

## **CARDIFF RLDP CONSULTATION COMMENTS ON CANDIDATE SITE 23 PLAS DWR UCHAF**

### **From: Radyr and Morganstown Local Development Group**

1. "Plas Dwr Uchaf" is a 144-hectare site on which is proposed a residential-led mixed use development.
2. There is no need for the allocation of this site - or any other - for housing as reserve sites. The Council's RLDP Option B is amongst the highest of the growth strategies that the Council has considered. Table 2 (page 24 of Edge Analytics Demographics study - October 2021 Technical Report: LDP Consultation Supporting Documents) indicates that there are three scenarios (High, Principal and Low) based upon the Welsh Government's 2018 population projections. The Principal scenario would lead to a growth of population of 17,194 and an average annual number of new dwellings of 898. Population growth in the strategy selected by Cardiff Council ("Option B") is more than double the Welsh Government Principal forecast, yet there is no rationale to justify this.
3. Paragraph 5.34 of the Development Plans Manual (2020) states that "in terms of considering the level of housing provision for a plan, the most up-to-date suite of Welsh Government Population and Household Projections are a fundamental part of the evidence base." Guidance states that Cardiff Council should have used the Welsh Government 2018 projections as the starting point for setting levels of growth in the RLDP. Any departure from these figures should be fully justified by demonstrable evidence. The Preferred Strategy, however, fails to provide any such demonstrable evidence.
4. Our primary observation on the site is that it does not conform to the Preferred Strategy as it is situated within an area designated as "countryside to be protected and enhanced".
5. Site 23 is crossed by a number of public footpaths and is used as a piece of informal open space by local residents. It provides an important piece of countryside which, as the Preferred Strategy acknowledges (paragraph 10.93) is a "valuable and finite resource which is under pressure from all kinds of development due to its proximity to the urban area.... Cardiff's countryside is particularly vulnerable to the cumulative impact of new developments that may harm its character and appearance."
6. We strongly object to the further destruction of North West Cardiff's green spaces. Huge areas have already been destroyed with the construction of Plas Dwr and other strategic sites near to Creigiau, despite Cardiff's "stronger, fairer, greener" policy and the "One Planet Cardiff" policy.
7. The site contains an important Site of Special Scientific Interest (SSSI) at Ty Du Moor. This SSSI is one of the best remaining examples of marshy grassland in the Cardiff area, consisting of a series of wet low-lying fields alongside the Nant Dowlais brook. Marshy grassland is now a rare habitat in Britain, and we have a special responsibility for its conservation. The marshy grassland contains a wide variety of marshland plants including many rare species. Also of special interest is the significant population of rare broad-leaved cotton grass, which is declining throughout Britain due to the loss of suitable marshy grassland habitat.

8. Moreover, there are also many Sites of Importance for Nature Conservation (SINC) situated in Site 23, including important marshland and wet meadows, and ancient woodlands. These include SINC's at Nant Rhydlafer (120), Nant Dowlais (112), Coed Y Glyn (38), The former Llantrisant Branch Line (67) and Ty Du Marsh (171). At present Nant Rhydlafer and Nant Dowlais streams are a clean water supply for the SSSI. Protected species in and around this area include Horseshoe Bats, Barn owls and Great Crested Newts. Development within 500 metres of the breeding site of Great Crested Newts would be very harmful to this species which is protected under UK Legislation.
9. It is inconceivable that the SSSI at Ty Du Moor could simply be ring-fenced within a housing development as it is an area of low-lying wetland, fed by surrounding streams, existing within an established ecosystem that extends beyond the strict boundaries of the SSSI.
10. The site is several miles from Radyr Station and from the proposed Plas Dwr Gorllewin Station on the proposed Crossrail Metro Line. Given the extensive developments proposed in the current LDP Strategic Sites to the north west of Cardiff (circa 8,000 houses in total). Strategic Policies SP16 and SP17 of the LDP are weak. We fully understand the Council's Transport White Paper (TWP), but it is now four years out of date and only contains vague cost estimates. It is difficult for even an optimist to see that much of the proposed Cardiff Crossrail tram-train line will be complete - or even started - by 2035 (The White Paper states that it will be complete by 2030). In the White Paper's own words, the "new communities in the west of the city.... are currently poorly served by public transport" yet the PS does nothing to improve this situation. Current estimates of railway line building and rebuilding from other parts of the UK (and the costs of the link from Cardiff Central to the Bay) would suggest that the 8 miles from Fairwater to Creigiau would exceed £1 billion at current prices.
11. Improvements to the Core Valley Lines from Radyr from 2024 will help a little and the increase in daily seats from approximately 15,000 to 32,000 is to be welcomed but many off these will be occupied by passengers from north of Cardiff.
12. The proposals to improve the level of active travel ignore the hilly topography and lack of pavements in North West Cardiff and the access of this site to the railway lines. The improvement of bus services in the North West Corridor via priority measures is important but we have seen no proposals to date which indicate how bus times will be improved through current bottlenecks of Llandaff Village and Cathedral Road.
13. The current developments close to this site have exposed significant problems with major infrastructure, such as sewage disposal and surface water drainage, and the proposed solutions make no provision for any future expansion in this area.
14. **Summary:** we object to this Candidate Site on the grounds that it is located within "countryside to be protected and enhanced", the RLDP does not need it to meet its growth strategy, there is no prospect of sufficient infrastructure to support it and its development would further undermine the 50:50 modal transport split.

Radyr and Morganstown Local Development Group  
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