

Your ref: 2020/01170/OUT

Land at Upper Cosmeston Farm, Lavernock Road, Penarth

Consultation

We would appreciate it be noted that the timing of this consultation comes at a difficult time i.e. with the overlap with lockdown and the same time as feedback was sought in terms of parking restrictions planned on Upper Cosmeston Farm due to changes proposed at Cosmeston Park.

Confusion remains in regards to the deadline to respond since we have had two letters and further notices attached to neighbouring posts notifying amendments to the original plans. Given the volume of material to read it has been difficult to 1) process all the information and 2) appreciate what changes have been made to the original proposals. We appreciate that every planning proposal needs to be treated differently however this proposal; from Welsh Government is not comparable to that of residents applying for extensions since the impact of this proposal will be not only far reaching for the town of Penarth but also a significant impact to local residents.

Also, our consultation letter came a week into the firebreak and then a second letter arrived a week later which said there had been changes but didn't say clearly what the changes were clearly enough, especially as there are so many documents to dwell with.

Given that we are in unprecedent times, we are aware of many residents e.g. older people who are unable to access this volume of material electronically. We appreciate that the Vale of Glamorgan will send hard copies on request however these were limited due the expense etc. Please could you inform us how this conforms to the requirements of the Equality Act 2010 access for older people, the explanation on line involves so many documents that it is difficult for older people to access this and / or discuss. We are concerned for some of our neighbours who may be hesitant to object. Many people have not been clear as to how to respond to the proposals especially if you have not been sent a direct letter of consultation.

We have written to the Vale already and to politicians regarding the new proposals in emails with no responses to date.

A Village: The overall rhetoric of the proposal lacks of evidence and construes what you want it to e.g. you mention that "Cosmeston is a village" but what you are doing is extending a town (Penarth) so Cosmeston will not be a 'village' anymore. The high storey pattern of housing takes away any notion of Cosmeston being a village in the future.

Density of buildings: There seem an unnecessary density of terraced and town houses disproportionate to local existing areas. A key point is that the housing is not in keeping with the surrounding environment. This can be demonstrated by viewing an aerial map of Penarth where it is clear that the proposed plans include much more intense pattern of housing. Whilst we recognize the report states that it is within the upper limit, this threshold is a national requirement and may be appropriate for other areas e.g. the Marina, it is not in keeping with

this are of Penarth. Also, in respect of this visual and biological greenfield site why go so high on the tolerance allowed?

It is stated that the area east of Upper Cosmeston Farm, being previously a landfill site, has effectively been used for many years a green land with cattle, horses, sheep etc all use the land. This claim therefore seems to lack integrity and given that Cosmeston Lakes Country Park is on similar category of land you would not therefore grant permission to put an estate on just on this argument.

Whilst we recognize low cost housing needs to be within any new build, this still needs to be in keeping with the area and provide adequate personal space both for existing and new dwellings. The recent lockdown has highlighted how much people have valued and used this green space as well as their own private gardens.

View: The report cites that the 'Landscape and Visual Impact Assessment' states that there will be some "significant adverse effects", however the proposal still pursues the high density of buildings which includes a significant number of 3, 4 and up to 7 storey buildings. The impact of the view from the lake on the skyline confirms this point. We have several concerns about this as this area is not conducive to having so many multi storied buildings that would be expected in city centres.

Tourism and cliff top path: The density and planned use of houses will destroy the current Wales coastal path experience, it will become just another suburb on the cliff top. The block of flats will be unsightly and the uniqueness of the coastal path will be lost.

Biodiversity: We regularly have bats that fly in and around our garden at dusk. As other private planning proposals have been declined due to wildlife, it seems unfair that you are not taking this into account. The bat report went nowhere near our property and you should have measured the buffer areas and long green wedge just east of Upper Cosmeston Farm as well as what we considered in the report.

The dormice crossing will not be sufficient to retain this species given that they are a legally protected species under section 5 of the Wildlife and Countryside act 1981.

The hedgerows to be retained should be kept completely green and not amended there is a colossal amount of bird wildlife that currently exists in the bramble and hedgerows.

The field in Area B was previously a landfill site and we are concerned that the sampling of asbestos testing presence has not been adequate. This was well known anecdotally in and amongst the community. Are you able to be completely convinced this will be safe land?

The fields are actually greenfield sites in terms of their biodiversity and visual appeal and not brown field sites with no visual impact. The impact on the character and appearance of the surrounding area will not be in keeping with the appearance of Cosmeston Park with three storey

houses and high storey flats. The words 'sympathetically designed' are mere rhetoric and marketing tools with no factual evidence.

'Impact on existing properties': You use the words 'appropriate distances between existing dwellings' and you want to ensure that the proposal does not have negative impact on existing properties – however this does not stack up for these reasons: -

- the proposal is to cram as many houses as possible on land that can be built on (as some areas can't be used). It is clear that you are fulfilling a quota with no account of negative impact on existing houses.
- The Upper Cosmeston Farm estate is quite distinct from the Cosmeston Drive houses and the proposals are not in keeping with Upper Cosmeston Farm. The boundaries with existing houses do not appear to be less dense.
- The proposed retention of hedgerows must be done without landscaping as there is already significant quality of hedgerows which MUST be retained without landscaping and new plantations placed in. This will act as a natural buffer and would therefore lessen the impact of existing properties.
- The hedgerows to be retained should be kept completely green.

