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Members of the Senedd

Caerdydd Ffynnon Taf

Planning Department

Cardiff Council

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Cardiff

CF10 4UW

Dyddiad | Date: 26 May 2026

Annwyl / Dear Planning Officer,

RE: Formal Objection to Planning Application 26/00109/HYB

We are writing to formally object to the above hybrid planning application submitted by Curtis Hall Limited, seeking permission to demolish the existing Cardiff East Park and Ride facility at Eastern Avenue, Llanrumney, and redevelop the site to provide a data centre campus comprising three data centres, an associated energy centre, onsite substation, and ancillary buildings across approximately 40 acres of land.

We understand that the consultation period for this application has now ended but we represent residents and community stakeholders in the Llanrumney, Pentwyn, and wider east Cardiff area who are directly and materially affected by these proposals. Following a recent community meeting and representations from concerned constituents as the newly elected Members of the Senedd for Caerdydd Ffynnon Taf we are contacting you to request that Cardiff Council refuse this application for the substantive planning reasons set out below.

1. Loss of Vital Transport Infrastructure and Public Access to Healthcare

The Cardiff East Park and Ride facility serves as a critical transport link for patients, visitors, and staff accessing the University Hospital of Wales. The removal of this facility without a confirmed, operationally equivalent replacement constitutes a direct conflict with national and local transport planning policy.

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Relevant planning policy grounds:

- Future Wales — The National Plan 2040, Policy 9 (Sustainable Transport): Developments must support sustainable transport principles and not undermine existing public transport infrastructure.
- Cardiff Local Development Plan (LDP) 2006–2026, Policy T1 (Sustainable Transport Infrastructure): Proposals that remove or diminish the effectiveness of existing transport infrastructure serving a strategic function will not be permitted unless equivalent replacement provision is secured in advance.
- Planning Policy Wales (PPW), Edition 12, Chapter 5 (Distinctive and Natural Places): Decision-makers must consider the cumulative impact of development on communities' ability to access essential services, including health facilities.

Cardiff Council has acknowledged in its own correspondence appended to the pre-application consultation report that an alternative park and ride site has not yet been identified. Approval of this application before a replacement is secured and operational would be premature and contrary to policy.

2. Environmental and Ecological Impact

The site contains two designated areas of Ancient Woodland, TPO (Tree Preservation Order) trees, and lies within the River Rhymney river corridor — a sensitive ecological zone. The proposed development would result in the loss and fragmentation of irreplaceable habitat, in direct conflict with national and local environmental policy.

- Planning Policy Wales (PPW), Edition 12, Section 6.4.3: Ancient Woodland is an irreplaceable habitat. Development that would result in the loss or deterioration of ancient woodland should be refused unless there are wholly exceptional reasons and a suitable compensation strategy exists.
- TAN 8: Renewable and Low Carbon Energy; TAN 15 (2024): Development within or adjacent to flood-risk areas and river corridors must demonstrate that risks are adequately mitigated. The northern part of the site lies within an area of high flood risk from rivers.
- Environment (Wales) Act 2016, Section 6 Duty: All public bodies, including planning authorities, must seek to maintain and enhance biodiversity. Approval of development causing net habitat loss would be contrary to this statutory duty.
- Cardiff LDP Policy EN3 (Nature Conservation): Development that causes unacceptable harm to designated ecological sites or protected species will be refused.

3. Severe Strain on Local Infrastructure — Power, Water, and Grid Capacity

Data centres are among the most energy- and water-intensive land uses in existence. A campus of the scale proposed — comprising three data halls with associated substations and an energy centre — will place extraordinary demands on the local electricity grid, water supply networks, and drainage infrastructure.

- PPW Edition 12, Policy 24 (Infrastructure and Services): Proposals must demonstrate that they will not overburden existing utility and infrastructure networks without adequate mitigation

and prior upgrade. The applicant must provide a full utility capacity assessment covering electricity grid connection, water abstraction and wastewater discharge.

- Cardiff LDP Policy EN6 / Infrastructure Delivery Plan: Developers must satisfy the LPA that adequate infrastructure capacity exists or will be in place to support the development prior to commencement.
- Dwr Cymru consultation: We urge the Council to require a full hydraulic capacity assessment from Dwr Cymru prior to determination, covering the impact on local supply and distribution networks.

We contend that the application as submitted does not contain sufficient evidence that the grid and water infrastructure required to support this development can be delivered without detriment to the surrounding area.

4. Noise and Disturbance — 24/7 Industrial Operation in a Residential Context

Data centres operate continuously, 24 hours a day, seven days a week. The constant mechanical noise generated by large-scale cooling systems, generators, and energy infrastructure would have a material and unacceptable impact on the amenity of residents in Llanrumney and the surrounding communities.

