

Managing Transportation Impacts (Incorporating Parking Standards)

Supplementary Planning Guidance



April 2018



Contents

1.	Introduction	3
	Purpose of Guidance	3
2.	Policy Framework	4
	UK and National Policies	4
	Cardiff Local Development Plan	4
3.	Managing impacts on the highway network	9
	Impacts on highway function	9
	Movement and Place Function	9
	User Hierarchy	10
	Highway Network	11
	Active Travel Network	13
	Strategic Bus Corridors and Wider Bus Networks	13
4.	Transport Assessments, Transport Statements and Travel Plans	15
	Transport Assessments	15
	Transport Statements	17
	Travel Plans	17
5.	Planning Conditions, Planning Obligations and Technical Standards	18
	Planning Conditions	18
	Planning Obligation	18
	Technical Design Standards for roads and highways	19
6.	Parking Guidance and Technical Standards	21
	Parking Standards	21
	Cycle Parking Standards	38
	Car Parking for People with Disabilities and Mobility Impairments	39
	Car Parking for People with Young Children	40

Motorcycle Parking Standards	40
Parking Layout and Design	41
Design for Refuse Collection	41
Car Clubs	41
Electric Vehicles	41
7. Public Rights of Way	42
Introduction	42
Guidance on Policy Implementation	42
8. Useful Publications	47

See also separate Appendices:

Appendix 1 UK and National Policies

Appendix 2 Transport Assessment Guidance and Checklist

Appendix 3 Travel Plans Guidance and Checklist

Appendix 4 Transport Statements

Appendix 5 Consultation on Draft SPG

Appendix 6 Consultation Representations and Responses on the Draft SPG

Mae'r ddogfen hon ar gael yn Gymraeg / This document is available in Welsh

1. INTRODUCTION

Purpose of Guidance

- 1.1 The Welsh Government (WG) supports the use of Supplementary Planning Guidance (SPG) to set out detailed guidance on the way in which development plan policies will be applied in particular circumstances or areas. SPG must be consistent with development plan policies and national planning policies and guidance and may be taken into account as a material planning consideration in planning decisions.
- 1.2 This SPG sets out Cardiff Council's approach to assessing and managing the transport impacts of developments and supplements the transport and other related policies in Cardiff's Local Development Plan 2006-2026 (see Section 2). It applies to all categories of development for which planning permission is required, including new developments, extensions, redevelopments and material changes of use.
- 1.3 The SPG provides detailed guidance with regard to:
 - How the Council will consider the impacts of development on the routes that make up the local highway network.
 - The detailed information that applicants for planning permission should include with their submissions to enable the Council to make a fully informed assessment of transport impacts.
 - The Council's approach to quantifying and assessing the transport impacts of development proposals as part of its determination of planning applications.
 - The types of transport infrastructure and other mitigation measures which may be sought to address transport impacts.
 - How the Council will seek to secure the transport infrastructure and other transport measures required to mitigate transport impacts, enable development to proceed and support the implementation of Transport policies in the Local Development Plan.
 - The scope and content of Travel Plans required as part of the overall package of measures to mitigate impacts and support the implementation of LDP transport policies.
 - The parking standards which apply to different types of development in specific areas of the city.
 - How the impacts of developments upon Public Rights of Way will be considered and the likely requirements for mitigation.

2. POLICY FRAMEWORK

UK and National Policies

2.1 Relevant policies are summarised in Appendix 1.

Cardiff Local Development Plan (January 2016)

2.2 Cardiff's Local Development Plan (LDP) covers the period 2006 to 2026 and sets out:

- The Council's Strategy, objectives and key policies relating to land use;
- Policies to promote and control development;
- Allocations of land for housing, employment and other uses;
- Policies and proposals to protect sensitive areas; and,
- Maps showing proposals and constraints.

2.3 The LDP provides for substantial growth in Cardiff's population and employment up to 2026. This expansion will produce significant increases in transport movements that will exert additional pressures upon Cardiff's transport network.

2.4 Modelling work undertaken to quantify the impact of the LDP indicates that demand for travel by car would increase by 41%, with 10% of new demand unable to be accommodated on the highway network due to lack of capacity. This would result in a 32% net increase in traffic and associated decrease in journey speeds and increase in journey times (approximately 41% or 7 minutes).

2.5 The LDP explains that adding to the capacity of the highway network to accommodate this increase in the volume of transport movements is neither affordable nor sustainable. Therefore, in order that the additional movements generated by urban expansion can be accommodated, the proportion of journeys made by car needs to decrease and the share of trips by sustainable modes of transport must increase to a level where there is a 50:50 split between car-based and walking, cycling and public transport journeys.

2.6 The LDP outlines the approach the Council will take to increase the proportion of people travelling by sustainable modes and to achieve the 50:50 modal split target. This will involve:

- enabling people to access employment, essential services and community facilities by walking and cycling through, for example, high quality, sustainable design and measures to minimise vehicle speed and give priority to pedestrians and cyclists
- developing strategic bus and rapid transit corridor enhancements and facilitating their integration with the wider transport network
- facilitating the transfer between transport modes by, for example, improving existing interchanges and developing new facilities such as strategically located park and ride facilities
- maximising provision for sustainable travel within new developments and securing infrastructure investment which can support modal shift within existing settlements.

2.7 These requirements are reflected in the following key transport policies which will be applied in the Council’s assessment of the transport impacts of development proposals and determining mitigation measures required to make developments acceptable. The policies can be read in full in the LDP (www.cardiff.gov.uk/localdevelopmentplan).

Policy Reference	Policy Summary
EN13: air, noise, light pollution and land contamination	EN13 emphasises that development will not be permitted where it would cause or result in unacceptable harm to, for example, health, the quality of the countryside (see also EN5), because of air, noise, light pollution or land contamination. It also details the impact road traffic may have on levels of pollution and the effects of poor air quality on health, quality of life and amenity.
KP2 (A-H): LDP Strategic Sites	<p>KP2 (A-H) LDP Strategic Sites outlines the allocation of Strategic Sites A to H to “help meet the need for new dwellings and jobs”. In policies KP2 (A) to KP2 (H), a detailed breakdown is provided for each Strategic Site setting out the key infrastructure and masterplanning requirements relating to each site.</p> <p>It outlines that the infrastructure requirements for these sites will primarily be delivered through planning obligations/ Section 106 Agreements with policies KP6 and KP7 providing the policy framework.</p>
KP4: Master Planning Approach	<p>KP4 outlines masterplanning general principles for major developments. The principles with particular relevance to transport include the following:</p> <ul style="list-style-type: none"> • High density residential and mixed-use development is focused along public transport corridors and in neighbourhood centres with lower densities provided elsewhere to deliver an overall range and choice to meet different needs; • Dedicated sustainable transport corridors including provision for public transport, cycling and walking which will form key elements of the overall master plan and effectively link into the wider network; • Walking, cycling and public transport will be attractive, practical and convenient travel choices for all; • Provision of a full range of social and community facilities will be concentrated within mixed use neighbourhood centres located along public transport corridors and easily accessed by walking and cycling. <p>The masterplanning, good quality and sustainable design principles set out in KP4 and KP5 will be used to provide a framework to consider planning applications relating to all Strategic Sites along with other development as defined in the policies.</p>
KP5: Good Quality and Sustainable Design	<p>KP5 sets out requirements in relation to achieving high quality, sustainable design and making a positive contribution to the creation of distinctive communities, places and spaces. The principles with particular relevance to transport include the following:</p> <ul style="list-style-type: none"> • Providing legible development which is easy to get around and which ensures a sense of continuity and enclosure;

	<ul style="list-style-type: none"> • Creating interconnected streets, squares and spaces as distinctive places, which are safe, accessible, vibrant and secure and incorporate public art where appropriate; • Providing a healthy and convenient environment for all users that supports the principles of community safety, encourages walking and cycling, enables employment, essential services and community facilities; • Accessible by sustainable transport and maximises the contribution of networks of multi-functional and connected open spaces to encourage healthier lifestyles.
KP6: New Infrastructure	<p>KP6 outlines the provision and/or contributions which will be required from new developments and the necessary infrastructure required as a consequence of the proposed development. With regard to transportation and highways, this may include access, circulation, parking, public transport provision, walking and cycling. It highlights that requirements will vary in different locations and will be dependent upon the scale and nature of proposed development. Indicative elements of transport infrastructure may include:</p> <ul style="list-style-type: none"> • Routes and facilities for walking and cycling comprising both on-road and off-road improvements; • Rapid transit corridors, including heavy rail, light rail, tram train and bus rapid transit; • Key bus corridors and the wider bus network including bus priority measures and passenger facilities; • The rail network and rail services including new rail stations, station improvements and facilities for rail freight; • Transport interchanges to support integration between modes including bus and rail stations, facilities for bus and rail-based park and ride, park and share, passenger drop off, taxis, park and cycle, coach parking, overnight lorry parking and water transport; • Designated freight routes and freight transfer facilities; • The road network, particularly measures to make better use of existing highway capacity; • Transport by river (including Cardiff Bay); and • Port and shipping facilities. <p>It emphasises the need for early identification of infrastructure requirements and a commitment from developers and service providers to work in partnership to ensure that all necessary infrastructure can be planned, delivered and managed in an orderly and timely manner.</p>
KP8: Sustainable Transport	<p>KP8 emphasises the impact of the location and form of developments on travel choices and demand. It sets out that “Development in Cardiff will be integrated with transport infrastructure and services in order to:</p> <ol style="list-style-type: none"> Achieve the target of a 50:50 modal split between journeys by car and journeys by walking, cycling and public transport. Reduce travel demand and dependence on the car; Enable and maximise use of sustainable and active modes of transport;

	<p>iv. Integrate travel modes;</p> <p>v. Provide for people with particular access and mobility requirements;</p> <p>vi. Improve safety for all travellers;</p> <p>vii. Maintain and improve the efficiency and reliability of the transport network;</p> <p>viii. Support the movement of freight by rail or water; and</p> <p>ix. Manage freight movements by road and minimise their impacts”.</p> <p>KP8 also demonstrates that achieving the 50:50 split between travel by car and sustainable travel is “necessary for the transport network to accommodate movements associated with the growth envisaged within this plan in a way which avoids unmanageable levels of congestion on the highway network”. This has been demonstrated through local knowledge of the transportation network and research of travel behaviour, patterns and trends in combination with modelling work carried out by the Council.</p>
KP18: Natural Resources	KP18 highlights the need for development proposals to take full account of the need to minimise impacts on the city’s natural resources and minimise pollution, in particular air pollution from industrial, domestic and road transportation sources and managing air quality (iii).
T1: Walking and Cycling	The purpose of T1 is to exploit the potential for encouraging modal shift towards active travel by favouring developments which include design features and facilities that make it easy for people to walk and cycle for everyday journeys instead of travelling by car. Encouraging ‘active travel’ will help to minimise car use and support the Council in fulfilling its legal duty under the Active Travel (Wales) Act 2013 to develop, improve and maintain local walking and cycling networks.
T2: Strategic Rapid Transit and Bus Corridors	T2 requires development to be served by effective public transport through the development of new rapid transit routes, key strategic bus corridors and improvements to the wider city bus network.
T3: Transport Interchanges	Providing for interchange between transport modes is essential to the efficient functioning of the transport network and making sustainable travel options more practical and attractive. This is particularly important in relation to the public transport network. This Policy provides support for all forms of transport interchange that help meet these requirements and deliver the modal shift objectives of the LDP.
T4: Regional Transport Hub	T4 sets out the Council’s requirements with regard to the functionality and aesthetic quality of a central interchange and its integration with existing and future development within the Cardiff Central Enterprise Zone. The Policy will be implemented through a process of master planning undertaken in collaboration between the Council, developers, transport providers, the public and key stakeholders.
T5: Managing Transport Impacts	The purpose of this Policy is to ensure that all new developments for which planning permission is required: <ul style="list-style-type: none"> i. Properly address the demand for travel and its impacts; ii. Contribute to reducing reliance on the private car, in line with national planning policies and the strategic transport objectives and policies of the LDP;

	<p>iii. Make satisfactory provision for access, parking and circulation, particularly by pedestrians, cyclists, public transport users and disabled people with mobility impairments and particular access needs; and</p> <p>iv. Avoid unacceptable harm to safe and efficient use and operation of the road, public transport and other movement networks and routes.</p>
T6: Impact on Transport Networks and Services	The purpose of T6 is to protect the transport network and its users from developments which may otherwise cause unacceptable harm to the operation and use of key transport networks and routes.
T7: Strategic Transportation Infrastructure	T7 provides support for three key elements of strategic transport infrastructure which are illustrated on the Constraints Map ¹ with further detailed work informing the precise land take requirements.
T8: Strategic Recreational Routes	T8 sets out the Council's desire to develop a network of recreational routes that will allow everyone in Cardiff to gain easy access to local green spaces, and the wider coast and countryside. It also accords with Planning Policy Wales which seeks to promote provision of safe accessible, convenient and well-signed walking and cycling routes and to protect and enhance the national cycle network and long-distance routes and footpaths that are important tourism and recreation facilities, both in their own right and as a means of linking other attractions and local communities.
T9: Cardiff City Region 'Metro' Network	The Cardiff City Region Metro is a proposal for a metropolitan-style, integrated public transport network extending across Cardiff and South East Wales. The 'Metro' is likely to be developed in phases over a number of years. Its purpose is to significantly enhance public transport accessibility across the region.

¹ www.cardiff.gov.uk/localdevelopmentplan

3. MANAGING IMPACTS ON THE HIGHWAY NETWORK

Impacts on highway function

- 3.1 Through introducing new access points, and increasing flows or turning movements, new developments can potentially impact on the function of the highway. This can impact on a route for different modes of travel by:
- Making traffic queues longer at junctions
 - Increasing bus journey times, making services less reliable and attractive
 - Reducing green time for pedestrians and cyclists at junctions and crossings
 - Making roads busier and less safe and attractive as places and for people cycling and walking
 - Worsening air quality impacts.
- 3.2 Such impacts can potentially impair the operation of the local highway network, add to congestion problems and conflict with the LDP's objectives to increase sustainable travel and achieve modal shift.
- 3.3 In considering development proposals, the Council will assess the impact of developments on the function of roads directly serving a development, within the immediate vicinity of the site and within the wider highway network.
- 3.4 For these reasons, it is essential that Transport Assessments provide all of information necessary to enable the Council to fully quantify and understand the impacts of development on the function of roads and wider highway network and to identify measures to mitigate these impacts and make the development acceptable in relation to the LDP's sustainable transport policies. Section 4 and Appendices 2, 3 and 4 provide detailed information on what is required from Transport Assessments, Travel Plans and Transport Statements submitted to the Council through the planning process.

Movement and Place Function

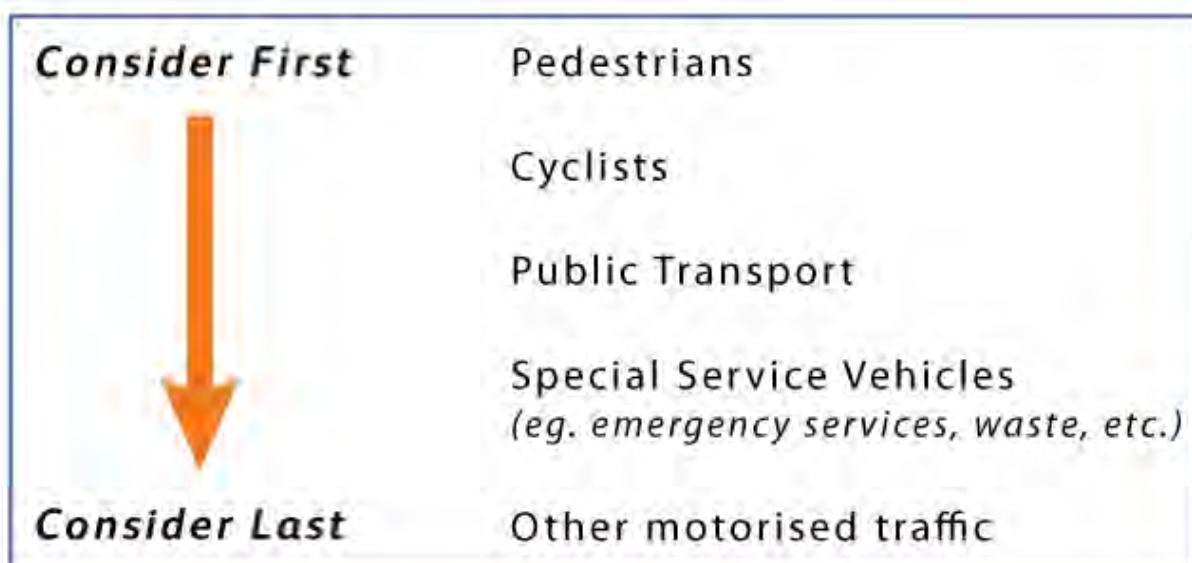
- 3.5 The highway network in Cardiff is comprised of a number of different types of roads which have different functions (see Table 3.2 below). Manual for Streets (MfS) and Manual for Streets 2 (MfS2) also make the important distinction between roads, which have a primary 'movement' function and streets where the 'place' function (the attributes that make the street function as a social space) are considered to take precedence over the 'movement' function.
- 3.6 Development-related trips can also impact on the 'place' function of streets. Increases in motorised traffic through residential streets can diminish their amenity and safety for walking and cycling and other activities such as children's play. These impacts potentially conflict with the sustainable neighbourhoods and modal shift objectives of the LDP. Transport Assessments should identify these impacts and suitable measures for mitigation.

- 3.7 Crucially, MfS recognises that even roads with a primary 'movement' function can include sections where a 'place' function predominates or moderates the movement function, depending on the adjacent land uses. For example, where a main or secondary distributor road passes through a district shopping centre or next to a school the 'place' function of the road may be accorded a greater degree of importance relative to the function of conveying through traffic.
- 3.8 In locations on a road where the 'movement' function is diminished by the 'place' function, this can present the opportunity to facilitate movement by other modes, particularly walking and cycling. For example, the introduction of new or improved crossing facilities for pedestrians and cyclists can help to reduce the severance effect of a road which carries high volumes of traffic and increase opportunities for walking and cycling.
- 3.9 In addition to other requirements, Transport Assessments should therefore assess the impacts of developments on the 'movement' and 'place' functions of affected roads and streets in accordance with the principles in MfS and MfS2.

User Hierarchy

- 3.10 Policy T5 of the Local Development Plan 'Managing Transport Impacts' states: "In assessing the transport and access aspects of proposals the Council will be more likely to give favourable consideration to developments which through their design and layout give priority to movements by sustainable travel modes and reflect the user hierarchy in Department for Transport Manual for Streets".
- 3.11 Transport Assessments (TAs) should explain how the MfS user hierarchy (see Figure 3.1) has been applied to the design of and layout of the development and the mitigation measures included in the Transport Implementation Strategy (TIS).

Figure 3.1: Manual for Streets User Hierarchy



Highway Network

- 3.12 The highway network in Cardiff is made up of roads defined within the Department for Transport (DfT) Carriageway Hierarchy (Well-maintained Highways Code of Practice for Highway Maintenance Management, London: DfT), shown in Table 3.2 below. The Hierarchy provides general definitions of the different types of roads within Cardiff's local highway network in terms of their function and characteristics. In addition to referencing the basic features of roads, the Hierarchy provides an indicative classification of each road category in terms of the 'movement' and 'place' functions as defined by Manual for Streets (MfS).
- 3.13 The Council will make reference to the Hierarchy when considering the impacts of development proposals on the characteristics and function of particular roads.
- 3.14 A flexible approach needs to be taken when using the Hierarchy to define the characteristics and function of particular roads/streets. This is because some roads may not wholly match all aspects of the description given within the Hierarchy. Furthermore, some routes which fall within the same category may actually differ in terms of the volumes of movements they experience, the number of trip attractors they serve or their relative importance as routes for buses, cycling or walking etc.

Table 3.2 The Carriageway Hierarchy

Carriageway Hierarchy				
Category	Hierarchy Description	Type of Road General Description	Type of Road Basic features	Examples of function (Manual for Streets classification)
1	Motorway	Limited access Motorway regulations apply	Routes for long distance traffic. Fully grade separated and restrictions on use.	Movement Function
2	Strategic Route	Trunk and some Principal 'A' roads between Primary Destinations	Routes for long distance traffic with little frontage access or pedestrian traffic. There are usually few junctions. Pedestrian crossings are either segregated or controlled and parked vehicles are generally prohibited.	Movement Function
3a	Main Distributor	Major Urban Network and Inter-Primary Links Short - medium distance traffic	Routes between Strategic Routes and linking urban centres to the strategic network with limited frontage access. In urban areas, parking may be restricted at peak times and there	Predominantly movement function, with some transitional areas where the place function is stronger e.g. Penarth Road

			are positive measures for pedestrian safety.	
3b	Secondary Distributor	Classified Road (B and C class) and unclassified urban bus routes carrying local traffic with frontage access and frequent junctions	In rural areas these roads link the larger villages and HGV generators to the Strategic and Main Distributor Network. In built up areas these roads have very high levels of pedestrian activity with some crossing facilities including zebra crossings. On street parking is generally unrestricted except for safety reasons	Rural areas: movement function between villages with stronger place function within village settlements e.g. Michaelston Road, St Fagans. Urban areas: place function. e.g. Merthyr Road, Cowbridge Road East
4a	Link Road	Roads linking between the Main and Secondary Distributor Network with frontage access and frequent junctions	In rural areas these roads link the smaller villages to the distributor roads. They are of varying width and not always capable of carrying two way traffic. In urban areas they are residential or industrial interconnecting roads with random pedestrian movements and uncontrolled parking	Rural areas: movement function between villages with stronger place function within village e.g. Drope Road. Urban areas movement function e.g. Excalibur Drive
4b	Local Access Road	Roads serving limited numbers of properties carrying only access traffic	In rural areas these roads serve small settlements and provide access to individual properties and land. They are often only single lane width and unsuitable for HGVs. In urban areas they are often residential loop roads or cul-de-sacs.	Rural: movement urban: place

Active Travel Network

- 3.15 Increasing the number of trips made by walking and cycling will make an important contribution towards achieving the 50:50 modal split target required by the LDP, as well as providing an opportunity for promoting health and wellbeing. The Planning for Health SPG provides more information on this. By providing a practical alternative to the car, particularly for short trips, active travel infrastructure and other supporting measures represent very important elements of the package of measures that the Council will seek to secure to mitigate development impacts, where appropriate.
- 3.16 LDP Policy T1 provides support for developments which enable daily travel by walking and cycling by combining high quality, sustainable design, permeable networks of routes, measures to manage vehicle speed, safe and convenient connections to the strategic cycle network and existing neighbourhoods and trip attractors and good supporting infrastructure.
- 3.17 Opportunities for travel by walking and cycling can be maximised through the master planning of development sites. Policies KP2(A) to KP2(H) of the Adopted Local Development Plan specify walking and cycling components of the 'essential/enabling' infrastructure that the Council will seek to secure when determining planning applications for those sites.
- 3.18 In considering proposals for development on smaller, non-strategic sites, the Council may also seek to secure development layouts and off-site improvements to routes and user safety which serve to maximise the ease of access by walking and cycling.
- 3.19 On-site active travel infrastructure will generally be secured by way of conditions of planning consent whilst off-site measures will be secured through S106 Planning Obligations, Section 278 agreements or Grampian conditions, as appropriate.

Strategic Bus Corridors and Wider Bus Network

- 3.20 Increasing the proportion of trips made by public transport is essential in order to manage demand for car travel and achieving the LDP 50:50 modal split target.
- 3.21 Policies KP2 (A) to KP2(H) identify the development of on-site and off-site bus and rapid transit infrastructure as infrastructure which is essential to enable the development of the strategic sites covered by those policies.
- 3.22 Policy T2 of the LDP identifies specific roads as strategic bus corridors and provides support for their development and enhancement as well as support for the development of future rapid transit routes and the development and improvement of the wider city bus network.
- 3.23 Where the Council's analysis of TAs and other relevant information provides evidence of negative transport impacts, the Council will seek to secure mitigation of those impacts through the following courses of action (either individually or in combination):

-
- maximising the provision of public transport infrastructure including interchange facilities within the master plans and layout of development sites as required by Policies KP(A) to KP2(H);
 - securing infrastructure on and/or off-site as appropriate including bus lanes, bus gates and junction modifications that enhance the function of roads identified as strategic bus corridors in Policy T2 by maximising service frequencies, minimising journey times and achieving maximum journey time reliability;
 - securing improvements to the wider local bus network by way of bus priority measures, interchange facilities, junction and service improvements.
- 3.24 Where necessary, on-site infrastructure will be secured through the development and agreement of site layout plans, masterplans and parameter plans and by way of conditions of planning consent. Provision of off-site measures will generally be secured by way of S106 Planning Obligations or Section 278 agreements and 'Grampian' conditions where appropriate.
- 3.25 Accessibility should be a primary consideration when designing for public transport facilities and infrastructure (e.g. bus stops and bus shelters), for example, ensuring bus stops are located in close proximity to key services and trip generators. Passengers are also pedestrians and/or cyclists at either end of their public transport journey and so consideration also needs to be given to the wider physical environment and connectivity as well as the waiting environment. For example, appropriate infrastructure such as cycle parking should be co-located with public transport stops. Under the Equalities Act (2010) services must also be fully accessible for people with disabilities and consideration should also be given to users with other accessibility needs such as parents/carers travelling with young children and prams/buggies. Transport for London (TfL) guidance on Accessible Bus Stop Design is a useful reference document.

Operational Railway Network

- 3.26 Cardiff's rail network has seen a significant increase in trips and the growth is projected to continue. Policy KP6 provides for development of the rail network as required to enable new development. Policy KP8 highlights the need for developments to be integrated with transport infrastructure and services. Development can impact on the railway network by contributing to the ongoing growth in the number of journeys undertaken on the network but also, for example, through an increase in traffic using level crossings. Where TAs and other relevant information provides evidence of impacts, appropriate mitigation will be sought, particularly where safety may be compromised.

4. TRANSPORT ASSESSMENTS, TRANSPORT STATEMENTS AND TRAVEL PLANS

Transport Assessments and Transport Statements

- 4.1 Transport Assessments (TAs) provide the means of identifying, quantifying and understanding the scale of anticipated transport impacts of a proposed development, including potential air quality impacts. TAs should provide information to enable decision makers to understand how the proposed development is likely to function in transport terms. They should also provide a comprehensive and consistent review of all the potential transport impacts of a proposed development so that they are easily understood by the Local Authority and the public. TAs inform consideration of the physical infrastructure and other transport measures required to mitigate the impact to ensure that a development accords with LDP policies with an agreed plan to mitigate any adverse consequences.
- 4.2 The strategic sites set out in the LDP include major greenfield sites which could have significant impacts on already congested corridors. Therefore it is important that modelling included in TA's take account of likely background growth in traffic on the network and the potential impacts of a specific development in combination with the likely impacts of other neighbouring sites that will be brought forward during the plan period. This is to ensure that impacts are not overlooked and that appropriate mitigation can be provided.
- 4.3 The WG policies on TAs within the planning process are contained in Planning Policy Wales (Edition 9 November 2016) (PPW). PPW (paragraph 8.7.2, p 124) states: "The Welsh Government expects that all applications for developments (including changes of use) falling into the following categories will be accompanied by a TA" (see Table 4.1 below).

Table 4.1: Thresholds for Transport Assessments and Travel Plans

Use Class	Use	Indicative Thresholds by Use Class for Transport Assessments and Travel Plans
A1	Retail (food and non-food)	>1,000 m ²
A2 & B1	Business	>2,500 m ²
B2	General Industrial	>5,000 m ²
B8	Warehousing & Distribution	>10,000 m ²
C1	Hotels	> 1,000 m ²
C2	Residential Institutions	>2,500 m ²
C3	Dwelling Houses	> 80 dwellings
D1	Non-residential institutions	>2,500 m ²
D1	Education	>2,500 m ² (All new and expanded school facilities)
D2	Cinemas & Conference Facilities and Leisure Facilities	>1,000 m ²
Other	Stadia	>1,500 seats
Sui Generis	Student Accommodation	> 25 students

-
- 4.4 TAN 18 (2007) indicates that the output of the TA should be a **Transport Implementation Strategy (TIS)** that addresses relevant transport objectives for the site, guided by policies in the development plan and the issues identified in the analysis of movements. A TIS is required for all applications subject to a TA.
- 4.5 Requirements regarding the contents of the TA and the TIS are provided in TAN 18 Annex D. Annex D sets out that the TA should be based on the person and freight trips generated by a development. It gives the aims of undertaking the TA and producing a TIS as:
- understanding the transport impacts of the development;
 - clearly communicating the impacts to assist the decision making process;
 - demonstrating the development is sited in a location that will produce a desired and predicted output (for example in terms of target modal split);
 - mitigating negative transport impacts through the design process and secured through planning conditions or obligations;
 - maximising the accessibility of the development by sustainable modes;
 - contributing to relevant development plan objectives relating to accessibility of services and modal share.
- 4.6 The guidance in TAN 18 further explains that any mitigation should be proposed in a TIS which should "set objectives and targets relating to managing travel demand". It states that the TIS should also include "targets relating to managing travel demand for the development and set out the infrastructure, demand management measures and financial contributions necessary to achieve them. The TIS should set a framework for monitoring the objectives and targets, including the future modal split of transport to development sites" (p. 36/37). Appropriate planning conditions and obligations may be used in relation to monitoring where necessary and where fairly and reasonably related to developments.
- 4.7 Section 9 of TAN 18 states that SPGs should be used to provide additional detail on the requirement for TAs to be produced alongside planning applications. Accordingly, it is strongly recommended that this section be read in conjunction with the explanatory notes and checklist of requirements which are provided in the appendices to this document (Appendix 2) and the Junction Assessment Tool guidance which is available on the Council's website. These are intended to assist the progress of planning applications by providing guidance to assist applicants in producing Transport Assessments (TAs) required through the planning process which can be approved in a timely manner and to ensure that any TA which is submitted to the Council contains all of the information which is required by the planning authority in assessing a planning application. A pre-application service is provided by the Council. Developers are encouraged to engage with the Council through this process as early as possible. The critical junctions to be included in the TA should be agreed with the Council.
- 4.8 Before submission to the Council, it is strongly recommended that all TAs are independently audited using the Transport Assessment Guidance and Checklist. The Checklist has been developed to assist developers in producing TAs and to ensure that a robust methodology is used which properly quantifies and analyses the transport impacts of a development and provides the evidence necessary to inform the identification of appropriate mitigation measures.

-
- 4.9 Completed audit checklists should be submitted along with the TA and they will be reviewed by the Council. Where deficiencies in the TA have been found as a result of the audit, it is likely that amendments will be requested and this may delay the progress of the planning application.
- 4.10 In some cases, developments which fall below the size thresholds where a TA would be required may have transport impacts which warrant investigation and assessment. Examples of such developments could include developments which require direct access onto major arterial routes or strategic bus corridors or where they may affect parts of the highway network or specific junctions which experience particularly high volumes of traffic flows or other problems. In such instances, the Council will ask the applicant to prepare a Transport Statement (TS) providing a qualitative and quantitative assessment of the existing transport conditions in and around a development site and the transport impacts of the development in terms of trip generation. It should also set out in detail the measures that will be taken to address those impacts. Appendix 4 outlines what should be included in a Transport Statement.

Travel Plans

- 4.11 A Travel Plan is a long term management strategy for an occupier (or group of occupiers) of a site that seeks to deliver sustainable transport objectives through positive action and is articulated in a document that is regularly reviewed (Good Practice Guidelines: Delivering Travel Plans through the planning process DfT 2009). Travel Plans are now considered an essential part of transport policy. It is strongly recommended that the explanatory notes in Appendix 3 should be used in conjunction with the guidance and checklist of requirements to ensure that any Travel Plan which is submitted to the Council contains all of the information which is required by the planning authority in assessing a planning application.
- 4.12 The thresholds at which Travel Plans will be required are outlined in Table 4.1. Travel Plans will also be required for:
- Smaller developments which could generate significant amounts of travel in, or near to, areas with air quality issues and in other locations where there are local initiatives or targets for the reduction of road traffic, or the promotion of public transport, walking and cycling
 - Developments where a Travel Plan would help address a particular local traffic problem associated with a planning application which might otherwise have to be refused on local traffic grounds, for example, where overspill parking might occur from developments with low or nil off-street parking provision
 - Smaller developments which may form part of incremental development, or be near to other developments and potentially contribute to an impact of overall area wide travel demand.
- 4.13 The Council will seek to secure travel plans and financial contributions towards their implementation through the planning process and using planning obligations where appropriate.