Transport: The highway report states that there would not be significant impact but how can we see the report? This will add massively to congestion.

Every single conversation we have with anyone in Penarth points to this as a major weakness and shortcoming in the proposal i.e. it will massively impact travel in Penarth. It is clear that ASPRI and those making this proposal do not actually have the experience of commuting here.

Transport links: cycle paths are good but you haven't allowed for adequate car park spaces for such a density of housing planned. As a result, there will be unsightly casual and inappropriate parking which no doubt will destroy verges and green planned areas.

A report in August 2020 is referred to and most probably hopes that more people will cycle than will actually do this.

Archaeological: All historical reports point to a heritage that will be clearly wiped out.

Local Impact:

- Three houses have suddenly popped up from the original Asbri plan next to item (7) these will look down on us and neighbours just east of Upper Cosmeston Farm, especially as they are town houses and three storeys high.
- This area just east of 18 Upper Cosmeston Farm is part of an old OS path which runs north/south and further south you have retained this line but for some reason not done so in the northern stretch by adding these houses.

- We have lived here for 24 years, keeping the area behind our garden clear and have previously requested to purchase the area (with our neighbours) so as to maintain the land and retain its natural beauty. This was turned down as the area was not for sale however we would be offered the chance to do so when it was for sale but this has been ignored.
- Hedgerows: The proposed 'retained hedgerow' area which acts a green buffer should be retained in its present state and not landscaped into meaningless green area that no one will use (as it is next to a road), this way the natural wildlife including goldfinches and greater spotted woodpeckers can thrive.
- The proposed parkland areas on the plan plus Cosmeston park, which is already there, provide enough play and grassed areas for people. So, the LAP should go and leave as much wild hedgerow as possible.
- The proposed LAP will well encourage access to our garden as the land is higher than our house and this may afford a lack of privacy. Into our bedrooms and all windows. We do not have the choices that others will make when buying new.

At the time of writing a petition to stop this is at 5,000 plus thus indicating the concern from the community.

Conclusion

We appreciate Welsh Government is putting pressure on Local Authorities to meet housing quotas, however this land once urbanized will never return. It is a unique feature of Penarth. We feel that these quotas can be achieved by identifying more suitable areas for example we understand there are other areas such as Llandow which have much better suited proposals yet are ignored here.

We understand the Prime Minister has recently announced a fund to restore species and combat climate change for the conservation of green areas and it seems perplexing that the Welsh Government is actively doing the opposite of remaining such areas which could be sustained at little cost.

The well-being of both local and future residents is now recognised as a priority, especially in terms of the Well Being and Future Generations Act as this is not only green field land but is coastal land with outstanding views across the channel and Cosmeston Country Park and should therefore be preserved and enhanced as a unique feature and asset of Penarth. The contribution to WFGA is clearly with bias and has not taken an holistic approach on impact only an itemized approach.

We find this process very stressful and it has caused a lot of anxiety on a personal level. Given the proposal's scale of impact, we would like reassurance that planners will listen to the voice of the people so as to make the proposal more appropriate i.e. less dense and more in keeping with the loss of a greenfield site.

Mark and Janet Frost

18 Upper Cosmeston Farm
Penarth
CF64 5UB

I have concerns about this development.

I think it is sad that both the Welsh Government and the Vale of Glamorgan want to lose pleasant green land close to the coastal path between Penarth and Sully. The Vale of Glamorgan and the Welsh Government spent a lot of money making the path attractive and easy to walk for residents and visitors alike.

I understand that the area outlined is larger, or certainly different, from the area outlined in the LDP and further encroaches on the green wedge land in the LDP.

I am sure 576 properties would produce a lot of traffic. Providing a track for cyclists and walkers would be good for leisure activities but it will not prevent people driving their children to school and to work. Many parents drop their children off at school on the way to work and do not have time to walk to school and back home before driving to work. There is little work in the community. Most people would be travelling to work in Cardiff or even further afield. There is already a lot of traffic during weekday mornings and evenings. Additional vehicles would cause huge hold ups at the Merrie Harrier traffic lights and the traffic lights near what used to be the Baron's Court Restaurant.

A special educational needs school close by would create even more traffic as these pupils will come from across the Vale of Glamorgan by taxi or in a vehicle owned by their parents. Special educational needs schools have a large number of staff and these people too will be driving into the area and returning home adding to the local traffic.

Having lived in Sully for nearly forty years, I am also aware that Lavernock Road floods from time to time. Surely, this is more likely to happen if the green land is lost and can no longer absorb the large amount of rain that falls in this part of Wales.

I know that the land was once used as a dumping ground for industrial waste and I would have thought that some people would be concerned to buy houses on this land.

I also understand that there are archaeological remains in the ground. This needs to be investigated.

