

**P-05-1069 Save the farmland and green fields at Cosmeston, Correspondence –
Petitioner to Committee, 06.12.20**

**P-05-1069 Response to Petitions Committee Meeting: Tuesday 15th December
by Michael Philip Garland on behalf of the Keep Cosmeston Green Group and the residents
of Cosmeston, Penarth, Sully and surrounding areas.**

To: The Petitions Committee.

I would like to thank the Petitions Committee for allowing myself the chance to respond to the letter of Rebecca Evans MS, Minister of Finance, and respond regarding the Petition Statement.

Response to the letter of Rebecca Evans MS Minister of Finance.

This has been the general response that has been received on many previous occasions by residents from Welsh Government, i.e., the need for houses, and, that it is for the Vale of Glamorgan Council to determine the application.

Response regarding the Petition Statement.

The petition to “Save the farmland and green fields at Cosmeston” has received support not just from residents in the locality, but from across Wales and beyond who are concerned about the large amount of development in this area and the removal of our natural coastal farmland, being replaced by a large housing development and schools, with little or no infrastructure to sustain it.

The development being proposed by the Welsh Government appears contrary to many of the Welsh Government policies in regard to Environmental and Climate Change, (such as Environmental Strategy for Wales, Welsh Government Sustainable Policy, Environmental Growth Plan for Wales, Environment & Climate Change Planning and Strategy, Environmental Principles & Governance in Wales, Woodlands for Wales Strategy), and the Well-being of Future Generations (Wales) Act 2015.

Therefore, I would like to make the following observations in regard to the development application

1. Procedural fairness.

Residents feel that the submission of this planning application on 23rd October 2020, especially the same day that the 17 day “Firebreak Lockdown” was introduced, was a deliberate act. Neighbours letters only arrived 7 days after the consultation period begun. As a result of the restrictions There has been an inability to discuss the matter with the public or hold public meetings, to leaflet residents or to view the voluminous plans and reports, except on-line. Circumstances have made it very difficult for people to have a meaningful input in the planning process within the 21-day consultation period.

2. The Vale of Glamorgan Council may have predetermined the application.

Residents feel that the Council (VoGC) have pre-determined the application and therefore cannot assess this application objectively, since the Welsh Government are providing it with land to build a two-form entry primary school for 450 pupils. In addition, proposals have already been drawn up by VoGC to build a Special Educational Needs Annex for Ysgol Y Deri School to the south of this site, with a principled agreement already reached by both parties in regard to the cost of the school, with the Welsh Government providing £8.25m of the £11m cost, dependent on planning permission being obtained.

3. The application does not conform with the adopted Vale of Glamorgan Council Local Development Plan 2017 (LDP).

The application site is larger than the area allocated for that purpose in the Vale of Glamorgan Local Development Plan 2017 (LDP). The scale of the proposed development significantly exceeds the threshold of 150 dwellings or 6ha requiring a call-in by Welsh Government.

This extension of the proposed development encroaches even further into the Green Wedge identified in the LDP and will lead to “infilling”/ “rounding-off” by future housing development, thus further eroding the Green Wedge leading to coalescence with Sully, even more so if the site is further extended by the Ysgol Y Deri Annex. The extension at the south east corner of this ‘greenfield’ site involves the demolition of Lower Cosmeston Farmhouse and farm buildings which form part of an agricultural holding.

This is in direct conflict with Policy MG18, which seeks to prevent the coalescence of settlements and to retain the openness of land. The policy states that within these areas development which prejudices the open nature of the land will not be permitted. Clearly, 576 dwellings, including a number of high-rise blocks and a school conflicts with this policy.

4. There is a lack of adequate transport/highway infrastructure.

This, together with inadequate public transport services is already leading to significant traffic congestion and consequent air pollution in the locality, surrounding areas and along routes to Cardiff and the M4 Motorway. This unsatisfactory situation will only be exacerbated by this development taken together with the housing developments in Barry, Sully and Landau, which have not been taken into account in traffic assessments. The assessments are therefore misleading, under-estimating traffic volumes and failing to correctly assess the impact of the development on the Merrie Harrier and Baron's Court junctions despite a requirement by the local highways authority to do so.