5. PLANNING CONDITIONS, PLANNING OBLIGATIONS AND TECHNICAL STANDARDS

Planning Conditions

- 5.1 Planning conditions may be imposed to secure on and/or off site transport measures and facilities as may be required by a proposed development, in line with paragraph 8.7.5 of Planning Policy Wales (November 2016) and Government standards set out in the Welsh Government Circular 016/2014 'The Use of Planning Conditions for Development Management'.
- 5.2 In relation to access, circulation and parking, conditions may be used to:-
- specify the number of parking spaces, their size and layout;
 - control the management and use of parking spaces, (for example) to limit the use to certain categories such as Blue Badge holders;
 - secure the removal of parking spaces after a specified period or when access to the site is improved by public transport, walking and cycling;
 - control the design of delivery areas, specifications for goods vehicle parking and manoeuvring;
 - secure the provision of cycle parking and changing facilities, and safe pedestrian and cycle routes;
 - secure the provision of on-site facilities for public transport, such as bus lanes, stops, shelters, boarders, real-time information units and CCTV;
 - require the preparation of a Travel Plan and/or aspects of a Travel Plan to be implemented;
 - restrict permitted development rights, where an otherwise permitted change of use could cause a material deterioration in local conditions;
 - Crime Prevention Through Environmental Design (CPTED) or community safety initiatives, such as improved street lighting, alley gating, ambassador schemes, provision of CCTV, etc.;
 - consideration/specification of surface finishes, including implications for sustainable drainage. Any works requiring new drainage will need consideration of the receiving drainage network and communication with the owner of that asset;
 - ensure the housing and other layouts are designed to allow refuse lorries to manoeuvre and to ensure that the collection vehicle is able to reach within 25m of all dwellings.
- 5.3 Conditions attached to a planning permission are enforceable against any developer who implements the permission and any subsequent occupiers of the development.

Planning Obligations

- 5.4 Guidance on Planning Obligations is set out in the Cardiff Planning Obligations SPG (2017).
- 5.5 The requirement to prepare a Travel Plan and the implementation of specific components of the Plan can be secured through Planning Obligations. Planning Obligations are normally the most appropriate means of securing the provision of physical measures outside the site boundary and financial contributions to support services or activities required for Travel Plan implementation. They are also likely to be the most effective mechanism for enforcing performance targets, for example, in relation to imposing sanctions and financial penalties where these are required to provide an incentive for Travel Plan delivery.

Section 38 and Section 278

- 5.6 Under section 38 of the Highways Act 1980, the highway authority² can enter into a legal agreement with a developer to adopt a highway provided the highway has been constructed to a specified standard and to the satisfaction of the local highway authority.
- 5.7 Under section 278 of the Highways Act 1980, the highway authority can enter into a legal agreement with a developer (in order to facilitate development) for the developer to either pay for, or make alterations or improvements to, the public highway.
- 5.8 The approval process for Section 38 and Section 278s will vary as appropriate to the nature and scale of the development and a separate process will normally undertaken for both the Section 38 and Section 278 elements of the development. Guidance on these processes is provided in Section A – Typical Design Approval Process.
- 5.9 Where matters affected by the works forming part of S278s are subject to Planning Condition(s), the location and cross section for example, the Council expect the developer to have discharged those conditions prior to entering into a S278 agreement. Design of the works subject to 278 must thereafter accord with the details agreed through the planning permission and discharge of condition(s).

Technical Design Standards for roads and highways

- 5.10 Technical Design Standards have been developed for matters relating to roads and highways. These are live technical documents which will be updated by the Council from time to time, as necessary. It should be ensured that the most up to date information available is referred to and that other relevant design guidance is also referenced (see Section 8).
- 5.11 For residential streets, the general principle of the development should be in accordance with guidance in the Cardiff Residential Design Guide SPG and also informed by the expectations presented in the Liveable Design Guide³. The detailed design will require the application of the standards and guidance as set out in Section B – Residential Development Roads.
- 5.12 Industrial and Commercial Roads should be designed in accordance with guidance in Section C – Industrial and Commercial Estate Roads. Further reference should be made to Section B – Residential Development Roads, which provides guidance on design philosophy. Reference will also be required to Section D – Advice on Design Elements, which provides advice on implementing common highway features.
- 5.13 Standard details for construction of roads to an adoptable standard are set out in Section E – Highway Construction Details. The designer should seek guidance where it appears that there is a difference in the guidance between these standards and the principals set out in the Sections A to D or the requirements in documents referred to in those sections.

² Normally Cardiff Council except on Trunk Roads where this will be with the Welsh Government

³ <https://www.cardiff.gov.uk/ENG/Your-Council/Strategies-plans-and-policies/liveable-design-guide/Pages/default.aspx>
Cardiff Managing Transport Impacts (incorporating Parking Standards) SPG April 2018

-
- 5.14 Where necessary designers may need refer to the standard details in the Manual for Construction of Highway Works – Volume 3: Highway Construction Details⁴, but any use of these details should be agreed with the Council.

Audits

- 5.15 A Design and Access Statement (DAS) can ask for accessibility and access information where this is material. Carrying out this review at the design stage through the use of a suitable and sufficient schematic Audit (accompanying a DAS) should resolve issues to avoid an additional cost impact.
- 5.16 All planning applications that include changes to the highway and new roads for adoption need to be accompanied by a Combined Audit (CA) in accordance with Cardiff Council's CA Manual or other similar, agreed, standard (for example, the DfT manual 'Quality Audit in the Street Design Process'). The CA should be embedded in a TA or TS where appropriate. There is an expectation that Stage 1 is required as part of the design process.

⁴ <http://www.standardsforhighways.co.uk/mchw/vol3/index.htm>

6. PARKING GUIDANCE AND STANDARDS

Parking Standards

- 6.1 The availability of parking spaces and their location can influence travel choices. Excessive provision can serve to stimulate demand for car travel and perpetuate reliance on the car. The application of parking standards to new developments is therefore an important tool in managing demand for travel by car and encouraging a shift to sustainable transport modes. These objectives are balanced against the need to manage pressures on on-street parking space and the negative impacts of oversubscription of space including congestion, hazards, visual intrusion and harm to residential amenity. Reference should also be made to the Council's Parking Strategy for further information on how parking is managed in Cardiff, including residents parking schemes.
- 6.2 The Council's parking standards are outlined in Tables P.1 to P.12 as follows. **The parking standards are maximum parking standards and should be used in conjunction with the guidance set out in this section.**

Table 6.1: Reference List

Table No	Use Class	Standards
P.1	A1	Retail and Wholesale: Shops, retail warehouses, hairdressers, undertakers, travel and ticket agencies, post offices, pet shops, sandwich bars, showrooms, domestic hire shops, dry cleaners and funeral directors.
P.2	A2	Financial and Business: Banks, building societies, estate and employment agencies, professional & financial services and betting offices, as well as call centres and conference facilities.
P.3	A3	Food, Drink, Entertainment: For the sale of food and drink for consumption on the premises - restaurants, snack bars and cafes. Public houses, wine bars or other drinking establishments (but not night clubs).
P.4	B1	Business: Offices, research and development, light industry appropriate in a residential area.
P.5	B2	General Industrial: Industrial process other than that falling within Class B1.
P.6	B8	Storage or distribution: General industrial, storage or distribution (including open air).
P.1	C1	Hotels, boarding and guest houses where no significant element of care is provided.
P.8	C2	Residential: Residential care homes, hospitals, nursing homes, boarding schools, residential colleges and training centres.
P.9	C3	Dwelling houses: Family houses, or houses occupied by up to six residents living together as a single household, including a household where care is provided for residents.

P.9	C4	Houses in multiple occupation by unrelated residents with shared kitchen/bathroom amenities.
P.10	D1	Non-residential Institutions: Clinics, health centres, crèches, day nurseries, day centres, schools, art galleries, museums, libraries, halls, places of worship, church halls, law courts. Non-residential education and training centres.
P.11	D2	Parking Standards for Assembly and Leisure: Cinemas, music and concert halls, bingo and dance halls (but not night clubs), swimming baths, skating rinks, gymnasiums or sports arenas (except for motor sports, or where firearms are used).
P.12	Sui Generis	Sui Generis e.g. garages, car sales, purpose built high density student housing, houses with multiple occupants with over 7 or more residents.

- 6.3 These SPG parking standards relate to specific land uses within the Town and Country Planning Use Classes Order 1995, but do not cover every possible land use or type of development. As such, any proposed land use or development not specifically mentioned will be considered on a site specific basis and on its individual merits. **The absence of parking standards for a specific use does not mean that no parking provision will be required or that there is no restriction on provision.**
- 6.4 Different standards are applied to the central area of Cardiff. The boundary for the Central Area is shown on figure 6.1.
- 6.5 The Central Area has been informed by two principal considerations:
- i. The need to encourage modal shift in order to achieve the 50:50 modal split target in the LDP
 - ii. Policies relating to the management of Council-controlled on-street and off-street car parking in the Council's Parking Strategy.
- 6.6 The Central Area includes the City Centre and Cardiff Bay Areas and the large residential areas which extend outwards from the core shopping centre into the wards of Grangetown, Canton, and Cathays. A number of the city's principal trip attractors are located in the area including the City Centre, Cardiff Bay the Cardiff Enterprise Zone, and the LDP Strategic Site focussing on Cardiff Central Station and Central Square. The Central Area also includes a number of existing industrial/business land uses including the employment areas around Penarth Road/Leckwith Road to the west of the City Centre and employment uses around Ocean Way and Tremorfa to the east/south East.
- 6.7 The Central Area broadly aligns with the boundary of the Cardiff Controlled Parking Area (CPA) and Residential Parking Areas as defined in the Council's Parking Strategy.
- 6.8 Limiting the provision of parking in these central areas of the city is necessary to manage the demand for travel by car to central Cardiff and encourage travel by public transport, walking and cycling in order to achieve the Local Development Plan target of a 50:50 modal split.
- 6.9 The Parking Standards support these objectives by requiring a lower quantity of car parking spaces within new developments in the Central Area than the standards for developments in the

Outer Area. In both the Central Area and Outer Area, the minimum level of cycle parking provision has been calculated using an analysis of TRICS in order to provide, where appropriate by use class, sufficient cycle parking for 30% of employees to travel by bike, in line with the 50:50 modal split target and aspirations for significantly increasing trips made by cycling.

- 6.10 For mixed use developments, the standards relating to each use should be used to calculate the overall total parking level.
- 6.11 There may be scope for applying standards flexibly in exceptional circumstances where the specific use or nature of development or its occupation or management warrants this. Where the standards are applied flexibly the Council may impose conditions to limit permitted development rights or to control management and occupancy.
- 6.12 Changes of use will generally be subject to the same standards as new development for the same use class. Reduced numbers of parking spaces will be sought where the proposed use is demonstrably less traffic intensive than the previously approved use.
- 6.13 Changes of use involving the subdivision of properties to create additional units can potentially result in the intensification of use and an increase in the level of demand for car parking. In areas where there is a high concentration of single dwellings that are in multiple occupation, or have been subdivided into multiple flat/bedsit/apartment units, levels of on-street parking may already be oversubscribed. In locations where these circumstances exist, proposals for the further subdivision of existing dwellings will need to be carefully considered in light of the likely impacts of any intensification upon existing parking pressures. In exceptional circumstances, the likely parking impacts of a proposal may warrant a flexible application of the standards in this SPG with the effect that permission may not be granted unless additional off-street parking space can be provided within the curtilage of the building.
- 6.14 For the avoidance of doubt, parking standards that relate to floor area are GROSS floor area (GFA), unless stated otherwise.
- 6.15 The **Residential parking standards** do not include a requirement for visitor parking. The design and layout of parking spaces will be reviewed and may not be considered in accordance with the maximum standards if dimensions are found to be able to accommodate parking above the maximum permitted. For example, where due to its proposed dimensions a driveway to a dwelling can be shown to have the capacity to accommodate a greater number of vehicles than permitted under the parking standards, a reduction in the dimensions may be required. For the purpose of the standards, garages are not counted with the parking provision for residences.
- 6.16 Standards for **non-residential development** include both the operational parking space required for servicing a development (e.g. loading/unloading)/HGV parking and non-operational parking (e.g. employee and visitor/shopper parking).

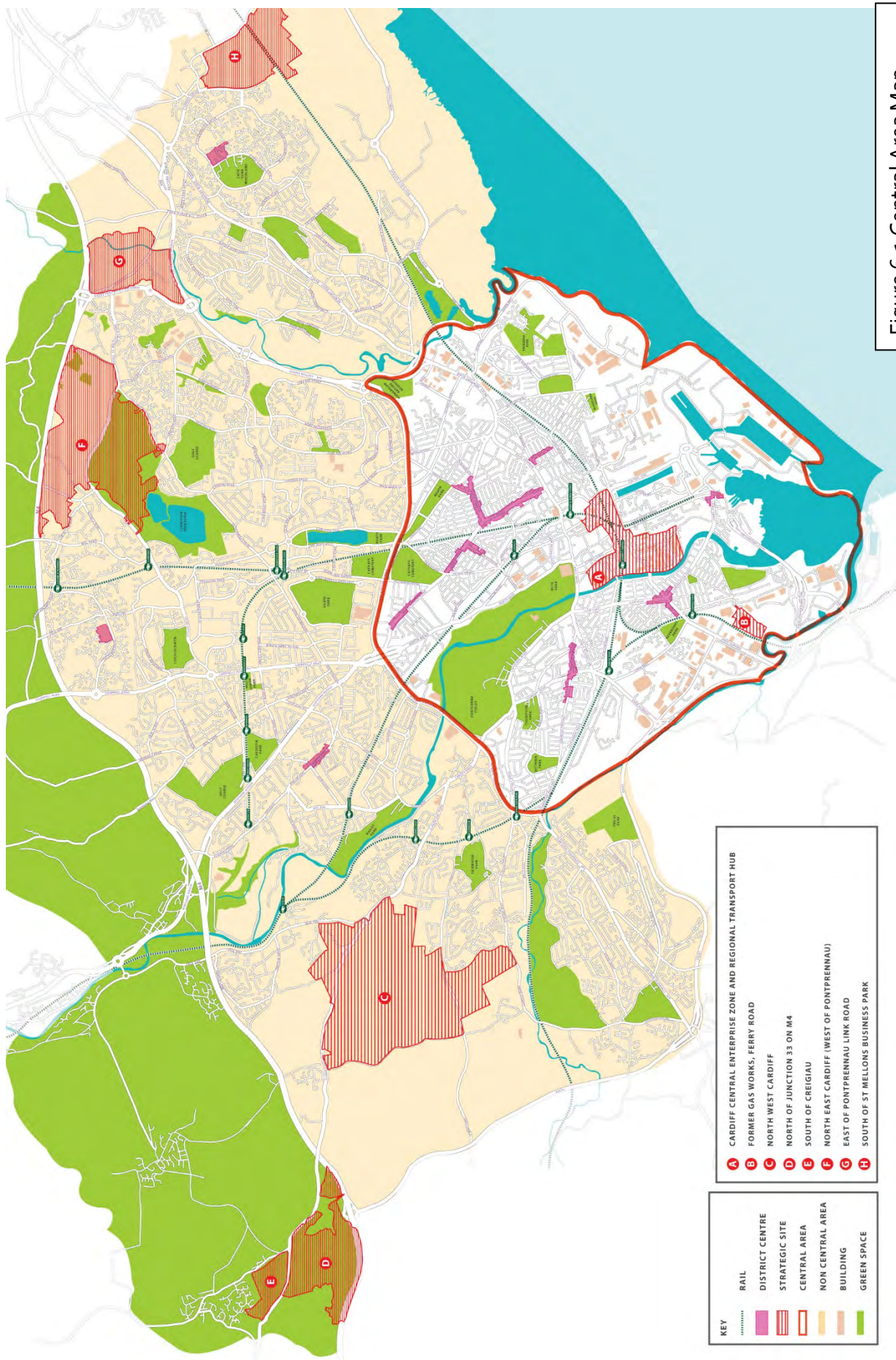


Figure 6.1 Central Area Map

Parking Standards by Land Use

Table P.1: A1 Retail							
Area	Development Type	Maximum car parking spaces	Minimum staff cycle parking – undercover, secure and suitable for long term use	Minimum visitor cycle parking	Maximum Powered two-wheeler parking	Disabled parking provision	
						Where car parking provision is up to 200 car parking spaces	Where car parking provision is over 200 car parking spaces
Central	Retail	1 per 400sqm	2 per 100sqm	1 per 100sqm	1% - 5% of total parking spaces	6% of total parking spaces, and a further 6% of spaces should be enlarged standard spaces	4 spaces plus 4% of total capacity, and a further 4% of spaces should be enlarged standard spaces
Non central	Retail (<300sqm)	1 per 60sqm	2 per 100sqm	1 per 100sqm			
	Retail (301 – 1200 sqm)	1 per 40sqm	2 per 100sqm	1 per 200sqm			
	Retail (>1201sqm) Shopping malls addressed on individual unit size	1 per 20sqm	2 per 100sqm	1 per 250sqm			

Table P.2: A2 Financial and Professional Services							
Area	Development Type	Maximum car parking spaces	Minimum staff cycle parking – undercover, secure and suitable for long term use	Minimum visitor stay cycle parking	Maximum Powered two-wheeler parking	Disabled parking provision	
						Where car parking provision is up to 200 car parking spaces	Where car parking provision is over 200 car parking spaces
Central	Provision of; Financial, Professional and other services (public facing)	1 per 250sqm	2 per 100sqm	1 per 500sqm	1% - 5% of total parking spaces	5 % of total parking spaces, and a further 5% of spaces should be enlarged standard spaces	6 spaces plus 2% of total parking spaces , and a further 2% of spaces should be enlarged standard spaces
Non central	Provision of; Financial, Professional and other services (public facing)	1 per 50sqm	2 per 100sqm	Min. 4 plus 1 per 1000 sqm			

Table P.3: A3 Food and Drink							
Area	Development Type	Maximum car parking spaces	Minimum staff cycle parking – undercover, secure and suitable for long term use	Minimum visitor stay cycle parking	Maximum Powered two-wheeler parking	Disabled parking provision	
						Where car parking provision is up to 200 car parking spaces	Where car parking provision is over 200 car parking spaces
Central	All food and drink	0 Any dedicated drop off spaces must be within curtilage	2 per 100sqm	1 per 100sqm	1% - 5% of total parking spaces	6% of total parking spaces, whichever is greater, and a further 6% of spaces should be enlarged standard spaces	4 spaces plus 4% of total parking spaces, and a further 4% of spaces should be enlarged standard spaces
Non central	All food and drink	1 per 10 sqm					4 spaces plus 4% of total parking spaces, and a further 4% of spaces should be enlarged standard spaces

Table P.4: B1 Business							
Area	Development Type	Maximum car parking spaces	Minimum staff cycle parking – undercover, secure and suitable for long term use	Minimum visitor stay cycle parking	Maximum Powered two-wheeler parking	Disabled parking provision	
						Where car parking provision is up to 200 car parking spaces	Where car parking provision is over 200 car parking spaces
Central	Offices. Highly technical and light industry. Offices for research and development processes.	1 per 250sqm	2 per 100sqm	4 plus 1 per 1000 sqm	1% - 5% of total parking spaces	5 % of total parking spaces, and a further 5% of spaces should be enlarged standard spaces	6 spaces plus 2% of total parking spaces, and a further 2% of spaces should be enlarged standard spaces
Non central	Offices. Highly technical and light industry. Offices for research and development processes.	1 per 50sqm	2 per 100sqm				

Table P.5: B2 General Industry							
Area	Development Type	Maximum car parking spaces	Minimum staff cycle parking -- undercover, secure and suitable for long term use	Minimum visitor stay cycle parking	Maximum Powered two-wheeler parking	Disabled parking provision	
						Where car parking provision is up to 200 car parking spaces	Where car parking provision is over 200 car parking spaces
Central	All industry	1 per 1000sqm	2 per 100sqm	1 per 200sqm	1% - 5% of parking spaces	5% of total parking spaces, and a further 5% of spaces should be enlarged standard spaces	6 spaces plus 2% of total capacity parking spaces, and a further 2% of spaces should be enlarged standard spaces
Non central	Industrial units (<500sqm)	1 per 50sqm	2 per 100sqm	1 per 1000sqm			
	Industrial units (501 - 1000sqm)	1 per 60sqm	2 per 100sqm	1 per 1000sqm			
	Industrial units (1001 >)	1 per 120sqm	2 per 100sqm	1 per 1000sqm			

Table P.6: B8 Distribution							
Area	Development Type	Maximum car parking spaces	Minimum staff cycle parking – undercover, secure and suitable for long term use	Minimum visitor cycle parking	Maximum Powered two-wheeler parking	Disabled parking provision	
						Where car parking provision is up to 200 car parking spaces	Where car parking provision is over 200 car parking spaces
Central	All wholesale warehousing	1 per 1000sqm	2 per 100sqm	1 per 200sqm	1% - 5% of total parking spaces	5% of total parking spaces, and a further 5% of spaces should be enlarged standard spaces	6 spaces plus 2% of total parking spaces, and a further 2% of spaces should be enlarged standard spaces
Non central	Wholesale warehousing (<500sqm)	1 per 50sqm	2 per 100sqm	1 per 1000sqm			
	Wholesale warehousing (501 - 1000sqm)	1 per 60sqm	2 per 100sqm	1 per 1000sqm			
	Wholesale warehousing (1001>sqm)	1 per 120sqm	2 per 100sqm	1 per 1000sqm			

Table P.7: C1 Hotels, Hostels and All Other Lodgings					
Area	Maximum car parking spaces	Minimum cycle parking (all to be secure and undercover for overnight use)	Maximum Powered two-wheeler parking	Disabled parking provision	
				Where car parking provision is up to 200 car parking spaces	Where car parking provision is over 200 car parking spaces
Central	0 Any dedicated drop off and servicing spaces must be within in curtilage	Minimum of 5 plus 1 per 20 beds	1% - 5% of total parking spaces	6% of total parking spaces, and a further 5% of spaces should be enlarged standard spaces. For hotels, there should be one designated car parking space per accessible bedroom.	4 spaces plus 4% of total parking spaces, and a further 4% of spaces should be enlarged standard spaces. For hotels, there should be one designated car parking space per accessible bedroom.
Non central	1 space per 2 guest bedrooms				

Table P.8: C2 Residential institutions					
Area	Development Type	Maximum car parking spaces:	Minimum cycle parking	Maximum Powered two-wheeler parking	Disabled parking provision
Central and Non central	Residential institutions (boarding schools, care homes, nursing homes)	1 per 4 beds	Min. of 5 plus 1 per 10 beds	1%-5% of total parking spaces	1 per disabled staff member plus 5% of the total parking, and a further 5% of spaces should be enlarged standard spaces.
	Hospitals	Operational vehicle space <u>AND</u> 1 per bed	Min. of 5 plus 1 per 20 beds		Up to 200 spaces 6% of total parking spaces, and a further 6% of spaces should be enlarged standard spaces Over 200 spaces - 4% of total parking spaces, and a further 4% of spaces should be enlarged standard spaces.
	Sheltered housing	1 per 4 units	Min. of 5 plus 1 per 10 beds		Provided in car parking allocation

Table P.9: C₃ and C₄ Dwelling properties				
Area	Development type	Maximum car parking spaces per unit	Minimum cycle parking	Disabled parking provision
Central	All dwellings	1 per unit	1 per bedroom See also 6.23.	Provided in car parking allocation.
	Houses of multiple occupation (3 – 6 unrelated residents and 7+ unrelated residents)	1 per unit	1 per bedroom	
	Elderly person dwellings	1 per unit	1 per 10 units	
Non central	1 bedroom dwellings	1 per unit	1 per bedroom	
	2+ bedroom dwellings	2 per unit	1 per bedroom	
	Houses of multiple occupation (3 – 6 unrelated residents and 7+ unrelated residents)	1 per unit	1 per bedroom	
	Elderly person dwellings	1 per unit	1 per 10 units	

Table P.10: D1 Non-residential institutions							
Area	Development Type	Maximum car parking spaces	Minimum long stay cycle parking	Minimum short stay cycle parking	Maximum Powered two-wheeler parking	Disabled parking provision	
						Where car parking provision is up to 200 car parking spaces	Where car parking provision is over 200 car parking spaces
Central	All types	Nil	As non-central	As non-central	1% - 5% of total parking spaces	6% of total parking spaces, and a further 6% of spaces should be enlarged standard spaces	4 spaces plus 4% of total parking spaces, and a further 4% of spaces should be enlarged standard spaces
	Schools/ places of education	1 per 30 pupils	1 per 10 pupils plus 1 per 10 pupils scooter parking for primary schools 1 per 5 for secondary schools	1 per 4 long stay spaces			
Non central	Health centres and surgeries	2 per consulting room	1 per consulting room	1 per consulting room			
	Crèche, day centre, nursery	1 per 20 children	1 per 10 children	1 per 4 long stay spaces			
	Schools/ places of education	1 per 30 pupils	1 per 10 pupils plus 1 per 10 pupils scooter parking for primary schools 1 per 5 for secondary schools	1 per 4 long stay spaces			
	Museums/ Galleries/ Exhibition room	1 per 50sqm GFA	Min. 5 plus 1 per 50 sqm				
	Public hall/ Place of worship	1 per 10 capacity	Min. 5 plus 1 per 50 sqm				
	Library	1 per 75sqm GFA	Min. 5 plus 1 per 50 sqm				

Table P.11: D2 Assembly and Leisure						
Area	Development Type	Maximum car parking spaces	Minimum cycle parking	Maximum Powered two-wheeler parking	Disabled parking provision	
					Where car parking provision is up to 200 car parking spaces	Where car parking provision is over 200 car parking spaces
Central	All types	0	As Non-central	1% - 5% of total parking spaces	6% of total parking spaces, and a further 6% of spaces should be enlarged standard spaces. For sports facilities, levels may be determined according to the usage of the sports facility. For further information, see Accessible Sports Facilities (Sports England) and Guide to Safety at Sports Grounds (Green Guide).	4 spaces plus 4% of total parking spaces, and a further 4% of spaces should be enlarged standard spaces. For sports facilities, levels may be determined according to the usage of the sports facility. For further information, see Accessible Sports Facilities (Sports England) and Guide to Safety at Sports Grounds (Green Guide).
Non central	Cinema/ Concert hall/ Bingo/Casino	1 per 10 capacity	1 per 10 capacity			
	Sports and leisure facilities	1 per 20sqm	Min. 5 plus 1 per 20 sqm			

Table P.12: Sui Generis						
Area	Development Type	Maximum car parking spaces	Cycle parking	Maximum Powered two-wheeler parking	Disabled parking provision	
					Where car parking provision is up to 200 car parking spaces	Where car parking provision is over 200 car parking spaces
Central	All sui generis, except where otherwise detailed	Bespoke with a presumption of 0	Bespoke	Bespoke	5 % of total capacity, and a further 5% of spaces should be enlarged standard spaces.	6 spaces plus 2% of total capacity, and a further 2% of spaces should be enlarged standard spaces.
Non central	Garages and service stations Private hire and vehicle hire	2 per service bay + appropriate waiting spaces to cater for the facility	Min. of 2			
	Car sales premises	1 transporter space 1 per 50sqm				
	Driving schools, licensed taxis	1 space				
All areas	Purpose built, high density student housing	1 space per 25 beds for operational parking A condition will also be applied requiring the submission of a Parking and Traffic Management Plan.	1 per 2 beds	Bespoke	1 per disabled student room + 2 spaces	

Cycle Parking Standards

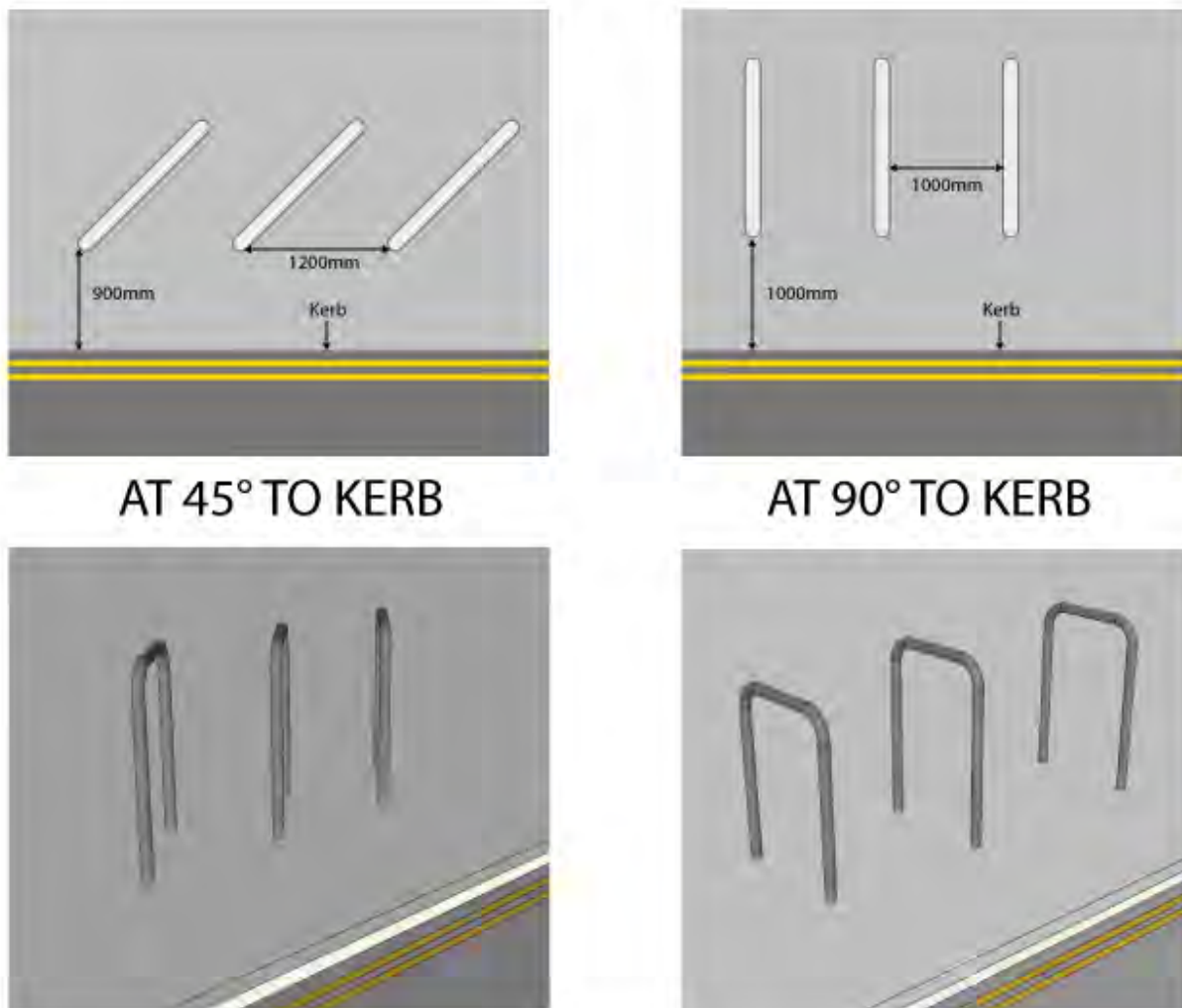
- 6.17 The importance of cycling facilities such as changing rooms, showers and lockers in encouraging more people to cycle cannot be underestimated. Such facilities will be sought in appropriate circumstances where long stay cycle parking is required, as determined by the land use above. At employment developments where the location makes it possible for employees to travel to work by active modes, the Council will seek to ensure that the development incorporates changing and shower facilities to facilitate anticipated levels of trips in the short term and sufficient to accommodate anticipated growth in these modes and modal shift in line with the 50:50 modal split. This approach is also supported by the Active Travel Act (Wales) 2013 and the Active Travel Design Guidance should be referred to⁵.
- 6.18 The standards for the provision of cycle parking for different types of development set out within Tables P.1 to P.12 represent minimum provision for all areas of Cardiff, which must be provided in addition to other vehicle parking.
- 6.19 Cycle parking should be provided in a safe, secure and convenient position and also be located close to the intended destinations. Wherever possible, it should be located within the curtilage of the development. Where appropriate, dropped kerbs provided adjacent to cycle parking can aid easy access for cyclists. Stands should be visible and positioned so they do not obstruct pedestrians or people with disabilities. They should be clearly signposted and highlighted by defined areas, such as the use of surface changes, colour or texture. In order to maximise security, cycle parking should be prominently located in places which maximise surveillance. They should be overlooked by passers-by, well lit and, where possible, viewed by CCTV or security guards.
- 6.20 Sheffield-type stands, which provide two cycle parking spaces and allow both the frame and wheels to be secured onto the 'n' shaped stand, are considered appropriate for short stay parking for most situations. Alternatives will be considered, but should offer at least the equivalent capacity, robustness and degree of protection for users. Stands which incorporate effective security and innovative design will be encouraged.
- 6.21 Short stay parking, which provides for the needs of visitors or customers to a building for a few hours, should be located as close as possible to the visitor entrances of a building and, ideally, within 30m. Long stay parking, which provides for the needs of employees, commuters and residents for longer periods, is more appropriately provided undercover and within a building where possible. All cycle parking should be overlooked or provided with surveillance.
- 6.22 Residential and long stay cycle parking should be secure and sheltered. The shelter may be in the form of accommodation within buildings, in cycle sheds or other sheltered structures and can include cycle lockers or cages located in close proximity to the main building access. For houses, where cycle parking is not specifically accommodated within individual dwellings (e.g. where garages are not available), appropriate alternative secure and sheltered provision should be made. Where communal cycle parking is provided, it is often better to have several small groups of stands rather than one large facility. Cycle provision should be designed into a scheme from the outset to ensure adequate provision is made available from first occupation. Reference

⁵ <http://gov.wales/topics/transport/walking-cycling/activetravelact/implementation>

should be made to the Cardiff Residential Design Guide and other relevant guidance. Innovative approaches to cycle storage and facilities, such as two tier storage systems and lockers for cycle helmets, are encouraged.