Finally, I think it is particularly unfair to apply for planning permission at this time when people in the area are reluctant to go out because of the possibility of catching Covid-19. This means that residents cannot meet together to discuss the matter nor canvass opinions in the local community. It gives the impression that the Welsh Government and the Vale of Glamorgan are trying to sneak planning consent through whilst the public is otherwise occupied with the pandemic.

Jean Bispham, 46 Conybeare Road, Sully, Vale of Glamorgan, CF64 5US. [REDACTED]
[REDACTED]

Housing:

Your ref: [2020/01170/OUT](#)

Land at Upper Cosmeston Farm, Lavernock Road, Penarth

The further expansion of Penarth will lead to a diminution of its identity as this risks merging into Sully in time. We regularly see wildlife that can't exist when areas are built on. In these fields live many pheasant, kestrel and hobby falcons.

Green Site: There have been several other local green sites turned down so why is this one being considered?

Consultation? It would appear that a decision to build 566 houses has already been taken and a true process of consultation not been put in place.

Timing: The Vale of Glamorgan has said that planning for housing was a result of pressure from Welsh Government so why so we has this added consultation to deal with during lockdown? With reference to the Rob Thomas response (2nd December 2020) to our letter of concern about this housing consultation being in the middle of a pandemic and alongside a local parking consultation, the point made was that the applicant was Welsh Government and that timing concerns were made then, so why is it that the school's consultation is exacerbating this at a time when it is difficult for people to respond.

Traffic: the independent assessment shows that the impact will be significant.

Environmental Contamination: the risk of building a school adjacent to an ex landfill site with toxic findings makes this a liability. The previous use of the land immediately behind our property (18 Upper Cosmeston Farm) has had various reports suggest that this is not actually suitable for building. Is it worth the Vale of Glamorgan taking on such a large risk as the toxic issues are well documented, since ramifications in the future could be huge. There is the implication that it is not green land, however since and during the lockdown period this has reinforced the need for natural areas to be accessible and not destroyed, whereas the proposal will do away with much hedgerow and trees and open green areas. It is imperative that we have areas that are not man made and left as wild within communities and are therefore accessible.

Archaeology: sites in the proximity are of significance which the consultation does not address.

Design: The intensity of the proposal including many 3 / 4 plus storey buildings would destroy the nature of the local area. We note no bungalows are included. The integrity of Penarth as a distinct town would be eroded as none of these buildings would be in keeping.







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)





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Lavernock Road, Penarth ***

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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)

[REDACTED]



Chair: Michael Philip Garland
3 Plover Way
Lavernock Park,
Cosmeston,
Lavernock. CF64 5FU

Ema
Tel:

Date: 2nd March 2021

Dear Mr Lankshear,

Subject: Planning Application No. 2020/01170/OUT Land at Upper Cosmeston Farm, Lavernock Road, Cosmeston. Lavernock

Proposal: Outline application for residential development, a primary school, community space and public open space with all matters reserved other than access

Keep Cosmeston Green wish to add further objections made regarding the aforementioned planning application.

It has become more and more apparent in recent months that coastal erosion is accelerating in the vicinity of the development site. There have recently been a number of cliff falls along the Wales Coastal Path which in various locations places the pathway perilously close to the cliff edge.

Many walkers do not realise how close to the edge they are because of dense bushes growing along the clifftop. Even experienced walkers are taking an unofficial diversion into adjoining fields to avoid having to follow the official and potentially dangerous route of Wales Coast Path

The Wales Coast Path is already said to be in a state of "significant disrepair". Because of poor drainage, pools of mud and puddles forming on the surface following periods of heavy rain. The Vale of Glamorgan Council have already acknowledged that the cliff line between Lavernock Point and Penarth has been affected by two very large cliff falls and plan to divert part of the Wales Coastal Path into the fields alongside the path.



However, since these plans were announced a large fissure has opened in the tarmac surface of the adjoining Cliff Walk public pathway that runs adjacent to Whitcliffe Drive in close proximity to the proposed development site. The fissure is approximately 9m distant from the safety fence that runs along the clifftop edge and possibly 15 metres from the cliff edge, which may indicate there is geological movement occurring in the cliff itself.



In relation to TAN 14 Coastal Planning, it is recommended that areas in settings of rapidly eroding cliffs and actively unstable slopes, in areas least suited to development due to these physical conditions, then any development considered should be preceded by a detailed investigation, full risk assessment and/or environmental study, and that applications in these areas may have to be refused on the basis of potential physical problems.

In relation to the application, only a limited visual inspection and a desk study were carried out, and not a detailed investigation, as required by TAN 14. The information on these is extremely limited and a document, 7061b.366 Rev 2, referred to in reports is not listed within the documentation provided. It appears that these studies took place nearly eleven months prior to the planning application was submitted and therefore could be considered outdated and carry little weight.

