

Planning Application 2016/0427/OUT - Objections to the proposal by St Athan Community Council following general meeting on January 10th 2017

Background: The St Athan Community Council has previously commented on this proposed development during the LDP consultations, which is currently still in review and has yet to be adopted. Also more recently via the major development consultation process, for which we could not find any reference in this application.

With regard to the current proposal for outline permission for some 300 dwellings we would like to reiterate our previous objections as follows:-

Land to East of Eglwys Brewis (MG2(5) in the LDP. We object to this site on grounds of:-

- Green field site of good agricultural land.
- Loss of green space. A section of this site is currently enjoyed as an 'open space' by residents of East Vale and the retained MOD housing site.
- Highway infrastructure.
- Site falls within Flood Zone C2 & C3. Other sites were rejected in the LDP for being Zone 2.
- Site is known to host a protected species.
- Most of this site was not published as a candidate site (5113/VG.1 – 9.43ha)
- Local sewer network is too small for this development.
- Urbanisation of 'rural' location, but still with 'rural' facilities.
- Overdevelopment of rural location.

Current Application

The Planning Statements makes many references to the LDP (Local Development Plan). However, our understanding is that the plan is still undergoing scrutiny by the Planning Inspectorate and has yet to be adopted. The hearing document statement (included as appendix B) of the Vale of Glamorgan Council states *'this greenfield site was not submitted as a candidate site but was allocated by the Council following discussion with the landowner'* and that *'they are still interested in developing the site for residential use following adoption of the Plan.'*

This application is therefore pre-empting the LDP (the plan) process. In addition the Vale of Glamorgan state, that there is enough flexibility in the Plan and that if this site did not come forward for the 255 dwellings (as amended in the statement) it would not undermine the overall Plan's housing and development strategy'.

Grounds for Objection

Unsustainable development. We believe that this application due to its location is unsustainable on many levels, and that there are more suitable sites available including brownfield. In particular it does not comply with the following key planning policies.

The proposals planning statement 4.4 states that **Sustainable development forms a key consideration central to all policies contained within Planning Policy Wales (PPW). Paragraph 4.4.3 of PPW sets out a series of objectives which development proposals should seek to achieve – those of key relevance to the application include the following:**

- a) *Minimise land-take and urban sprawl, especially through preference for the re-use of suitable previously developed land and buildings, wherever possible avoiding development on Greenfield sites;*

this development does not comply with this statement as the majority of the site is 'outside' the current settlement boundaries, and is on greenfield, agricultural land.

There are several brown field sites nearby including the former stadium site, and the former MOD St Athan site of some 700 acres, whilst being classed as an 'enterprise zone and strategic site' has for a number of years become increasingly vacant and redundant. There appears to be no formal plan for this site, so we believe it is entirely premature to build on green field before a real 'use' is found for this area. This is contrary to the planning statement which refers to the 'MOD Airbase' indicating it is still in service While understanding the need to have land available for employment during the LDP, the employment study paper comments that in the Vale of Glamorgan we have the equivalent to 164yrs supply of land marked as 'employment' a high proportion of which is on brownfield, and will not be deliverable.

- b) *'Locate developments so as to minimise the demand for travel, especially by private car'*

Housing to the North of St Athan away from the main traffic route of the B4265 will exasperate traffic problems in particular current issue of 'rat' runs through the rural lanes, such as the Llantrithyd to A48 route which is earmarked as 'cycle Route 88' Appendix A shows the various routes current local residents regularly take. The suggested routes when using a 'route planner' app based on 'The Gathering Place' Flemingston Road as a starting point show the following:

- i) To Cardiff - 10.2 miles – Cowbridge/St Athan Road via The Herbert's – St Hilary – A48
- j) To M4 East - 10 miles - Cowbridge/St Athan Road via The Herbert's – St Hilary – A48 – Bonvilston – Hensol Junction 34
- k) To M4 West - 12 miles – Eglwys-Brewis Road – Boverton – B4270 – Llysworney – A48

All of these suggested routes use minor roads to the North of the proposed development.