- 6.23 Stands should be positioned so that they can be properly used and do not cause a safety hazard. The diagram below outlines the positioning which is expected for on-street cycle parking. Reference should also be made to the Active Travel Design Guidance (for example, p.276) to ensure that the footway meets the minimum footway width requirements set out in the guidance.

Figure 6.2 Cycle Parking



Car Parking for People with Disabilities and Mobility Impairments

- 6.24 Standards on the number of designated parking bays for disabled people are set out in Tables P.1 to P.12. Previously these have been based on advice contained within the 'Parking Guidelines of the Standing Conference on Regional Planning in South Wales' (Revised Edition 1993) and the Department of Transport Traffic Advice Leaflet 5/95 'Parking for Disabled People' and have now been updated in line with BS8300, 'Design of buildings and their approaches to meet the needs of disabled people'.

-
- 6.25 The parking standards for people with disabilities represent minimum provision and should be provided in addition to the standard car parking provision. Where a reduced number of car parking spaces below the maximum level are provided, the level of car parking provision for disabled people should be maintained in the same proportion as if the overall number of spaces was up to the maximum level. At certain locations, and where the proportion of disabled people is known to be higher, the ratio of parking for disabled people may need to be increased. The needs of disabled people (including designated spaces) will also need to be considered in developments where no off-street car parking is proposed. Enlarged standard spaces are 3.6m by 6m. These spaces provide flexibility as they can be adapted to be parking spaces designated for use by disabled people.
- 6.26 Guidance on parking layout and appropriate streetscapes for use by disabled people can be obtained from *Inclusive Mobility: A Guide to Best Practice on Access to Pedestrian and Transport Infrastructure* DfT (2002) and *Part M: Access to and use of buildings – Volume 2: Buildings other than dwellings* (2015). Such an approach is required by the *Equalities Act, 2010*.
- 6.27 Part M (*Access to and use of buildings*) provides technical guidance on *Buildings Regulations* about access to and use of buildings. Guidance on access in the planning system (*‘Planning and Access for Disabled People – A Good Practice Guide’* published by the Office of Deputy Prime Minister 2006; BS 8300: 2010 *‘Design of buildings and their approaches to meet the needs of disabled people - Code of Practice’* 2009 and *Design Commission for Wales, Design and Access Statements in Wales* 2017) recommends provision of an access statement to identify the philosophy and approach to inclusive design adopted, the key issues of the particular scheme, and the sources of advice and guidance used. An additional benefit of providing an access statement is that it should set out, at the time of the planning application, most of the information needed by a building control body, thereby assisting the dialogue between the applicants and building control. Design of disabled parking provision must comply with all current legislation.

Car Parking for People with Young Children

- 6.28 In shops and buildings to which the public have access and in public car parks, spaces should be reserved for people needing to transfer young children to and from the car. Parking for people with young children should be:
- Marked with a suitable symbol;
 - Provided at a medium width of 3.6m, to include 1.2m access zone between parking bays;
 - Located close to the main accessible entrance to the building.

Parking Layout and Design

- 6.29 The principles outlined in Chapter 8 of the *Manual for Streets* should be taken into account for the layout and design of parking areas. Through good design, car parking (public and private) must give consideration to safety for pedestrians, cyclists and vehicles, for example, through appropriate separation of vehicles/persons and lighting/CCTV as appropriate. Pedestrians should be considered first in the design process, in accordance with the user hierarchy set out in *Manual for Streets*. It should also address issues of security, visual amenity and access requirements. Access and circulation arrangements must accommodate the needs of all users

with a particular emphasis on vulnerable groups. Entrances and exits must not present a hazard to road users, pedestrians and cyclists or interfere with safety and the movement of traffic. It is important that the provision and design of car parking space is well integrated with a high quality public realm. The Park Mark standard may also be usefully referenced and applied where appropriate.

- 6.30 Alternative parking layouts with specific provision for car clubs and/or accommodation of shared use vehicles will be encouraged where appropriate.
- 6.31 All off-street car parking spaces should have minimum dimensions of 5.0m x 2.5m (Manual for Streets 2007), with a minimum manoeuvring space of 6.0m behind a car parking bay. Where car parking spaces are provided in a linear layout, a minimum bay length of 6.0m is required.
- 6.32 Garages should have a minimum internal width of 3.2m with an internal length of 6.0m. Where garages are provided, a minimum driveway length of 5.5m is required from the back edge of the adjacent footway (or highway/verge where there is no footway). Where garages are also used to provide cycle parking (see 6.22), an additional width of 0.75m plus additional length of 1m should be provided to allow cycles to be independently stored/removed without first moving any parked car.

Parking Standards for Motorcycles

- 6.33 Well-placed and designed motorcycle parking can help to improve the appearance of an area, reduce obstructions to pedestrians by reducing random parking, theft and damage to secured motorcycles.
- 6.34 Parking should be provided in a safe, secure and convenient position with good surveillance and, wherever possible, within the curtilage of the development. Standard spaces should be 2.5m by 1.5m. Parking must be positioned so as not to obstruct pedestrians and/or people with disabilities. Motorcycle parking should also be on a level surface and be clearly sign-posted and well-lit. Consideration should also be given to the provision of appropriate anchor points.
- 6.35 Best practice guidance on the design of Powered Two Wheeler parking is provided in the Department of Transport, Local Government and the Regions' Traffic Advice Leaflet 2/02.

Design for Refuse Collection

- 6.36 For guidance on access for refuse collection vehicles and refuse collectors please refer to the Council's current guidance on Waste Collection and Storage Facilities.

Car Clubs

- 6.37 Car club parking spaces can be provided at workplaces, residences and on-street. Car Clubs can contribute to mitigating transport related impacts and there are a number of advantages to developers in providing car clubs and their use in meeting parking standards and environmental mitigation. Existing planning guidance emphasises the benefits of high density housing development and for developments where a reduced amount of parking is sought, a developer

may be required to be provide on-site car club provision, including appropriate parking reserved for the scheme.

- 6.38 Carplus, a national charity promoting responsible car use and which seeks to establish a national network of car club providers, is a useful source of car club information.

Electric Vehicles

- 6.39 The availability of and demand for electric vehicles is projected to increase. Further to KP5 viii, provision to enable charging for electric vehicles will be encouraged, particularly within public and/or communal car parks. Electric Vehicle charging is a developing technology and Cardiff Council will seek to ensure that charging points are installed in line with the current technical requirements at the time of application. Where there is an opportunity for developments to include vehicle charging points the Council will encourage their provision and seek to secure an appropriate level of provision through the planning process. In view of the anticipated changes in the nature of EV technology and demand for EV provision, as well as forthcoming revisions to Planning Policy Wales which will reflect these changes, Cardiff Council will develop further guidance relating specifically to the implications of EV.

7. PUBLIC RIGHTS OF WAY

Introduction

- 7.1 Public Rights of Way (PRoW) have an important role as part of Cardiff's transport network and Strategic Recreational Routes, as set out in the LDP policies T5, T6 and T8 (see also Section 2 and Appendix 1).
- 7.2 This section provides advice on:
- How to identify whether a proposal affects a PRoW
 - What must be considered if PRoWs are within a development site
 - When existing paths should be retained and situations where diversions may be acceptable
 - When new paths are needed and how they should be located within a development
 - Issues to consider when designing paths.
- 7.3 These considerations are especially relevant for new housing developments, but may also need to be considered for other kinds of development if these are likely to affect the alignment of an existing PRoW or increase its usage.

Guidance on Policy Implementation

The need to identify paths at the outset

- 7.4 There are a number of categories of PRoW serving different user groups. Types of rights of way are set out below:
1. **Footpaths** for use by walkers
 2. **Bridleways** for use by horse riders, cyclists and walkers
 3. **Byways Open to All Traffic (BOATs)** have footpath, bridleway and vehicular rights (there are current no BOATs in Cardiff)
 4. **Restricted Byway (RBs)** have footpath and bridleway rights and rights for non-motorised (i.e. horse drawn) vehicles.
- 7.5 Existing PRoWs should be identified at an early stage of the development process, using the Definitive Map and Statement of Rights of Way. This is a legal record of all rights of way existing within Cardiff.
- The Definitive Map and statements are public documents which may be viewed by contacting the Highways Department within the Council.
 - The map and statement are conclusive proof as to the existence, status, width and position of a public right of way.
 - The fact that a legal right of way is shown on the Definitive Map but does not physically exist on the ground is not evidence that no right of way exists.
 - The map does NOT include paths the public have access to use on private land which the landowner allows (sometimes known as giving 'permissive access').
- 7.6 As the Highway Authority, the Council has a legal responsibility to protect highways maintainable at the public's expense as outlined in the Highways Act 1980. Their responsibility in relation to the PROW network is outlined briefly below:

-
- Under Section 130, protect the public's right for the use and enjoyment of the right of way network.
 - Maintain the rights of way network to ensure the paths are accessible for all to use (i.e. way marking; vegetation clearance; clear of obstructions, etc.).
 - Retain and update the Definitive Map and Statements as legal events are confirmed (i.e. Diversions; Extinguishments; Creation Orders, etc.).

Protecting existing paths

- 7.7 Under Section 130 of the Highways Act 1980, the Council has a duty to protect the public's right to use rights of way. Most PRowS are long-established and many provide an important local movement and recreational function as well as forming part of a larger strategic network of transport and recreational routes which includes Promoted Circular Walking Trails, River Corridor Trails, Permissive Bridle Routes and other paths.
- 7.8 For these reasons, the developer must make every endeavour to incorporate and maintain the legal alignment of an existing PRow within the layout of a development.

PRowS in development sites

- 7.9 When designing their proposals, developers should give consideration to whether any public paths or rights of way cross the development site and whether they could be affected by the proposed development. Policy T6 of the LDP seeks to protect PRowS from developments which would cause unacceptable harm to their function and use. Therefore, where a development is likely to affect the existing legal alignment of a PRow, developers should seek to minimise this impact. This may be achieved by either incorporating the legal alignment of the path within the development or by diverting it along an alternative alignment.
- 7.10 In determining applications for developments which would affect the existing legal alignment of a PRow and require its diversion, the Council will assess the merits of the alternative diverted route relative to the existing alignment in terms of its quality, safety, convenience and attractiveness. In some cases, the route proposed for the diversion may offer demonstrable advantages over the existing PRow for users in respect of these attributes. A development may also provide the opportunity to create a more convenient route or to enhance the quality of a route, particularly on large sites.

Diversions and stopping up – legal processes

- 7.11 In certain cases it will not be possible to incorporate the legal alignment of the PRow within the development or developers may not wish to do so. In such instances, the developer will need to demonstrate to the Council's satisfaction why retaining the existing alignment would prejudice an otherwise acceptable development or layout and why a diversion or stopping up of a PRow is necessary. Where having considered these matters, the Council accepts there is a valid case for not retaining an existing alignment, once planning permission has been granted, the developer must apply for a diversion or extinguishment (if proven necessary). This process is open to public consultation and changes may not be confirmed if objections are deemed reasonable.

-
- 7.12 A diversion or stopping up may be acceptable where provision of an alternative alignment would offer a route of acceptable quality in terms of its quality, safety, convenience and attractiveness or otherwise offer demonstrable advantages.
- 7.13 When determining an application for a diversion or stopping up order, the Council will need to be satisfied that it is necessary (not just desirable or preferable) for the path to be altered in order for the planning permission to be granted.
- 7.14 Where a diversion or stopping up is deemed necessary, the Council can only use the powers of section 257 of the Town & Country Planning Act 1990 while the development is taking place and the following must be considered:
- Once Planning consent has been granted, the applicant must apply for the Section 257 order to be processed.
 - The full cost of making the order will be borne by the developer.
 - Until the legal order is completed and confirmed, the original definitive line must be retained.
 - Any additional changes made to the rights of way following completion of a development will require administration made under the *Highways Act 1980* legislation and open to public objection.
- 7.15 If changes to rights of way require re-alignment of an existing path, the developer will need adequate consideration for the time required to process the legal order to determine the outcome. Where a stopping up or diversion order are required it is likely to take up to a year to come into effect. Until that time the original definitive line must be kept open at all times.

Protecting Public Rights of Way during construction

- 7.16 Rights of Way must remain open and unobstructed at all times until the necessary statutory procedures, which authorise closure or diversion of the path/s, are completed as confirmed orders. Obstructions to the rights of way network, even in ignorance, may lead to enforcement action, prosecution and blighted property.
- 7.17 Temporary Diversions/Stopping up orders can be applied for from the Council, to allow works to be undertaken or prevent a danger to the public. This restriction is only temporary and the route must be reopened. These orders cannot be used in lieu of a permanent order and again the developer will be expected to pay the costs of producing and implementing the order. A temporary diversion/stopping up does not allow the original definitive path to be obstructed or damaged during the development.
- 7.18 Developers are responsible for ensuring PRoWs are managed and remain unobstructed throughout the construction process. Failure to meet this responsibility can result in the Council taking enforcement action:
- Even where planning permission has been granted, or is not required, this does not entitle a developer to obstruct, interfere with or move a Public Right of Way.
 - Under the Highways Act 1980 Section 131 clearly states "if a person, without lawful authority or excuse (b) removes any soil or turf from any part of a highway, except for the purpose of improving the highway and with the consent of the highway authority for the highway is guilty of an offence."

-
- The Council may take proceedings in a Magistrates' Court against any person obstructing a Public Right of Way. The Countryside Rights of Way Act 2000, Section 64 under section 137ZA of the Highways Act 1980, where there is penalty for wilful obstruction provides the court the power to order the offender to remove the obstruction.
 - The Local Authority has the power to require the developer to reinstate the right of way, even where development has already occurred.
 - Temporary Diversions/Stopping up orders can be applied for to allow works to be undertaken or prevent a danger to the public (see 7.9).

New paths

- 7.19 New paths may be needed to supplement the existing network. This is especially relevant for new housing developments where new path links will be required where they are necessary to create convenient access to work, services, leisure, through public open space and countryside primarily for those who live on the site. Such paths should be permanent and made up to adoptable standard i.e. constructed to conform to the requirements of the Council's *Highway Standards Manual*.
- 7.20 Under Section 25, Highways Act 1980, a public path creation agreement can be made when a local authority enters into 'an agreement with any person having the capacity to dedicate a footpath, bridleway or restricted byway over land in their area'. The public path creation agreement requires:
- The Council to consult with other local authorities or local members in whose area the land concerned is situated;
 - The full cost of making the order to be borne by the developer where it is agreed that a creation order under Section 25 is necessary;
 - Agreement of limitations or conditions affecting the right of way over it;
 - The Council to take necessary steps for securing that the footpath, bridleway or restricted byway is dedicated with the above agreements;
 - The dedication of the right of way to be advertised in at least one local newspaper in which the land to which the agreement relates is situated.
- 7.21 On larger sites, the public rights of way network should be considered in a comprehensive manner and as part of the network of off-road routes for moving round the site, and linking with surrounding communities and countryside. The builder/developer is required to follow guidance as outlined in the Green Infrastructure SPG to ensure new and existing paths are created cohesively within green spaces.

Design Considerations

Detailed design of paths

7.22 All paths whether existing or new should be designed to accommodate their intended use and to minimise the risk of disturbance to neighbours and opportunities for crime. Further guidance is set out in the Green Infrastructure SPG section specifically for Public Rights of Way.

Developer Contributions

7.23 There may be occasions where the Council requires a financial contribution from a developer for off-site works. This would be to ensure that proposed improvements and enhancements within a development site link effectively with the existing network of routes and are constructed to an appropriate standard for the increased use likely to result from the completion of the development.

7.24 Where paths contain an adjoining soft landscape area this strip will require a commuted sum for ongoing maintenance if it is to be transferred to the Council.

7.25 Paths which will require a legal order to divert, extinguish or create will require compensation to cover the legal fees, advertising and potential public enquiry costs.

Summary

7.26 For best practice follow the checklist below:

- Take account of all relevant national and local planning guidance, including the Green Infrastructure SPG.
- Check if a Public Right of Way, claim or anomaly affects the proposed development site.
- Design the layout to take account of any existing Public Rights of Way.
- Consider if a new Public Right of Way can be incorporated into the site following guidance from Green Infrastructure SPG, Public Rights of Way section.
- Leave sufficient time to implement temporary/permanent changes to the Public Rights of Way network.
- Liaise regularly with the Council's PROW Team to ensure problems are avoided and appropriate guidance can be provided.

Reference

Rights of Way Improvement Plan Guidance (Produced as part of the Council's statutory duty under the Countryside and Rights of Way Act 2000).

Right of Way: A Guide to Law and Practice, Fourth Edition by John Riddall and John Trevelyan

8. USEFUL PUBLICATIONS

Welsh Government

Design and Access Statements in Wales (June 2017)

Planning Policy Wales (Edition 9, November 2016)

Design Guidance Active Travel (Wales) Act 2013

Technical Advice Note 18: Transport (2007)

Cardiff Council

Cardiff Local Development Plan 2006-2026

Cardiff Local Development Plan Masterplanning Framework

Liveable Design Guide: Placemaking, urban design, architecture

Cardiff Cycle Design Guide

Cardiff Parking Strategy

Cardiff Public Art Strategy

Cardiff Public Realm Manual

Rights of Way Improvement Plan Guidance (Produced as part of the Council's statutory duty under the Countryside and Rights of Way Act 2000)

Technical Design Standards

Junction Assessment Tool Guidance

Supplementary Planning Guidance

Green Infrastructure

Planning for Health

Infill Sites Design Guide

Open Spaces

Planning Obligations

Trees and Development

Waste collection and storage facilities

Cardiff Residential Design Guide

UK Government

Webtag

Department for Transport (2013 revisions) Well-maintained Highways Code of Practice for Highway Maintenance Management, London: DfT

Department for Transport (2012) Quality Audit in the Street Design Process, London: DfT

Department for Transport (2010) Manual for Streets 2: Wider Application of the Principles, London: DfT

Department for Transport (2007) Manual for Streets, London: DfT

Department for Transport (2005) Inclusive Mobility, London: DfT

Part M (Access to and use of buildings) 2015

Planning and Access for Disabled People – A Good Practice Guide' Office of Deputy Prime Minister 2006

BS 8300: 2010 'Design of buildings and their approaches to meet the needs of disabled people - Code of Practice' 2009

Other Publications

Right of Way: A Guide to Law and Practice, Fourth Edition by John Riddall and John Trevelyan

Design Commission for Wales, Design and Access Statement 2008

Cardiff Managing Transport Impacts (incorporating Parking Standards) SPG April 2018



Appendix 1 UK and National Policies

- 1.1 **The Community Infrastructure Levy Regulations 2010** and subsequent Amendments allow Local Authorities to raise funds from developers who are undertaking new building projects in their area. The Levy (or 'CIL') is a charge per square metre of new development and is collected as development is implemented. The money can be used to pay for a wide range of infrastructure that is needed to support growth. This can include things like transport schemes, schools and community facilities. Detailed information is available through www.cardiff.gov.uk.
- 1.2 **The Active Travel Act (Wales) 2013 places a legal duty on** local authorities in Wales to map and plan for suitable routes for active travel, and to build and improve their infrastructure and facilities for walking and cycling every year, as well as to promote walking and cycling as a mode of transport. Highways authorities are required to consider the needs of walkers and cyclists and make better provision for them.
- 1.2 **The Well-being of Future Generations (Wales) Act 2015** puts in place seven well-being goals. It requires public bodies to carry out sustainable development which is defined as the "...process of improving the economic, social, environmental and cultural well-being of Wales by taking action, in accordance with the sustainable development principle, aimed at achieving the well-being goals." This means that public bodies must act in a manner which seeks to ensure that the needs of the present are met without compromising the ability of future generations to meet their own needs. To meet their well-being objectives, public bodies are required to take account of: the importance of balancing short term needs with the need to safeguard the ability to meet long term needs; how public bodies impact upon each other; involving people and considering the diversity of the population; collaborating and assisting other public bodies; and how deploying resources to prevent problems occurring or getting worse may contribute to meeting the well-being objectives.
- 1.3 **Planning Policy Wales (November 2016)** sets out the Government's planning policies as they apply in Wales. It includes guidance on car parking provision (paras 8.4.1 – 8.4.6), which is viewed as a: '*major influence on the choice of means of transport and the pattern of development*'. It outlines that local authorities should: '*ensure new developments provide lower levels of parking*'. Therefore, **minimum** parking standards are no longer seen as appropriate.
- 1.4 8.3.4 states that 'where development can only take place with improvements to public transport services, local authorities should consider the use of planning conditions and/or planning obligations'. Planning conditions 'may legitimately be imposed on the grant of planning permission to secure on-site transport measures and facilities as part of the proposed development. Planning obligations may also be used in appropriate circumstances to secure off-site improvements in public transport, walking and cycling, where such measures would be likely to influence travel patterns to the site involved'.

- 1.5 The importance of conducting Transport Assessments is identified as these can 'provide the basis for negotiation on schemes, including the levels of parking, and measures to improve public transport access, walking and cycling' (8.7.2).
- 1.6 Planning Policy Wales also encourages local authorities to collaborate with neighbouring authorities when considering parking issues in order to '*establish maximum levels of parking for broad classes of development*', together with a: '*threshold size of development above which such levels will apply*' (8.4.3).
- 1.7 **Planning Policy Wales - Technical Advice Note 12: Design 2016** [TAN 12, 2016] supplements Planning Policy Wales and provides additional guidance and detailed advice on promoting sustainability through good design and planning for sustainable buildings within the planning system. Good design has the potential to assist environmental sustainability, economic growth and social inclusion.
- 1.8 TAN 12 provides advice on the way in which areas function and the connections between people and places as well as aesthetic considerations and emphasises that design should take into account:
 - Movement – promoting sustainable modes of travel
 - Access – ensuring ease of access for all
 - Character – for example, promoting local character and legible development
 - Environmental Sustainability – for example, designing for change
 - Community Safety - for example, ensuring attractive, safe public spaces.
- 1.9 In relation to transport, elements of design and the planning of movement in developments, TAN 12 sets out that planning should be based on the understanding of the local context via an analysis of the needs and potential of the local area.
- 1.10 The document states that the siting, layout and detailed design of development will often be critically important to the success of efforts to provide genuine alternatives to car travel and to achieving quality in the environment as a whole: "Good site location, building and street design can play an important role in achieving a reduction in car traffic and speed and short distance motorised journeys, as well as encouraging a wider choice of more sustainable modes of travel" (5.9.1).
- 1.11 TAN 12 sets out that the emphasis should be on safe, accessible movement of people and goods along routes that are both attractive and appropriate to the environment through which they pass. The layout of infrastructure should contribute to the promotion of walking, cycling and public transport, including ensuring direct and attractive routes for pedestrians and cyclists and giving particular attention to the needs of disabled people, children and older people. This extends to larger developments where the potential for public transport interchanges should be considered and accommodated, as well as the benefits of locally based traffic management measures.
- 1.12 The guidance indicates the need to avoid severance and community fragmentation when design is considered, promoting permeable access for all. Issues such as

gradient, lighting and security are seen as important along with coherent, legible, direct, attractive, safe and unobstructed routes. It emphasises the need for early stakeholder involvement in transport and movement issues so that the needs of users and operators are understood and reflected in design solutions, with the needs of disabled people, children and older people given particular attention.

- 1.13 **Planning Policy Wales - Technical Advice Note 18: Transport 2007** [TAN 18, 2007] supplements Planning Policy Wales and provides additional guidance on achieving a sustainable and integrated land use planning and transport system. TAN 18 emphasises that local authorities should consider the need for introducing or reviewing parking standards and requirements, and the parking needs of disabled people. Car parking policies should address the provision and management of both on-street and off-street parking, and the standards to be applied to new developments, reflecting the differing needs of various land uses. Additionally, it states that neighbouring authorities should co-operate to achieve a more consistent regional approach.
- 1.14 TAN 18 also indicates that the extra traffic generated by a proposed development may produce the need for transport improvements in the vicinity, and beyond. It states that where improvements are necessary, local planning authorities may grant planning permission subject to a condition requiring that improvements are completed prior to the commencement/occupation of the development. Furthermore, it says that developers will be required to pay the cost of any highway improvements where the need is directly created by their development. Such improvements may be secured under section 278 of the Highways Act 1980, whilst the use of planning obligations may be appropriate in some circumstances.
- 1.15 TAN 18 sets out the position with respect to **Transport Assessments** and **Transport Implementation Strategies**. Transport Assessments are used to assess the likely impact of a development in transport terms. A Transport Implementation Strategy is the output of a Transport Assessment detailing the measures a developer will use to mitigate the transport impacts: *'The transport assessment process should include the production of a Transport Implementation Strategy for the development. This should set objectives and targets relating to managing travel demand for the development.'*
- 1.16 Paragraph 9.22 of TAN 18 states that 'planning authorities may use planning obligations to secure improvements in roads, walking, cycling and public transport, whether as a result of a proposal on its own or cumulatively with other proposals and where such improvements would be likely to influence travel patterns either on their own or as part of a package of measures'. Paragraph 9.25 makes clear that the objective of using planning obligations in relation to transport should be to 'secure satisfactory accessibility to sites by all modes with the greatest degree of access being achieved by public transport, walking and cycling'.
- 1.17 TAN 18 also sets out the most recent position with respect to **Travel Plans** in Wales and states (paragraph 9.14) 'The Assembly Government wishes to promote the

widespread adoption of Travel Plans by businesses, schools, hospitals, tourist attractions and other significant travel generating uses’.

- 1.18 **Welsh Office Circular 5/93 ‘Rights of Way’** provides advice on recording, maintaining, protecting and modifying the rights of way network.
- 1.19 **Manual for Streets (MfS, Department for Transport 2007)** states that ‘a clear distinction can be drawn between streets and roads. Roads are essentially highways whose main function is accommodating the movement of motor traffic. Streets are typically lined with buildings and public spaces, and while movement is still a key function, there are several others, of which the place function is the most important.’
- 1.20 **Manual for Streets 2 (MfS 2, Chartered Institution of Highways & Transportation 2010)** is endorsed by the Department for Transport (DfT), the Homes and Community Agency (HCA), the Welsh Government, the Commission for Architecture and the Built Environment (CABE), the Association of Directors of Environment Economy Planning and Transport (ADEPT) and English Heritage. MfS2 does not supersede MfS1 but rather it explains how the principles of MfS1 can be applied more widely.

Appendix 2 Cardiff Council Transport Assessment Guidance Note and Checklist Contents

1.0	Introduction.....	6
1.1	Purpose of guidance	6
2.0	Transport Assessment Requirements	7
2.1	Baseline data, existing site information and proposed development	7
2.2	Public transport and walking/cycling assessment	7
2.3	Safety Considerations and Accident Analysis	7
2.4	Appraising the Impact of the Proposed Development - Weltag	8
2.5	Promoting Smarter Choices via Travel Plans	8
2.6	Transport Impacts and Mitigation Measures	9
3.0	Modelling Specific Requirements	10
3.1	Modelling Core Principles	10
3.2	Scope of Study	11
3.3	Analysis Approach	12
3.4	Calibration & Validation	13
3.5	Forecasting	14
3.6	Trip Generation & Distribution	15
3.7	Model Outputs	16
4.0	Cardiff Council TA Guidance: Checklist	17
	Cardiff Council Modelling Technical Note: Modelling Background Growth	27

4.1	Purpose of guidance	32
4.2	Travel Plans	33
4.3	Travel Plan Design and Contents	33
Cardiff Council TP Guidance: Checklist		36

1.0 Introduction

1.1 Purpose of guidance

- 1.1.1 Transport Assessments (TAs) are an important mechanism for setting out the scale of anticipated impacts a proposed development, or redevelopment, is likely to have. They assist in helping to anticipate the impacts of development so that they can be understood and catered for.
- 1.1.2 The Welsh Government’s policies on TAs within the planning process are contained in Planning Policy Wales (Edition 9 November 2016) (PPW). This document expands on the available guidance, providing detailed guidance on all aspects of TAs including modelling. The checklist below is not exhaustive and adaptation may be required to reflect the type and scale of the proposed development. Webtag and other source references were correct at the time of writing.
- 1.1.3 The guidance is intended to expedite the progress of planning applications. Following the guidance should assist applicants in producing TAs required through the planning process which can be approved in a timely manner. The explanatory notes below should be used in conjunction with the checklist of requirements at the end of the document to ensure that any TA which is submitted to Cardiff Council contains all of the information which is required by the planning authority in assessing a planning application. Where essential information is omitted, this may result in a delay in determining an application as any outstanding material may be required through the determination period. A pre-application service (discretionary) is offered by the Council and it is recommended developers use this service to ensure engagement at the earliest possible opportunity.
- 1.1.4 Before submission to the Council, it is strongly recommended that all TAs are independently audited, using the below checklist. Where TAs are submitted for consideration at pre-application stage or with a planning application, the Council will also use the list to audit the submission to check that it contains all the appropriate details and information to enable the Council to properly assess and understand the transport impacts of development proposals and determine the transport mitigation measures necessary to address such impacts.

2.0 Transport Assessment Requirements

2.1 Baseline data, existing site information and proposed development

2.1.1 Baseline conditions need to be established accurately to understand fully the context of the development proposal. A full description of existing site information should be provided as well as a detailed description of the proposed use or uses of the site. The description should include the elements outlined in the checklist as a minimum.

2.2 Public transport and walking/cycling assessment

2.2.1 A key issue in seeking the most sustainable solution for a particular development is the need to encourage trips made by walking and cycling and the use of public transport. TAs should include but not be limited to the elements in the checklist.

2.2.2 Public Transport Network Assessment and Planning is an integral part of the TA process. For major developments, it is important to identify the spare capacity on buses and trains in order to establish the ability of the public transport network to accommodate any increase in demand associated with a proposed development, particularly for rail. Public transport journey times and reliability should also be referenced.

2.2.3 Such assessments should inform later stages in the TA process in respect of determining modal split, travel plan objectives and, in appropriate cases, public transport infrastructure enhancements and improvements to the local cycleway and footpath network as part of an overall mitigation package. The TA should also demonstrate the principles of design for the walking and cycling network and urban realm and how these principles follow guidance in Manual for Streets, Manual for Streets 2 and the Welsh Government's Active Travel Design Guidance.

2.2.4 A suggested methodology for assessing the capacity (i.e. the maximum number of people that can be accommodated on the route within the licensing laws of that particular mode) of the public transport network is set out in the checklist. Detailed guidance relating to all aspects of modelling can be found in Section 3.

2.3 Safety Considerations and Accident Analysis

2.3.1 The assessment should identify any significant highway safety issues and provide an analysis of the recent accident history of the study area. The extent of the safety issue considerations and accident analysis will depend on the scale of the proposed development

and its location. The need to minimise conflicts between vehicles and other road-user groups, particularly vulnerable users, should be adequately addressed. Where appropriate, this should also include consideration of impacts on the railway network.

2.4 Appraising the Impact of the Proposed Development - Weltag

- 2.4.1 It should be noted that in the Welsh context the Welsh Transport Planning Appraisal Guidance (Weltag) process should be used for larger scale developments with wider than local impacts. Weltag enables practitioners to set transport objectives and plan, evaluate and monitor initiatives in accordance with the Wales Transport Strategy. Appraisal is centred on three main impact areas, the pillars of sustainable development: Economy, Environment and Society (including Accessibility, Integration and Safety). The criteria in the checklist below should also be referenced by the appraisal. Where appropriate, and commensurate with the scale of a development, TAs should demonstrate that reference has been made to Weltag in carrying out the assessment of issues relating to the three impact areas. Weltag is recommended as a robust process for addressing problems which have been identified through the TA process and principles of the Weltag methodology can usefully be applied in this context. For example, Stage 1 provides a framework for identifying options where impacts have been identified; Stage 2 for options testing and Stage 3 for the development of a preferred option.
- 2.4.2 In line with the Weltag process, the environmental impacts of any significant development need to be addressed. Environmental impacts which are set out in an environmental impact assessment (EIA) should be cross-referenced in the TA. This will help ensure that the significance of the predicted impacts and the scope for mitigating them are properly addressed at the outset.
- 2.4.3 The Local Highway Authority and/or the Highway Agency would require assessment of the environmental impact from any increase of traffic on the highway network where statutory limits might be breached. The same is true if any highway mitigation measures were to be proposed as a result of the development.