The reports supplied by the applicant conclude that due to restricted access and dense vegetation where investigation was permitted there were no clear indications of instability, yet there have been at least two significant cliff falls since that time, and now the appearance of this fissure which could be considered as clear indications of instability. The applicant reports usage of a “commonly observed and adopted rule for regression-rate of the Vale of Glamorgan coastline of approximately 1m per 30 years, while the Vale of Glamorgan Council (Highway and Engineering) are determining a 10m per 100 years regression rate, a significant difference, and supports that the applicant’s investigations are not detailed. However, this recent fissure appearing 15m from the cliff edge suggest that even the Vale of Glamorgan Council’s guesstimates may not be reliable, The Vale of Glamorgan Council (Highways / Engineering) also report that, no evidence has been submitted attempting to quantify the actual erosion rates fronting the development. It is also concerning, that in determining such regression rates, is placing a “life expectancy” on the proposed development which will have disastrous effects in future years and will seriously affect the sustainability of the proposed development.

In conclusion, as no appropriate detailed investigations and assessments have been carried out, and no significant evidence has been submitted by the applicant quantifying actual erosion rates prior to the development being considered, contrary to TAN 14, and that the coastal/cliff top erosion is occurring at significant higher rates than can be predicted, the application should be refused based on potential physical problems.

Yours Faithfully,
Michael Philip Garland, on behalf of Keep Cosmeston Green.

(Photographs courtesy of Penarth Daily News)



Chair: Michael Philip Garland



Date: 18th March 2021

Dear Mr Lankshear,

Subject: Planning Application No. 2020/01170/OUT Land at Upper Cosmeston Farm, Lavernock Road, Cosmeston. Lavernock

Proposal: Outline application for residential development, a primary school, community space and public open space with all matters reserved other than access

As Chair of Keep Cosmeston Green, I wish to make the following objections to the above-mentioned planning application.

1. It is concerning that reading the submitted Design Commission for Wales Report (dated 21st January 2021) that they report that they are unable to support the proposals as they have been submitted for outline planning consent, which in their view is a premature step.

The DCFW Report highlights their concerns; -

- over the increasing heights of the building which appear to have been raised significantly from the original application, despite a significant number of objections received on this issue.
- the positioning of the dwellings, “fronts to back”
- the location of the school and suggest that alternative locations be tested, and,
- that Active Travel and Net Zero Carbon Development aspirations cannot be achieved.

which the Design Commission for Wales feel have not been addressed appropriately.

In regard to the increasing the heights of the buildings, it would appear this is to accommodate the reduction in site area due to the set back of the coastal path and ongoing coastal erosion and the seriously contaminated land that cannot be built on, rather than the need to allow for necessary population density to sustain a community facility.

2. It was rather significant that the Vale of Glamorgan Council, Miles Punter, in response to the 23rd of December 2020 flooding at Lavernock Road, Cosmeston, Lavernock, the area where the entrance to the development and schools are to be located, stated that the flooding occurred as a result of the main sewer becoming overloaded. If the main sewer is already overloaded then the connection of a further 576 homes and two schools and Community and Sports facilities will significantly increase the risk and degree of flooding to the surrounding areas not forgetting that the site is adjacent to a flood area, and therefore the development should not be permitted.

It is concerning that Sully Brook is now designated a main river and considered suitable to take any surface water run-off, etc. Again, regarding the 23rd of December 2020 and the regular previous flooding events at Cosmeston, the levels of Sully Brook rise quite considerably as it is not only located in a flood zone but flows into further flood zones at Cog Moors and Sully Moors and will not be able to contain any excess surface water run-off.

3. Planning Policy Wales states that development on the coast should be developments that require a coastal location. A large housing development cannot be considered as an appropriate coastal development that requires a coastal location and therefore should not be permitted.
4. Such a development is incongruous with the surrounding open coastal landscape of the area, being visible from both land and sea, and therefore should not be permitted.
5. There appears to be no measures in place to address traffic overload in and outside the locality of the development, and the applicant does state that there will be a detrimental loss of air quality in the area of the access to the site and school, with the applicant hoping that residents, schoolchildren and staff will hopefully cycle and walk to use the local amenities, facilities, shops, employment, etc, the majority of which are considerably outside the maximum permitted walking distance or would require cycling on dangerous stretches of highway.
6. It is concerning and disappointing that the Vale of Glamorgan Council are supporting this planning application, even though it is significantly different to Local Development Plan proposal, the public consultation event and the original submitted planning application, in order to achieve the provision of land from the applicant for a school and maintain “agreements in principles” in regard to provision land and £8.25 million funding of a further school to be built on and adjacent site owned by the applicant.

Keep Cosmeston Green would appreciate that these comments along with previous objections made be shown within the appropriate documentation of the application as it is concerning that many Objectors comments regarding the application are not being displayed.

Yours Faithfully

Michael Garland

Chair – Keep Cosmeston Green

Date: 30th October 2020

Vale of Glamorgan Council
Mr Robert Lankshear
Planning Department

Dear Sirs

Objection to the Outline Planning Application by Welsh Government to Vale of Glamorgan County Council for 576 residential units at Upper Cosmeston Farm, Lavernock, (not Penarth as stated in the Application)

I am writing to request that planning application 2020/01170/OUT is refused planning permission as requested for the Welsh Government site. The grounds for doing so are outlined as follows:

The proposal is contrary to current best planning practice for the following reasons:

The housing supply calculations in the LDP were increased at the suggestion of the Welsh Government. These calculations were based on the household formation rates during the LDP formulation process i.e. pre 2017. Those rates were too high and do not correspond with the what has happened over the last few years. In recent years they have fallen by a quarter (see [Civitas: riseandfalltheshiftinhouseholdgrowthratesincethe1990s.pdf](#)). This would result in the housing demand calculated for the current LDP being a third more than was actually needed - invalidating the LDP assessment. Moreover, the Environmental Statement Volume 2, Chapter 6 Planning policy submitted with this application states that a percentage 'of additional homes should be affordable' - it does **not** calculate need and then add a further 40% as affordable homes as the Vale's LDP does.