While the site is close to a bus stop, a specialised restaurant and a private member's golf club, these services and facilities alone are not enough to make the development "sustainable". Many of the essential health services and facilities are further than the maximum permitted walking distance of 2km, which would be by way of the unlit Coastal Footpath and an unlit footpath/cycle track to Penarth, This, plus the use of inadequate public transport would result in more reliance on the motor vehicle for access to basic services.

Examples of actual travel distances to services and facilities

- Penarth Railway Station (2.5km),
- Penarth Town Centre (2.9km).
- Nursery Schools – St Aubin Nursery (2.1km), Bute Cottage Nursery (2.8km), Sully Nursery (3.2km), Cogan Nursery (4.1km).
- Secondary Schools – Stanwell School (2.6km), Westbourne School (2.6km).
- GP Surgeries – Penarth Health Partnership (2.5km), Sully Surgery (3km).
- Dentist Surgeries – Penarth Town Centre Area (2.7km).
- Mainstream Supermarkets are on the extreme northern boundary of Penarth (4.5km).
- Sully Library (2.3km) and Penarth Library (2.7km).

on the motor vehicle for access to basic services.

The train service to Cardiff is unreliable with too few carriages or short notice cancellations.

5. The proposed development would have wide effects beyond the immediate locality.

Residents of the Vale of Glamorgan who travel to the capital city by car or bus for employment, shopping or entertainment purposes are obliged to use one of three bridges across the Ely River. This is acknowledged by all responsible authorities as a major problem that does not have a solution at the present time.

Existing traffic flows through Penarth and Dinas Powys to the extremely busy Merrie Harrier junction which feeds two of the bridges. Traffic flows at the junction are already being increased as a result of the construction of the first phase of the 250-dwelling development at Cog Road, Sully, and by developments at Barry Waterfront and Llandough, without any mitigation measures in place. The proposed development would further exacerbate this problem and, while the supporting documentation suggests that prospective residents would be encouraged to walk and cycle to Penarth Station, it is inevitable that car and bus users from the Vale as a whole would experience even longer delays as a result of additional traffic movements generated by the proposed development.

6. The proposed development would cause substantial controversy beyond the immediate locality.

Traffic generation from the proposed development and the resulting delays, especially to peak commuter traffic is already causing widespread controversy. The traffic problems on the western edge of Cardiff are widely acknowledged, yet this proposal conflict with the applicant's own policies that, amongst other things, require that careful consideration is given to the allocation of new sites which are likely to generate significant levels of movement. This proposal will significantly increase traffic flows through Penarth, resulting in delays, noise and pollution for its residents, as well as for residents of the eastern Vale travelling to and from Cardiff.

7. The development will have an unacceptable impact on the countryside and its biodiversity environment.

The building of 576 dwellings on 60 acres of farmland and green fields will cause the loss of arable and pasture farmland and of important open spaces that contribute to the local amenity, character, and distinctiveness of the area, together with its rich ecology and biodiversity.

The proposed development will have a significant harmful effect on the area, which is of more than local importance due to its position adjacent to the Severn Estuary Special Area of Conservation (SAC) and designated Marine Protection Area. The site is also protected under the Ramsar Convention as part of the coast, together with Cosmeston Lakes Country Park (SSSI), as an assembly and arrival point for migrating birds.

The erosion of Green Wedge and proximity of developments to the Wales Coastal Path would have a harmful impact on both, as well as harming the setting of Cosmeston Medieval Village. Its importance as an effective visual and practical buffer between Sully and Penarth is significant and locally important.

This site is strategically important for wildlife because it lies between a number of wildlife areas, Cosmeston Lakes Country Park (SSSI) to the West, Ty-r-Orsaf, Site of Nature Conversation (SINC) to the South and the Severn Estuary (Ramsar, Special Protection Area (SPA) Special Area of Conservation (SAC) and Penarth Coast (SSSI) to the north, acting as a buffer zone and a corridor to connect them.

For many of these species this area is their natural habitat, while for others it is their natural roosting and foraging area, a corridor to connect them to other areas, such as Cosmeston Lakes Country Park, or used as a migratory passage. The loss of woodland, wetland, grassland, and hedgerows will seriously reduce the insect biomass on which the birds, bats and other species rely on.

The site supports a huge diversity of species, including many protected species.

- Bats - 6 species including common pipistrelle, soprano pipistrelle, Nathusius.
- Great Crested Newts (European Protected Species)
- Reptile – slow worms
- Birds – 56 species of bird including Herring Gull, Skylark, Barn Owl, Cettis Warbler, Peregrine Falcon. 21 species being of conservation concern. Red List 7. Amber List 14.
- Doormice
- Foxes
- Other animals and insects.