2.5 Promoting Smarter Choices via Travel Plans

- 2.5.1 Smarter Choices are techniques for influencing people's travel behaviour towards more sustainable options. They include measures such as travel plans, individualised marketing, personalised journey plans, public transport information and marketing initiatives, car sharing schemes and car clubs, plus measures that reduce the need to travel, such as video conferencing and teleworking.
- 2.5.2 Travel Plan (TPs) should be tailored to address the site-specific issues relating to the proposed development. Whenever a site-specific TP is proposed, the developer should ascertain the existence of an area-wide TP and integrate the site-specific TP with this. Appendix 3 provides the Cardiff Council TP Guidance and Checklist for detailed information on TP requirements.

2.6 Transport Impacts and Mitigation Measures

- 2.6.1 Preference should be given wherever possible to sustainable travel solutions rather than the construction of new roads, for example through facilitating walking and cycling as well as accessibility to the local public transport infrastructure and improvements to the local public transport network.
- 2.6.2 Where mitigation is proposed, appropriate conditions may be attached to any planning permission granted. The conditions or obligations should specify the improvements required to accommodate the proposed development's trips by all modes. They should also ensure the safety of all road users, including non-motorised users or vulnerable users. Conditions or obligations may require that necessary mitigation measures be completed before first occupation of units on the site, or before work on the development site itself commences if construction traffic is a major issue.
- 2.6.3 As outlined in TAN 18, as a broad guide the Welsh Government regards an increase in turning movements in the order of 5% as material in most cases, that is, a 5% increase of traffic using any link of a junction. Where the capacity of a junction is near to, or is being, exceeded a smaller percentage increase on a link would normally be material, as would any additional turning movements which in the case of, for example, heavily laden slow moving vehicles, might have serious safety implications for road users. The critical junctions to be included in the TA should be agreed with the Council.
- 2.6.4 Where a development will have a material impact on the highway network, the level of impact at all critical locations on the network should be established as well as conditions which may be unique to the network in the local area. In respect of the strategic road network, the degree of impact on all junctions that would be affected by the movements generated by a development should be assessed. The impacts upon the functioning of the strategic network should also be assessed. In this regard, the functional attributes of the network to be assessed and measured should include queue lengths, delays caused by queuing, journey time impacts (all modes), the configuration of traffic signal cycle times at junctions and the level and quality of access afforded to pedestrians, cyclists and public transport at road junctions and along links between junctions. The additional vehicular movements generated by a development can potentially reduce the capacity of the road network and make journeys by sustainable modes less safe, convenient or attractive. Examples of this could include:
- where additional flows through junctions can only be accommodated by reducing the 'green time' for pedestrians and cyclists at junction crossings or modifications to junctions that introduce or increase the degree of staggered pedestrian/cycle movements or prevent the introduction of pedestrian/cycle crossings.
 - where additional flows prevent the reallocation of road space to sustainable modes.

- 2.6.5 Further to policy T6 of the LDP, the core principals required of a development are defined below, whereby the developer should demonstrate that these have been adhered to and propose any necessary mitigation measures accordingly –
- The development will not cause unacceptable harm to new or existing pedestrians, cyclists and public transport users, while larger developments will be expected to provide improvements to these modes;
 - The development will not cause unacceptable harm to the safe and operation of the highway for example queuing back (maximum rather than average queue length) to an extent such as to affect access or block upstream junctions.
- 2.6.6 In line with TAN 18 (9.1), the TA process should also include the production of a Transport Implementation Strategy (TIS) which should “set objectives and targets relating to managing travel demand for the development and set out the infrastructure, demand management measures and financial contributions necessary to achieve them”. The elements set out in the checklist should be included as a minimum.

3.0 Modelling Specific Requirements

3.1 Modelling Core Principles

- 3.1.1 As a general principle, all TAs should be compliant with the appropriate guidance, including TAN 18', 'DfT WebTAG' and 'Design Manual for Roads and Bridges (DMRB)'.
- 3.1.2 The assessment should take into account the following core principles, as discussed in 'TAG Unit M2 (Variable Demand Modelling)' and should be considered part of an overall iterative process. Links to relevant discussion in relation to each of these aspects is provided below –
- Trip Generation [Ref: Par 3.6.1-3.6.2.]
 - Mode Choice [Ref: Par 3.6.3.]
 - Time Period Choice [Ref: Par 3.3.8.]
 - Trip Distribution (Destination Choice) [Ref: Par 3.6.6-3.6.8.]
 - Trip Assignment (Route Choice) [Ref: Sect 3.3.]

- 3.1.3 All assumptions and methodologies should be consistently applied and appropriately documented. All models, calculation spreadsheets and associated documentation, including the 'Appraisal Specification Report' and 'LMVR' as described in 'TAG Unit M3.1 (Highway Assignment Modelling)', should be made available to the Council, and submitted electronically (i.e. not simply scanned hard copies) along with the Transport Assessment; i.e. all aspects should be auditable.
- 3.1.4 All software used in the assessment process (e.g. models, TEMPRO, TRICS etc.) should be current, unless there is a valid reason otherwise. The applicant should adhere to best practice and any guidance specific to the use of each software application.

3.2 Scope of Study

- 3.2.1 The scope of the study area for the proposed development should be provided to the Council during the preliminary stages of the application, and should be based on the area of significant influence from the development. A balance needs to be sought between drawing the study boundary close to the scheme, with the need to provide sufficient information so as to be able to make robust decisions, as described in 'DMRB Vol.12 Sect.1 Pt.1 (Traffic Appraisal Manual)'.
- 3.2.2 Where a development is a component part of a future larger scale development, then suitable consideration should be made of the larger development as a whole, including approved developments within the study area, so as not to prejudice the delivery of the wider strategy for sustainable travel. TAN 18 provides further details regarding assessing the cumulative effects of development through TAs.
- 3.2.3 As a minimum, the study period for any assessment should be a midweek 'AM Peak' and 'PM Peak', typically 08:00-09:00 and 16:30-17:30, respectively; however this should be determined from in combination, the analysis of the development trip generation profile and flow profile on the adjoining network. Significant land uses other than residential may require the need to look at additional time periods such as the inter-peak or during the weekend.
- 3.2.4 The type of surveys undertaken will in part be determined by the type of analysis to be undertaken, as explored in 'TAG Unit M1.1 (Principles of Modelling and Forecasting)', however as a minimum requirement these should involve peak classified turning movements, recorded in at least 15 minute increments, and the applicant should demonstrate their detailed understanding of the issues from having undertaken specialist site visits.
- 3.2.5 The suggested categories for classified surveys are as follows – 'Lights' (Cars/LGV), 'OGV1', 'OGV2', 'PSV' (Buses/Coaches), 'Bicycles', as described in 'DMRB Vol.7 Sect.2 Pt.1 (Traffic Assessment)', and consistent with the 'DMRB Vol.13 COBA 11 Manual'. Numbers of pedestrians crossing at a junction should also be routinely surveyed, even if no formal crossing facility exists.

- 3.2.6 Queue Lengths (at 5 minute intervals), Journey Times by bus/car (minimum of 5 runs for statistical significance), ATC counts (to account for flow variations), Origin-Destination surveys (for matrix estimation), Public Transport surveys, Parking surveys, Stated Preference surveys, and other types of data may be required for model calibration and validation; especially for detailed modelling and for larger scale developments.
- 3.2.7 Signal timing data (e.g. LOTU, AVSP) and associated plans should be sought from the Council's Network Management Group (Contact: Dave Kinnaid – 029 2087 3321 / Paul Jones – 029 2087 3305) for all signalised junctions and crossing facilities within the study area. A copy of all survey data should be provided electronically to the Council.
- 3.2.8 All surveys should be conducted during neutral time periods, so as to be reflective of typical traffic conditions. Further guidance on data collection methodology is provided in 'TAG Unit M1.2 (Data Sources and Surveys)' and 'DMRB Vol.12 Sect.1 Pt.1. (The Application of Traffic Appraisal to Trunk Road Schemes) Ch.6'.

3.3 Analysis Approach

- 3.3.1 In essence, the extent and complexity of any analysis undertaken should be commensurate with the scale of development and its likely impacts. Fundamentally, the purpose of the modelling is to demonstrate mitigation of the impacts of the development, with a view to sustainability, as discussed in 2.6.6.
- 3.3.2 For situations where there is no interaction between junctions, then subject to the limitations below, these can be modelled in isolation using Junction Assessment Tools such as – OSCADY (signalised junctions), PICADY (priority junctions), ARCADY (roundabouts), TRANSYT or preferably LINSIG. Cardiff Council has produced a Junction Assessment Tool which is available on the Council website. Use of this tool is strongly recommended.
- 3.3.3 Where a series of junctions are to be modelled within comparatively close proximity on an urban or congested network, often within the same SCOOT UTC region, then a TRANSYT or preferably LINSIG Network Model should be used as a minimum.
- 3.3.4 Where there is likelihood in these situations for queues to extend back from a junction thereby interfering with other junctions downstream, or where there are complex interactions that cannot be adequately represented in any of the above programs, then a Micro-simulation Model should also be used, i.e. VISSIM or preferably S-PARAMICS.
- 3.3.5 Micro-simulation models are inherently data hungry, and will typically involve a significant data collection exercise. Matrices should be fully profiled in 5 minute increments, with use of suitable 'warm-up' periods. Bus services should be expressly modelled (NPTDR

and NaPTAN are useful data sources for this), together with all significant junctions and signalised crossing facilities within the study area. Account should also be taken of natural variation in traffic flow, ideally through running models a number of times using different/random seeds, then aggregating the results.

- 3.3.6 For larger scale developments, one or more of the above should be considered in conjunction. Furthermore, where a development is of sufficient scale such as to influence distribution, modal split and route choice on the wider network; then more Strategic Analysis methods should also be employed, such as the use of – WebTAG compliant ‘Logit’ or ‘Variable Demand Elasticity Assignment’ Models, and/or software such as – OmniTRANS, SATURN, VISUM, CUBE etc.
- 3.3.7 The above strategic analysis methods are based on iterative assignment, therefore the results of model convergence should be suitably monitored and documented, as discussed in ‘TAG Unit M3.1 (Highway Assignment Modelling)’.
- 3.3.8 Furthermore, for large scale developments, account should be made of more complex changes in travel behaviour in response to differences in travel cost, such as – Trip Suppression/Induction, Trip Redistribution, Modal-Shift, Peak Spreading, and Traffic Rerouting; as explored in ‘TAG Unit M2 (Variable Demand Modelling)’.
- 3.3.9 Whichever approach has been taken, due consideration should be made of non-car based modes, mindful of the need to encourage sustainable travel, in particular to account for public transport, as discussed in ‘TAG Unit M3.2 (Public Transport Assignment Modelling)’.
- 3.3.10 More detailed guidance is provided in ‘TAG Unit M1.1 (Principles of Modelling and Forecasting’, ‘TAG Unit M2 (Variable Demand Modelling)’, ‘TAG Unit M3.1 (Highway Assignment Modelling)’, ‘TAG Unit M3.2 (Public Transport Assignment Modelling)’ and ‘TAG Unit M4 (Forecasting and Uncertainty)’.

3.4 Calibration & Validation

- 3.4.1 A statement of validation should accompany all assessments, detailing the acceptability of a model for use in scenario testing, the core principles of which are discussed in ‘TAG Unit M3.1 (Highway Assignment Modelling)’, however in essence any model should strive to achieve the following targets –
 - Modelled Screenline flows within 5% of observed counts in nearly all cases
 - Modelled Link/Turn flows (less than 700) within 100 vehicles of counts in 85% of cases
 - Modelled Link/Turn flows (700 to 2,700) within 15% of counts in 85% of cases
 - Modelled Link/Turn flows (more than 2,700) within 400 vehicles of counts in 85% of cases

- Modelled Link/Turn flows with a GEH of less than 5 in 85% of cases
- Modelled Journey Times within 15% (or 1 minute if higher) of surveyed times in 85% of cases.

3.4.2 In addition, where large-scale strategic models are required, calibration and validation should be undertaken and reported on for – Network, Trip Matrices and Route Choice.

3.4.3 As part of the calibration process, all departures from default program parameters and values should be clearly documented and justified. The model itself should be constructed and labelled properly, such as to avoid confusion and to aid interrogation by any third party.

3.4.4 Where a model is particularly complex, e.g. in the instance of a micro-simulation model, the applicant should be prepared to demonstrate the model in operation to Council officers and other relevant stakeholders. In such cases, a valid Base Model representative of existing conditions and agreed by the Council, is a prerequisite before undertaking any further analyses.

3.5 Forecasting

3.5.1 The scenarios required to be tested should be based on those discussed in 'TAG Unit M1.1 (Principles of Modelling and Forecasting)' and 'TAG Unit M4 (Forecasting & Uncertainty)', these are summarised below –

- **Base Year**
- **Forecast Year: Do Minimum** Reference Case accounting for TEMPRO Growth and committed development
- **Forecast Year: Do-Nothing** Development Case Without Intervention
- **Forecast Year: Do-Something** Development Case With Intervention

3.5.2 The forecast year should be 10 years post completion unless specified otherwise by the Council. Background growth assumptions for use in forecast years should be calculated on the basis of factors derived from the transport planning software TEMPRO. The methodology, which should be specific to a given application, is discussed in detail below in Appendix 1. In some instances, observed historic local trends can provide a useful steer on likely future background growth.

3.5.3 However as a general principle, this should demonstrate that sufficient consideration has been given to committed development and development plan allocations, as identified by the Council, and should aim to ensure that background trips are neither double-counted nor under-counted. Larger scale developments, in particular those near the periphery of Cardiff, should also take into

account cross-boundary effects.

- 3.5.4 There is likely to be more than one 'Do-Something' in most instances, in order to represent different possible interventions. For sites where new associated infrastructure is required/proposed, then separate scenarios with different underlying assumptions should be established to represent these, and an iterative approach based on a multi-stage model should be adopted.

3.6 Trip Generation & Distribution

- 3.6.1 Vehicular Trips rates and Person Trips (where available) by time period, should be sought for each land-use/aspect of the development, ideally from surveys of existing local comparable sites, but otherwise through use of an industry standard database such as TRICS, which should be used in accordance with best practice, e.g. the 'TRICS Good Practice Guide'.
- 3.6.2 A balance should be sought between trying to select sites with comparable characteristics to the development (e.g. walking/cycling/PT accessibility, demographics, urban density etc.) and the availability of data, with a view to achieving representative samples. Where no comparable sites exist, in particular for large mixed-use developments, then where possible 85th percentile trip rates should be determined from a sample size of 20 or more sites. Alternatively, in the absence of this, an average trip rate should be determined on the basis of 5 or more sites.
- 3.6.3 The applicant should be mindful that non-vehicular trips are often under recorded in such surveys; and therefore while databases such as TRICS may provide some steer with regards modal-split, ultimately any assumptions on trips by mode should be viewed within the context of available local data, e.g. '2011 Census: Method of Travel to Work', 'Ask Cardiff Survey', 'TEMPRO' etc.
- 3.6.4 Data from TRICS and other similar databases provide no indication of what proportion of their reported trips for a given site will be new to the network. For exclusively residential developments it should be assumed that all trips are new to the network; but for other development types, or non-residential elements of a larger mixed-use site (i.e. where some trips may remain internal to within the site), then it may be necessary to make certain adjustments to vehicle trip rates.
- 3.6.5 Potential adjustments would be to account for the following – 'Pass-by' trips, 'Linked' trips, 'Diverted' trips and 'Transferred' trips, which are explored in more detail in relevant guidance. Any adjustments made should be reasonable/ appropriate and ideally be evidence-based.
- 3.6.6 For localised assessments of comparatively small developments, it may be sufficient to use turning movements as the basis for trip distribution, by utilising simple furnishing techniques against known trip-ends. Schemes of a more strategic nature, however, require a more detailed knowledge of trip origins and destinations, and should typically involve employing some form of Matrix

Estimation (ME2) in constructing demand matrices for modelling.

- 3.6.7 In the case of these larger developments, the '2001 Census: Origin-Destination Workplace Statistics' can provide a useful starting point, albeit that this dataset is now fairly old and only covers Home-Based Work (HBW) trips. Data from the National Trip End Model (NTEM), TEMPRO and the National Travel Survey (NTS) may also be of use. Ultimately however, it may be necessary to undertake local origin-destination surveys such as – Roadside Interview surveys (RSI), Household Interview surveys or ANPR/Registration Plate surveys; as discussed in 'TAG Unit M1.2 (Data Sources and Surveys)', and explored further in 'DMRB Vol.12. Sect.1 Pt.1' and 'DMRB Vol.5. Sect.1 Pt.4 TA 11/09 (Traffic Surveys by Roadside Interview)'.
- 3.6.8 The above in many instances however, may be prohibitively difficult to undertake, and provide no mechanism to forecast Trip Redistribution; in which case, some variation of a WebTAG compliant Gravity-based Trip-Distribution Model should be employed, as discussed in 'TAG Unit M2 (Variable Demand Modelling)'.

3.7 Model Outputs

- 3.7.1 Specific outputs will vary depending on the tools that have been used in the assessment. However as a general principle, there is a need to effectively demonstrate statistically robust comparisons of the following between the Base and Forecast models –
- Capacity (PRC/RFC/Saturation)
 - Journey Times/Delays (by mode)
 - Queue Lengths (average and maximum)
 - Traffic Flow comparisons, and
 - Traffic Signal Timings and Staging.
- 3.7.2 The above outputs should be clearly presented through the use of appropriate tables and diagrams, such that the Council can arrive at a balanced and robust decision as to the acceptability or otherwise of the development.

4.0 Cardiff Council TA Guidance: Checklist

Although not exhaustive, this checklist is provided as a means to demonstrate compliance with 'Cardiff Council Transport Assessment Guidance Note: Modelling'. It is strongly recommended applicants use this guidance. Furthermore, it provides a basis against which an assessment can be independently audited, and as a mechanism for evaluation by Council planning officers. Please complete the form below, by marking 'Y', 'N' or 'n/a' accordingly, providing explanatory comments where necessary.

GUIDANCE REQUIREMENT	Y / N	COMMENTS
2.1 Baseline data, existing site information and proposed development		
<ul style="list-style-type: none"> • For full applications - detailed location plan, showing proposed and existing uses and the scale of development • For outline applications - master plan with indicative layout, land uses and transport network/links and development phasing. 		
<p>Existing site access layout and access constraints:</p> <ul style="list-style-type: none"> • Public Transport facilities • Pedestrian and cycle routes • Local network classification • Vehicular capacity on road network in vicinity, including any abnormal load uses • Assessment of attractiveness of travel modes to and from the site e.g. journeys times, availability • AQMAs, NO₂, particulate matter , noise (including from Wales Noise Mapping resource) and carbon emissions information • Current personal injury records (3 – 5 years) • Planned transport improvements in the area 		

<ul style="list-style-type: none"> • Operating hours (weekly including weekends) • Proposed access and servicing arrangements • Traffic impact of construction work • Existing parking facilities and potential impact of development on these, with reference to the Cardiff Council Parking Strategy. 		
2.2 Public Transport, Walking and cycling assessment		
<p>Detailed assessment of public transport, walking and cycling, including:</p> <ul style="list-style-type: none"> • Existing services, capacity and patronage • Potential improvements to services/capacity • Indicative demand forecasts. <p>How target modal share and patronage are to be reached, to include:</p> <ul style="list-style-type: none"> • Provision of active travel infrastructure and facilities • Bus stop placement and walking access from 400m catchment • Journey times and trip distribution for bus and rail • Service frequencies and vehicle capacity required • On and off site bus infrastructure provision, including physical constraints e.g. corridor width, priority features • Bus provision in relation to the phasing of the development, where appropriate, including service levels at different stages and any risks to delivery • Compatibility with existing services including time tabling • Potential funding streams • How mixed modal transport use is to be encouraged; and cycling and walking infrastructure improved. 		
<p>Provides appraisal summary tables, having regard to Stage 1 WelTAG appraisal principles.</p>		
<p>Assesses the available capacity of the existing cycleway and footpath network in the area of the development and identifies any required walking and cycling</p>		

network enhancements, demonstrating how the design principles follow the relevant active travel and Manual for Streets/Manual for Streets 2 guidance.		
Demonstrates walking and cycling access to key local facilities.		
Provides door to door travel times, on-site and to key trip destinations by specific routes).		
2.3 Safety considerations and accident analysis		
Identifies any significant highway safety issues and provides an analysis of the recent accident history of the study area to determine if the proposed development will exacerbate existing problems or whether any proposed highway mitigation works or traffic management measures will help to alleviate the problems. Including a comparison with local/national statistics as appropriate, particularly where the Strategic Road Network (SRN) is involved.		
Site inspections have been conducted to determine if the proposed location and design of access roads (including visibility/sight distance restrictions) would create an increased potential for accidents.		
Road safety audit carried out where appropriate.		
2.4 Weltag: Economy, Environment and Society		
Assessment has followed Weltag guidance with regard to identifying and evaluating issues relating to each of the key strands – Economy, Environment and Society – and evidence of this is provided.		
2.5 Transport Impacts And Mitigation Measures		
<ul style="list-style-type: none"> • Identification of problems & mitigation. • Required walking and cycling improvements (on/off-site). • Current access to local public transport infrastructure. • Required public transport network improvements. • Timetable for implementation, in line with development phasing where appropriate. • Assesses whether is material impact. • Uses appropriate design guides and parameters. 		

2.6 Transport Implementation Strategy (TIS)		
Identifies what policy objectives and requirements are set by the development plan in terms of access to the development and movements in and around the site.		
Identifies what access arrangements are required for a successful development (meeting the needs of the developer, end user, addressing impacts on neighbours and existing movements surrounding the site).		
Specifies the package of physical, management and promotional measures needed to accommodate the requirements identified above, such as physical infrastructure, the design and location of buildings, parking management, financial incentives and dedicated Travel Plan Coordinators.		
Contributes to development plan, including any objectives to overcome particular localised difficulties, for example, for an area of particularly significant congestion, an historic area requiring protection or air quality and noise pollution.		
Transport objectives for the development should consider commercial requirements and environmental constraints and includes a package of measures needed to achieve its objectives. These should include physical measures including the site layout, management and promotional measures such as demand management through parking restrictions or the employment of a travel plan co-ordinator.		
Travel Plan, where appropriate, integrating smarter choices with the physical design of the development. See also the Travel Plan Checklist (Appendix 3).		
Suitable financial information relevant to the implementation of the strategy, including conditions/obligations to secure implementation.		
Sets out proposed scheme of monitoring.		
3.1.1. Key Modelling Guidance		
Has the assessment complied with key guidance (e.g. <i>TAN18</i> , <i>DMRB</i> , <i>WebTAG</i>)?		

3.1.2. Core Assessment Principles		
<ul style="list-style-type: none"> • Trip Generation? • Trip Distribution / Destination Choice? • Mode-Choice? • Trip Assignment / Route Choice? 		
3.1.3. Assumptions, Methods & Documentation		
<ul style="list-style-type: none"> • Have all assumptions & methodologies been consistently applied and documented? • Have all models, files and documentation been submitted electronically? • Is all software used up-to-date? • Has software best practice been applied? 		
3.2.1. Study Area and Time Periods		
<ul style="list-style-type: none"> • Is the study area as per provided previously to the Council? • AM Peak? (<i>specify time opposite</i>) • PM Peak? (<i>specify time opposite</i>) • Off-Peak? (<i>specify time opposite</i>) • Saturday Peak? (<i>specify time opposite</i>) 		
3.2.2. Constituent Sites		
If the development is a component part of a future larger site, then has the larger site been taken into account?		
3.2.4. Surveys & Data		
<ul style="list-style-type: none"> • Have Turning Movement Counts been undertaken? • Have Site Visits with observations been undertaken? • Have Cars, HGVs & Buses been surveyed? • Have Bicycles been surveyed? • Have Pedestrians been surveyed? • Queue Lengths? 		

<ul style="list-style-type: none"> • Journey Times by Bus /Car? • ATC Counts? • O-D Surveys? • Public Transport Surveys? • Parking Surveys? • Stated-Preference Surveys? • Other surveys? • Have Signal Timings been obtained from Telematics and used for the Base model? • Do the surveys reflect current typical traffic conditions? • Is the extent of analysis consistent with the scale of development? 		
3.2.5. Modelling		
<ul style="list-style-type: none"> • Have individual junctions been modelled, and if so which software has been used? (<i>specify opposite</i>) • Have nearby junctions been modelled as a network, and if so which software has been used? • Are junction interactions sufficiently complex such as to require a micro-simulation model, and if so which software has been used? (<i>specify opposite</i>) 		
3.3.1. Modelling Methodology		
<ul style="list-style-type: none"> • Are matrices fully profiled? (<i>specify interval opposite</i>) • Have suitable 'warm-up' periods been used? (<i>specify opposite</i>) • Have all bus services & stops within the modelled area been coded? • Have all junctions & crossings within the modelled area been coded? • Has account been taken of variability in flow (e.g. seeding)? • Has sufficient consideration been given to the modelling non-car modes, with a view to 'Sustainable Travel'? 		

<ul style="list-style-type: none"> • Has <i>WebTAG</i> modelling guidance been followed? 		
3.3.2. Wider Strategic Effects		
Will the development influence wider distribution, mode-split and route choice, and if so then which tools have been used to model these effects? (<i>specify tools opposite</i>)		
3.3.3. Iteration & Convergence		
<ul style="list-style-type: none"> • Has an iterative approach been employed? • Has model convergence been documented? 		
3.3.4. Changes in Travel Behaviour		
<ul style="list-style-type: none"> • Trip Suppression/ Induction? • Trip Redistribution? • Modal-Shift? • Peak Spreading? • Traffic Rerouting? 		
3.4.1. Model Validation		
<p>Please specify % opposite for the following:</p> <ul style="list-style-type: none"> • Has a statement of validation been produced? • Modelled Screenline flows within 5% of observed? • Modelled Link/Turn flows (<700) within 100 of observed? • Modelled Link/Turn flows (700-2,700) within 15% of observed? • Modelled Link/Turn flows (>2,700) within 400 of observed? • All Modelled Link/Turn flows with a GEH of less than 5? • Modelled Journey Times within 15% or 1 minute of observed? 		
3.4.2. Strategic Validation Criteria		
<ul style="list-style-type: none"> • Network Validation? • Trip Matrix Validation? • Route Choice Validation? 		
3.4.3. Model Parameters & Nomenclature		

<ul style="list-style-type: none"> • Have all departures from default model parameters been documented & justified? • Has the model been suitably labelled to avoid any confusion (e.g. filenames and annotation)? 		
3.4.4. Model Acceptance		
Have the models been demonstrated to the Council & relevant stakeholders?		
3.5.1. Baseline Scenarios, Background Growth and Committed Development		
Please specify opposite for the following: <ul style="list-style-type: none"> • 'Base Year'? • 'Do-Minimum' (DM)? • Has <i>TEMPRO</i> growth been accounted for? • Have observed local historic trends been considered? • Has committed development been accounted for? • Have plan allocations been accounted for? • Has growth in cross-boundary movement been considered? 		
3.5.2. Forecast Scenarios		
<ul style="list-style-type: none"> • 'Do-Nothing' / Development Scenario? <i>(specify residential units & jobs and GFA for employment, retail, education & leisure opposite)</i> • 'Do-Something' (DS) Scenarios? <i>(briefly summarise scenarios opposite)</i> 		
3.6.1. Development Trip Generation		
<ul style="list-style-type: none"> • Has <i>TRICS</i> been used to derive trip-rates? • Person Trip-Rates? <i>(specify trips arriving/departing for each period opposite)</i> • Vehicle Trip-Rates? <i>(specify trips arriving/departing for each period opposite)</i> 		
3.6.2. Representative Sample Size		
<ul style="list-style-type: none"> • Has a site/s been selected on the basis of similar characteristics to the development? 		

<ul style="list-style-type: none"> • Have 5 or more sites been used as a basis for calculating trip-rates? <i>(specify no. of sites opposite)</i> • Has an 85th percentile been used? 		
3.6.3. Modal-Split		
<ul style="list-style-type: none"> • Existing area mode-split for all journey purposes? • Development mode-split, <u>without</u> interventions? • Development mode-split, <u>with</u> interventions? <i>(specify source of mode-split data for each, and provide % split for each mode opposite)</i>		
What percentage of travel is by Sustainable Modes (i.e. walking, cycling, public transport)? <i>(specify % opposite)</i>		
3.6.4. New Trips		
What percentage of trips will be new to the network? <i>(specify % opposite)</i>		
3.6.5. Existing Trips		
Please specify opposite for the following: <ul style="list-style-type: none"> • 'Pass-by' trips <i>(specify % opposite)</i> • 'Linked' trips <i>(specify % opposite)</i> • 'Diverted' trips <i>(specify % opposite)</i> 'Transferred' trips <i>(specify % opposite)</i>		
3.6.6. Trip Matrix Construction		
<ul style="list-style-type: none"> • Have matrices been constructed from 'furnessing' turning count data? • Has Matrix Estimation (ME2) been used to construct matrices? 		
3.6.7. Origin-Destination Data Sources		
Has the '2001 Census O-D Workplace Statistics' data been used as the basis to assume trip distribution for the development? <i>(specify assumptions opposite)</i>		
Has data from NTEM/TEMPRO been used as the basis to assume trip distribution for the development?		

Have RSI surveys, ANPR counts or Household Interview data been used as the basis to assume trip distribution for the development? <i>(specify opposite)</i>		
3.6.8. Trip Distribution / Redistribution		
Has a Trip Distribution / Gravity Model been used?		
3.7.1. Model Outputs		
<ul style="list-style-type: none"> • Have the results been shown to be statistically robust? • Junction Capacity? • Journey Times / Delays? • Queue Lengths? • Traffic Flows? • Signal Timings (provided to Telematics)? 		
3.7.2. Development Impacts & Mitigation		
Have all necessary results been appropriately presented?		
<p>What is the net effect of the development on:</p> <ul style="list-style-type: none"> • General traffic? • Bus Services? • Cycling? • Pedestrians? <p><i>(specify 'Detriment', 'No Significant Impact' or 'Improvement' opposite)</i></p>		
Have the effects of the development been effectively mitigated? <i>(provide justification opposite)</i>		
4. TA Audit		
Has the TA been independently audited using this guidance/checklist? Is a copy of the audit available for submission with the TA as part of the relevant planning application?		

Cardiff Council Modelling Technical Note: Modelling Background Growth

Introduction

1. The process by which background traffic growth is typically forecast is through the use of the DfT's National Trip End Model (NTEM) dataset, which can be interrogated through use of the Trip End Model Presentation Program (TEMPRO). The current relevant procedures are discussed in detail within [Transport Analysis Guidance \(TAG\) UNIT M4 \(Forecasting and Uncertainty; November 2014\)](#).
2. The specific methodology to be utilised depends on whether a variable demand model (multi or uni-modal), fixed demand model or whether no model is to be used; the scale of the development to be assessed; and the scope of the study area (national, regional, local authority or NTEM zone).
3. Essentially TEMPRO provides separate estimates of growth by spatial area, year, journey purpose, mode and by time period/car availability, provided as origins/destinations or productions/attractions.
4. Traditionally, in the absence of a model and in order to calculate local growth factors on specific roads or junctions, published National Road Traffic Forecasts (NRTF) factors were manually applied to TEMPRO derived growth. NRTF has since been superseded by the published National Transport Model (NTM) growth factors.
5. However as of version 6.1, NTM has been incorporated within TEMPRO, and these calculations can now be done automatically within the software. It should be noted however that this is a "...very approximate approach which would not normally be used in forecasts for the appraisal of major transport schemes." (TAG Unit M4; Par 9.1.2).
6. For a fixed demand model, TEMPRO derived NTEM growth factors are required to be factored to account for income and fuel adjustment factors, as can be calculated using the published [WebTAG Data Book \(December 2015\)](#).
7. It should be noted that TEMPRO doesn't account for significant local or regional public transport or walking/cycling interventions such as the proposed Cardiff Metro, and the resulting likelihood for modal-shift to occur, but rather assumes that mode-choice will remain broadly the same in future as is existing.
8. Nor does it take into account the level of saturation on the local highway network; in recognition that simply applying unfettered NTEM growth to an already congested link/s or junction/s may yield unrealistic results, as to do this takes no account of resultant changes in travel behaviour in

order to minimise delay, such as the potential for rerouting, peak spreading, mode-shift, or even trip suppression. It also does little to inform the specific distribution of trips.