It was also reported that a staggering 78% of homes (5564) sold through the 'help to buy scheme', sold for over £150,000 with over 1,000 homes that were counted as 'affordable' sold for over £250,000. Research shows that many of the new houses already built remain unsold.

Wouldn't it be prudent to investigate why these houses are empty and seek to fill them before building more? If the Council and Welsh Government were truly seeking to address the housing shortage and it was not being done for financial gain then this would be the road that was being taken.

The land is recognised as green wedge and not brownfield, (all brownfield areas should be considered for development before resorting to even thinking of building on green wedges – see Llandow comment below) it was proposed the following areas to be designated as a Green Wedge, extract from the LDP says "*The Topic paper concludes that the existing green wedges designation (with certain amendments) should be included within the LDP. In addition a new green wedge designation is proposed to afford protection to land located between Penarth and Sully. Green wedges are therefore proposed at the following locations: Between Dinas Powys, Penarth and Llandough, North West of Sully, North of Wenvoe, South of Bridgend, between Barry and Rhoose, North of Rhoose and South Penarth to Sully.* I believe some of these areas have already been built on. So the Vale will deviate from the LDP if it will profit from it in any way but when it comes to actually acting for the people who are paying

the wages you do not listen to their views. You permit the overdevelopment of the area, which the majority of those living in the Vale do not want and are not needed.

With the Welsh Government owning over 500 acres which is adjacent to the site, this could potentially mean that the countryside between Penarth and Sully will be drastically reduced as this proposal will set a precedent for the erosion of the green wedge.

The Council threw out an application to include the old Llandow trading estate as part of the LDP for reasons best known to themselves. This brownfield land would have created a new community with a train station and supporting infrastructure such as school, doctor/dentist's surgery etc. This development would have catered for most of the allocation of housing for the Vale's LDP and would not have pushed all towns and villages over their infrastructure capacities. The original planning consultant (Geoff Webber working for Hyder at the time) employed by the Council had to walk away as he did feel he would have been able to support the Council's decision not to include it within their LDP had it gone to a Public inquiry. This should have gone to a Public Inquiry, but I believe the Council found a way around this, a source working at the Council at the time informs me.

The area has no substantial means of employment except in the proposed school for children with Special Needs, most of those attending from out of the area will be unable to use public transport and will require being driven by car. The sketch schemes show high rise flats and long terraces of housing that are totally inappropriate in this area of mainly single/double storey housing, detached dwellings and short terraces. The whole proposed development plan is not in keeping with the area – which I believe is one of the criteria in approving planning. If an individual wants to change their fence which is higher than 6 ft and borders the public highway, the council checks to see if this is in keeping with the area, if it doesn't then it does not get approved. The proposed houses/flats for this development are certainly not in keeping with the area. This will become another Billy Banks situation.

Moreover, those housing demand calculations were introduced very late in the LDP development process and did not give residents the opportunity to prepare effective objections.

The development of this area will increase traffic on what are already near to capacity junctions. The Welsh Government's traffic assessments show this development will generate an additional vehicle movement every 10 seconds during the peak hour and with the additional movements from the Cog Road development under construction in Sully these flows could easily be 50% higher. Cosmeston Drive residents living adjacent to the proposals already regularly wait for 40-50 vehicles to pass the end of their street before they can pull out onto the main road (Lavernock Road); the implications for the Merry Harriers junction and the junction at the other end of the Cogan Spur Road are horrendous.

The Transport Assessment (TA) submitted in support of the Barry Waterfront development and endorsed by the Vale Of Glamorgan Council identified that predicted traffic growth (without additional development) will exceed the capacity of 15 important highway junctions on the primary highway network in Barry and the South East Zone within the next 8 years. The TA also confirmed that some of the junctions were already at or near capacity and this is clearly evidenced by existing traffic congestion problems. It is important to note that the LDP acknowledges there is no realistic prospect of securing funding for the Dinas Powys Bypass within the plan period, as we have since

seen. This means the existing traffic congestion problems on the A4055 in Dinas Powys will inevitably intensify and likewise those travelling through Sully and Penarth. If the highway network and the junctions referred to above are examined in detail it is evident that the scope to engineer additional capacity is extremely limited. This fact appears to be passively accepted in the LDP by the lack of proposals to address existing and predicted future traffic congestion issues. It is therefore quite clear that even with substantial improvements to public transport the effect of allocating over 5400 dwellings in the South East Zone of the Vale will cause a dramatic escalation in traffic congestion. The highway network is either at, or rapidly approaching, capacity and is unable to accommodate the significant additional levels of traffic that would be generated by the LDP proposals for residential allocation. The strategy for allocating residential development in Barry and the South East Zone is not realistic and conflicts with Policy MG6.