- PPW Edition 12, Section 5.9 (Noise): Development that would cause an unacceptable impact on residential amenity as a result of noise should be refused. The LPA must have full regard to the proximity of noise-sensitive receptors, including homes, schools, and healthcare facilities.
- TAN 11: Noise: Requires that noise impact assessments are conducted to BS4142 and BS8233 standards. We request confirmation that a comprehensive noise impact assessment covering operational noise (fans, cooling towers, back-up generators, HGV servicing) has been provided and independently verified.
- Cardiff LDP Policy KP5 / General Development Control Policy: Development that would have an unacceptable impact on the amenity of adjoining residential occupiers — particularly at night — will not be permitted.

5. Traffic and Highway Safety

The construction phase alone will generate significant and sustained heavy goods vehicle movements on the local road network, including the A48 Eastern Avenue — an already heavily congested corridor. The long-term operational phase will similarly generate employment-related traffic and servicing vehicles on a 24-hour basis.

- PPW Edition 12, Policy 36 (Managing Traffic Impacts): Development generating significant traffic must demonstrate that the highway network has the capacity to accommodate additional movements without detriment to highway safety or the free flow of traffic.
- Cardiff LDP Policy T1 and T2 (Transport Assessments and Travel Plans): A full Transport Assessment and Construction Traffic Management Plan must be submitted, assessed, and approved before the application is determined.
- The proposed new roundabout and river bridge, while providing some improvement to east Cardiff connectivity, does not mitigate the impact of additional HGV and construction traffic on

local residential roads including those in Llanrumney, particularly given the proximity to residential streets with restricted width and capacity.

6. Scale and Appropriateness of the Development for This Location

The proposed data centre campus represents a significant industrial-scale development of approximately 40 acres in close proximity to established residential communities. The scale and industrial character of the proposal is wholly out of keeping with the surrounding area and the original purpose of this site as public transport infrastructure.

- Cardiff LDP Adopted Proposals Map: The site is not allocated for data centre, industrial, or employment use in the adopted Local Development Plan. The applicant has not demonstrated that the exceptional case for departing from the development plan has been made out.
- Planning and Compulsory Purchase Act 2004, Section 38(6): Decisions must be made in accordance with the development plan unless material considerations indicate otherwise. In this case, no allocations or policies support this quantum of industrial-type development in this location.
- Future Wales — Policy 5 (Distinctive and Natural Places): Major development must be designed sensitively to respect local character and avoid overwhelming existing communities. A data centre campus of this scale fails this test.

We note that alternative brownfield locations — including former industrial sites and commercial parks within Cardiff and the wider South Wales region — have not been demonstrably ruled out. The applicant has not provided an adequate sequential site assessment justifying the selection of this specific location over less sensitive alternatives.

7. Loss of Green Space and Public Recreation Land

Beyond the hard-surfaced car park, the wider site contains areas of publicly accessible woodland, grassland, and informal footpaths, as well as sections of the Rhymney Trail — a key active travel and recreation route. The loss of this green and semi-natural land represents a direct detriment to the health, wellbeing, and quality of life of nearby communities.

- PPW Edition 12, Chapter 5 (Well-Being and Communities): All development must contribute positively to health and wellbeing. The loss of publicly accessible green and recreation space in an area of high deprivation and limited green infrastructure is contrary to this requirement.
- Cardiff LDP Policy C1 and Green Infrastructure Policy: The Council must protect and enhance its network of green spaces. Development that results in the net loss of accessible open space or green infrastructure will be resisted.
- Active Travel (Wales) Act 2013: Any reduction in the usability or extent of the Rhymney Trail and associated active travel infrastructure must be treated as a significant material consideration weighing against the application.

Conclusion

For the reasons set out above, we submit that planning application 26/00109/HYB should be refused on the following material grounds:

- Premature removal of essential transport infrastructure serving Wales' largest hospital, without a confirmed replacement;
- Unacceptable harm to Ancient Woodland, TPO trees, and the River Rhymney ecological corridor;
- Inadequate evidence that electricity grid, water, and drainage infrastructure can support the development;
- Unacceptable noise impact from 24/7 industrial operations on nearby residential properties and healthcare facilities;
- Significant highway and traffic safety impacts during both construction and operation;
- A development of inappropriate scale and character contrary to the development plan and national planning policy;
- Loss of publicly accessible green space and active travel infrastructure.

We understand that this application will shortly be determined by the Planning Committee and if there is any further feedback that you think will be of assistance in the meantime or if you would like to meet to discuss further, please get in touch.

Yours sincerely / Yn gywir,

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