9. Similarly, TEMPRO “makes no assumptions about whether or not individual land use developments go ahead” (TAG Unit M4; Par 7.3.4), nor is it updated annually to accurately reflect the true number of households/jobs in recent years (the current NTEM dataset version being 6.2; April 2011).
10. TEMPRO therefore provides an ‘alternative assumptions’ facility, whereby the number of households and jobs can be adjusted in order to better reflect existing and future conditions based on more recently available local planning data.
11. This also provides a mechanism whereby the number of housing/jobs for selective major developments can be excluded from the calculations, in order to avoid double counting, which would otherwise occur by simply adding development traffic on top of TEMPRO factored flows. In other words, at least some of the future growth will already have been accounted for by development traffic and is implied within the NTEM forecasts.

Applying Background Growth to LDP Developments:

12. From the LDP Deposit Plan, we have it that over the plan period, if all developments are realised, then a potential 41,273 dwellings (42,363 households) and 40,000 jobs can be delivered between 2006 and 2026. The key figures are illustrated in the table below –

Table 1: LDP Planning Assumptions

	Dwellings	Jobs	Households	Population
2006 LDP Reference Year	138,735 ¹	193,600 ²	132,108 ³	323,766 ³
Land Bank, Adjustments & Allowances	26,775 ¹	-	-	-
LDP Strategic Sites	13,950 ¹	-	-	-
LDP Non-Strategic Sites	548 ¹	-	-	-
TOTAL (excl. 10% Flexibility)	41,273 ¹	40,000 ¹	42,363 ³	71,612 ³

2026 LDP Deposit Plan (Full Build-Out All Development)	180,008 ¹	233,600 ²	174,471 ³	395,378 ³
--	----------------------	----------------------	----------------------	----------------------

Sources:

1 LDP Deposit Plan

2 LDP Background Technical Paper No. 4

3 LDP Background Technical Paper No. 1

13. By way of illustration of the previous discussion; for example as a basis for establishing unfettered background growth against which to assess the Churchlands development (1,200 households) within the context of the LDP, then by following current guidance as discussed in TAG Unit M4, the below methods should be employed.

Establishing Local Growth Factors in the Absence of a Model:

14. The limitations notwithstanding, the methodology for establishing local growth factors in the absence of a formal model is discussed within Chapter 9 of TAG Unit M4.
15. Comparing the assumptions underpinning NTEM 6.2 predictions within TEMPRO for Cardiff between 2006 and 2026, with those observed for 2006 and predicted for 2026 within the LDP evidence base, we have the following discrepancies –

Table 2: NTEM vs. LDP Planning Assumptions

	NTEM	LDP
Households (2006)	135,913	132,108
Households (2026)	161,049	174,471
Household Increase	25,136 (18%)	42,363 (32%)
Jobs (2006)	198,342	193,600
Jobs (2026)	222,065	233,600
Jobs Increase	23,723 (12%)	40,000 (21%)

16. It is not clear why the outturn for 2006 should be different between data sources, however the difference in the forecasts are unsurprising given that the NTEM 6.2 figure is based around 2007 planning data for Cardiff and 2003 dwelling trajectories, and is set within the context of no adopted LDP or UDP at that time.
17. For consistency with the LDP Deposit Plan, it is therefore necessary to amend NTEM planning assumptions as per the values above (albeit with the future households reduced by 1,200 to 173,271, in order to account for the Churchlands development). This is done by using the 'alternative assumptions' facility within TEMPRO, as discussed in Chapter 7.3.7 of TAG Unit M4.
18. From having made the above adjustments, through use of the NTM AFog dataset within TEMPRO, we are able to establish the following unfettered local car traffic growth factors by road type and time period; against which to assess the Churchlands development traffic –

Table 3: TEMPRO (NTM AFog) Local Growth Factors, 2006-2026

	AM Peak:		PM Peak:	
	Urban	Rural	Urban	Rural
Motorway	-	1.4902	-	1.4901
Trunk	1.4011	1.3699	1.4009	1.3697
Principal	1.3811	1.3766	1.3809	1.3765
Minor	1.3999	1.3643	1.3997	1.3641
All	1.3911	1.3867	1.3909	1.3865

Establishing Wider Area Growth for a Fixed Demand Model:

19. The methodology for establishing the wider area growth for Cardiff (trips to/from and within), in the absence of a demand model, is discussed in Chapter 7.4 of TAG Unit M4.
20. As per (17.) previous, the alternative assumptions are again applied. The resulting NTEM 6.2 growth rates generated by TEMPRO (AM: 1.2898; PM: 1.2897) are required to be multiplied by income and fuel adjustment factors; which for the period 2006-2026 are calculated to be 1.1000, using TAG Data Book Table M4.2.1 (December 2015).
21. The resulting unfettered wider area growth factors (averaged from origins and destinations), against which to assess the Churchlands development traffic, are given below –

Table 4: TEMPRO (NTEM 6.2) Wider Area Growth Factors, 2006-2026

AM Peak	PM Peak
1.4190	1.4188

Appendix 3 Cardiff Council Travel Plan Guidance and Checklist Contents

4.1 Purpose of guidance

- 4.1.1 Together with Transport Assessments, Travel Plans (TPs) are an important tool in anticipating the impacts of development so that they can be understood and catered for. It is strongly recommended applicants use this document, which can also be used with reference to the Council's Transport Assessments Guidance and Checklist which forms part of the suite of supporting documents for the SPG. The checklist is not exhaustive and adaptation may be required to reflect the type and scale of the proposed development.
 - 4.1.2 The guidance set out in this document is intended to assist the progress of planning applications. Following the guidance below should assist applicants in producing Travel Plans required through the planning process and enable them to be assessed by the Council in a timely manner. The explanatory notes below should be used in conjunction with the checklist of requirements at the end of the document to ensure that any Travel Plan which is submitted to the Council contains all of the information which is required by the planning authority in assessing a planning application.
 - 4.1.3 The Welsh Government's policies on Transport Assessments and Travel Plans within the planning process are contained in Planning Policy Wales (Edition 9 November 2016) (PPW) and the Technical Advice Note 18 (TAN 18).
 - 4.1.4 A number of resources are available to assist in the development of TPs. The checklist below is derived from the Transport for London ATTrBuTE web based application and sets out the Council's requirements for Travel Plans prepared to accompany planning applications.
 - 4.1.5 Where essential information is omitted, this may result in a delay in determining an application as any outstanding material may be required through the determination period. A pre-application service is offered by the Council and it is recommended developers use this service to ensure engagement at the earliest possible opportunity.
 - 4.1.6 Where TPs are submitted for consideration at pre-application stage or with a planning application, the Council will use the list to audit the submission to check that it contains all the appropriate details and information to enable the Council to properly assess and understand the necessary transport mitigation measures required to address the transport impacts of the development proposals.
-

- 4.1.7 Additional travel planning resources are available from www.keepingcardiffmoving.co.uk. The Department for Transport (DfT) guides 'Making Residential Travel Plans Work' (2005) and 'Delivering Travel Plans through the Planning Process' (2009) are also useful resources.

4.2 Travel Plans

- 4.2.1 A TP is a package of site-specific initiatives aimed at improving the availability and choice of travel modes to and from a development. It may also promote practices or policies that reduce the need for travel. The TP should be tailored to address the site-specific issues relating to the proposed development.
- 4.2.2 The use of area-wide travel plans for multiple organisations and/or sites is also an important mechanism in the underlying aim to manage vehicle trips at source. Whenever a site-specific TP is proposed, the developer should ascertain whether an area-wide TP exists and integrate the site-specific TP with this where appropriate.

4.3 Travel Plan Design and Contents

- 4.3.1 Travel Plans will vary according to the type of development. These specific requirements are addressed below.
- 4.3.2 **Organisational Travel Plans** - A Travel Plan should be specifically tailored to the needs of the organisation/site for which it is written, taking account of individual circumstances and requirements. It should describe proposed sustainable travel measures and measures to reduce the need to travel. For new developments, a full Travel Plan may not be possible prior to commencement of development, as appropriate information regarding the end user and their travel patterns will not be available. In this instance, an interim or 'Framework' Travel Plan should be produced, as outlined below.
- 4.3.3 **Framework Travel Plan** – The Framework Travel Plan should specify any measures to be implemented before occupation (for example, improvements for pedestrian and cycle parking facilities etc.). It should outline a firm commitment and timetable for production and implementation of the Final Travel Plan which should be submitted to the Council for approval within 6 months of the commencement of occupation. Delay in developing and implementing the Travel Plan following occupation should be mitigated by setting clear timescales for roll out and maintaining contact with the Council during this time.
- 4.3.4 **Multi-occupancy sites** - The cumulative transport impacts of a number of smaller organisations or developments within one site may justify an 'umbrella' Travel Plan for the whole site. This should be provided and administered by an appropriate contact, for example, the agent of the developer/site manager. Additional Travel Plans for individual organisations may be required in respect of the smaller 'units' which directly relate to and integrate with the umbrella Travel Plan. Where possible, it should include the requirement to produce an organisational Travel Plan (a Travel
-

Plan relating to an individual organisation that sits within an Umbrella Travel Plan) as a part of the lease.

- 4.3.5 **Residential Travel Plans** - These differ from other Travel Plans in that they deal with complex varied patterns of journeys and journey types from a place of origin. Residential Travel Plans require that an ongoing Travel Plan management and organisational structure be put in place to continue and coordinate Travel Plan implementation. The scope of Residential Travel Plans varies significantly with the type, location and scale of the residential development involved and how it integrates with the local area in which the Travel Plan is operating e.g. part of a mixed use development.
- 4.3.6 **School Travel Plans** – These are designed specifically to address the transport needs of pupils and staff. Each plan will vary according to the nature of the education provided and the catchment area of the school. Close liaison with school transport services is recommended.
- 4.3.7 **Travel Action Plans** - In smaller, less complex sites a Travel Action Plan can be sufficient to set out key measures, responsibilities, a communication plan and a timescale for implementation, as well as a strategy for monitoring and reporting results to the Local Authority.
- 4.3.8 All Travel Plans comprise a 'package' of measures and actions, as illustrated in the 'Travel Plan pyramid' below (Figure 1.1).
-

Figure 1.1: Travel Plan Pyramid



Cardiff Council TP Guidance: Checklist

Requirement	Yes/No	Comments
The development		
1. Does the travel plan include: a) full address of the development/organisation? b) contact details for the person responsible for preparing the travel plan?	Yes No	
2. Where appropriate, does the travel plan include: a) a breakdown of the different land uses expected on site? b) details of the size of each type of land use? c) details of how build-out of the development will be phased?	Yes No	
3. Does the travel plan include details of the number of users expected on site, including: <ul style="list-style-type: none"> • Employees • Residents • Deliveries • Visitors. Note: As much detail as possible should be provided e.g. breakdown of Full-time/Part-time employees, number of staff expected on site at any one time, number of deliveries expected.	Yes No	

<p>4. If a framework travel plan has been submitted, does it include a commitment for occupiers of the site to develop individual travel plans within the context of the overarching plan?</p> <p>Note: Where thresholds are met occupiers should develop site-specific travel plans.</p>	<p>Yes No</p>	
<p>Site assessment</p>		
<p>5. Does the travel plan clearly describe the accessibility and quality of existing transport networks and initiatives and existing travel initiatives available to all users? This should include the below, where appropriate.</p> <ul style="list-style-type: none"> • Walking environment: quality onsite and on local streets, focusing particularly on routes to local transport and other amenities. • Existing cycle infrastructure: quality and availability around the site and connections to the wider network. • Planned cycle infrastructure: parking and other facilities (e.g. showers, lockers, drying room) that will be introduced as part of the development. • Promotion of cycling: e.g. organisation policies and other initiatives that will influence the take up of cycling such as tax free cycle schemes, cycle training. • Car related initiatives: car park management policies, car clubs in the local area, car sharing, pool cars. • Public transport: options, routes available, hours of operation and frequency of services, quality of stops and stations including lighting, cleanliness, cover of real time information, organisational policies that influence travel by public transport e.g. provision of season ticket loans. 	<p>Yes No</p>	
<p>Surveys</p>		

<p>6. Does the travel plan propose: a) site user travel surveys? b) an agreed date with the authority for the surveys to take place?</p> <p>Note: The TP should specify when travel surveys will be undertaken, this will usually be within three months of occupation.</p>	Yes No	
<p>7. Is a baseline modal split (actual trip numbers and percentage of all trips) estimated for the site?</p>	Yes No	
<p>Objectives and Targets</p>		
<p>8. Does the travel plan include objectives which reflect: a) Welsh Government policy and strategic guidance? b) local policy and guidance? c) the challenges and opportunities specific to the site?</p>	Yes No	
<p>9. Are there targets linking directly to each objective?</p>	Yes No	
<p>10. Where required, have targets appropriate to the phasing of the development been set?</p> <p>Note: Targets should relate back to the TA.</p>	Yes No	
<p>Travel Plan Co-ordinator</p>		

<p>11. Has a travel plan co-ordinator been identified, or is there agreement upon when a co-ordinator will be in place?</p> <p>Note: A nominated point of contact should be provided in absence of a named travel plan co-ordinator.</p>	<p>Yes No</p>	
<p>12. Has the travel plan co-ordinator:</p> <p>a) clear roles and responsibilities? b) been allocated a sufficient amount of time to spend on the travel plan?</p> <p>Note: Roles may include development/ management/distribution of marketing and promotional materials, providing personal travel planning advice, managing welcome packs for residents/new staff, and travel plan monitoring.</p>	<p>Yes No</p>	
Measures		
<p>13. Do the site-wide measures:</p> <p>a) support the objectives of the travel plan? b) reflect the context of the site?</p> <p>Note: Measures should support the travel plan objectives and enable the targets to be met. They also should be site specific as different measures will have different levels of success depending on the surrounding area. The following measures may be appropriate but are not an exhaustive list:</p> <ul style="list-style-type: none"> • Walking measures: routes in and around the site and facilities e.g. showering, changing, drying and lockers. • Cycling measures: infrastructure e.g. cycle parking and shower, changing, drying and locker facilities. Operational policies and other initiatives that encourage cycling should be considered e.g. cycle mileage for business travel, bike maintenance sessions, cycle/cycle 	<p>Yes No</p>	

<p>equipment discounts/vouchers.</p> <ul style="list-style-type: none"> Public transport measures: season ticket loans, vouchers/discounts, signage to local public transport facilities and personalised travel planning. Car share/car club measures: this could include the appointment of a car club operator for the site or designated car share parking bays. Other measures: internet shopping, working from home, flexible working hours, teleconferencing. 		
<p>14. Is an action plan provided which includes: a) short / medium / long term actions? b) timescales and responsibilities?</p>	<p>Yes No</p>	
<p>Umbrella Travel Plans</p>		
<p>15. Is the action plan clear on how and when travel plans will be developed among occupying organisations?</p>	<p>Yes No</p>	
<p>Monitoring</p>		
<p>16. Is a clear monitoring programme included?</p> <p>Note: Monitoring should occur in year one as a baseline and as agreed thereafter.</p>	<p>Yes No</p>	
<p>17. For a site-wide or area travel plan, is it clear who is responsible for site-wide monitoring?</p>	<p>No Yes</p>	
<p>Securing and enforcement</p>		

<p>18. Is it clear how the travel plan will be secured?</p> <p>Note: The travel plan should state which measures are in place to ensure it is undertaken effectively e.g. sanctions tied into S106. Relevant excerpts from the S106 agreement or planning conditions should be included in the travel plan.</p>	<p>Yes No</p>	
<p>19. Does the travel plan set out the agreed life of the plan?</p>	<p>Yes No</p>	
<p>20. Does the travel plan include reporting requirements and measures which can be put into place with any failure to meet targets etc? This should reference any funds secured by s106 if appropriate.</p>	<p>Yes No</p>	
<p>Funding</p>		
<p>21. Has a budget been set for the site-wide:</p> <p>a) travel plan co-ordinator post? b) measures? c) monitoring programme?</p> <p>Note: A good budget should identify how each element of the travel plan delivery would be paid for including the travel plan coordinator, marketing components and physical measures.</p>	<p>Yes No</p>	

<p>22. If appropriate, have funding streams been identified for a site-wide:</p> <p>a) travel plan co-ordinator post?</p> <p>b) measures?</p> <p>c) monitoring programme?</p> <p>Note: It is important that a funding stream for the implementation of the travel plan is secured in the early stages of the development process. Identifying a funding stream is a good indicator of commitment to the plan.</p>	<p>Yes</p> <p>No</p>	
<p>Comments</p>		
<p>23. Do you have any final comments?</p>	<p>Yes</p> <p>No</p>	

Appendix 4 Transport Statements

- 1.1 A Transport Statement (TS) may be required where a development falls below the threshold for a Transport Assessment (TA), but may still have an impact in transport terms. It is strongly recommended applicants use this document, which can also be used with reference to the Council's suite of supporting documents for the SPG. The guidance is not exhaustive and adaptation may be required to reflect the type and scale of the proposed development.
- 1.2 A TS should set out the transport issues relating to a proposed development site, both the existing conditions and also details of the development proposals.
- 1.3 The developer should provide a full description of:
 - existing site information – describing the current physical infrastructure and characteristics of the site and its surroundings, including a site location plan showing the proposed development site in relation to the surrounding area and transport system;
 - baseline transport data – background transport data and current transport infrastructure details.
- 1.4 This information should be accurately established to understand the context of the development proposal. The description should include as a minimum:
 - the permitted and existing use of the site;
 - the existing land uses in the vicinity of the site, including development plan allocations, or potential future use in the case of undeveloped sites;
 - existing site access arrangements including access constraints, where appropriate;
 - whether the location of the site is within or near a designated Air Quality Management Area (AQMA);
 - any abnormal load uses of the current site.

Baseline transport data

- 1.5 A full set of baseline data should be provided, including, where appropriate:
 - a qualitative description of the travel characteristics of the existing site, including
 - pedestrian and cyclist movements and facilities, where applicable;
 - existing public transport provision, including provision/frequency of services, location of bus stops/train stations, park-and-ride facilities;
 - a description and functional classification of the highway network in the vicinity of the site;
 - an analysis of the injury accident records on the public highway in the vicinity of the site access for the most recent three-year period, or five-year period if the proposed site has been identified as within a high accident area.
-

Proposed Development

- 1.6 The developer should provide a full description within the TS including, as a minimum:
- plans and drawings showing the proposed site layout, particularly the proposed
 - pedestrian and vehicular access points into the site;
 - the proposed land use;
 - the scale of development, such as numbers of residential units and/or gross floor area (GFA), subdivided by land use where appropriate;
 - the main features (design layout and access points) of the development;
 - the person-trip generation of the proposed development and distribution of trips across mode;
 - a qualitative and quantitative description (based on recent site observations) of the travel characteristics of the proposed development, including pedestrian and cyclist facilities/movements, in the vicinity of the site;
 - proposed improvements to site accessibility via sustainable modes of travel, such as provision/enhancement of footpath and cycle path linkages, public transport
 - improvements, and servicing arrangements where appropriate;
 - a proposed parking strategy and internal vehicular circulation (including number of spaces, parking accumulation, parking layout in relation to other site elements, method of car park operation, overspill parking considerations, disabled parking, motorcycle parking, cycle parking, taxi drop-off
 - points);
 - residual vehicular trip impact;
 - the transport impacts of site construction, including the requirements of abnormal loads in the construction, use and decommissioning the present development;
 - the transport impacts of freight or service operations; and
 - if the site of the proposed development has a current use or an extant planning
 - permission with trip patterns/volumes, the net level of change that might arise out of the new proposals should be set out.
- 1.7 The above requirements are not exhaustive and there may be a need for supplementary information that takes account of local conditions as well as other material considerations.
- 1.8 However, not all proposed developments that are considered to require a TS would necessarily need all of the above matters to be considered. Therefore, it is important that the scope of the TS is agreed at the pre-application discussion stage between the developer and appropriate authorities.
-

Appendix 5 Consultation on Draft SPG

Public consultation was undertaken between Thursday 9th November 2017 and Thursday 21st December 2017. A press notice was placed in a local newspaper on Wednesday 8th November 2017. Copies of the draft guidance was placed in all Cardiff libraries and at County Hall Reception. The draft guidance was also published on the Council website. Letters notifying that consultation was being undertaken on the draft guidance were sent to all Councillors, Welsh Government, Community Councils in Cardiff and any interested persons and the following organisations known to have general interest in planning in Cardiff or a potential interest in this guidance.

*** denotes consultees who have responded to consultation, in addition to members of the public and individual Councillors.

ACE - Action in Caerau and Ely	Boyer Planning
Alder King	Bristol City Council
ALDI ***	BT Group plc
Alternatives for Transport	Business in the Community Wales
AMEC Environment & Infrastructure UK Limited	C2J
Arts Council of Wales	Cadwyn Housing Association
Arup	Caerphilly County Borough Council
Asbri Planning Ltd	Campaign for the Protection of Rural Wales
Associated British Ports	Cardiff & Vale Parents Federation
Association of Inland Navigation Authorities	Cardiff & Vale University Health Board
Atkins	Cardiff Access Group
Austin-Smith: Lord	Cardiff Against the Incinerator
Barratt Homes	Cardiff and Vale University Local Health Board ***
Barton Willmore	Cardiff Bus
Bellway Homes	Cardiff Bus Users
Biffa	Cardiff Civic Society
Bilfinger GVA	Cardiff Community Housing Association
Black Environment Network	Cardiff Cycling Campaign
Blake Morgan LLP	Cardiff Greenpeace
BNP Paribas Real Estate	Cardiff Heliport
Bovis Homes	Cardiff International Airport Ltd.

Cardiff Local Access Forum
Cardiff Metropolitan University
Cardiff Naturalists
Cardiff Pedestrian Liberation
Cardiff Transition
Cardiff University
Cardiff West Communities First
Carolyn Jones Planning Services
CDN Planning
Celsa Manufacturing (UK) LTD
Cemex Uk Operations Ltd
CFW Architects
CGMS Consulting
Chartered Institute of Housing in Wales
Chris Morgan
Chwarae Teg
Civil Aviation Authority
Coal Authority
Coleg Glan Hafren
Communities First Adamsdown
Community Housing Cymru
Community Land Advisory Service Cymru
Confederation of British Industry
Confederation of Passenger Transport
Connections Design
Country Land and Business Association
CSJ Planning Consultants
Cymdeithas yr iaith gymraeg
Danescourt Community Association
David Lock Associates
Davies Sutton Architects
DavisMeade Agricultural
Derek Prosser Associates
Design Circle RSAW South

Design Commission for Wales ***
Development Planning Partnership
Development, Land & Planning Consultants
Ltd
Disability Arts Cymru
Disability Wales
DLP Consultants
DLP Planning Ltd
DPP Cardiff
DTB Design
DTZ
Dwr Cymru Welsh Water
Edenstone Homes
Equality and Human Rights Commission
Ethnic Business Support Project
Federation of Small Businesses
First City Limited
FirstGroup plc
Firstplan
Freight Transport Association
Friends of Nantfawr Community Woodland
Fulfords Land & Planning
G L Hearn
G Powys Jones
Garden History Society
Geraint John Planning Ltd
GL Hearn Planning Limited
Glamorgan - Gwent Archaeological Trust Ltd
Glamorgan Gwent Housing Association
GMA Planning
Graig Community Council
Graig Protection Society
Great Western Trains Company Limited
Grosvenor Waterside
GVA

GVA Grimley
H O W Commercial Planning Advisors
Hafod Housing Association Limited/ Hafod
Care Association Limited
Halcrow
Hammonds Yates
Hawkins
Heath Residents Association
Herbert R Thomas LLP
Home Builders Federation ***
Hughes
Hutchinson 3G UK
Hyland Edgar Driver
Hywel Davies
Interfaith Wales
Jacobs Babtie
Jeremy Peter Associates
JLL
John Robinson Planning & Design
John Wotton Architects
Jones Lang LaSalle
JP Morgan Asset Management
Keep Wales Tidy
Kelly Taylor & Associates
Kingsmead Assets Limited
Knight Frank
Landscape Institute Wales
Level Ltd
Lichfield Planning
Linc-Cymru
Lisvane Community Council
Llandaff Conservation Group
Llandaff Society
Lovell Partnership
Loyn & Co Architects
LUC
Madley Construction
Mango Planning and Development Limited
Marshfield Community Council
Martin Robeson Planning Practice
McCarthy & Stone
Meadgate Homes Ltd
Mineral Products Association
Morgan Cole
Mott MacDonald
National Federation of Builders
National Youth Arts
Natural Resources Wales ***
Neame Sutton
Network Rail ***
Network Rail Infrastructure Ltd
Newport City Council
NFU Cymru
North West Cardiff Group ***
Novell Tullet
O2 UK
Oakgrove Nurseries
Old St Mellons Community Council
Orange
Origin3
Pantmawr Residents Association
Peace Mala
Peacock & Smith
Pegasus
Pentyrch Community Council ***
Persimmon Homes
Peterson Williams
Peterstone Community Council
Phillippa Cole

Pitt
Planning Aid Wales
Planning Potential
Police & Crime Commissioner
Powell Dobson
Powergen
Prospero Planning
Public Health Wales ***
Quarry Products Association
Quinco
Quod
Race Equality First
Radyr & Morganstown Association
Radyr and Morganstown Community Council
Radyr and Morganstown Partnership and
Community Trust (PACT)
Radyr Farm
Radyr Golf Club
Rapleys
Redrow Homes ***
Reeves Retail Planning Consultancy Ltd
Renplan
Reservoir Action Group (RAG)
Rhiwbina Civic Society
Rhondda Cynon Taf County Borough Council
RICS Wales
Rio Architects
Riverside Communities First Team
Robert Turley Associates
Roberts Limbrick
Robertson Francis Partnership
Royal Commission on the Ancient &
Historical Monuments of Wales
Royal National Institute for the Blind
RPS Group Plc
RSPB Cymru
Save Creigiau Action Group
Savills
Scope Cymru
Scott Brownrigg
Sellwood Planning
Shawn Cullen
SK Designs
SLR Consulting
South Wales Chamber of Commerce Cardiff
South Wales Police ***
South Wales WIN
Splott and Tremorfa Communities First
Sport Wales
SSE Energy Supply Ltd
St Fagans Community Council ***
Stedman Architectural
Stewart Ross Associates
Stonewall Cymru
Stride Treglown Town Planning
Stuart Coventry Scott Wilson
Sullivan Land & Planning
Sustrans Cymru
SWALEC
Taff Housing Association
Tanner & Tilley
Taylor Wimpey ***
Terry Nunns Architects
The 20th Century Society
The Boarding Centre Ltd
The Design Group 3
The Georgian Group
The Institute of Cemetery and Crematorium
Management
The Land Mark Practice

The Planning Bureau
The Royal Town Planning Institute
The Urbanists
The Victorian Society
The Wildlife Trust of South & West Wales
Theatres Trust
T-Mobile (UK) Ltd
Tongwynlais Community Council
Torfaen County Borough Council
Turley
United Welsh Housing Association
Urban City Ltd
Urdd Youth Group
Velindre NHS Trust Corporate Headquarters
Virgin Media

Vodafone
Wales & West Housing Association
Wales Council for Voluntary Action
Wales Women's Aid
Walters
Watts Morgan
Welsh Ambulance Services NHS Trust -
South East Region
Welsh Government
Welsh Language Commissioner
Welsh Tenants Federation Ltd
Wentloog Community Council
White Young Green
Wimpey Homes
Wyevale Garden Centre

Appendix 6 Summary of Consultation Representations and Responses

Consultee comments	Council response	Changes proposed to SPG
Vectos, on behalf of Home Builders Federation		
<p>Introduction</p> <p>1. Cardiff Council recently published consultation draft Supplementary Planning Guidance titled 'Managing Transportation Impacts (Incorporating Parking Standards)'.</p> <p>2. Vectos has undertaken a review of consultation draft. The key points to note are:</p> <p>A maximum of 2 parking spaces per residential dwelling; A new way to assess traffic junctions, unique to Cardiff Council; The requirement for more extensive, and potentially unnecessary assessment, work, including Weltag assessments, which is potentially unfeasible, expensive or both, and could further delay the preparation of reports and increase timescales in preparing a Transport Assessment in support of a planning application A focus on highway impact and traffic growth, ignoring the 50:50 mode split target in the LDP and the acknowledgement that further traffic growth cannot be accommodated on the highway network; and Requirements to assess air quality and noise impacts</p>	Noted.	N/A
<p>Parking Standards</p> <p>3. The consultation draft includes new maximum parking standards.</p> <p>4. The maximum parking standards proposed are summarised in Table 1:</p> <p>5. The residential parking standards do not include a requirement for visitor parking¹.</p> <p>6. The proposed maximum parking standards represent a very constrained approach to residential car parking. A new five-bedroom house located on the edge of the city would only be permitted to have a maximum of 2 car parking spaces (and a garage). In fact, any new house or any new development would only be permitted a maximum of 2 car parking spaces (and a garage).</p> <p>7. Minimising parking spaces is not realistic and ultimately results in poor design and streets cluttered with parking. People are unlikely to reduce car numbers because the scheme does not provide parking on site. It simply creates streets congested with on street parking which is contrary to good design.</p> <p>8. The consultation draft is also contradictory, and this will need addressing. At paragraph 6.15 it states: <i>"The design and layout of parking spaces will be reviewed and may not be considered in accordance with the maximum standards if dimensions are found to be able to accommodate parking above the maximum permitted. For example, where due to its proposed dimensions a driveway to a dwelling can be shown to have the capacity to accommodate a greater number of vehicles than permitted under the parking standards, a reduction in the dimensions may be required. For the purpose of the standards, garages are not counted with the parking provision for residences."</i></p> <p>9. However, paragraph 6.32 states: <i>"Garages must have a minimum internal width of 3.2m with an internal length of 6.0m. Where garages are provided, a minimum driveway length of 5.5m is required."</i></p> <p>¹ Paragraph 6.15</p>	<p>6/7: The parking standards which are outlined in the draft SPG are Cardiff specific and are aligned with the policies set out in the LDP and Planning Policy Wales, which form the basis of Cardiff's policy to limit parking spaces in line with the provision of alternatives modes of travel which will be secured through the development process. Potential issues with overspill parking can often be addressed through design and, where appropriate, parking restrictions.</p> <p>8/9/10: The text in relation to garages has been amended, as above. Garages are not required by the parking standards but if they are provided, they should be of a size which will give residents the choice to garage their vehicle if they opt to do so. The size requirement has been retained and refined in order to ensure adequate storage space can be provided for bikes.</p>	N/A

Consultee comments	Council response	Changes proposed to SPG
<p>Page: 3</p> <p>10. Given that garages are not counted in the parking provision it is unclear why they should have a minimum dimension, or why a minimum length should be provided on the driveway, contrary to what is stated at paragraph 6.15.</p>		
<p>Traffic Modelling</p> <p>11. At Appendix 3 the Council sets out Junction Assessment Tools from First Principles. The Council is looking to introduce a new first principles assessment of junction capacity to overcome what it views as inefficiencies, inconsistencies and misuse of industry-wide recognised junction modelling software.</p>	<p>Traffic Modelling</p> <p>11. The purpose of Cardiff Council having developed the proposed suite of assessment tools is not because of an inherent problem with industry standard software per se, but more in recognition that the use of different software often yields different results, and as such there is a lack of a unified approach to junction assessment.</p> <p>Furthermore, it is the Council's experience that there is a general lack of critical judgement being applied amongst engineering practitioners, whom tend to be overly reliant on the use of said software as 'black box' tools, without suitable consideration of the most appropriate assumptions and inputs, or due interpretation of outputs accordingly. This is particularly of concern, given that seemingly small changes in parameters can result in such fundamental differences in results.</p> <p>The decision has been to remove the Junction Assessment Tool from the SPG. However, it remains a recommended tool which can offer a number of benefits for developers.</p>	N/A
<p>12. This proposed assessment is unique to Cardiff, and provides a generic approach to all priority junctions and priority roundabouts, and a further generic approach to signal controlled junction. The methodology is complex, requires even more detailed survey work, which would lead to additional time and cost, and is highly subjective in how it is applied, which could lead to increased misunderstanding and confusion between applicants and the Council which would lead to more protracted discussions and timescales for each application.</p>	<p>12. The assessment methodologies proposed are based on first principles, the same principles as accepted research and on which industry standard software are based, and therefore while the specific method of visually representing junction performance may be unique to Cardiff, the processes underlying these are not.</p> <p>The key difference here is that Cardiff Council has sought to draw together conflicting alternative formulae for calculating capacity (as illustrated in Figure 1), with a view of establishing an average 'best fit' across all of these.</p>	N/A