The area was very badly flooded in February 2020 and this development is likely to exacerbate existing issues by increasing run off at times of high rainfall (see video: <https://www.facebook.com/100013275875113/posts/882146842237837>)

As anyone with any awareness of the environment will know destroying soil means carbon is released into the atmosphere and water is not absorbed. If developers build all over the 60 acres of land currently working hard on our behalf to keep the environment in good shape you will see increased pollution and flooding. This is not a prophecy, it is a fact. It is the reason that flooding is much worse than it was previously, as what were once green fields and woods have all been chopped down in the name of progress. I am not sure if those in the government realise we only have one planet and we are rapidly destroying it and the wildlife that inhabits rural areas. We are driving wildlife further into urban areas to seek food as we take away their means of food and habitation. It cannot be any coincidence that since the commencement of building in Sully, residents have seen an increase in field rats entering their gardens. What future are we actually giving the younger generation – not having a 3 bedroomed house will be the least of their problems when they are so choked with fumes and sick due to the polluted environment.

There is the issue of Biodiversity and enhancement of the country park. There was a very poor Environmental Impact Assessment conducted at the time of the consultations over the scheme in 2019. It did not identify many of the species living in the area - most of them protected under law. The Welsh Government has, over recent years, published many eloquent statements over its Strategies for Bio-Diversity, Countryside and Woodlands. Eloquent, but now is the time for action to protect this land for future generations. This area of land would be much better serving the community, it could be used for educational purposes and healthy outdoor activities instead of concreting all over it to provide unnecessary houses.

The area was also used for fly tipping in the 1970s and there are structures that look like methane distributors on site - problems not identified in the EIA - even though it found asbestos! Of course, this contamination can be removed but it will be costly if done correctly, or contained but there are no proposals for this in the Welsh Government's planning application. Developer's do not have the best reputation for making good on all the promises they make at the start of the process.

The site is next to Cosmeston Medieval village and there is valuable 15 Century archaeology (a fireplace) at Cosmeston Farm. Again, there are no proposals in the plans for the Archaeology to be assessed properly.

The site is also very visible from the coastal path and from Cosmeston Lakes Country Park, especially if 9 storey flats are built at the highest point. This will have the absurd result of turning the Country Park into an 'urban park', which I believe is probably the Council's aim as it concretes over a lot of that as well.

The site is very close to the Severn Estuary Special Area of Conservation which is of European significance and the Severn Estuary RAMSAR, of international importance to a variety of fish species and waterfowl. The noise from the construction phase is likely to affect the site and so could the occupied development.

Finally, I have to comment that your timing is undemocratic and ill thought out at this time of the country being under lockdown and restrictions. You may be within the law but it is morally and ethically bankrupt to try to rush this scheme through during the Covid crisis when residents are unable to undertake meaningful consultation or meet to discuss this matter.

Yours faithfully

Julie Robinson

There does not appear to be any consideration with the amount of traffic which will inevitably come from the building in excess of 1100 new houses and school in both Cosmeston Farm and Cog Road

The development on Cog road with is estimated 540 homes, the Lower Cosmeston Farm development a further estimated at 540 homes, it is estimated that that around 1100 homes would put an approximately 1600 more vehicles on our roads. When you add in the extra service vehicles one can easily envisage over 2000 extra vehicles on our already congested roads. The pollution alone coming from these vehicles is enough to cause concern, but in the documentation originally published by Aspri, they declare there would be no impact on the environment.

The report by Aspri it stated that there would be no upgrade or revision to the road infrastructure, the report also suggested that there would be no impact on traffic or road usage when the development was complete. Aspri plans includes the use of cycle paths and walking, encouraging cycling would make sense if the current and planned cycle paths were continuous or even existed, for example, the plans show that there would be a cycle/pedestrian path extending from the development alighting on the cliff top path, however cycling is not allowed along the cliff top path. The cycle paths along Lavernock road have recently been extended to the east but the path terminates near Lavernock Service Station, which means that cyclists either have to cross the road to join a very busy main road or cycle on a very narrow pavement both of which are considered dangerous, especially for younger cyclists. Also cycling along the railway path is already congested and does not have a safe, sensible exit into Penarth Town Centre.

The level of pollutants described at this location in the report, and the potentially devastating effect these chemicals can have and wherever the polluted materials are to be removed to. Listed on the planning application are several different pollutants contaminating this site, mentioned in the report, originally operated by the council in the 1970s, according to the report, and who are now to decide on awarding planning permission to the Welsh Government, the current owners. Firstly arsenic, no doubt we can assume this isn't conducive to good health. There is mention of a "former cattle pyre", what pathogens are lurking in the ground we are yet to be informed of, but it appears to be a relic of the 1960s foot and mouth epidemic. According to the report Polycyclic aromatic hydrocarbons (referred to as PAHs) and Total Petroleum Hydrocarbons (referred to as TPHs) are also located here, on land that planning permission for the type of development known as "residential with plant up take", is being sought, that means families living in houses and digging in

gardens. A brief search on the internet reveals that these chemicals are carcinogenic and also cause damage to foetuses and the impaired development of young children and are also harmful to adults.

