptable flood risk unless TAN15 mitigation.

PS Appendix 5 lists SFCA Phases 1, 2 & 3 work, with the most recent Report dated August 2012; this has not been published with the PS documentation (see response below to Q.23 on evidence availability).

The Initial Sustainability Appraisal Report (BTPNo.1 – ISAR Non-Technical Summary) shows that parts of strategic sites B, C, G & I, and all of site J (St Mellons) are in flood risk zones. The deposit LDP will need to justify how the strategy and allocations have due regard to national policy (especially PPW ed.5 13.2&13.3, and TAN15).

**x. Minerals**

The PS documentation contains limited information on minerals (we note PS para.7.39, Policy 6 and Appendix 1.18ff&2.45). It is not clear how mineral reserves of sand, gravel, hard rock and coal, and the South Wales Regional Technical Statement (2008-21) requirements, have affected the development of the Preferred Strategy, including strategic site selection. Minerals safeguarding and any potential conflicts with other development must be taken into account in the strategy at an early stage, including how this has influenced the strategy and identification of sites.

**xi. Waste**

Waste is clearly a key issue for the LDP in view of the scale of waste arisings, the major increase in growth and the need to make provision for an adequate network of waste management facilities in the LDP. Pre-deposit documentation information is at PS para.7.38, Policy 7 and Appendix 1.17&2.44. The regional working (through Prosiect Gwyrdd) is acknowledged.

The pre-deposit documentation indicates that the SEWRWP'08 requires 20.9ha maximum; and that since the 2008RWP planning permission has been granted for regional energy from waste plant at Trident Park, as well as other facilities.

The intention to rely on existing industrial areas identified in the employment land review is noted; however, it is important that the Deposit LDP demonstrates that there are adequate locations for waste management facilities representing an adequate network and a genuine choice of suitable sites.

#### **xii. Neighbouring Plan Areas**

We refer at Q.2 above to the regional collaborative working (summarised in Background Technical Paper No. 7: Report of Findings of Collaborative Officer Working Group; and also in the PS at paragraph 5.21ff).

The Deposit LDP should clarify the relationships, linkages and cross-boundary issues that have been explored and also seek to ensure that any designations / areas that extend to the boundaries of the Proposal Map tie in with neighbouring LDP Proposal Maps, or that differences are justified.

#### **xiii. Strategic Policies**

The strategic policies in the proposed Preferred Strategy need to be reviewed for the Deposit LDP. Strategic and non-strategic policies must be clear locally distinct policies specific to Cardiff which address the key local issues identified rather than simply repeating national policy or being wholly aspirational. (PPW ed.5 section 2.1.4 & 2.8; LDPW 2.2; LDP Manual 5.3.1).

**xiv. Key Diagram** (at end of Ch7) is very clear and informative and includes named strategic sites.

See comments above at Q.23 iv. relating to housing flexibility requirements and the key diagram.

*(Note that website also has maps)*

#### **xv. Evidence Availability**

Whilst the Background Technical Papers do provide important pointers to the evidence and some clarity to the choices made, the published pre-deposit documentation did not include all the evidence base documents listed in Appendix 5; nor did it clarify where / how these could be viewed. Access to this documentation would have enabled more informed consideration by stakeholders.

It is vital that a robust evidence base that informs and supports the Deposit LDP is made publicly available at the Deposit stage.

#### **xvi. Monitoring Framework**

PS paras.6.23 & 7.19ff and Appendix 8 refer to the need to monitor implementation and the importance of the Annual Monitoring Reporting.

The Deposit LDP will need to include a suitably comprehensive monitoring framework with SMART key targets, indicators and triggers for review against which LPA can measure the effectiveness of the strategy and its strategic policies.