Consultee comments	Council response	Changes proposed to SPG
	<p>Importantly, the Council's tools also seek to distinguish between a junction that is within maximum theoretical capacity, and that which is within practical capacity, i.e. 80% degree of saturation, and in response to this the need to consider alternative methods of control, as per Design Manual for Roads and Bridges (DMRB) 6.2.6.</p> <p>Furthermore, these tools also take into account variance (in demand, saturation flow and in allocated green time), which is typically overlooked when using conventional junction assessment software, in spite of the knowledge that variance is an everyday reality, and that it can have a profound impact on the performance of a junction.</p> <p>Contrary to what is stated, the methodology is not inherently complex, nor does it require significant additional cost or time to employ. Arguably, Cardiff's guidance simply lays out the data that should already be collected as a matter of course anyway irrespective of the method used to assess junction performance, and yet are all too often overlooked.</p> <p>Rather than being subjective and resulting in confusion, the proposed approach is simple, transparent, and is entirely conducive to establishing a common understanding of junction performance between all parties, and should therefore actually reduce rather than increase the likelihood of 'protracted discussions and timescales'.</p>	
<p>13. The assessment will not replace more conventional modelling techniques, but instead add another layer to the traffic modelling exercise. The traditional modelling assessments will still be required.</p>	<p>13. The proposed tools are meant to complement the use of conventional assessment software, rather than replace these. Using the tools proposed, it is possible to undertake an assessment of junction performance with minimal effort and far quicker than using the software alternatives.</p> <p>The result of which is the ability to quickly establish scale of effect in determining a</p>	<p>N/A</p>

Consultee comments	Council response	Changes proposed to SPG
	<p>suitable study area, and in rapid option testing, allowing options to be quickly sifted and eliminated or taken forward for further analysis using the conventional software. Therefore rather than result in additional or abortive work, the proposed tools should actually reduce the extent of more time consuming detailed assessment to only those options which are feasible.</p>	
<p>14. The proposed assessment aims to further refine, predict and provide for highway capacity in even more detail, when highway capacity is not the critical factor by which development should be measured and judged as per the Council's mantra in its LDP re 50:50 split.</p>	<p>14. This statement is nonsensical, in that the proposed tools do not aim to 'predict and provide' any more than the use of any method of junction assessment, to claim otherwise is tantamount to suggesting that no assessment should be undertaken of the impacts of development.</p> <p>To clarify, the requirement to achieve the 50:50, does not negate the need to properly quantify the impact of development upon junction performance, moreover without quantifying this impact, it is not possible to evidence the mitigation which is required, or the level of mode-shift which is achievable.</p>	N/A
<p>15. The level of detail the proposed assessment extends to is not require for the purposes of forming a judgement as to whether the potential impact of a development is acceptable or not, it is simply fulfilling an aspiring mathematicians thirst for numbers.</p>	<p>15. As the local planning authority, it is a matter for Cardiff Council to decide (within reason) and not for the developer to dictate, what is required for the purpose of forming judgements as to what impacts are considered 'acceptable' or not.</p> <p>The proposed tools are not simply an indulgence by 'mathematicians', rather they are based entirely on established theory and published guidance, and are in no way less valid than any other conventionally used method of assessment.</p>	N/A
<p>Transport Assessments</p> <p>16. The process to prepare and validate a Transport Assessment is quite extensive:</p> <ul style="list-style-type: none"> • The Council recommends developers engage in pre-application advice at an early stage²; • Critical junctions to be included in a Transport Assessment must be agreed with the Council³; • A substantially complete Transport Assessment must be included in the presubmission pack; • Before planning application submission, all Transport Assessments must be independently audited, using the Transport Assessment Guidance and Checklist⁴; 	<p>Traffic Assessments</p> <p>16. It has always been the case that developers have been expected to come forward in reasonable time as part of the pre-application process, and to agree the scope of their assessment (i.e. the critical junctions to be included). Moreover, the SPG 'encourages' rather than requires this early engagement with</p>	N/A

Consultee comments	Council response	Changes proposed to SPG
<p>• All Transport Assessments must include completed audit checklists, which will be reviewed by the Council.</p> <p>² Paragraph 4.7 ³ Paragraph 4.7 ⁴ Paragraph 4.8</p>	<p>the Council.</p> <p>It is a requirement not of Cardiff Council, but of recently introduced national legislation on statutory public pre-consultation, for a substantially complete TA to be included as part of the pre-submission process.</p> <p>Noted. The independent auditing of TAs shall be changed from a requirement (“must be”) to being desirable. Nevertheless, it is considered to be in the developers’ best interests to undertake an independent audit, such as “...to ensure that a robust methodology is used which properly quantifies and analyses the transport impacts of a development and provides the evidence necessary to inform the identification of appropriate mitigation measures” (SPG Par 4.8).</p> <p>The completion of the TA guidance checklist has been found to be relatively straightforward and comparatively quick to do, and therefore this process is not considered will be particularly onerous on the part of the developer.</p>	<p>SPG:</p> <p>4.8. Before submission to the Council, it is recommended that all TAs should be independently audited, using the Transport Assessment Guidance and Checklist...</p> <p>4.9. Completed audit checklists should be submitted along with the TA and they will be reviewed by the Council.</p> <p>Appendix 2 1.1.4 Before submission to the Council, it is recommended that all TAs should be independently audited, using the below checklist. Where TAs are submitted for consideration at pre-application stage or with a planning application, the Council will also use the list to audit the submission to check that it contains all the appropriate details and information to enable the Council to properly assess and understand the transport impacts of development proposals and determine the transport mitigation measures necessary to address such impacts.</p>
<p>17. There is a requirement for Transport Assessments to identify spare capacity on the bus and rail networks. This is particularly time-consuming, expensive and difficult. Public transport operators do not release demand or capacity data, citing commercial sensitivities, and therefore to undertake this task would require surveys of the public transport network.</p>	<p>17. For large-scale developments, identifying the residual capacity available on existing public transport services is critical in determining the feasibility of mode-split predictions, and in determining the extent of provision and level of investment required for bus services in order to support this.</p> <p>It is acknowledged that the necessary information is not likely to be forthcoming from operators. However, it is not agreed that for a developer to undertake their own surveys would be either time-consuming, expensive or difficult.</p>	<p>N/A</p>

Consultee comments	Council response	Changes proposed to SPG
	<p>For example, all that would likely be required would be a peak survey of train occupancy conducted from the platform at the one or two stations affected; and a peak survey of bus occupancy conducted from the roadside at one or a handful of locations.</p> <p>This data could be collected as part of the general programme of surveys that would otherwise be required to be undertaken anyway in preparation of the Transport Assessment.</p>	
<p>18. This level of pre-submission engagement, consultation and review will increase the time and cost in preparing Transport Assessments. The aim is to ensure a more efficient review of the Transport Assessment once the application has been submitted – although the evidence following the introduction of the pre-application consultation procedural requirements is that this is not the case.</p>	<p>18. As correctly stated, the aim of the guidance provided is to ensure a more efficient review of the Transport Assessment once the application has been submitted, with the implication that where applicants fail to sufficiently engage in the process, that "...it is likely that amendments will be required and this may delay the progress of the planning application" (SPG Par 4.9).</p> <p>However, as to the success or otherwise of this pre-submission engagement; it is too early to assess the impact of the recently introduced legislation on statutory public pre-consultation process, and the Council are not aware of any evidence to suggest either way.</p>	N/A
<p>Weltag</p> <p>19. There are references to appraising the impact of a proposed development in line with Weltag. This is inappropriate. Weltag is used to appraise competing schemes or transport proposals to ensure the best scheme is selected. It should not inform development control decisions in relation to new development. <i>There are two primary purposes of Weltag:</i></p> <p><i>To assist in the development of proposals to enable the most appropriate scheme to be identified and progressed – one that is focused on objectives, maximises the benefits and minimises the impacts; and</i></p> <p><i>To allow the comparison of competing schemes on a like-for-like basis, so decision makers can make difficult funding decisions.</i></p>	<p>Although the use of Weltag has previously often been associated with local government in Wales, the 2017 Weltag guidance from Welsh Government emphasises that the process has wider applications. It states: "Weltag is a framework for thinking about proposed changes to the transport system...This guidance is written for anyone interested or involved in the development of any proposed intervention to deliver a more sustainable transport system for Wales... WelTAG is recommended as the starting point whenever a problem is identified with the transport system or within another area but it is affected by, or affects, the transport system".</p> <p>As such, Cardiff Council has identified the Weltag process as one of the elements which should be included in a TA. The TA Guidance</p>	<p>Appendix 2</p> <p>2.4. 1 It should be noted that in the Welsh context the Welsh Transport Planning Appraisal Guidance (Weltag) process should be used. Weltag enables practitioners to set transport objectives, plan, evaluate and monitor initiatives in accordance with the Wales Transport Strategy. Appraisal is centred around three main impact areas, the pillars of sustainable development: Economy, Environment and Society (including Accessibility, Integration and Safety). The criteria in the checklist below should also be referenced by the appraisal. Where appropriate, and commensurate with the scale of a development, TAs should demonstrate that appropriate reference has been made to Weltag in carrying out the assessment of issues relating to the three impact areas. Weltag is recommended as a robust process for addressing problems which have been identified through the TA process and principles of the Weltag methodology can usefully be applied in this context. For</p>

Consultee comments	Council response	Changes proposed to SPG
	<p>and Checklist (Appendix 2) states: "TAs should demonstrate that appropriate reference has been made to Weltag in carrying out the assessment of issues relating to the three impact areas". The scope of and detail provided in TAs should be commensurate with the scale of the proposed development. This is also reflected in the Weltag guidance, which emphasises that Weltag is "a proportionate process...the level of detail provided in the Weltag reports should be proportionate to the impacts under consideration". The Council is likely to recommend that the Weltag process is followed for larger scale developments with wider than local impacts. For these developments, Weltag would provide a robust process through which problems can be explored and appropriate mitigation identified.</p>	<p>example, Stage 1 provides a framework for identifying options where impacts have been identified; Stage 2 for options testing and Stage 3 for the development of a preferred option.</p>
<p>Highway Impact and Traffic Growth 20. In the LDP Cardiff Council sets out its aim of achieving a 50:50 mode split between car trips and non-car trips. This is in order to accommodate further growth, and a maintain traffic levels across the city at 2011 levels. Cardiff Council accepts and agrees that the assessment work they have undertaken demonstrates that no further growth can be accommodated on the existing highway network.</p>	<p>Highway Impact and Traffic Growth 20. The 50:50 mode-split is a global figure, in recognition of the need to maintain traffic conditions across Cardiff as a whole broadly around 2010 (not 2011) levels. However, Cardiff Council has been clear in its evidence that while "...a number of key junctions and roads are either at or approaching capacity at peak times" (LDP Background Technical Paper - Section 2.9.1), that it is factually incorrect to claim that there is no capacity anywhere on the network.</p> <p>Apart from which, it should not be taken as a given that a junction being at/over capacity will result in modal-shift in and of itself, in that mode-shift is only one possible user response to increased congestion. For example, while some users may indeed change their mode, others will continue to travel in spite of inconvenience, others will change their route or the time they travel, travel elsewhere, or even choose not to travel at all (i.e. suppressed trips).</p>	<p>N/A</p>
<p>21. The consultation draft includes all the correct references to sustainable travel and prioritising walking, cycling and public transport, and even makes allowances for Trip Suppression/Induction, Trip Redistribution, Modal-Shift, Peak Spreading, and Traffic</p>	<p>21. For the assessment of a development of strategic significance, it is entirely reasonable to require that the above be quantified and</p>	<p>N/A</p>

Consultee comments	Council response	Changes proposed to SPG
<p>Rerouting in terms of assessment8. 5 Paragraph 4.9 6 Page 55, Paragraph 2.4.1 7 Page 3, Paragraph 1.4.1, Welsh Transport Planning and Appraisal Guidance, June 2008 8 Page 60, Paragraph 3.3.8 Page: 5</p>	<p>suitably evidenced. This level of assessment would be considered commensurate with the scale of said development.</p>	
<p>22. However, there is still a primary focus on highway impact which is in stark contradiction to the Council's LDP.</p>	<p>22. Contrary to the claim, the Council is not primarily concerned with establishing highway impact, but of properly evidencing the above user response, in establishing the improvements required in order to mitigate the impact of development, and to support modal-shift.</p>	<p>N/A</p>
<p>23. The Council consider a 5% impact or more on any link in most cases as material, and where a junction is already at capacity, a change of less than this will also be material9.</p>	<p>23. The reason that a blanket 5% threshold is not applied in all instances is in recognition that under congested conditions, a junction which is already at/over practical capacity (80% degree of saturation) is highly sensitive to even small increases in demand (below 5%), resulting in exponential queueing and delays. Hence the importance of identifying and agreeing the scope of junctions to be assessed.</p>	<p>N/A</p>
<p>24. The Council will require four scenarios to be assessed: • Base Year • Forecast Year: Do Minimum Reference Case accounting for TEMPORARY Growth and committed development • Forecast Year: Do-Nothing Development Case Without-Intervention • Forecast Year: Do-Something Development Case With-Intervention</p>	<p>24. The required scenarios are entirely consistent with the principles of forecasting as set out in TAG Unit M1.1 and M4.</p>	<p>N/A</p>
<p>25. The forecast year will be 10 years post-completion, unless specified by the Council10. This is unreasonable, and could result in assessment years which are 15 years after the date of the application. With the rapid speed at which technology is changing our lives, mobility, and the way we travel, an assessment year so far into the future serves little value other than to predict and provide for highway capacity. In 2002, only 13% of households had internet access, the iPhone had not yet been launched, and the launch of Facebook was still years away.</p>	<p>25. A forecast year of 10 years post completion is not considered excessive, in particular for a strategic development. TAG Unit M4 (Forecasting and Uncertainty) 1.2.1. states that "For economic appraisal it is best if the forecast year is as far into the future as possible...", and goes on to provide several worked examples of assessing development 15 years post completion.</p> <p>The Council acknowledges that with forecasting further ahead comes increasing uncertainty, however this is not a justification for not accounting for appropriate future assessment years. It is also accepted that technology is rapidly changing, however this</p>	<p>N/A</p>

Consultee comments	Council response	Changes proposed to SPG
	has long been the case, and equally does not negate the need to consider suitable forecast years. TAG Unit M4 provides discussion on how to deal with uncertainty.	
26. The only difference between a forecast year of 1, 5, 10 or 15 years into the future, would be the level of background growth applied to the baseline traffic levels. The Council is insistent that modelling work takes account of <i>'likely background growth in traffic on the network'</i> . This serves little purpose – the Council already knows and acknowledges in its LDP that background growth cannot be accommodated.	26. As per the discussion in relation to points 20-22 above, while much of the network is at or close to capacity during peak times, this isn't to say that there is no capacity for growth anywhere on the network. While growth over a certain level at a given junction/link may be deemed to be unrealistic, it is nevertheless important to quantify this growth in providing a worst case/'unconstrained demand' scenario (i.e. assuming no interventions), as the starting point from which to begin considering the mitigation required and in evidencing this.	N/A
27. The Council would like growth to be calculated from TEMPRO.	27. TAG Unit M4 specifies the use of TEMPRO in order to determine NTEM background growth, and details how this should be applied in different given situations, together with the use of the alternative assumptions facility.	N/A
28. However, the consultation draft itself states TEMPRO: <ul style="list-style-type: none"> • doesn't account for significant local or regional public transport or walking/cycling interventions such as the proposed Cardiff Metro; • assumes that mode-choice will remain broadly the same in future as is existing; and • doesn't account the level of saturation on the local highway network or the resultant changes in travel behaviour in order to minimise delay, such as the potential for rerouting, peak spreading, mode-shift, or even trip suppression¹¹. 	28. The limitations of this approach as listed, are provided in the Appendix to Appendix 2 of the SPG. Therefore, when assessing the impact of strategic development, the application of simple NTEM growth would rarely be a substitute to undertaking a suitable strategic level of assessment using a four-stage model or else a form of logit model, in order to properly account for these.	N/A
29. The document states that 85th percentile trip rates should be used for sample sizes of 5 sites or more. However, the industry standard is for 85th percentile rates to be used for sample sizes of 20 sites or more. Adopting this approach for 5 sites or more would inflate trip rates 9 Page 56, Paragraph 2.6.3 10 Page 62, Paragraph 3.5.2 11 Page 74 Paragraph 8 Page: 6 and potentially exaggerate the impact of a proposed development. No explanation is provided.	29. Agreed. Paragraph 3.6.2 was incorrectly worded, this was intended to convey that where possible a sample size of 20 or more sites should be used such as to determine the 85 th percentile trip rate, but in the absence of this, an average trip rate derived from 5 or more sites may also be acceptable.	3.6.2. Where no comparable sites exist, in particular for large mixed-use developments, then where possible 85th percentile trip rates should be determined from a sample size of 20 or more sites . Alternatively, in the absence of this, an average trip rate should be determined on the basis of 5 or more sites.
30. The Council will also assess maximum queues rather than average queues ¹² .	30. The Council requires the assessment of maximum queue length, in recognition of the	N/A

Consultee comments	Council response	Changes proposed to SPG
	<p>fact that conventional junction assessment software report mean maximum queue lengths (MMQ), while in reality under congested conditions the worst extent of queuing is generally considered to be between 50 -100% higher this value, as is discussed in TRL Software Article 31 ('Mean Maximum Queue Part 1: An explanation'). Therefore to not assess maximum queue length, means potentially to under account for the scale of effects.</p>	
<p>Air Quality and Noise Impacts 31. The consultation draft includes a requirement for air quality, noise and carbon emissions data¹³. Whilst this would typically be provided (and assessed) in an Environmental Statement, this information is not normally required for a Transport Assessment, and this would require input into the Transport Assessment for non-transport experts, which is unusual and unnecessarily complex. This would add an additional layer of complication into the process of both producing and reviewing a Transport Assessment, which could impact on timescales on both sides.</p>	<p>Air quality, noise and carbon emissions are all impacts arising from transport.</p> <p>TAN 18 states that a Transport Assessment should "clearly set out what the impact of a proposed development, or redevelopment, are likely to be so that they are easily understood" (D1).</p> <p>It gives the aims of undertaking a TA and producing a TIS (Transport Implementation Strategy) as to "understand the transport impacts of the development; mitigate negative transport impacts through the design process and secured through planning conditions or obligations".</p> <p>D.14 states: "TIS should contribute towards the aims of the development plan. This includes any specific development plan objectives to overcome particular localised difficulties e.g. for an area of particularly significant congestion, an historic area requiring protection or an air quality management area".</p> <p>TAN 18 further indicates that "Well designed and implemented traffic management measures can help to secure planning objectives in a number of ways, including: reducing community severance, noise, local air pollution and traffic accidents".</p>	<p>N/A</p>

Consultee comments	Council response	Changes proposed to SPG
	<p>This is supported by Planning Policy Wales (November 2016) which states: "8.7.1 When determining a planning application for development that has transport implications, local planning authorities should take into account: the environmental impact of both transport infrastructure and the traffic generated (with a particular emphasis on minimising the causes of climate change associated with transport)".</p> <p>This can only be achieved if the likely impacts are fully identified and understood.</p>	
WSP, on behalf of Taylor Wimpey		
<p>WSP have been engaged by our client Taylor Wimpey to conduct a review of Cardiff Council's draft Supplementary Planning Guidance (SPG), <i>Managing Transport Impacts (Incorporating Parking Standards)</i>. A draft of the SPG has been produced for public consultation until 21st December 2017.</p> <p>This review considers the following:</p> <ul style="list-style-type: none"> ⌋ Requirements for Transport Assessments (TAs) ⌋ Modelling requirements for TAs ⌋ Parking standards ⌋ Public rights of way and development sites. <p>The review found the following key points:</p> <ul style="list-style-type: none"> ⌋ The guidance promotes an excessive and, in some cases, unrealistic process and approach for TAs. ⌋ The proposed tools to assess junction capacity are labour intensive and subjective. ⌋ Requirements to provide appraisal summary tools and to follow WebTAG for identifying and evaluating issues related to Economy, Environment and Society are considered to be unsuitable and excessive. ⌋ The standard for a maximum of two parking spaces for any size of residential dwelling is overly restrictive and at risk of providing insufficient parking provision for larger dwellings to the detriment of highway and pedestrian safety. ⌋ The reasoning for minimum dimensions for garages and driveway lengths leading to garages is unclear given that garages are not counted within calculations of parking provision. ⌋ Our client considers that in light of the above comments the SPG should be amended to refer (in noncentral areas) to a car parking requirement of 1 space per bedroom up to a maximum of 3 spaces per dwelling plus 1 visitor space for every 5 dwellings 	Noted.	N/A
<p>Section 2 of the SPG outlines requirements and guidance for Transport Assessments, Transport Statements and Travel Plans. This is supported by Appendix 2 which sets out detailed requirements for Transport Assessments including a checklist and Appendix 4 concerning Travel Plans.</p> <p>The SPG sets out an unduly extensive and prescriptive process for Transport Assessments, particularly the following requirements:</p>	Contrary to being considered unduly extensive or prescriptive, the SPG merely seeks to provide clarity with regard the process in developing a robust Transport Assessment.	N/A
<p>1. For the critical junctions to be included in the TA they must be agreed with the Council (para. 4.7).</p>	<p>1. It has always been the case that the scope of critical junctions to be included in the TA have</p>	N/A

Consultee comments	Council response	Changes proposed to SPG
<p>2. Before submission to the Council, all TAs must be independently audited, using the Transport Assessment Guidance and Checklist. Completed audit checklists must be submitted along with the TA and they will be reviewed by the Council (para. 4.8; para. 4.9).</p> <p>In relation to point 2 above, the need for TAs to be independently audited using the checklist is seen as an unnecessary complication and potential duplication of efforts. The intention of the checklist is to assist applicants in producing a TA which is robust and approved in a timely manner (para 4.8; Appendix 2, para 1.1.3). An independent audit is an unnecessary and conflicting element that runs counter to Planning Performance Agreements which encourage joint working between the applicant and Council as local planning and highway authority. When work has been undertaken cooperatively with the local authority in this way, an independent audit is unnecessary.</p>	<p>been required to be agreed with the Council beforehand.</p> <p>2. Noted. The independent auditing of TAs shall be changed from a requirement (“must be”) to being desirable. Nevertheless, it is considered to be in the developers’ best interests to undertake an independent audit, such as “...to ensure that a robust methodology is used which properly quantifies and analyses the transport impacts of a development and provides the evidence necessary to inform the identification of appropriate mitigation measures” (SPG Par 4.8).</p> <p>Moreover, the completion of the TA guidance checklist has been found to be relatively straightforward and comparatively quick to do, and therefore this process is not considered will be particularly onerous on the part of the developer.</p>	<p>4.8. Before submission to the Council, it is recommended that all TAs should be independently audited, using the Transport Assessment Guidance and Checklist...</p> <p>4.9. Completed audit checklists should be submitted along with the TA and they will be reviewed by the Council.</p>
<p>3. For major developments: spare capacity on buses and trains should be identified in order to establish the ability of the public transport network to accommodate any increase in demand associated with a proposed development, particularly for rail. Public transport journey times and reliability should also be referenced (Appendix 2, para 2.2.2).</p> <p>In relation to point 3 above, establishing spare capacity on buses and trains would require extensive surveys as it is not realistic to expect that passenger demand levels would be supplied by public transport providers for commercial reasons. Similarly, it is not realistic for journey time reliability statistics to be obtained from public transport providers.</p>	<p>3. For large-scale developments, identifying the residual capacity available on existing public transport services, as well as journey times and reliability, are critical in determining the feasibility of mode-split predictions, and in determining the extent of provision and level of investment required for bus services in order to support this.</p> <p>It is acknowledged that the necessary information is not likely to be forthcoming from operators. However, it is not agreed that for a developer to undertake their own surveys would be either time-consuming, expensive or difficult.</p> <p>For example, all that would likely be required would be a peak survey of train occupancy conducted from the platform at the one or two stations affected; a peak survey of bus occupancy conducted from the roadside at one or a handful of locations; and a sample of bus surveys conducted on-board during the peak, so as to determine average journey times and</p>	<p>N/A</p>

Consultee comments	Council response	Changes proposed to SPG
	reliability.	
<p>4. To assess the available capacity of the existing cycleway and footpath network in the area of the development (Appendix 2, page 65).</p>	<p>4. This and the above data could be collected as part of the general programme of surveys and site visits/observations that would otherwise be required to be undertaken anyway in preparation of the Transport Assessment, and are commensurate with the scale of assessment necessary for strategic development.</p>	N/A
<p>5. To provide appraisal summary tables, having regard to Stage 1 WelTAG appraisal principles (Appendix 2, page 65).</p> <p>6. Assessment is to follow WelTAG with regard to identifying and evaluating issues relating to each of the key strands – Economy, Environment and Society – and evidence of this is to be provided (Appendix 2, page 66).</p> <p>In relation to point 5 and 6 above, the use of WelTAG in this way for TAs is unsuitable, excessive and unnecessary. An assessment against the topics of economy, environment and society is not within the scope of a typical TA. WelTAG is centred on an option appraisal process to tackle a specific need for intervention, as follows: <i>"The WelTAG process is designed to provide a framework for structuring the thinking around the problem being tackled; identifying possible solutions, refining the design of those options so as to maximise their benefits and minimise any adverse impacts and to consider the wide range of possible consequences of implementing proposed solutions.1"</i></p>	<p>5-6. It is recognised that applying a WelTAG approach may not be appropriate in all instances. However, for a strategic development with far reaching effects requiring significant mitigation, then a WelTAG appraisal should be used, in recognition that "...under the [Wellbeing of Future Generations] Act, public bodies now have a duty to use sustainable development to shape everything they do, how it is done, and how it is communicated (via reporting), to show how they are contributing to the achievement of the well-being goals" (WelTAG Page 1).</p>	N/A
<p>7. To include air quality, noise and carbon emission information.</p> <p>As stated in point 7 above, the SPG requires air quality, noise and carbon emission information to be included in the TA. This information is typically provided within an Environmental Statement or separate Technical Assessments related to the TA but not within a TA. As such, this would require multi-disciplinary input into the TA which has the potential to complicate and extend timescales for producing and reviewing a TA, which would be undesirable when delivery of development is paramount.</p> <p>A pre-application service (discretionary) is offered by the Council and it is recommended developers use this service to ensure engagement at the earliest possible opportunity (para. 4.7)</p>	<p>7. It is agreed that environmental information is typically provided within an ES or separate report. Nevertheless, for strategic developments in adopting a WelTAG approach, this information will also be required to be referenced within the TA. It would also be argued that a TA for a strategic development should by nature require multi-disciplinary input, in recognition of the inherent complexity of assessment required.</p>	N/A
<p>Modelling Specific Requirements</p> <p>Section 3 of Appendix 3 sets out specific modelling requirements for TAs, which are unique to Cardiff. A considerable amount of the guidance relates to the modelling techniques required for strategic transport models. Although not stated in the SPG, it is expected that strategic modelling would utilise Cardiff Council's own strategic model which is assumed to have already been built to WebTAG standards.</p>	<p>The assessment methodologies proposed are based on first principles, the same principles as accepted research and on which industry standard software are based, and therefore while the specific method of visually representing junction performance may be unique to Cardiff, the processes underlying these are not.</p> <p>To confirm, it is not the case that Cardiff</p>	N/A

Consultee comments	Council response	Changes proposed to SPG
	Council would advocate developers to make use of Cardiff's own strategic model. Rather, it is suggested that applicants should approach the Welsh Government requesting for their development to be tested using the purpose built South East Wales Regional Transport Model.	
Reference is made to the use of micro-simulation modelling in Appendix 3, where appropriate. The guidance, however, only refers to the development of matrices, whereas software packages such as VISSIM can be operated statically based on specific turning movements rather than matrices. Use of turning movements reduces the amount of data required for such modelling exercises and is the preferred assignment choice by the software developer PTV.	It is agreed that VISSIM can make use of turning movements rather than matrices, and that in many circumstances this may be the preferred method of assignment. However, in modelling a network, the use of fixed turning movements may not be appropriate as it precludes modelling route choice (i.e. dynamic assignment), without manual intervention. Also, it is considered that in many instances, the developing of matrices for a network is not significantly more involved than the use of turning movements, and that the level of data required to be collected in building, calibrating and validating the model is similar in both instances.	N/A
Where reference is made to specific junction modelling techniques, no reference is made to how such models should be calibrated and validated. The use of the appropriate software, including calibration and validation of these models, is key to ensuring the quality of the outputs of such models thereby reducing inconsistencies and the misuse of models whilst acknowledging the uniqueness of each junction.	The importance of suitable validation and calibration when building a model, is agreed, and a discussion on these are provided in Section 3.4 of the SPG, in reference to TAG Unit M3.1. However, in the case of the proposed junction tools specifically, the undertaking of validation or calibration are not relevant, since these are based entirely on first principles, with no variables that can be changed, little or no user interpretation required, and any supposed margin for error can be considered as having already been accounted for by the need to plot a range of values.	N/A
The guidance sets out a forecast year for modelling of 10 years post completion, unless otherwise specified by the Council (Appendix 3, para 3.5.2). This is inconsistent with the rest of the relevant planning guidance and could result in assessment years which are 15 years after the application has been submitted. Such an advanced forecast year would be subject to significant uncertainties.	A forecast year of 10 years post completion is not considered excessive, in particular for a strategic development. TAG Unit M4 (Forecasting and Uncertainty) 1.2.1. states that "For economic appraisal it is best if the forecast year is as far into the future as possible...", and goes on to provide several worked examples of	N/A

Consultee comments	Council response	Changes proposed to SPG
	<p>assessing development 15 years post completion.</p> <p>The Council acknowledges that with forecasting further ahead comes increasing uncertainty, however this is not a justification for not accounting for appropriate future assessment years. TAG Unit M4 provides discussion on how to deal with uncertainty.</p>	
<p>Junction Assessment tools In Appendix 3, Cardiff Council set out junction assessment tools from first principles to be used as an alternative approach to industry standard modelling techniques. This proposed approach is not adopted elsewhere in the county and provides a generic approach to all junctions. The methodology outlined is complex and would require further data collection and potentially produce very subjective results. Ultimately this approach would result in further costs to the developer as it would not be possible to replace more conventional use of industry standard modelling techniques and tools.</p>	<p>Junction Assessment tools</p> <p>As stated previous, the assessment methodologies proposed are based on first principles, the same principles as accepted research and on which industry standard software are based, and therefore while the specific method of visually representing junction performance may be unique to Cardiff, the processes underlying these are not.</p> <p>The key difference here is that Cardiff Council has sought to draw together conflicting alternative formulae for calculating capacity (as illustrated in Figure 1), with a view of establishing an average 'best fit' across all of these.</p> <p>Importantly, the Council's tools also seek to distinguish between a junction that is within maximum theoretical capacity, and that which is within practical capacity, i.e. 80% degree of saturation, and in response to this the need to consider alternative methods of control, as per DMRB 6.2.6.</p> <p>Furthermore, these tools also take into account variance (in demand, saturation flow and in allocated green time), which is typically overlooked when using conventional junction assessment software, in spite of the knowledge that variance is an everyday reality, and that it can have a profound impact on the performance of a junction.</p> <p>Contrary to what is stated, the methodology is</p>	<p>N/A</p>

Consultee comments	Council response	Changes proposed to SPG
	<p>not inherently complex, nor does it necessarily require significant additional data to be collected. Arguably, Cardiff's guidance simply lays out the data that should already be collected as a matter of course anyway irrespective of the method used to assess junction performance, and yet are all too often overlooked.</p> <p>Rather than being subjective, the proposed approach is simple, transparent, and is entirely conducive to establishing a common understanding of junction performance between all parties, and should therefore actually reduce unnecessary costs incurred by the developer, in minimising unnecessary duplication of effort or abortive work.</p> <p>The proposed tools are meant to complement the use of conventional assessment software, rather than replace these. Using the tools proposed, it is possible to undertake an assessment of junction performance with minimal effort and far quicker than using the software alternatives.</p>	
<p>The SPG recommends that the tools should be used in the first instance to assess the existing capacity and undertake option tests. Preferred options can then be tested in more depth using traditional junction assessment and/or microsimulation modelling tools (Appendix 3, para. 1.2).</p> <p>Cardiff Council recognise the following limitations of assessing junctions, as follows:</p> <ul style="list-style-type: none"> ⌋ <i>"Short lane effects may be accounted for to some extent using these graphs by adjusting the saturation flows due to the underutilisation of the relevant lanes for the movement. However, other methods may be better able to provide the detail needed to understand the interactions (e.g. micro-simulation)."</i> (Appendix 3, page 90) ⌋ The process for estimating capacity at priority controlled junctions <i>"does not account for traffic conditions that result in platoons of traffic in the opposing flow"</i> (Appendix 3, page 82). 	<p>Cardiff Council fully acknowledges the limitations of the tools provided, and states that the use of these may not be appropriate in all instances. However, it should be noted that limitations are also inherent in any of the traditional modelling tools; for example LinSig and TRANSYT do not accurately represent queue length or delay under congested conditions, in particular the results cannot be relied upon at saturation levels above the 80% practical capacity threshold.</p>	<p>N/A</p>
<p>Trip Generation Regarding estimating trip generation, paragraph 3.6.2 of Appendix 2 states <i>"where no comparable sites exist, in particular for large mixed-use developments, then 85th percentile trip rates should be determined from a sample size of 5 or more sites."</i> This is contradictory to TRICS Good Practice Guide 2016 which recommends at least 20 surveys in a rank order list before 85th and 15th percentiles; therefore sample sizes of less than 20 may not provide a robust assessment.</p>	<p>Trip Generation Agreed. Paragraph 3.6.2 was incorrectly worded, this was intended to convey that where possible a sample size of 20 or more sites should be used such as to determine the 85th percentile trip rate, but in the absence of this, an average trip rate derived from 5 or more</p>	<p>Appendix 2 3.6.2. Where no comparable sites exist, in particular for large mixed-use developments, then where possible 85th percentile trip rates should be determined from a sample size of 20 or more sites. Alternatively, in the absence of this, an average trip rate should be determined on the basis of 5 or more sites.</p>

