

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 greenfield site on which is proposed a residential-led mixed use development.
2. We agree with the assessment that this site should NOT be included in the Deposit Plan.
3. Our primary observation on the site is that it does not conform to the Deposit Plan's Strategic Policy SP17 as it is situated outside the settlement boundary and within an area designated as "countryside to be protected and enhanced".
4. There is no need for the allocation of this site - or any other - for housing as reserve sites. The Deposit Plan shows that over 1,500 houses planned for the Plas Dwr Strategic Site will not be completed by the end of Plan period in 2036. Therefore, if further land is needed, this land already allocated at Plas Dwr should be given priority.
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 SINCs at Nant Rhydlafar (120), Nant Dowlais (112), Coed Y Glyn (38), the former Llantrisant Branch Line (67) and Ty Du Marsh (171). At present Nant Rhydlafar 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. We fully understand the Council's Transport White Paper (TWP), but it is now five 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 Deposit Plan does nothing to improve this situation.
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 of 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 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 protected countryside outside the settlement boundary, the Deposit Plan does not need it to meet its growth strategy, and there is no prospect of sufficient infrastructure to support it. It should therefore be excluded from the Deposit Plan.

Radyr and Morganstown Local Development Group
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