

CARDIFF RLDP EiP: SESSION TUESDAY 30 JUNE: TRANSPORT

REPRESENTOR I.D: 39

REPRESENTATION NO: 39/02-08

1. Will the strategic and detailed policies of the RLDP deliver the target of 75% of all journeys being sustainable?

i) **NO.** We urge PEDW Inspectors to heed our concerns, set out in para 1.4-1.6 and wording in bold in para 1.8 of our comments on the Deposit Plan. To be judged sound the RLDP **must** include policies that will secure funding for a step-change in the amount of sustainable transport infrastructure provided **“in advance of development”** not just “in a timely manner” (SP5).

ii) The RLDP needs to acknowledge that S106 Planning obligations are not adequate to deliver the scale of transport infrastructure required to deliver the mode share projected. Data from the Department for Transport National Travel Survey 2022: of mode share, journey lengths and trends in public transport in England, collected using sample surveys, showed that **the highest proportion in England who walk or cycle (42%), or use public transport (25%) ie a total of 67% was in London, which has substantial high density development and extensive public transport.** The 2023 surveys in England showed that how people travelled had changed little compared with 2022. Cardiff needs a firm statistical basis for transport planning, but the Council’s Transport Surveys appear to be based on self-initiated responses, not on sample surveys, in which case the results are not statistically valid.

iii) According to the World Economic Forum Briefing Paper “The Urban Mobility Scorecard Tool” (May 2023) “The cities of the future need to move more people with fewer, cleaner, vehicles. Investment in electrification, public transport and shared mobility is the solution”. In “learning and Next Steps” it argues the need to plug “investment/funding gaps”. Amongst other things needed to achieve the Paris Agreement climate goals are “more compact cities”. A 75% target for sustainable modes by 2036 in Cardiff is clearly implausible without all of this being delivered.

iv) The RLDP will not be sound unless **a policy for CIL applies to all greenfield development sites.** As we and others in North-West Cardiff have pointed out consistently for over 10 years, CIL is needed to raise funds for infrastructure to increase the proportion of travel by sustainable modes that will otherwise be unachievable. CIL is vital, in addition to S106 which should continue to provide local transport infrastructure within and around sites. Our representations on the LDP did not lead to CIL being levied on the Strategic Sites - a missed opportunity to generate funding from the major uplift in land values due to planning.

3. Major changes in policy - outlined above - are needed to ensure the RLDP is sound. This would also give long-term reassurance to existing residents of a prospect of a levelling off, and potentially a reduction, in the amount of traffic, noise and air pollution that afflicts them as a result of the Strategic Allocations in North West Cardiff. To date these have resulted in a monoculture of housing, apart from one Junior School. Residents of the new private houses on greenfield sites need to travel to reach facilities which should be provided locally in advance of - not after, if ever - the housing. A new policy requiring CIL to be levied on all Strategic Sites is vital as well as one which provides local facilities in advance of housing development.