Consultee comments	Council response	Changes proposed to SPG
<p>The SPG recommends use of TEMPRO to calculate growth in Cardiff (Appendix 2, para. 3.5.1) despite acknowledging the following limitation for TEMPRO:</p> <ul style="list-style-type: none"> ; <i>“TEMPRO doesn’t account for significant local or regional public transport or walking/cycling interventions such as the proposed Cardiff Metro, and the resulting likelihood for modal-shift to occur, but rather assumes that mode-choice will remain broadly the same in future as existing.”</i> ; TEMPRO does not <i>“take into account the level of saturation on the local highway network; in recognition that simply applying unfettered NTEM growth to an already congested link/s or junction/s may yield unrealistic results</i> 	<p>sites may also be acceptable.</p> <p>The limitations of this approach as listed, are provided in Appendix 2 of the SPG. Therefore, when assessing the impact of strategic development, the application of simple NTEM growth would rarely be a substitute to undertaking a suitable strategic level of assessment using a four-stage model or else a form of logit model, in order to properly account for these.</p> <p>While much of the network is at or close to capacity during peak times, this isn’t to say that there is no capacity for growth anywhere on the network. While growth over a certain level at a given junction/link may be deemed to be unrealistic, it is nevertheless important to quantify this growth in providing a worst case/‘unconstrained demand’ scenario (i.e. assuming no interventions), as the starting point from which to begin considering the mitigation required and in evidencing this.</p>	<p>N/A</p>
<p>PARKING STANDARDS</p> <p>Table 1 below outlines the proposed maximum parking standards for residential properties. The residential parking standards do not include a requirement for visitor parking.</p> <p>The Central Area includes the City Centre and Cardiff Bay Areas and the large residential areas which extend outwards from the core shopping centre into the wards of Grangetown, Canton and Cathays.</p> <p>Table 1 shows that the maximum number of parking spaces is two spaces for non-central areas in Cardiff and one space for central areas, regardless of the number of bedrooms. This is a restrictive and unrealistic approach, particularly for larger dwellings on the edge of the city. There is no requirement for visitor parking as set out.</p> <p>Paragraph 6.15 of the SPG states: <i>“The design and layout of parking spaces will be reviewed and may not be considered in accordance with the maximum standards if dimensions are found to be able to accommodate parking above the maximum permitted. For example, where due to its proposed dimensions a driveway to a dwelling can be shown to have the capacity to accommodate a greater number of vehicles than permitted under the parking standards, a reduction in the dimensions may be required.”</i></p> <p>Paragraph 6.32 states: <i>“Garages must have a minimum internal width of 3.2m with an internal length of 6.0m. Where garages are provided, a minimum driveway length of 5.5m is required.”</i></p> <p>The need for minimum dimension requirements for garages and driveway lengths leading to garages is unclear and confusing as garages are not counted within the parking provision for residences (para. 6.15); these paragraphs contradict each other and need to be reviewed.</p> <p>The Cardiff Council approach to car parking for Use Class C3 and C4 type dwellings is not consistent with the</p>	<p>Please see comments above relating to residential parking standards.</p>	

Consultee comments	Council response	Changes proposed to SPG
<p>general approach taken by other authorities in Wales and England. The level of provision proposed will potentially lead to vehicles being parked on the surrounding highway and landscaped areas, which would be detrimental to place making, have a negative impact on the local area and potentially impact on highway/pedestrian safety and restrict emergency services accessing the location.</p> <p>To avoid such situations occurring our client considers that the SPG should be amended to refer (in noncentral areas) to a car parking requirement of 1 space per bedroom up to a maximum of 3 spaces per dwelling plus 1 visitor space for every 5 dwellings</p>		
<p>PUBLIC RIGHTS OF WAY</p> <p>The SPG places an emphasis on identifying and protecting public rights of way (PRoW). Developers are required to give consideration to whether any public paths or rights of way cross the development site and whether they would be affected by the proposed development. Where a development is likely to affect a PRoW, developers may either incorporate the legal alignment of the path within the development or seek to divert it along an alternative alignment. This may assist in developing a coherent active travel network to improve the connectivity of new developments with each other and new developments to existing land uses.</p> <p>However, flexibility is required to maximise the benefit from the network. The concern is stopping up or diversion can be a lengthy process delaying developments so consideration must be given to using temporary orders where appropriate to facilitate development especially on allocated sites.</p> <p>Paragraph 7.15 of the guidance states: <i>"If changes to rights of way require re-alignment of an existing path, the developer will need adequate consideration for the time required to process the legal order to determine the outcome. Where a stopping up or diversion order are required it is likely to take up to a year to come into effect. Until that time the original definitive line must be kept open at all times."</i></p>	<p>In response to the question posed, there is a legal requirement under Section 257 and Section 259 of the Town and Country Planning Act which requires a right of way to be retained on its current alignment until the necessary legal order is made or confirmed. If the developer completes works prior to the legal order being confirmed, it will invalidate the order and it is then down to the Local Authority to determine what action is taken.</p> <p>Temporary Traffic Orders can be applied for to close a right of way for Health and Safety reasons in order to work on site without public access. An alternative route should be provided for the public to use until the works are completed. This does not permit developers to build on the right of way if their order is not confirmed. As part of the planning consultation process, PROW officers inform applicants of the timescales involved so that they are fully aware of cost implications and the length of time it may take to confirm an order. There is never a guarantee that even where planning permission has been granted, the legal order will be confirmed as it is open to public consultation and may be objected to.</p> <p>This is why it is important for applicants to liaise with the Public Rights of Way Team at an early stage to discuss the development of a site.</p>	N/A
Redrow		
<p>As per the LDP Manual SPGs contain "supplementary information in respect of policies in an LDP. SPG does not form part of the development plan and is not subject to independent examination but must be consistent with it and with national planning policy". SPGs are material considerations in the determination of planning applications.</p>	Noted.	
<p>SPGs are non-statutory and only guidance. They cannot be used to be prescriptive and be certain that in all cases things "must", "will" or "shall" be done in certain ways.</p>	Legal advice has been sought on these issues:	A number of changes have been made to the text in the SPG and appendices in order that the language used is

Consultee comments	Council response	Changes proposed to SPG
<p>As the guidance that they are then the wording should be broader to refer to things "should", "can" or "could" be done in certain ways when providing more detailed information in support of LDP policies. Each application must continue to be assessed on its own merits</p>	<p>"An application for planning permission has to be determined on its own merits, in accordance with the development plan and any other material considerations (S70(2) TCPA 1990).</p> <p>I have attached a copy of section 2.3 of Planning Policy Wales Nov 2016, which states that whilst only the policies in the development plan have special status under section 38(6) of the 2004 Act in deciding planning applications, SPG may be taken into account as a material consideration.</p> <p>Paragraph 2.3.1 states that SPG is a means of setting out more detailed thematic or site specific guidance on the way in which the policies of the Local Development Plan are to be interpreted and applied in particular circumstances or areas.</p> <p>The LDP Manual Paragraph 7.3.5 states that SPG will have a key role in interpreting and expanding on generic policies in the LDP, SPG can provide for the matters listed in that paragraph including details and numerical guidelines/thresholds.</p> <p>I note that the wording you refer to is not dissimilar to that already contained within the Council's existing SGP Access, Circulation and Parking Standards 2010 eg paragraph 4.2.4 which this draft is presumably intended to replace".</p> <p>In line with the LDP Manual, the SPG and its appendices is intended to provide more detailed guidance relating to the interpretation of the relevant LDP policies and how these are to be applied in achieving the 50:50 modal split target set out in the LDP. It is noted that the Consultation Draft documents contained inconsistencies in relation to the use of, for example, 'must'/'should'. Having reviewed the documents and the comments supplied by Legal, changes have been made in order to provide consistency in the terminology used.</p>	<p>consistently 'should', 'can', could' rather than 'must', 'will', 'shall' where appropriate to the context. Where changes have been made, paragraph numbers are given below.</p> <p>SPG:</p> <p>1.3 3.6 3.9 3.15 3.18 3.20 4.1 4.4 4.7 4.8 4.9 5.9 5.13 6.19 6.20 6.22 6.28 6.32 6.34</p> <p>Appendix 2 TA:</p> <p>1.1.3 1.1.4 2.2.3 2.6.2 2.6.3 2.6.5 3.1.2 3.1.3 3.2.1 3.3.3 3.3.4 3.3.5 3.3.6 3.3.9 3.4.1 3.4.2 3.5.1 3.5.2 3.5.3 3.5.4</p>

Consultee comments	Council response	Changes proposed to SPG
		3.6.6 3.7.1 Table 2.2, 2.6 Appendix 3 TP: 13 1.1.2 1.1.11
<p>If the Council require certain documents, by stating “must / shall” be submitted, with certain applications then the appropriate method to deal with this would be via publishing ‘Local Validation Requirements’ as introduced with the 1APP forms in 2015. SPGs cannot be used to advise applicants what they must do. For example, where does guidance / policy set out that it is appropriate and reasonable for all TAs to be independently audited prior to submission. Professional independent consultants are employed by applicants to provide supporting TAs. The extent of information sought at a pre-application stage and with a formal planning submission is onerous and expensive for no good reason.</p>	<p>As above, the use of ‘must/shall’ in the documents has been reviewed and amended as appropriate. Further details are also provided above relating to the purpose of TAs and other information which is sought. The information which is required is necessary in order for an informed assessment of the transport impacts of development to be undertaken. It is in line with Welsh Government policy, as set out in Planning Policy Wales (Edition 9 November 2016). The pre-application process enables applicants to provide a robust application to enable timely progress through the planning process.</p>	<p>As above.</p>
<p>There are numerous examples of policies / guidance that are incorrect, outdated, have been superseded or do not apply in Wales. For example, the latest national planning policy framework in Wales is Planning Policy Wales (PPW) November 2016 but references are made to PPW January 2016 and PPW February 2014.</p> <p>Reference is made in para 4.12 to Good Practice Guidelines: Delivering Travel Plans through the planning process DfT 2009. This guidance was written for England only and not endorsed by the Welsh Government. It was superseded and incorporated as part of Planning Practice Guidance, again for England only, in March 2014. Relevant Travel Plan guidance applicable to Wales is found in PPW Edition 9 and TAN18.</p>	<p>Reference to PPW January 2016 amended in SPG and Appendices. Reference to PPW February 2014 amended in Appendix 1.</p> <p>The reference in 4.1.2 provides a definition. It is not citing the DfT guidelines as guidance to be followed. Although the document itself has been superseded, it remains a useful definition.</p>	<p>SPG</p> <p>4.1 The WG policies on TAs within the planning process are contained in Planning Policy Wales (Edition 8–9 January November 2016) (PPW). PPW (paragraph 8.7.2, p 124) states: “The Welsh Government expects that all applications for developments (including changes of use) falling into the following categories will be accompanied by a TA” (see Table 4.1 below).</p> <p>5.1 Planning conditions may be imposed to secure on and/or off site transport measures and facilities as may be required by a proposed development, in line with paragraph 8.7.5 of Planning Policy Wales (January November 2016)</p> <p>8. USEFUL PUBLICATIONS</p> <p>Welsh Government <i>Planning Policy Wales (Edition 8 9, January November 2016)</i></p>

Consultee comments	Council response	Changes proposed to SPG
		<p>Appendix 1</p> <p>Planning Policy Wales (February 2014 November 2016) sets out the Government's planning policies as they apply in Wales. It includes guidance on car parking provision (paras 8.4.1 – 8.4.6), which is viewed as a: '<i>major influence on the choice of means of transport and the pattern of development</i>'. It outlines that local authorities should: '<i>ensure new developments provide lower levels of parking</i>'. Therefore, minimum parking standards are no longer seen as appropriate.</p> <p>Appendix 2</p> <p>1.1.2 The Welsh Government's policies on TAs within the planning process are contained in Planning Policy Wales (Edition 8-9 January November 2016) (PPW). This document expands on the available guidance, providing detailed guidance on all aspects of TAs including modelling. The checklist below is not exhaustive and adaptation may be required to reflect the type and scale of the proposed development. Webtag and other source references were correct at the time of writing.</p> <p>Appendix 3</p> <p>1.1.3 The Welsh Government's policies on Transport Assessments and Travel Plans within the planning process are contained in Planning Policy Wales (Edition 8-9 January November 2016) (PPW) and the Technical Advice Note 18 (TAN 18).</p>
<p>Chapter 3 Para 3.4 – Any part of the SPG that is updated, including appendices, will need to be subject to public consultation. Any updated 'technical documents' will need to be based on recognised and endorsed guidance / policies.</p>	<p>Noted. The decision has been taken to remove Appendix 3, the Junction Assessment Tool Guidance, from the SPG appendices as it may be necessary to amend this periodically. It will be publically available and remains a recommended tool.</p>	<p>4.10 For these reasons, it is essential that Transport Assessments provide all of information necessary to enable the Council to fully quantify and understand the impacts of development on the function of roads and wider highway network and to identify measures to mitigate these impacts and make the development acceptable in relation to the LDP's sustainable transport policies. Section 4 and Appendices 2 and 3 provide detailed information on what is required from</p>

Consultee comments	Council response	Changes proposed to SPG
		<p>Transport Assessments submitted to the Council through the planning process. These technical documents will be updated periodically and it should be ensured that the most up to date versions are used.</p> <p>4.11 The Transport Assessment Guidance and Checklist is a live technical document which will be updated by the Council from time to time, as necessary. It should be ensured that the most up to date information is referred to.</p> <p>4.12 In some cases, developments which fall below the size thresholds where a TA would be required may have transport impacts which warrant investigation and assessment. Examples of such developments could include developments which require direct access onto major arterial routes or strategic bus corridors or where they may affect parts of the highway network or specific junctions which experience particularly high volumes of traffic flows or other problems. In such instances, the Council will ask the applicant to prepare a Transport Statement (TS) providing a qualitative and quantitative assessment of the existing transport conditions in and around a development site and the transport impacts of the development in terms of trip generation. It should also set out in detail the measures that will be taken to address those impacts. Appendix 4 outlines what should be included in a Transport Statement. This technical document will be updated periodically as required and it should be ensured that the most up to date version of the guidance is used.</p> <p>4.12 A Travel Plan is a long term management strategy for an occupier (or group of occupiers) of a site that seeks to deliver sustainable transport objectives through positive action and is articulated in a document that is regularly reviewed (Good Practice Guidelines: Delivering Travel Plans through the planning process DfT 2009). Travel Plans are now considered an essential part of transport policy. It is strongly recommended that the explanatory notes in Appendix 3 should be used in conjunction with the guidance and checklist of requirements to ensure that</p>

Consultee comments	Council response	Changes proposed to SPG
		any Travel Plan which is submitted to the Council contains all of the information which is required by the planning authority in assessing a planning application. This technical document will be updated periodically as required and it should be ensured that the most up to date version of the guidance is used.
2.2 Para 5.9 – the details that are covered under a S278 or S38 should not be subject to planning condition(s) in the first place. Circular WGC 016/2014 – The Use of Planning Conditions for Development Management sets out the test that must be met to apply a planning condition. This includes being necessary and relevant to planning. Conditions are not to be used to repeat provisions of other conditions or duplicate controls under other legislation. The location and size of roads is a matter for the planning application (full or RM element) but the technical design standards are to be subject to Highways Section agreements.	Having a S278 agreement can't be conditioned but the parameters set within it may form the basis of conditions, for example the location, cross section and that the road should be designed to adoptable standards.	5.9 Where matters affected by the works forming part of S278s are subject to Planning Condition(s), the location and cross section for example, the Council will expect the developer's applicant to have discharged had those conditions discharged prior to entering into a S278 agreement. It should also be ensured that the d Design of the works subject to the 278 are in must thereafter accordance with the details agreed through the planning permission and discharge of condition(s) and approvals.
2.3 Paras 5.13 & 5.14 – Reference to Highways Construction Details is simply not appropriate within a planning SPG.	The Highways Construction Details and other Technical Design Standards are referred to in the SPG in order that applicants will be aware of these standards and to signpost them to the relevant documents. This is not considered to be inappropriate.	N/A
Chapter 6 2.4 Para 6.32 – There is considered no reason for garages to have minimum internal sizes of 3.2m by 6m given that they are not counted as parking spaces (para 6.15). Furthermore Chapter 8 of Manual For Streets, which para 6.29 of the draft SPG advises should be taken into account, sets out that garages are recommended to have minimum internal dimensions of 3m by 6m where they are counted as parking spaces. This size is considered suitable for use for storage and car parking. As garages are not to be counted as parking spaces then it would be more appropriate that they be smaller in size than suggested in Manual for Streets.	The text in relation to garages has been amended, as above. The size requirement has been retained and refined in order to ensure adequate storage space can be provided for bikes.	N/A
2.5 The proposed TA requirements are considered onerous and costly. National planning guidance and producing information appropriate for the scale of development, via scoping exercise with the local authority at a pre-application stage, and in line with industry recognised assessment is considered appropriate. The approach is surprising given that the LDP has been adopted and Cardiff acknowledges through assessment work undertaken that no further growth can be accommodated on the existing highway network. To achieve the 50:50 city wide target over the LDP period requires strong focus on the sustainable travel measures	The guidance and checklist proposed is considered to be entirely consistent with national planning guidance, and seeks to result in assessments which are commensurate with the scale of development; to provide clarity on what Cardiff Council requires/expects (in-line with the LDP, LTP, Transport Strategy, Cycle Strategy etc.); and to address the current deficit between this and what is submitted in many cases being substandard. While much of the network is at or close to capacity during peak times, this isn't to say that there is no capacity for growth anywhere on the	N/A

Consultee comments	Council response	Changes proposed to SPG
	<p>network. While growth over a certain level at a given junction/link may be deemed to be unrealistic, it is nevertheless important to quantify this growth in providing a worst case/'unconstrained demand' scenario (i.e. assuming no interventions), as the starting point from which to begin considering the mitigation required and in evidencing this.</p> <p>It is agreed that in order to achieve the 50:50 target, a strong focus is required on sustainable travel measures, and this is what Cardiff seeks to ensure through the formulation of its SPG planning guidance and checklist.</p>	
<p>2.6 The use of Weltag for assessing individual planning applications is inappropriate. This tool should be used by the local authority to appraise competing schemes and its reference in guidance for assessing planning proposals is out of context</p>	<p>Please see above comments with regard to Weltag.</p>	<p>N/A</p>
<p>2.7 Redrow has been advised that the proposed approach to Junction Assessment is unique to Cardiff. Redrow is concerned that an extra level of assessment, beyond recognised industry-wide assessments that would still be required, will add considerable time and cost to the planning assessment process. This is in the context of an adopted LDP that is seeking a 50:50 modal shift and of highway capacity is not considered a critical factor by which development should be measured. The additional time and cost for any unnecessary assessment, not required by other local planning authorities, would need to be reasonably factored in for any viability review on planning proposals</p>	<p>The assessment methodologies proposed are based on first principles, the same principles as accepted research and on which industry standard software are based, and therefore while the specific method of visually representing junction performance may be unique to Cardiff, the processes underlying these are not.</p> <p>The proposed tools are meant to complement the use of conventional assessment software, rather than replace these. Using the tools proposed, it is possible to undertake an assessment of junction performance with minimal effort and far quicker than using the software alternatives.</p> <p>The result of which is the ability to quickly establish scale of effect in determining a suitable study area, and in rapid option testing, allowing options to be quickly sifted and eliminated or taken forward for further analysis using the conventional software. Therefore much less than result in additional time and cost, the proposed tools should actually reduce the extent of more time consuming detailed assessment to only those options which are feasible.</p>	<p>N/A</p>

Consultee comments	Council response	Changes proposed to SPG
	<p>To clarify, while highway capacity in itself may not be the sole consideration in making progress towards the 50:50, nevertheless, it is still a material consideration, and that in order to deliver on this there will still be a need to manage traffic. Section 4.93 of the LDP discusses this as one element in providing the transport infrastructure necessary to facilitate growth, i.e. – <i>“The road network, particularly measures to make better use of existing highway capacity”</i></p> <p>The requirement to achieve the 50:50 does not negate the need to properly quantify the impact of development upon junction performance, moreover without quantifying this impact, it is not possible to evidence the mitigation which is required, or the level of mode-shift which is achievable.</p> <p>It should also be born in mind that contrary to the inference, when referring to ‘highway capacity’, we actually do so from the perspective of all users, and not just those travelling by car; and that this should be viewed within the context of the user hierarchy as defined by Manual for Streets.</p>	
Aldi		
<p>ALDI Stores Ltd</p> <p>ALDI is one of the world’s leading grocery retailers. The company has built a network of stores in Europe, the USA and Australia. ALDI first entered the UK market in 1990 and has now expanded to over 700 stores across England, Scotland and Wales.</p> <p>ALDI is committed to continuing its strong investment in the UK economy, and is currently undertaking a nationwide floorspace expansion programme, through the delivery of new foodstores and enhancement of their existing portfolio, creating many new employment opportunities in the process. ALDI is seen as an important employer at the UK level and a significant investor in the UK economy. ALDI opened a new Regional Distribution Centre (RDC) in Wentloog in early 2017. This RDC facilitates the expansion programme in Wales and the south west.</p> <p>ALDI has a very different approach to food retailing than other food retailers based on simplicity and maximum efficiency at every stage of the business, from supplier to customer. This enables Aldi to sell high quality products, from a limited core range (compared to other supermarkets) of mainly exclusive own labels, at the lowest possible price consistently across the entire range. ALDI is a ‘deep discount’ retailer. New stores are medium sized (typically having a c.1,800sqm gross floorspace including a c.1,250sqm net sales area) and stock only a limited range of predominantly own-branded products. ALDI only has a limited amount of non-food floorspace (around 20%), which mostly contains time-limited specials. This is a significant difference to the larger ‘Big 4’ supermarkets, which average between 30%-50% comparison</p>	<p>Noted.</p>	

Consultee comments	Council response	Changes proposed to SPG
<p>goods floorspace.</p> <p>In addition, ALDI's efficient shop floor layout and produce delivery system (including only 2 main HGV deliveries per day) reduces the need for a large back of house warehouse area. Overall, this means that non-sales floorspace also forms a much smaller proportion of the gross floorspace, than the established superstores.</p> <p>The ALDI store format does not include specialist food counters such as a butcher, fishmonger, bakery, delicatessen or chemist, which are provided by larger chains. ALDI customers are therefore likely to visit other local stores to complete their shopping trip. As a result an ALDI car park serves a wider function and helps to facilitate linked shopping trips.</p> <p>To operate in this way and deliver the associated benefits, ALDI adopts a highly streamlined and efficient operational model.</p> <p>The Competition Commission recognises these factors and accordingly categorises ALDI as a Limited Assortment Discounter (LAD), providing an important distinction between discount food operators and larger convenience operators.</p>		
<p>Parking Standards for Retail Development</p> <p>Section 6 of the Draft SPG sets out maximum parking standards for retail development which are tailored to the size of the retail use, and location (i.e. Central and Non-Central). The draft SPG identifies that a retail unit of more than 1,201sqm would be allowed a maximum of one parking space per 20sqm. For an ALDI foodstore of 1,800sqm, this would allow for only 90 parking spaces.</p> <p>Paragraph 6.1 of the draft SPG states:</p> <p>The availability of parking spaces and their location can influence travel choices. Excessive provision can serve to stimulate demand for car travel and perpetuate reliance on the car. The application of parking standards to new developments is therefore an important tool in managing demand for travel by car and encouraging a shift to sustainable transport modes.</p> <p>These objectives are balanced against the need to manage pressures on on-street parking space and the negative impacts of oversubscription of space including congestion, hazards, visual intrusion and harm to residential amenity.</p> <p>ALDI have in excess of 700 foodstores across the UK. Experience across these stores has shown that an ALDI food store requires a minimum of 100 onsite parking spaces to function successfully. ALDI seeks to ensure that stores are located in sustainable locations, and easily accessible to public transport and within walking distance of residential areas. However, due to the practicalities of undertaking a 'main food' or weekly shopping trip, it is found that where there is less than 100 parking spaces onsite, transport issues such as queuing, circulating, and on-street parking occur.</p> <p>While we acknowledge the statement in paragraph 6.11 of the Draft SPG, which states that 'there may be scope to apply flexibility in exceptional circumstances', we consider that in almost all circumstances, a medium sized supermarket of the scale of ALDI, would require in excess of 100 spaces. In fact, recently permitted store proposals in Cardiff have provided over 120 spaces.</p> <p>Smaller convenience retailers that rely on top-up shopping are unlikely to be affected by the proposed changes to parking standards. As noted above, larger superstores are supplemented by a greater proportion of non-sales floorspace, which inflates the gross floorspace, making them less sensitive to reduced parking standards. In contrast, due to the streamlined store configuration, new ALDI store proposals would be placed at a competitive disadvantage by the proposed reduced standards.</p> <p>The existing parking standards contained within the Access, Circulation, and Parking Standards (2010) require a maximum of one parking space per 14sqm of GFA, for a retail use in excess of 1,000sqm in a non-Central location.</p> <p>For an ALDI store of 1,800sqm, the maximum standard would be 128 parking spaces. These standards are</p>	<p>Further evidence to support the requirement for this level of parking was requested on this issue from Aldi but had not been received as of 7/3/18.</p> <p>The concerns are noted. As the response states, the SPG does allow for applying the parking standards flexibly in exceptional circumstances. However, the onus remains on the applicant to demonstrate why additional parking is required.</p>	<p>N/A</p>

Consultee comments	Council response	Changes proposed to SPG
<p>considered to be appropriately flexible, and we urge the Council to maintain a one space per 14sqm GFA standard prior to adopting the SPG.</p> <p>Alternatively, a reduced standard could be applied to 'superstores' over 2,000sq gross floorspace. At the very least, the SPG should make clear that the maximum could be exceeded where need can be demonstrated / evidenced.</p> <p>The proposed broadening of the designated central area, in which very low maximum standards are applied, is also questioned, since the impacts on proposals discussed above are not limited to the outer areas of the city.</p> <p>The proposed maximum parking standards for retail development within the draft SPG are too restrictive, and will ultimately jeopardise the establishment and successful operation of ALDI foodstores within the Cardiff Council area.</p> <p>In addition, the standards as proposed could have wider impacts. Where there is an under provision of onsite parking, customers often circulate the car park resulting in congestion, illegal parking, or displacement onto valuable on street parking.</p>		
<p>Conclusions</p> <p>ALDI object to the proposed reduction in parking standards, since they are likely to either hinder new store proposals or cause severe operational difficulties if they are rigorously applied.</p> <p>It is suggested that the existing standards (1 space per 14sqm gross floorspace) are maintained or the reduced standard is applied only to 'superstores' with a gross floor area above 2,000sqm.</p> <p>We respectfully urge the Council to carefully consider the points raised, since without the necessary fine tuning, the appetite for investors such as ALDI to bring new development to the City will be diminished</p>	Noted.	N/A
Public Health Wales, Kristian James		
<p>Thank you for the opportunity to comment on the above. We acknowledge that transport infrastructure is fundamental and cross-cutting in terms of providing both positive and negative impacts upon health. Therefore this SPG should seek to identify opportunities to help deliver health benefits whenever opportune and reflect the principles of the Well-being of future generation (Wales) Act 2015. We have no adverse comments on this draft SPG, but offer the following comments and recommendation:-</p> <ul style="list-style-type: none"> • We support the requirement to consider air quality, noise, road safety and Active Travel. The specific inclusion of these within Transport Assessments and subsequent Transport Implementation Strategies and Travel Plans is encouraged. 	<p>Largely these issues are covered in the TA Guidance. Specific reference to air quality and noise has been added under TIS as recommended in the consultation response. Road Safety and Active Travel are already referenced elsewhere in the text and will be addressed throughout the TIS and Travel Plan so no changes to these are proposed.</p>	<p>Appendix 2 TA Guidance and Checklist</p> <p>2.6 Transport Implementation Strategy (TIS)</p> <p>Contributes to development plan, including any objectives to overcome particular localised difficulties, for example, for an area of particularly significant congestion, an historic area requiring protection or an air quality management area air quality and noise pollution.</p> <p>Appendix 2 TA Guidance and Checklist</p> <p>Existing site access layout and access constraints:</p> <ul style="list-style-type: none"> • AQMAs/air quality, noise (including from Wales Noise Mapping resource) and carbon emissions information
<ul style="list-style-type: none"> • Noise assessment could include (where appropriate) reference to published noise maps that include Cardiff. 	Referenced included, as per comments from Shared Regulatory Services.	
<ul style="list-style-type: none"> • We support the requirement that users consider the 'Manual for Streets User Hierarchy' (which puts non- 	Noted.	N/A

Consultee comments	Council response	Changes proposed to SPG
motorised transport considerations first).		
<ul style="list-style-type: none"> • This SPG is clearly set in the context of wider Cardiff Council planning policy. We would recommend further cross referencing with regional and neighbouring local authority transport plans if this not already happening in practice. 	Noted.	N/A
<ul style="list-style-type: none"> • A requirement to link this SPG with the evolving Clean Air Strategy for Cardiff to achieve cleaner air for all, Active Travel Networks, bus network development, passenger needs assessment and maintaining green open spaces are also recommended. 	The Clean Air Strategy has not been formally adopted so not appropriate to link this to the SPG.	N/A
<ul style="list-style-type: none"> • There are opportunities to support and reinforce health considerations by linking the new Transport SPG with the content of the 'Planning for Health and Well-being Supplementary Planning Guidance',² notable examples include Healthy Lifestyles (paragraph 3.6) Active Travel (paragraph 3.6.2), the Considerations that developers should take into account when submitting development proposals to reduce air, noise and light pollution (paragraph 3.7.3) Access to services (paragraph 3.8) and Road safety (paragraph 3.9.2) within the Transport SPG. 	Air, noise and light pollution – Planning for Health refers to EN13, and it is also now referenced in the Transport SPG. Healthy Lifestyles – the reference to the Planning for Health SPG addresses this. Road Safety – this is addressed in the Transport SPG & Appendices. Access to services – this is covered by the SPG through the references to LDP policies.	N/A
Design Commission for Wales		
Thank you for the opportunity to comment on the above draft SPG, we have the following comments: The Design Commission for Wales encourage Cardiff Council to take a more holistic view of Supplementary Planning Guidance on transportation in the city. The draft Managing Transportation Impacts SPG appears reactive in its approach to transport in the city and focuses on road networks rather than the entire system, including rail and the future potential of the South Wales Metro. The recently adopted Cardiff Residential Design Guide 2017 identifies principles such as filtered permeability and integrating bus stops into development, which encourage a reduction in car use and move towards the aspired 50:50 modal split. This type of proactive guidance should be delivered concisely and consistently with guidance on highways, active travel networks and bus corridors, not in separate lengthy documents. The Manual for Streets approach to highway design should also be consistently promoted where applicable. A more holistic transport guidance would be more appropriate which would include all transport modes and, first and foremost, provide guidance which encourages design for public transport and active travel as the starting point for new development, then subsequently address management of transport impacts. Setting up the guidance in this proactive way will better equip the Council and design teams to design for incoming transport infrastructure, such as the South Wales Metro. The relationship between different SPG must be clear and easy to use.	Noted and suggest that the comments are sent to Planning to note for the future.	None
South Wales Police		
South Wales Police welcome the draft SPG on Managing Transport Impacts SPG particularly references made to KP5 creating safe and secure sites and supporting the principles of community safety. Specifically 5.2 (p18) could include reference to: 1 Ensuring parking and cycle storage areas are well over looked in order to provide active surveillance. 2 Larger car parks should include clear separation/ demarcation between vehicles/ persons, good levels of lighting, CCTV, and signing to afford safe and secure parking. 3 Consideration of Park Mark scheme standards (where appropriate). I attach a best practice document on Bus and Coach station security that you may wish to make reference too.	1 Ensuring parking and cycle storage areas are well over looked in order to provide active surveillance – this is addressed in 6.19/6.21 2 Larger car parks should include clear separation/ demarcation between vehicles/ persons, good levels of lighting, CCTV, and signing to afford safe and secure parking – 5.2 gives examples of planning conditions. 3 It is suggested that the Bus and Coach station	The principles outlined in Chapter 8 of the Manual for Streets should be taken into account for the layout and design of parking areas. Through good design, car parking (public and private) must give consideration to safety for pedestrians, cyclists and vehicles, for example, through appropriate separation of vehicles/persons and lighting/CCTV as appropriate. It should and also address issues of security, visual amenity and access requirements.