There has been concern in Wales before on the development of these sites and the health risk to children. The Children's Commissioner and Welsh gov are not strangers to this.

In the planning report, it advises that there is asbestos, aka ACMs asbestos containing materials, in its current state, buried under the soil asbestos does not prove a problem unless disturbed, however, asbestos was not disposed of under the stringent controls of the Disposal of asbestos regulations of 2012 back in the 1970s when the Council managed this site. Great care needs to be taken in excavating asbestos and allowing it to become airborne is a huge risk to the current residents of Cosmeston. Research on Medical sites and planners who have examined this site indicate that there is NO safe level of asbestos. One particle can bring on various diseases such as lung cancer <https://gov.wales/sites/default/files/publications/2019-08/asbestos-management-in-schools-19.pdf>

The responsibility for clearing up such land according to the Environmental Protection Act 1990 normally falls on the current owners or the original polluters, so is it right in this case the council should be allowing planning permission to the current owners. Should the view of other parties regarding the development of this land be sought ie Welsh Office , Environment Agency?

This type of land is supposed to be regulated by the Local Authority, in this case the tip was "managed" in the 1970s by the council, who are now being approached re planning permission by the Welsh Gov who are now the owners. What has been done by the Local Authority to identify and manage the risks caused by this contamination?

Every Local Council has a duty under Part 2 A of the Environmental Protection Act 1990 to devise a strategy to identify contaminated land and must actively take steps to reduce the risk to people and the environment if planning permission is granted will the liability of the seller, in this case the Welsh Gov , be passed to a buyer ie a developer and then onto future owners of the land ie house owners.

Advice on the Act states that if we contact the council with our concerns they should take it seriously. There is considerable objection to this development regarding Health issues. What has the Local Authority done to address concerns and identify such risks as per the Environmental Protection Act.

This site hasn't been touched since the 1970s , so what steps have been taken to make it safe?

While the planning report is lengthy it does raise questions into the above and more concernedly an area marked on the report as "landfill quarry", at area C on the plans. This area is to be "community allotments and orchards", an area extensively dumped in back in the 1970s in an unregulated manner by chemical companies and anyone else who cared to deposit material at this previously unsecured site, as there does not seem to be any records for the site, no one can be sure of what is buried here.

Neither the Council nor the Welsh gov can deny knowing the history of this site if health problems arise in the future. To reassure public concern will the Local Authority or the Welsh Gov issue a statement acknowledging the history of this site as a refuse tip, and assure those concerned its safe to, house people on such a site and there is or isn't a need for contingency plans regarding any future health problems.

The reports also make reference to surface water issue, this area is prone to flooding, as Lavernock road is on or below sea level. It's well known that once land has been cleared, unless drainage is sufficient then the surface water will cause issues for the surrounding facilities/roads. As these fields hold a lot of surface water due to the clay based soil, having buildings and roads would lead to more surface water. Does the authorities recognise this fact and do they have a plan to deal with the increase in surface water?

Have any other considerations been given to developing this site that would be of lower health risks, Wales has the lowest proportion of wooded areas in the UK, trees could be planted to reduce the carbon footprint, also a vast solar energy farm could be located here, so the thousands of visitors to Cosmeston could actually see that green energy and carbon reduction was more than just talk, and overlooking the world's second largest tidal range, could there be a future there to? Has any consideration been given to this as a viable alternative.

This is an area of natural beauty and should be put to better use.

There is a development on Cog road with an estimated 540 homes, the Lower Cosmeston Farm development is estimated at 540 homes. The initial report advised that there would be no upgrade or revision to the road infrastructure, it is estimated that that around 1100 homes would put an estimated 1600 more vehicles on our roads. When you add in the extra service vehicles one can easily envisage over 2000 extra vehicles on our already congested roads.

The pollution alone coming from these vehicles is enough to cause concern, but in the documentation originally published, there are no plans to enhance our environment, except for extended cycle paths.

When you look closely at the original planning for the cycle paths, they have not taken into consideration that cycling along the cliff top path is not allowed and cycling along the railway path is already congested and does not have a safe, sensible exit into Penarth Town Centre.

Lower Cosmeston Farmhouse and Barns; Request for Listing

Mark Lambert BA

Listing request written and compiled by Mark Lambert BA

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Introduction

Lower Cosmeston Farm is located on the outskirts of Penarth, within the Vale of Glamorgan, South Wales (ST 17916 68965). It lies adjacent to Lavernock Road (B4267) and is situated directly opposite Cosmeston Lakes Country Park, which in addition to being a Site of Special Scientific Interest (SSSI) also contains the reconstructed remains of the Medieval Village of Cosmeston which lie c 160 m west of Lower Cosmeston Farm.