Transport Assessment:

The Transport report with this application stated that 3.22 Cowbridge Road is a 2-way single carriageway road with central road markings. There is a footway running alongside its western side only. However all of these routes only follow Cowbridge Road for a very short strip they then either follow St Athan Road a 2 way carriageway with NO central road markings that drops to 'single' lane in parts between The Herbert's and Cowbridge. The route through St Hilary is single track. The Eglwys-Brewis road is also mainly 2 way single carriageway with NO road markings.

3.11 *'There is a footway along the northern side of Eglwys Brewis Road that provides access to the nearest bus stops and will also provide access to the NAR and its improved links to Llantwit Major when this is delivered'*

This site should not be approved based on the assumption that the Northern Access Road will be delivered and that it will serve this development. Additionally, according to the recent consultation on the NAR, there will be a significant length of roadway with NO planned safe route for pedestrians and cyclists between Eglwys Brewis bus stop and the start of the NAR which includes a dangerous bend.

3.13 *'The Department of Transport (DfT) Local Transport Note 2/08 Cycle Infrastructure Design (October 2008) suggests that a trip distance of over 5 miles (8km) is not uncommon'.*

3.14 'Based on this advice it is feasible for journeys to all parts of St. Athan, Llantwit Major and Cowbridge to be made by bicycle'.

While it could be accepted that a wide pavement is available between this site and St Athan Village the route to Llantwit Major via the Eglwys Brewis road is poor and has recently been the subject of resident's protests regarding the safety of school pupils being expected to walk to the senior school at Llantwit Major. The decision of the Vale of Glamorgan Council on the suitability of this route as a '@safe route to school' is currently being vigorously challenged. There are no cycleways in either direction from the proposed development

The St Athan Road that takes you to Cowbridge could in no way be classed as an acceptable route for cyclists or pedestrians. Again there is no cycle way or footpath along this route.

3.15 It is considered that the relatively quiet streets within St Athan are suitable for cyclists. Cycle trips to and from Llantwit Major can be made along Eglwys Brewis Road thereby avoiding the busier B4265. In the future the proposed NAR will deliver improved cycle links between the two settlements. The topography around St. Athan and Llantwit Major is largely flat and presents no significant barrier to cycling trips.

As stated in our comment to 3.11 above we believe that no development should be approved based on an **assumption** that new infrastructure will be delivered that has yet to go through the planning process and has currently no apparent funding!

St Athan Community Council together with the Vale's Highway department have received a number of residents' complaints about speeding traffic and near misses especially in the Village shopping and school crossing area – we would not agree with the statement 'relatively quiet streets'

During the recent consultation on the NAR, following discussion on our concerns of traffic flows through St Athan Village, we were informed that the entrance to the 'Super Hanger/ proposed Aston Martin plant will be engineered to prevent vehicles entering the site from a eastern direction – therefore access by vehicle to this potential employment from this residential development site should not be possible.

3.16 Cycle trips to and from Cowbridge, along St. Athan Road would be more challenging in terms of distance and topography and would likely be considered only by more experienced cyclists. Even so the journey time of some 25 to 30 minutes by bike makes this journey feasible for commuter trips, for instance.

The St Athan Road to Cowbridge road could in no way be classed as an acceptable route for cyclists or pedestrians, the route is a mixture of 2 way unmarked carriageway and single lane rural road. For the consultants to believe that this is a usable route for commute especially in adverse weather, darkness, and unless there are shower facilities in your workplace must lead us to believe that perhaps they have not actually visited the area!

3.18 The nearest bus stops to the site are located at Pinewood Square on Eglwys Brewis Road. They are some 350m from the application site. There is also the East Camp bus stops located on Cowbridge Road, some 300m south of the site. The same bus services call at both Pinewood Square and East Camp stops.

3.19 46 buses leave from these stops per day, Monday to Friday, with 23 on Saturday and 9 on Sunday. Listed below are the different bus services available from these stops and timetables for the public service routes are provided as Appendix 3.