Consultee comments	Council response	Changes proposed to SPG
	security relates more to operational matters and is not an appropriate reference for the SPG.	It is also important that the provision and design of car parking space is well integrated with a high quality public realm. Pedestrians should be considered first in the design process, in accordance with the user hierarchy set out in Manual for Streets. The Park Mark standard may also be usefully referenced and applied where appropriate.
Tom Porter, PHW		
<p>•In reference to modal shift and encouraging active travel and public transport it is important to also encourage mixed mode travel, particularly for medium-length journeys. For example, cycling to a bus or train stop, then taking public transport, then resuming cycling or walking at the other end. This could be strengthened for example in para 3.20 and 3.25 – passengers may be pedestrians or cyclists and appropriate infrastructure (e.g. cycle parking) should be co-located with public transport stops</p>	Wording amended to reflect this.	3.25 Accessibility should be a primary consideration when designing for public transport facilities and infrastructure (e.g. bus stops and bus shelters). For example, ensuring bus stops are located in close proximity to key services and trip generators. Passengers are also pedestrians and/or cyclists at either end of their public transport journey and so consideration also needs to be given to the wider physical environment and connectivity as well as the waiting environment. For example, appropriate infrastructure such as cycle parking should be co-located with public transport stops. Under the Equalities Act (2010) services must also be fully accessible for people with disabilities and consideration should also be given to users with other accessibility needs such as parents/carers travelling with young children and prams/buggies. Transport for London (TfL) guidance on Accessible Bus Stop Design is a useful reference document.
<p>•4.13 – while we welcome the reference to air quality, this shouldn't be restricted only to air quality management areas as it is recognised that air quality should be reduced across a wider area in addition to a focus on specific AQMAs. There is no safe level of air pollution exposure</p>	Wording amended to reflect this.	4.13 Smaller developments which could generate significant amounts of travel in, or near to, air quality management areas areas with air quality issues and in other locations where there are local initiatives or targets for the reduction of road traffic, or the promotion of public transport, walking and cycling
<p>•6.2 – suggest reference here to providing parking dedicated to car pools / car clubs</p>	Wording amended to reflect this.	6.29 The principles outlined in Chapter 8 of the Manual for Streets should be taken into account for the layout and design of parking areas. Through good design, car parking (public and private) must give consideration to safety for pedestrians, cyclists and vehicles, for example, through appropriate separation of vehicles/persons and lighting/CCTV as appropriate. Pedestrians should be considered first in the design process, in accordance with the user hierarchy set out in Manual for Streets. Access and circulation arrangements must accommodate the needs of all users with a particular

Consultee comments	Council response	Changes proposed to SPG
		<p>emphasis on vulnerable groups. Entrances and exits must not present a hazard to road users, pedestrians and cyclists or interfere with safety and the movement of traffic. It should and also address issues of security, visual amenity and access requirements. It is important that the provision and design of car parking space is well integrated with a high quality public realm. The Park Mark standard may also be usefully referenced and applied where appropriate.</p> <p>6.30 Alternative parking layouts with specific provision for car clubs and/or accommodation of shared use vehicles will be encouraged where appropriate. Access and circulation arrangements must accommodate the needs of all users with a particular emphasis on vulnerable groups. Entrances and exits must not present a hazard to road users, pedestrians and cyclists or interfere with safety and the movement of traffic.</p>
<p>•6.5 – the 50:50 LDP modal split is referred to, but in terms of aspiration we should be seeking a 50:50 split or better</p>	<p>The Council does have an aspiration for a modal split of higher than 50% of journeys made by sustainable modes. However, the SPG is aligned with the LDP which gives the target as a 50:50 modal split. In order to be consistent with this, the SPG will refer to the 50:50.</p>	<p>N/A</p>
<p>•Table P1 – parking standards. The minimum levels of cycle parking are welcomed. However, while recognising the car parking spaces are given as a maximum and the cycle parking at a minimum, in some cases the ratio of car spaces to bike spaces seems inconsistent, and at face value should be more ambitious if we are to reach a 50:50 modal split. Currently non-central retail has a ratio of 5:1 car parking spaces to cycle spaces; central financial services 2:1 car parking spaces to cycle spaces; hospital spaces a ratio of 20:1 car parking to cycle spaces; and non-central houses with 2+ beds have a ratio of 2:1 car parking to cycle spaces. These ratios seem inconsistent with encouraging active travel and public transport over car use</p>	<p>As set out in 6.9 of the SPG, the minimum level of cycle parking provision has been calculated using an analysis of TRICS in order to provide, where appropriate by use class, sufficient cycle parking for 30% of employees to travel by bike, in line with the 50:50 modal split target and aspirations for significantly increasing trips made by cycling. The different ratios reflect the different requirements of different developments and types of journeys.</p>	<p>N/A</p>
<p>•6.17-6.23. We welcome the cycle parking standards and think they are very helpful. A couple of suggestions are, firstly, whether it could be prompted (even if not mandatory) that cycle helmet lockers be considered for provision adjacent to residential cycle parking (e.g. option 2 here for TfL: https://www.lbhf.gov.uk/sites/default/files/section_attachments/tfl_school_cycle_parking_programme_options_2016-17.pdf). In addition, a drop kerb adjacent to cycle parking allows easy entry and exit from the carriageway/cycle path. Two tier cycle racks are another option which increases cycle storage in small spaces.</p>	<p>Text amended to reference dropped kerbs and innovative approaches to cycle storage such as helmet lockers.</p>	<p>6.19 Cycle parking must be provided in a safe, secure and convenient position and also be located close to the intended destinations. Wherever possible, it should be located within the curtilage of the development. Where appropriate, dropped kerbs provided adjacent to cycle parking can aid easy access for cyclists. Stands should be visible and positioned so they do not obstruct pedestrians or people with disabilities. They should be clearly</p>

Consultee comments	Council response	Changes proposed to SPG
		<p>signposted and highlighted by defined areas, such as the use of surface changes, colour or texture. In order to maximise security, cycle parking should be prominently located in places which maximise surveillance. They should be overlooked by passers-by, well lit and, where possible, viewed by CCTV or security guards.</p> <p>6.22 Residential and long stay cycle parking must be secure and sheltered. The shelter may be in the form of accommodation within buildings, in cycle sheds or other sheltered structures and can include cycle lockers or cages located in close proximity to the main building access. For houses, where cycle parking cannot be is not specifically accommodated within individual dwellings (e.g. where garages and/or outside space are not available), appropriate alternative secure and sheltered provision should be made. Where communal cycle parking is provided, it is often better to have several small groups of stands rather than one large facility. Cycle provision should be designed into a scheme from the outset to ensure adequate provision is made available from first occupation. Reference should be made to the Cardiff Residential Design Guide and other relevant guidance. Innovative approaches to cycle storage and facilities, such as two tier storage systems and lockers for cycle helmets, are encouraged.</p>
<p>•Cardiff Council TA guidance checklist (p64). 2.1 – Include specifically NO₂ and particulate matter air pollution in the air quality section</p>	<p>Reference to NO₂ and particulate matter air pollution has been included.</p>	<p>Appendix 2 TA Guidance and Checklist</p> <p>2.1 AQMA_s, NO₂, particulate matter, air quality, noise (including from Wales Noise Mapping resource) and carbon emissions information</p>
<p>•p65 - 2.2 Explain how mixed modal transport use will be encouraged; and cycling and walking infrastructure improved. Also include details on the health impact (benefits/harms) associated with changes in travel modal share as a result of the development</p>	<p>Text included which addresses mixed modal transport use and cycling and walking infrastructure. Planning Policy Wales does not provide a policy basis for requiring a health impact assessment of modal shift.</p>	<p>Appendix 2 TA Guidance and Checklist</p> <p>2.2 Detailed assessment of public transport, walking and cycling, including:</p> <ul style="list-style-type: none"> • Existing services, capacity and patronage • Potential improvements to services/capacity • Indicative demand forecasts <p>How target modal share and patronage will be reached, to include:</p> <ul style="list-style-type: none"> • Provision of active travel infrastructure and facilities

Consultee comments	Council response	Changes proposed to SPG
		<ul style="list-style-type: none"> • Bus stop placement and walking access from 400m catchment • Journey times and trip distribution for bus and rail • Service frequencies and vehicle capacity required • On and off site bus infrastructure provision, including physical constraints e.g. corridor width, priority features • Bus provision in relation to the phasing of the development, where appropriate, including service levels at different stages and any risks to delivery • Compatibility with existing services including time tabling • Potential funding streams • Explain how mixed modal transport use will be encouraged; and cycling and walking infrastructure improved.
Shared Regulatory Services		
<p>The benefits of Guidance that considers the impacts of transportation on health and well-being, including matters such as air quality is to be applauded. We would be grateful if the World Health Organisation (WHO) reporting of noise being second only to air pollution in relation to the impact on human health could also be acknowledged and documented. WHO research states that noise is a major cause, not only of hearing loss, but also of increased stress, annoyance and sleep disturbance, leading to increased risk of heart disease, stroke, and poor mental health. With those in densely populated urban areas and many low-income communities being particularly affect by noise pollution¹.</p> <p>The SPGs highlighting of the Council's desire to develop a network of recreational routes that will allow everyone in Cardiff to gain easy access to local green spaces, and the wider coast and countryside supports the Welsh Government decision to create 'quiet areas' including those within the Cardiff agglomeration. The 'quiet areas' designated by the Welsh Government, as part of implementation of the Environmental Noise Directive (END), are deemed to 'get more noise protection under planning policy'. Therefore the recognition of green spaces ,that may overlay the designated 'quiet areas', within this SPG and the LDP enforces the Welsh Government planning and END obligations which could also be acknowledged.</p> <p>The Council's approach outlined in the LDP, and noted within this SPG, in relation to increasing the proportion of people travelling by sustainable modes with the aim of achieving a 50:50 split between car-based and walking, cycling and public transport journeys may also have a positive impact upon those areas identified by the Welsh Government as part of their obligations, under the END, to map noise across Wales ⁴. The initial Noise Maps produced in 2012 identified 220 priority areas for road noise⁵ that may be positively affected by measures implemented in relation to this SPG and the LDP.</p> <p>Acknowledgment of the influence and interaction of transportation in relation to noise pollution could be advantageous for Cardiff and neighbouring Authorities and agglomerations.</p>	<p>Reference included to the impact of transportation in relation to noise pollution. EN13 has been referenced in the document; 'quiet areas' are addressed by this policy.</p>	<p>p.8 T8 sets out the Council's desire to develop a network of recreational routes that will allow everyone in Cardiff to gain easy access to local green spaces, and the wider coast and countryside. It also accords with Planning Policy Wales which seeks to promote provision of safe accessible, convenient and well-signed walking and cycling routes and to protect and enhance the national cycle network and long-distance routes and footpaths that are important tourism and recreation facilities, both in their own right and as a means of linking other attractions and local communities.</p> <p>3.1 Through introducing new access points, and increasing flows or turning movements, new developments can potentially impact on the function of the highway. This can impact on a route for different modes of travel by:</p> <ul style="list-style-type: none"> • Making traffic queues longer at junctions • Increasing bus journey times, makes services less reliable and attractive • Reducing green time for pedestrians and cyclists at junctions and crossings • Making roads busier and less safe and attractive as places and for people cycling and walking

Consultee comments	Council response	Changes proposed to SPG
		<ul style="list-style-type: none"> Worsening air quality and noise pollution impacts. <p>3.6 Development-related trips can also impact on the 'place' function of streets. Increases in motorised traffic through residential streets can diminish their amenity and safety for walking and cycling and other activities such as children's play. These impacts potentially conflict with the sustainable neighbourhoods and modal shift objectives of the LDP, as well as contributing to air and noise pollution which are widely documented as having adverse health impacts. Transport Assessments must identify these impacts and suitable measures for mitigation.</p>
Stuart Williams		
<p>Would it also be possible to also add a cross reference in the SPG to the Health and Planning and Well-being SPG given the benefits active Travel have in relation to promoting health and well-being?</p>	<p>Reference has been added to the Health and Wellbeing SPG.</p>	<p>3.15 Increasing the number of trips made by walking and cycling will make an important contribution towards achieving the 50:50 modal split target required by the LDP, as well as providing an opportunity for promoting health and well-being. The Planning for Health SPG provides more information on this. By providing a practical alternative to the car, particularly for short trips, active travel infrastructure and other supporting measures will represent very important elements of the package of measures that the Council will seek to secure to mitigate development impacts.</p> <p>Section 8 SPG Planning for Health</p>
Mike Biddulph		
<p>Very minor comments on the Managing Transportation Impacts (Incorporating Parking Standards) SPG:</p> <p>Unusual title to the SPG. I don't think that a title should include brackets.</p> <p>The publication includes some unusual capitalisation. It is only necessary to capitalise proper nouns: eg para 3.12 it is not necessary to capitalise <i>hierarchy, movement or place</i></p>	<p>Noted.</p> <p>Capitalisation has been reviewed.</p>	<p>5.11 For residential roads streets, the general principle of the development should be in accordance with guidance in the Cardiff Residential Design Guide SPG and also informed by the expectations presented in the Liveable Design Guide¹. The detailed design will require the application of the standards and guidance as set out in Section B –</p>

¹ <https://www.cardiff.gov.uk/ENG/Your-Council/Strategies-plans-and-policies/liveable-design-guide/Pages/default.aspx>

Consultee comments	Council response	Changes proposed to SPG
<p>Figure 6.1 requires a title and the number next to it.</p> <p>The SPG list should include the Cardiff Residential Design Guide.</p> <p>"5.11 For residential <i>streets</i>, the general principle of the development should be in accordance with guidance in the <i>Cardiff Residential Design Guide SPG and also informed by the expectations presented in the Cardiff Liveable Design Guide.</i>"</p>	<p>Title added.</p> <p>Added to SPG list.</p> <p>Added, as opposite.</p>	<p>Residential Development Roads.</p>
Natural Resources Wales		
<p>There is no reference to the impact from transportation on protected sites. We therefore suggest you make reference within the SPG to one or more of the following policies from the Cardiff LDP (January 2016) and make it clear that consideration also needs to be given to the potential impacts on designated sites and the wider countryside. <input type="checkbox"/> KP18: Natural Resources <input type="checkbox"/> EN5: Designated Sites <input type="checkbox"/> EN13: Air, Noise, Light Pollution and Land Contamination</p>	<p>References to EN3, EN13 and KP18 included as recommended in the consultation response.</p>	<p>2.7 EN13 emphasises that development will not be permitted where it would cause or result in unacceptable harm to, for example, health, the quality of the countryside (see also EN3), because of air, noise, light pollution or land contamination. It also details the impact road traffic may have on levels of pollution and the effects of poor air quality on health, quality of life and amenity.</p> <p>KP18 highlights the need for development proposals to take full account of the need to minimise impacts on the city's natural resources and minimise pollution, in particular air pollution from industrial, domestic and road transportation sources and managing air quality (iii).</p>
Network Rail		
<p>Network Rail supports the provision within Policy KP6 for the possible impact new developments may have on the railway network. We also agree with the promotion Policy KP8 provides for the use of the railway network as a sustainable transport option.</p>	<p>Noted.</p>	<p>N/A</p>
<p>Section 2 of the SPG provides guidance on the requirements of Transport Assessments. Section 2.3 looks at safety considerations, there is no mention of the railway. We have concerns that developers should within this SPG be made aware that when developing near to a level crossing they should consider the potential impacts on the operation of the railway and this should be covered within their TA.</p>	<p>Reference to the railway network included under safety in the TA guidance.</p>	<p>Appendix 2</p> <p>2.3.1 The assessment should identify any significant highway safety issues and provide an analysis of the recent accident history of the study area. The extent of the safety issue considerations and accident analysis will depend on the scale of the proposed development and its location. The need to minimise conflicts between vehicles and other road-user groups, particularly vulnerable users, should be adequately addressed. Where appropriate, this should also include consideration of impacts on the railway network.</p>
<p>There are several level crossings in the plan area, any development of land which would result in a material increase or significant change in the character of traffic using a rail crossings should be refused unless, in consultation with Network Rail, it can either be demonstrated that the safety will not be compromised, or where safety is compromised serious mitigation measures would be incorporated to prevent any increased safety risk as a requirement of any permission.</p>	<p>Reference to this added to the SPG.</p>	<p>3.26 Cardiff rail network has seen a significant increase in trips and the growth is projected to continue. Policy KP6 provides for development of the rail network as required to enable new development. Policy KP8</p>

Consultee comments	Council response	Changes proposed to SPG
		<p>highlights the need for developments to be integrated with transport infrastructure and services. Development can impact on the railway network by contributing to the ongoing growth in the number of journeys undertaken on the network but also, for example, through an increase in traffic using level crossings. Where TAs and other relevant information provides evidence of impacts, appropriate mitigation will be sought, particularly where safety may be compromised.</p>
<p>Network Rail has a strong policy to guide and improve its management of level crossings, which aims to; reduce risk at level crossings, reduce the number and types of level crossings, ensure level crossings are fit for purpose, ensure Network Rail works with users / stakeholders and supports enforcement initiatives. Without significant consultation with Network Rail and if proved as required, approved mitigation measures, Network Rail would be extremely concerned by the impact any future development would have on the safety and operation of these level crossings. The safety of the operational railway and of those crossing it is of the highest importance to Network Rail.</p>	<p>Addressed as above.</p>	
<p>Councils are urged to take the view that level crossings can be impacted in a variety of ways by planning proposals:</p> <ul style="list-style-type: none"> • By a proposal being directly next to a level crossing • By the cumulative effect of development added over time • By the type of crossing involved • By the construction of large developments (commercial and residential) where road access to and from site includes a level crossing • By developments that might impede pedestrians ability to hear approaching trains • By proposals that may interfere with pedestrian and vehicle users' ability to see level crossing warning signs • By any developments for schools, colleges or nurseries where minors in numbers may be using a level crossing. 	<p>Addressed as above.</p>	
<p>It is Network Rail's and indeed the Office of Rail and Road's (ORR) policy to reduce risk at level crossings not to increase risk. The ORR, in their policy, hold Network Rail accountable under the Management of Health and Safety at Work Regulations 1999, and that risk control should, where practicable, be achieved through the elimination of level crossings in favour of bridges or diversions.</p>	<p>Noted.</p>	
<p>The Council have a statutory responsibility under planning legislation to consult the statutory rail undertaker where a proposal for development is likely to result in a material increase in the rail volume or a material change in the character of traffic using a level crossing over a railway:- <i>(Schedule 4 (d)(ii) of the Town & Country Planning (Development Management Procedure) (Wales) order, 2012) requires that the Council should consult the network operator (Network Rail) and the Welsh Ministers... where a proposed development is likely to result in a material increase in the volume or a material change in the character of traffic using a level crossing over the railway".</i></p>	<p>Noted.</p>	
<p>We would appreciate the Council's providing Network Rail with an opportunity to comment on any future planning policy documents as we may have more specific comments to make (further to those above). We</p>	<p>Noted.</p>	

Consultee comments	Council response	Changes proposed to SPG
look forward to continuing to work with you to maintain consistency between local and rail network planning strategy.		
North West Cardiff Group		
<p>1. One of Cardiff's problems is that each evening most residential estates suffer from their access roads being littered by parked cars that are left on the highway by residents because of an absence of adequate levels of off-street parking. This makes finding a space by visitors almost impossible and restricts the ease of access by the emergency services. Your document contains 20 pages (21 to 41) of your draft proposals, but in our opinion these will not lead to any future improvement in the situation just described.</p> <p>Whilst there is nothing wrong with the Council's LDP policy to try to achieve a 50:50 modal shift away from using the car to travel to work, the members of this group do not believe this will ever be achieved. Irrespective of whether or not this policy does succeed, it will not prevent residents from purchasing cars, if only for other purposes than commuting. Restricting the number of residential parking spaces will also have no influence on this situation. Most families now own more than one car. All these vehicles deserve a domestic off-street parking space unless the city is to become even more cluttered with parked cars every evening..</p> <p>Back in 2007 this problem was recognised by CSS Wales (County Surveyors Society Wales). A group of parking experts was assembled to produce a comprehensive set of parking standards for the whole of Wales, the result of which was the publication in 2008 of the <i>Wales Parking Standards</i>. This document introduced the concept of zoning for the first time, which has proved very successful.</p> <p>Since that date all the members of CSS Wales except for Anglesey, Cardiff and Gwynedd have adopted this document as their policy. It is also known to be in use elsewhere. As a member of CSS Wales, it seems odd that Cardiff Council does not want to take advantage of the rather more sophisticated advice that is available to it through use of the CSS document. Producing something vaguely similar, as you have, but which lacks the expertise that was put into the CSS document is just a waste of valuable resources.</p> <p>For these reasons we respectfully suggest that Cardiff should also use the 2014 update of the <i>Wales Parking Standards</i> in this SPG. You can find a copy of it on the website of Caerphilly CBC at http://www.caerphilly.gov.uk/CaerphillyDocs/Planning/LDP5-car-parking-standards.aspx</p>	<p>The CSS Wales Parking Standards 2014 document states: "The scale of parking provision varies throughout Wales and local priorities will dictate the manner in which the standards are used (6.1)". The parking standards which are outlined in the draft SPG are Cardiff specific and are aligned with the policies set out in the LDP and Planning Policy Wales, which form the basis of Cardiff's policy to limit parking spaces in line with the provision of alternatives modes of travel which will be secured through the development process. For the strategic sites, the process of master planning will also ensure that appropriate on and off site links are provided. This will help to minimize the need to travel and internalize trips within sites, ensuring that provision of active and sustainable travel is attractive and high quality. Although not a material consideration for the Parking Standards, limiting the provision of parking should also result in saving developable land.</p>	<p>N/A</p>
<p>2. On page 20 you refer to the <i>Manual for Construction of Highway Works Volume 3 Highway Construction Details</i> and on page 58 the <i>Design Manual for Roads and Bridges</i> is mentioned. Neither of these manuals are listed within your List of Useful Publications on page 47 however.</p>	<p>Added to Useful Publications</p>	<p>Other Publications <i>Manual for Construction of Highway Works Volume 3 Highway Construction Details 2008</i> <i>Design Manual for Roads and Bridges 2017</i></p>
<p>3. On page 41 a standard parking bay is shown to be 4.8m x 2.4m. Notwithstanding the inclusion of a similarly sized bay in <i>Manual for Streets</i>, in deference to the ever increasing widths of many types of car, the <i>Wales Parking Standards 2014</i> specify a standard parking bay to be 4.8m x 2.6m.</p>	<p>The recommended parking bay size has been amended and is now given as 5.0m x 2.5m.</p>	<p>N/A</p>
<p>4. On page 24 at 6.15 you state that "garages are not counted with the parking provision for residences", which is strange as the dictionary definition of the word 'garage' is a building or shed for storage of motor vehicle(s). Providing they are of specified sizes, they are counted as parking spaces within the <i>Wales Parking Standards 2014</i> and when provided for a disabled user a greater width is specified to enable access. A difficulty can arise when a resident decides to alter the use of a garage</p>	<p>Please see above regarding garages. Garages are not counted as parking spaces. In relation to disabled people, where residential developments require specific provision for disabled people (for example, housing provided</p>	<p>N/A</p>

Consultee comments	Council response	Changes proposed to SPG
<p>to some other domestic use because a parking space is then lost. This can be controlled however by use of a standard planning condition to prevent such a conversion.</p>	<p>by a Housing Association), specific parking provision will be required.</p>	
<p>5. Another difficulty is caused when a front garden is paved over in order to provide off-street parking. Although this helps to de-litter the highway, it removes a planted area and increases storm water run-off, which contributes to flooding. Again this could be avoided through use of a standard planning condition to prevent it.</p>	<p>The control over conversion of front gardens to hardstanding is through the planning system. The Town and Country Planning (General Permitted Development) (Amendment) (Wales) Order 2013 grants permission for front gardens to be converted into a hard stand without seeking permission from the council, subject to the following limitation :</p> <ul style="list-style-type: none"> • <i>is not within the curtilage of a listed building</i> • <i>The hardstanding must be: porous or permeable; or (ii) provided to direct run-off water from the hard surface to a porous or permeable area or surface within the curtilage of the dwellinghouse;</i> • <i>Where permitted development rights have been removed e.g conservation areas with Article 4 directions.</i> 	<p>N/A</p>
<p>6. It is disappointing that making provision for the Metro when it is built has not been given more prominence in the document.</p>	<p>The Metro is being delivered by Welsh Government and the Council are working closely with WG to support delivery. The LDP is clear that it should be ensured development should not prejudice the future delivery of the Metro by keeping free land required for the project once land requirements are known. LDP Policy T9 'Cardiff City Region 'Metro' Network' is one of the key policies which underpins the SPG. It states: "Where the alignment of a future route which is likely to form part of a 'Metro' network falls within any part of a development site, the Council will, through the development management process, seek either to secure provision of the necessary infrastructure as part of the development, or otherwise, safeguard the land and space required to accommodate the route and potential mode options in the future. This will include requiring a development to be designed in a way which does not prejudice the future</p>	<p>N/A</p>

Consultee comments	Council response	Changes proposed to SPG
	development of the 'Metro' route and would enable it to be incorporated within the development at a later date".	
7. We would also welcome the inclusion of guidance and in particular the requirements for developers to take account of the present utilisation of already available means of transport in preparing their Transport Assessments. Developers should be required to resubmit realistic Transport Assessments based on this guidance and the S.106 transport levies based on these should be at appropriately increased levels.	Data on current travel patterns and modal split are required by the Council through TAs to establish current demand.	N/A
8. A standard planning condition should be devised to make developers responsible for the transport predictions put forward in any Transport Assessment and to make them liable for any shortcomings that may become apparent during the period they are required to predict.	It is not possible to use a planning condition of this nature. The planning system does, however, offer other mechanisms to address impacts such as controlling the build out of developments. Cardiff Council uses the S106 process to ensure that mitigation is brought about in a timely manner.	
St. Fagans Community Council		
<p>I refer to your email received on 9th November inviting comments on the above document. I have been asked to submit the following comments on behalf of this Council.</p> <p>St Fagans Community Council is a member of the NWCG and fully supports the comments made by that Group.</p> <p>The Council fully supports the ambition to achieve a 50:50 modal split but Members are disappointed in the SPG and believe that Cardiff is adopting a fundamentally flawed approach to transport planning.</p>	Noted.	N/A
<p>For example, Figure 1 Manual for Streets User Hierarchy requires developers/planners to "Consider First" Pedestrians, followed by Cyclists, Public Transport, Special Service Vehicles (including emergency vehicles) to "Consider Last" Other Motorised traffic.</p> <p>Members believe that it is irresponsible for emergency vehicle access to be given such low priority. This should be one of the first things to be considered and planned for.</p>	<p>Provision will be made for the requirements of emergency vehicles. This is explicitly set out in Manual for Streets, for example:</p> <p>"The hierarchy is not meant to be rigidly applied and does not necessarily mean that it is always more important to provide for pedestrians than it is for the other modes. However, they should at least be considered first, followed by consideration for the others in the order given. This helps ensure that the street will serve all of its users in a balanced way" (3.6.9).</p> <p>"The requirements for emergency vehicles are generally dictated by those for large fire appliances. Providing for these will cater for police vehicles and ambulances. The requirements for access by the Fire Service are specified in Building Regulations, and</p>	N/A

Consultee comments	Council response	Changes proposed to SPG
	<p>additional information can be provided by the Association of Chief Fire Officers (Manual for Streets summary)".</p> <p>"<i>Network Management Duties Guidance</i> published by the Department for Transport in November 2004 (<i>Wales</i>: guidance published November 2006). This states that it is for the authority to decide the levels of priority given to different road users on each road, for example, particular routes may be defined as being important to the response times of the emergency services (2.4.7)".</p>	
<p>Vectos, the developer's transport consultants were persistent in telling us (in documents and during the LDP hearings) that it was not their task to make life easier for car drivers. We cannot recall anyone asking for this. Their insistence on this point is simply a way of avoiding dealing with a difficult issue. We can expect this of developers and their consultants.</p> <p>Unfortunately, Cardiff seems to be adopting the Vectos approach by stating that "Other Motorised traffic" is to be "Considered Last". Car ownership and use is a fact of life. It is why we have congestion! People will not stop owning and using cars just because Vectos – and Cardiff Council – choose to ignore the impact of several thousand extra cars!</p> <p>St Fagans Council believes that car use should be Considered First. Not to make life easier for the motorist, but to require serious examination of how the 50:50 modal split can be achieved. Transport proposals for the roads around the strategic sites are limited to changes to junctions, bus lanes along part of key routes and a few extra bus services. These are wholly inadequate to deliver improvements to the modal split; if anything, the situation will get worse as many supposed enhancements will not happen until occupancy has started (and "bad habits" become embedded at the start).</p> <p>Cardiff's solution to the congestion problems seems to be to make life difficult for the motorist in the hope that people will give up their cars. Cardiff Council has recently discussed the gridlock afflicting the roads. People have not yet given up their cars – the rush "hour" is just getting longer. Where is the evidence to suggest that this solution will suddenly start to work?</p>	<p>The Council's position on sustainable transport and the rationale for this are set out in Policy KP8 in the LDP.</p>	<p>N/A</p>
<p>In addition to gridlock Cardiff is now allowing developments that limit the number of parking spaces available. This is not new but we the policy is clearly ineffective. There are already estates in Cardiff where cars are parked on both sides of the road because residents have no option but to leave their vehicles on roads due to inadequate off-road parking. This is potentially dangerous as visibility is often affected and the actual space available for cars on the road is narrow. Very often cars are parked partly on the pavement causing difficulties for pedestrians, particularly those with prams/pushchairs or wheelchairs. (Is this a pedestrian issue to be "Considered First"?). Where is the evidence that this has persuaded anyone to give up their car?</p>	<p>The LDP clearly outlines the requirement for high quality, sustainable design and measures to give priority to pedestrians and cyclists. Inconsiderate and illegal parking can often be prevented through appropriate design.</p>	<p>N/A</p>
<p>Members strongly support the request from NWCG that Cardiff adopt the latest version of the <i>Wales Parking Standards</i> which was published in 2014.</p>	<p>Please see above with regard to the Wales Parking Standards.</p>	<p>N/A</p>

Consultee comments	Council response	Changes proposed to SPG
Members ask that these matters be given serious consideration before the SPG is finalised.		
Pentyrch Community Council		
<p>One of Cardiff's problems is that each evening most residential estates are congested by parked cars on the highway because residents do not have adequate off-street parking. This makes finding a space by visitors almost impossible and restricts the ease of access by the emergency services. Your document contains 20 pages (21 to 41) of your draft proposals but, in our opinion, these will not help ease this congestion.</p> <p>We support the Council's LDP policy of a 50:50 modal shift away from using cars, although we have real concerns about whether this can be achieved across the city without a modern public transport system, such as the Metro. The reality now is that most families own more than one car. All these vehicles need off-street parking unless the city is to become even more cluttered with parked cars.</p> <p>Back in 2007 this problem was recognised by CSS Wales (County Surveyors Society Wales). A group of parking experts was assembled to produce a comprehensive set of parking standards for the whole of Wales, the result of which was the publication in 2008 of the <i>Wales Parking Standards</i>. This document introduced the concept of zoning for the first time, which has proved very successful.</p> <p>Since that date all the members of CSS Wales except for Anglesey, Cardiff and Gwynedd have adopted this document as their policy. It is also known to be in use elsewhere. As a member of CSS Wales, Cardiff Council should be happy to use this documentation, rather than producing something vaguely similar but which lacks the expertise that was put into the CSS document.</p> <p>For these reasons we ask that Cardiff adopt the most recent version of the <i>Wales Parking Standards</i> which was published in 2014.</p>	Please see above with regard to the Wales Parking Standards.	N/A
On page 41 a standard parking bay is shown to be 4.8m x 2.4m. Notwithstanding the inclusion of a similarly sized bay in <i>Manual for Streets</i> , in recognition of the increasing widths of many cars, the <i>Wales Parking Standards 2014</i> specify a standard parking bay to be 4.8m x 2.6m.	The garage size has been amended, as above.	N/A
We are disappointed that making provision for the Metro is not given more prominence in the document. This new system is vital for bring Cardiff's transport network up to C21 standards. We understand that the Metro will comprise a mix of travel choices but in a city where roads area congested now buses should be a part of and not a substitute for C21 travel such as a light-rail system	As addressed above, the Metro is being planned and delivered by Welsh Government.	N/A
We welcome the guidance, and in particular the requirement, for developers to take account of the present use of available transport in providing their transport plans. We ask that developers are required to resubmit realistic transport assessments based on this guidance and to increase transport levies on developers based on these more realistic resubmissions.	Please see comments above.	N/A
Cardiff is our capital city and deserves a level of investment in infrastructure that really makes it a European city. It does not deserve a mix and match system of disparate routes and modes of transport which are a botched version of a C21 regional Metro. We hope you will consider our comments.	Noted.	N/A