



Planning Objections and Observations

**Upper Cosmeston Farm,
Lavernock Road, Penarth ***

Application No: 2020/01170/OUT

Keep Cosmeston Green was formed in October 2019, by a number of volunteer residents from Cosmeston, Sully, Penarth and Barry following a Public Meeting to discuss the proposed development held at Lakeside Café, Cosmeston Lakes Country Park.

Keep Cosmeston Green have received concerns about the effects of the proposed developments from many residents of Cosmeston/Lavernock and the surrounding communities and together with a review of the applicants documentation wish to make the following Objections and Observations in regard to Planning Application 2020/01170/OUT, for residential development, a primary school, community space and public open space with all matters reserved other than access, at Upper Cosmeston Farm, Lavernock Road, Penarth*, made by the Welsh Government.

(* The application site is located in Cosmeston/Lavernock and not in Penarth.)

A Welsh Assembly Petition was raised to “Save the farmland and green fields at Cosmeston“ and has currently raised over 5,000 signatures, with the Welsh Assembly Petitions Committee considering the petition for a debate in the Senedd

Keep Cosmeston Green Objections and Observations are as follows;

1. 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 LDP. The scale of the proposed development significantly exceeds the threshold of 150 dwellings or 6ha.

Whilst the additional area of land is modest in size, when taken together with the proposed development it encroaches even further into the Green Wedge identified in the LDP. This is in direct conflict with Policy MG 18 which seeks to prevent the incremental loss of open land and lead to coalescence of settlements. 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 primary school conflicts with this policy.

2. The development will exacerbate increased traffic, congestion, and pollution

The proposed development site may be 500m from the current bus stop (To Penarth/Cardiff) outside Cosmeston Lakes Country Park, 650 m from a Restaurant (Ego at the Schooner - Mediterranean) and 700m from the Glamorganshire Golf Club. These services and facilities are not enough to make the development “sustainable”.

Many of the essential services and facilities are further than the maximum permitted walking distance of 2km,

- Penarth Railway Station (2.5km).
- Penarth Town Centre (2.9km).
- Distances to schools are.
 - Nursery Schools – St Aubin Nursery (2.1km), Bute Cottage Nursery (2.8km), Sully Nursery (3.2km), Cogan Nursery (4.1km).
 - Primary Schools – Evenlode Primary (2.1km), Sully Primary (3.9km).
 - 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).
- Leisure Facilities – Cogan Leisure Centre (4km), Sully Sports and Social Club (2.7km). International Sports Village, Cardiff (4.8km).

Owing to poor infrastructure, limited street lighting and which is non-existent on most of Railway Walk and Wales Coastal Path, the journey between the site and these locations would not be very safe or convenient for people walking or cycling. They would be off-putting for many, especially for those parents / child-carers with buggies and pushchairs to manage. Journeys along these walking and cycling routes would also be off-putting in inclement weather conditions.

Although there is a regular bus service passing the development it can be onerous traveling into Cardiff with journey times in the region of 40-50 minutes, with no direct routes to various commercial areas, and the terminus (at present) located on the outskirts of the City Centre shopping area.

It is noted that contributions can be made by the developer to increase the number of buses servicing a route, although this is usually for a set period when the extra services then come to a stop.

Traveling by train into Cardiff is also not without its' problems as the service is undependable, trains turn up with too few carriages for the passengers travelling, and trains cancelled at short notice.

For the above reasons, future occupants of the proposed dwellings would almost certainly rely on private motor vehicles to access these facilities and services.

It is also proposed that the development will also provide a primary school, but it is understood that the Vale of Glamorgan Council Education Department have recommended that the school site be allocated to a 150 place Special Educational Needs School (a satellite operation to Ysgol y Deri) which will cause an increase in traffic and congestion volumes with the additional minibuses, coaches and cars necessary for the delivery of pupils to the Special Educational Needs School.

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 not does not have a solution at the present time. The problem will get even worse with this development and other developments at Sully, Barry and Landough.

Existing traffic flows through Penarth and Dinas Powys to the extremely busy Merrie Harriers junction which feeds two of the bridges. Traffic flows at the junction are already being increased

as a result of construction of the first phase of the 250-dwelling development at Cog Road, Sully and by development at Barry Waterfront. Without any mitigation measures in place. The proposed development would further exacerbate this problem and, while the supporting documentation suggest 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.