The natural habitats of these animals will be lost when the site is developed, being replaced by hedgerows and small green areas in close proximity to populated buildings, gardens, play areas, roads, vehicle noise and pollution. The proposed “central corridor” through the site will be used by walkers and cyclists, to the detriment of other species expected to share it.

8. The development proposals will have an adverse impact on the important architectural heritage and archaeological remains present on the site.

It is concerning that the applicants report dismiss the archaeology, as not identified of being of sufficient significance, and the architecture of Lower Cosmeston Farm as not worth retaining and described it as of ‘moderate to limited heritage significance’, in order to implement this development. This is in contrast to recent trial excavations that revealed archaeological remains of almost certain medieval date which the capacity to transform our understanding of the evolution of Cosmeston as a settlement and its earliest inhabitants.

Lower Cosmeston Farm is recognised as a rare surviving example of a 16th century, single-unit, end-entry hearth passage house and is listed within an inventory of ancient monuments ‘Glamorgan Farmhouses and Cottages’ (RCAHMW 1988).

Glamorgan Gwent Archaeological Trust has stated that there is a strong possibility that further medieval archaeology will be present on the site, advising that some parts of the site may need to be retained as open space in order to protect archaeological features (Vale of Glamorgan Council Statement at LDP Hearing Session 24).

There are layers of Middle Jurassic Lias Cliff formation containing fossilised remains and one recent find of what is thought to be dinosaur footprints is currently under investigation by the Natural Museum of Wales.

There are many points of concern regarding the development site's archaeological, historical, and natural environment that will be lost not only to the public now but to generations to come if this housing development were to proceed.

9. Contamination within the site renders the site unsuitable for development.

Landfill material, comprising both domestic and commercial waste was used to fill three historic quarries on the site during the 1960's and 1970's, resulting in the majority of the site becoming contaminated by the wide variety of substances which were dumped in them.

No records of what materials were placed in the landfill were maintained or kept by the relevant authorities at the time. However, the applicant's Environmental Statement states that testing and investigations found the presence of asbestos materials, sulphates, arsenic and organic compounds. The site was used for cattle pyres during the foot and mouth epidemic in 2001. Area E (The "Old Quarry") was not accessible for investigation, due to ecological constraints and therefore no assessment was undertaken. One area found to be so severely contaminated that it has been recommended not to build in this area but use the area as public open space for use by adults and children. Furthermore, it is concerning that a full and proper assessment has not been undertaken on parts of the site that were not investigated due to ecological constraints.

10. Flooding and Coastal Erosion will affect access to the site.

The stretch of Lavernock Road in close proximity to the west entrances to the site are located alongside a flood zone and Sully Brook. There have been regular occasions of flooding here over the years which have meant closure of the road for long periods of time and therefore access/egress to/from the site from Lavernock Road would be compromised.

The stretch of coast between Penarth and Sully is liable to frequent cliff falls and coastal erosion and proposals to move the Wales Coastal Path 20 metres inland are being made and therefore access /egress to the site will be compromised

11. The development will have an impact on catchment area pupil numbers and thus exacerbate the existing shortage of Nursery and Secondary school places.

Currently the area has a shortage of adequate Nursery, Primary and Secondary School places.

The planning application refers to the provision of land for a new school site, inferring that this site would provide additional primary school education places within walking distance of the new proposed housing development.

This development, together with the housing development at Cog Road, Sully will substantially increase the number of school spaces required and put added pressure onto the Vale of Glamorgan Council Education Department intensifying the shortage of current Nursery and Secondary School places.

The Education Authority has also recommended that a school site be allocated to a 150 place Special Educational Needs School (a satellite operation to Ysgol y Deri), adjacent to the application site. Whilst not objecting to the benefit of additional Special Educational Needs provision, this situation would only intensify increased traffic congestion volumes with the additional minibuses, coaches and cars necessary for the delivery of pupils to the Special Educational Needs School.

Therefore, on behalf of Keep Cosmeston Green and the residents of the communities of Cosmeston, Penarth, Sully and surroundings areas, I request that the Welsh Government withdraw this planning application in order to stop the urbanisation of our countryside and conserve the landscape, amenity, environment, biodiversity and historical heritage for future generations to come.

[REDACTED]