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Eich cyf : Your ref: MAC Cons (WG)
Ein cyf : Our ref:
Dyddiad : Date: **23 July 2015**

Dear James

Cardiff Local Development Plan 2006 - 2026
- Consultation on Matters Arising Changes (MACs)

Thank you for your correspondence in relation to the consultation on the proposed MACs. We note that the Draft MACs Schedule is supplemented by a SA and an HRA.

We recognise your Authority's commitment to achieving a sound LDP and the amount of work by the LDP team in reaching this stage. The matter of whether a plan is considered 'sound' will be for the appointed Planning Inspector(s) to determine.

Whilst we consider that the Council has addressed the majority of the concerns expressed in our Deposit representation and discussed during the examination hearing sessions, we consider that there are 2 important matters that remain unresolved. We therefore have **one objection** to the proposed MACs under the tests of soundness (MACs 22-23 Gypsy & Travellers) and would take this opportunity to refer to a second matter which is not related to a proposed MAC (i.e. Green Belt).

1. MAC23 Gypsy & Travellers - OBJECTION

We object to the proposed MAC23 for the following reasons:

- Firstly, at paragraph 5.52 the references to the WG Circular 30/2007 and the requirement in national policy (PPW) to allocate sites to meet the identified need should not be deleted – it is required.



- Secondly, proposed paragraph 5.53 refers to an updated accommodation needs assessment (to be submitted by March 2016) which will form the basis for the level of pitches required in the short/long term, and the basis for the site selection process going forward. Such an approach does not comply with national planning policy. It is not appropriate to refer to evidence that has not yet been prepared. Whilst we acknowledge that the Council intends to revisit its site assessment methodology, this is a separate process to the already identified level of need (108 pitches). The site selection and identification process should not be delayed until a new needs assessment is completed. Indeed the number of pitches and timescales identified in the current evidence base should form the basis going forward.

As set out in paragraph 17 of Welsh Government Circular 30/2007, where there is an assessment of unmet need for Gypsy and Traveller Accommodation in the area, local planning authorities should allocate sufficient sites in LDPs to ensure the identified pitch requirement for residential and transit use can be met.

The LDP should, therefore, specifically include the number of pitches required by the identified timescales (i.e. 43 pitches by 2017, 65 pitches long term need by 2021) in order to reflect the current evidence base and satisfy the requirements of national policy. Our comments also apply to the monitoring framework (OB2 S08) which should also be amended on this basis.

The Welsh Government considers the **changes are required in order to ensure compliance with national policy.**

2. Green Belt

Our deposit objection D7/KP3A on the proposed Green Belt referred to a lack of justification in accordance with PPW and therefore sought that it be removed from the plan. We are concerned that no MACs are proposed to achieve this aim.

3. Comments

We have included below several **comments** relating to clarity which may be of assistance to the Inspector at this late stage in considering suitable changes to improve the clarity and accuracy of the plan.

- MAC4 & Appendix One – KP1: Level of Growth

Proposed paragraph 4.42 iii refers to the capacity of the site being highlighted in Table1; however, Table 1 has been amended and no longer includes this information.

- MAC5 & Appendix Two – KP2 : Strategic Sites / New Key Policies

The reasoned justification to Policies KP2(C) and KP2(D&E) could usefully make reference to the relevant Search Areas A & B on the Proposals Map.

- MAC39 – New Policy T9 Cardiff City Region ‘Metro’ Network

The proposed reasoned justification refers to the consultation draft WG National Transport Plan. The LDP should refer to, and reflect, the National Transport Finance Plan 2015 which has now been published (July 2015):

<http://gov.wales/topics/transport/planning-strategies/ntp/?lang=en>;
<http://gov.wales/about/cabinet/cabinetstatements/2015/10383639/?lang=en>.

- **MAC75 & Appendix Five – Monitoring & Implementation**
OB2 S08 & OB2 S09 of the monitoring framework are the same.

Lastly, I would point out that a revised LDP chapter 2 to Planning Policy Wales together with a revised LDP Manual are to be issued shortly alongside amendment regulations to the Town and Country Planning (Local Development Plan) (Wales) Regulations 2005; all subject to Ministerial approval.

Yours sincerely



Mark Newey
Head of Plans Branch
Planning Directorate