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 conflicts with the applicants 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 along Lavernock Road, 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.

3. The development will have an impact on catchment area pupil numbers and will exacerbate the shortage of Nursery, Junior and Secondary school places available.

Currently the area does experience a shortage of adequate Nursery, Primary and Secondary School places

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.

In the planning application a reference is made to the provision of a new school site, inferring that this site would provide additional primary school education places within walking distance of the new proposed housing development.

However, the Vale of Glamorgan Council Education Department have recommended that the school site be allocated to a 150 place Special Educational Needs School (a satellite operation to Ysgol y Deri).

Whilst not objecting to the benefit of additional Special Educational Needs provision, this situation would only intensify the shortage of current Nursery and Primary School places, together with causing increased traffic congestion volumes with the additional minibuses, coaches and cars necessary for the delivery of pupils to the Special Educational Needs School.

The development is in an unsustainable location and will have an impact on active travel in respect of permitted maximum walking distances to schools and reliance on motor vehicles.

Walking distances to schools are.

- Nursery Schools – St Aubin Nursery 2.1km, Bute Cottage Nursery 2.8km, Sully Nursery 3.2km, Cogan Nursery 4.1km
- Primary Schools – Evenlode Primary 2.1km, Sully Primary 3.9km.
- Secondary Schools – Stanwell School 2.6km, Westbourne School 2.6km.

Owing to poor infrastructure, limited street lighting and which is non-existent on most of Railway, the journey between the site and these locations would not be very safe or convenient for people walking or cycling. They would be off-putting for many, especially for those parents / child-carers with buggies and pushchairs to manage.

For the above reasons, future occupants of the proposed dwellings would almost certainly rely on private motor vehicles to meet the need for their children to gain access to these schools.

4. 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 in no doubt prejudice the open nature of the land, together with its ecology, biodiversity, and amenity.

A development of this size and form is going to have a significant effect. Not only the loss of arable and pasture farmland but the loss of important open spaces that contribute to the local amenity, character, and distinctiveness of the area

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, 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. While the area may not be of the highest intrinsic landscape value, its importance as an effective visual and practical buffer between Sully and Penarth is significant and locally important.

The development will result in a loss of biodiversity as mitigation measures will do little to conserve and enhance the natural habitats of the flora and fauna present on the site and the surrounding areas.

This site is strategically important for wildlife because it lies between a number of wildlife areas, Cosmeston Lakes Country Park, to the West, Ty-r-Orsaf, Site of Nature Conservation (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.

The site supports a huge diversity of 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.

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 natural habitats of these animals, spread over the site range from hedgerows, woodland, trees, tree stumps, wood piles, ditches, ponds, watercourses and grassland will all 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. While a “central corridor” through the site will be populated by walkers and cyclists.

The loss of woodland, wetland, grassland, and hedgerows will seriously reduce the insect biomass on which the birds, bats and other species rely on.

5. 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 containing materials (ACM), sulphate (aggressively attacks building materials and structures), arsenic and organic compounds (PAH and TPH).
- the site was used for cattle pyres during the foot and mouth epidemic in 2001.
- that areas of site are currently being used to store a number of materials, including fencing, signage, cones, and metal containers. A number of other man- made materials such as plastic tubs, cement, lubricants, and tar-macadam products were stored directly on the ground along with bottles of propane gas bottles, farm machinery and fly tipped materials.
- that area E (The “Old Quarry”) was not accessible for investigation, due to ecological constraints and therefore no assessment was undertaken.
- That areas of archeological importance are present in Areas A (West Fields), and C (The historic former quarry and part of a former landfill).

It is concerning that parts of the site were not investigated due to ecological constraints and therefore a full and proper assessment has not been undertaken.

The excavation and disturbance of the soils will have the potential to spread contamination to uncontaminated areas, both on and off-site, placing people, animals, gardens, etc., on the development and surrounding areas at risk. Severe health problems can arise if materials containing asbestos are disturbed or damaged, asbestos fibres are released into the air and breathed in by people and puts them at potential risk of contracting a number of serious diseases later in life including mesothelioma and lung cancer. Are families expected to live in this area containing potentially lethal chemicals, exposing them to life-threatening health risks.