During a recent 'Creative Rural Communities' survey the improvement of public transport was top of a list of what residents stated was required to improve the neighbourhood - to provide a reliable public transport for St Athan, East Vale and Eglwys Brewis. The current poor service particularly for employment opportunities has been a regular complaint for the past few years. There is currently no direct bus service to Cowbridge.

We feel it is important to note that many of the pavements at Eglwys Brewis and East Vale, including those running along the eastern edge of Cowbridge Road (by the Bus Stop) are not 'adopted' and are in the private control of the residents of East Vale!

It should also be noted that the main employment areas are Cardiff, Llantrisant and Bridgend which are all inaccessible by cycle and with a limited public transport connection to central Cardiff and Bridgend only, this is unlikely to be usable for the majority of residents.

Open Space

2.2 of the planning statement as '*one smaller parcel which lies within the settlement boundary limits and is currently comprised of a tarmacked area, mown grass and landscaping*'

This area borders a community facility 'The Gathering Place' and is currently enjoyed by a number of existing local residents as a public open space, the provisions within the plan will not satisfy this loss as it will only serve the new development ;

In addition the play area (Paragraph 2.7 in statement) indicated as being close to the site (Celyn Close) is a 'privately' run play area serving the MOD retained housing.

Overdevelopment

St Athan over a number of years has seen significant increases via many recent developments and previously following the release of the former MOD houses into civilian ownership – over 600 dwellings were added without any planning or provisions for impact, additional infrastructure or amenities. Even though they had been previously well served by employment and amenities at RAF St Athan.

This development is badly served by routes to the main employment areas of Cardiff and Bridgend, and will exacerbate already current traffic issues in the locality especially the 'rat runs' through rural lanes. More attention should also be given to the wider highway impacts including to the West where major work is required from Llantwit Major to A48, and onwards to the M4. The improvements needed to the roads, junctions, pavements, cycle routes and provision of additional open space will be much more than 106 monies can deliver.

In conclusion this development should be rejected as an unsustainable development - it will have '*unacceptable impact on the amenity and character of the locality by way of noise, traffic congestion and parking; and 'Does not make appropriate provision for community infrastructure to meet the needs of future occupiers.* This will lead to an unacceptable impact on the current communities of St Athan, Eglwys Brewis, East Vale, Flemingston, St Mary Church, St Hilary and more.

It is an unacceptable loss of agricultural land, has flooding and waste issues, and includes the loss of open space and protected species.

Many thanks in anticipation of your full consideration of our representation
St Athan Community Council

Also includes Appendix A

Routeplanner Routes from the location of this development.

For this exercise 'The Gathering Place' was used as the initial location.

- 1) Routes to Culverhouse Cross, Cardiff.
 - a) 8.9 miles – Flemingston Road via Flemingston Village – Llantrithyd – A48
 - b) 9.6 miles – Cowbridge/St Athan Road via St Mary Church X roads – Llantrithyd – A48
 - c) 10.2 miles – Cowbridge/St Athan Road via The Herberts – St Hilary – A48
 - d) 11.3 miles – St Athan Village – B4265 – Port Road.

 - 2) Routes to M4 East (Cardiff)
 - a) 10 miles - Cowbridge/St Athan Road via The Herberts – St Hilary – A48 – Bonvilston – Hensol Junction 34
 - b) 16.6 miles - St Athan Village – B4265 – Culverhouse Cross – M4 Junction 33

 - 3) Routes to M4 West (Pencoed) via Pentre Meyrick – St Mary Hill
 - a) 11.4 miles – Cowbridge/St Athan Rd via lanes New Barn towards Signstone – B4270 Llandow – Llysworney – A48 – Pentre Meyrick
 - b) 12 miles – Eglwys-Brewis Road – Boverton – B4270 – Llysworney – A48 A48 – Pentre Meyrick (note this will be a similar situation if the Northern Access Road is built)
- Notes:
- i) When MOD St Athan was a fully functioning RAF base that the official allowed routes were 1 d, and 3 b.
 - ii) The RED routes in the plan all have large sections of single way very rural lanes.
 - iii) The Port Road routes 1d and 2b, are already very highly congested, which has been further compounded by new bus lanes.