6. 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 Reports 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 total contrast to,

- to the research and investigations of local archaeologists who have recently discovered through two trial trenches archaeological remains of almost certain medieval date. This newly discovered medieval archaeology has the capacity to transform our understanding of not only the evolution of Cosmeston as a settlement, but to also elicit more information about the lives of some of Cosmeston's earliest inhabitants. It is a fascinating and exciting discovery and represents the first new discovery at Cosmeston for almost 30 years.
- the Royal Commission on Ancient and Historical Monuments Wales (RCAHMW) recognised that Lower Cosmeston Farm as a rare surviving example of a 16th century, single-unit, end-entry hearth passage house. This was deemed important enough to be listed within an inventory of ancient monuments compiled by the RCAHMW and published in 1988 within the book 'Glamorgan Farmhouses and Cottages'. It is also recognised by RCAHMW that this building has an intrinsic value which cannot be replaced. Two of the outbuildings are of late eighteenth-century date and survive in excellent condition retaining their original hand crafted timber roof structures and a great deal of its architectural features such as its stone spiral staircase, fireplaces with lintels, bread ovens and wooden corbels. The basic layout of Lower Cosmeston Farm was noted on the Bute estate map of 1824 and has for the most part remained unchanged since. Lower Cosmeston Farm is also home to a rich historical and archaeological environment The Farmhouse is an early 17th century building (mentioned in the Glamorgan Hearth Tax records of 1670) The basic layout of Lower Cosmeston Farm was noted on the Bute estate map of 1824 and has for the most part remained unchanged since.
- Glamorgan Gwent Archaeological Trust (GGAT) have stated that there is a strong possibility that further medieval archaeology will be present on the site, and advised 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)

Cosmeston has a history dating back to the early 12th century when it was founded as a manor granted to the de Constantine family from where the settlement takes its name.

The first known record of the settlement can be seen in the *Liber Niger* where Robertus de Constantine held one knight's fee, doubtless in Constantinestun, and is the earliest mentioned Lord of the Manor of Cosmeston, which lay between Sully in the South and extended into (modern day) Penarth in the north.

With a population of 200 plus it would show that the village of Cosmeston would encompass more of the surrounding area than that covered by the current reconstructed Medieval village located

Past archaeological finds in the area around the shrunken Medieval Village that lies alongside the proposed development site, have indicated that medieval Cosmeston was not just a farming community involved in dairy and bakery production but also a flourishing pottery industry, cloth production, and across Channel trade through the port at Swanbridge.

Given that the village had a population of 200 plus and the close proximity of these recent archaeological remains to the shrunken medieval village at Cosmeston Lakes Country Park, there is undoubtedly a connection to a larger village setting.

There are layers of Middle Jurassic Lias Cliff formation containing fossilised remains. Only recently there was a find of what is thought to be dinosaur footprints which is being investigated by researchers of the Natural History Museum of Wales

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

7. The increase in Surface Water Run-off from the development site will lead to increased flooding on Lavernock Road, and difficulties accessing the residential areas and School.

Lavernock Road at the development location runs alongside a flood zone incorporating Sully Brook and has experienced many occasions of flooding during heavy rain making the road nearly impassable. The flooding on Lavernock Road can stretch from The Schooner Inn to the North, to past Lower Cosmeston farm in the South.

The development of 576 houses and roads will decrease the area of green space available leading to an increase in Surface Water Run-off from this area onto Lavernock Road. It should be noted that access to the development will be located on this length of Lavernock Road which may greatly affect the access to and from the development site and the proposed school.

Although the on-site attenuation ponds may mitigate some of the Surface Water Run-off there will still be an excess of Run-off onto Lavernock Road.

In conclusion Keep Cosmeston Green are concerned that the proposed development at Upper Cosmeston Farm is inappropriate to the area in that it will greatly will greatly affect the local wildlife ecology and biodiversity here and in the surrounding areas together with a loss of the areas countryside amenity and local cultural historical heritage.

Such a large development will be unsustainable due to the lack of local highway and health infrastructure and will exacerbate traffic congestion and flooding in nearby areas. The land should be kept for farming and associated businesses which together with local community amenity projects will maintain the prospects of the landscape for the well being of Future Generations.

Therefore Keep Cosmeston Green wish to object to the proposed development.

Michael Garland
(Chair – Keep Cosmeston Green)