Impetus for listing

The impetus behind this application for listing is the Welsh Assembly Government's intention to develop Lower Cosmeston Farm. A report commissioned by the Welsh Assembly Government as a part of the planning process entitled '*Land at Upper Cosmeston Farm, Lavernock Road, Penarth-Archaeological and Heritage Assessment: Prepared by the Environmental Dimension Partnership on Behalf of the Welsh Assembly Government. 2019*' (Report Reference edp5187_r003d), has sought to evaluate the historical and architectural worth of Lower Cosmeston farmhouse and its outbuildings. This report concluded that the historic farmhouse and all of its outbuildings are on account of their condition and relative ubiquity, '*not recommended for retention*'.

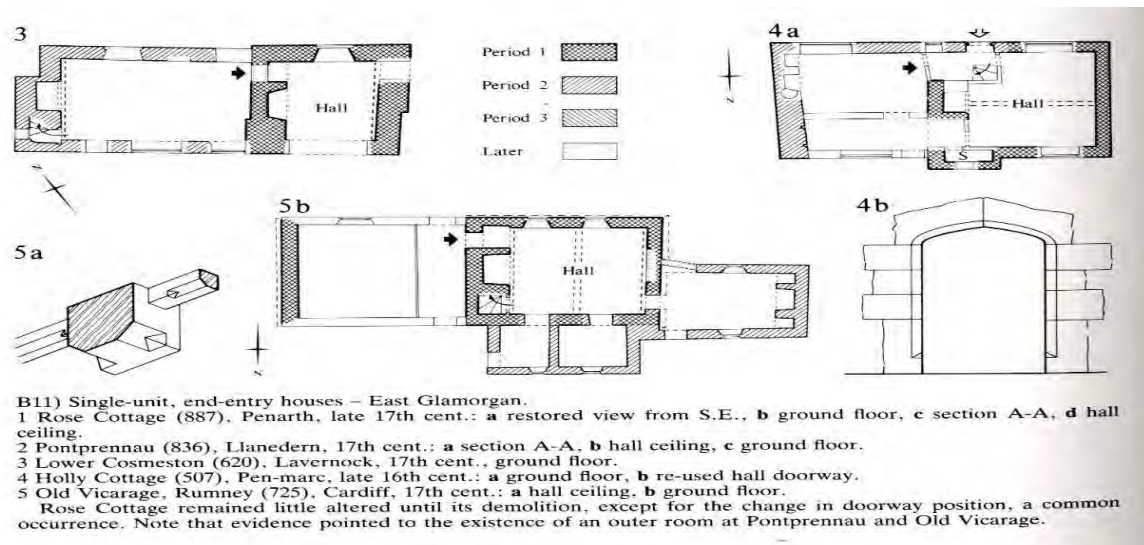
The author of this listing application however believes that the Archaeological and Heritage Assessment of Lower Cosmeston farmhouse and its outbuildings may be challenged. My reasoning will be discussed throughout the course of this listing application.

Listing Criteria

Having read carefully through the listing requirements found on the CADW website it seems clear that there is a reasonable case for retention. Lower Cosmeston farmhouse fulfills all of the criteria laid down by CADW regarding Grade 2 listing. These criteria are discussed below.

1. Architectural interest

Lower Cosmeston farmhouse was considered to be of sufficient age and architectural interest to be included within the 1988 RCAHMW publication 'Glamorgan Farmhouses and Cottages' where it is listed as a 'single-unit, end entry hearth passage house' (RCAHMW 1988, P-297). Lower Cosmeston farmhouse is the *only* example of this type of vernacular architecture within the Cosmeston, Lavernock and Penarth area



(Figure 1. Excerpt showing drawing (Fig 3) of Lower Cosmeston farmhouse within RCAHMW Glamorgan Farmhouses and Cottages, 1988)

Lower Cosmeston farmhouse has seen a number of alterations and is no longer a habitable dwelling. The present occupied Lower Cosmeston farmhouse, which was designed by noted architect E W M Corbett under the auspice of the Marquis of Bute, was constructed in 1896, presumably as a replacement for the seventeenth century farmhouse. It is likely however that some form of habitation of the old Lower Cosmeston farmhouse continued during the late nineteenth and early twentieth century.

Description

The seventeenth century farmhouse is constructed of locally derived lias-limestone and is comprised internally of three sections. The ground floor contains two sections, and the upper level consists of a single section. Two extensions, located on the farmhouse's east and south angles respectively, are likely contemporary with the late Victorian period farmhouse. These extensions are quite plain and exhibit very few dateable features. One of these extensions however, a small annex located on the east side of Lower Cosmeston farmhouse, exhibits a Victorian period fire grate.

Section one

The first section-and largest of the two ground floor sections, is located on building's west angle. This part of the building is likely to have been the parlour and nucleus of the house. This room has within recent years been utilized to house farm animals. This occurrence is evident in that several portions of the outer wall on the south angle, have been taken out to incorporate open entrances, presumably to facilitate the entrance and exit of animals. The gable corner at the building's south angle has within recent years suffered moderate damage and has been, somewhat clumsily, patched-up with modern breeze blocks. The sole surviving ground floor window on the building's south angle has had its surround reconstructed with red bricks at a likely early twentieth century date.



(Figure 2. View of Lower Cosmeston farmhouse from its south-west angle showing some of its later alterations and the Victorian period east-annex)

Despite these modifications the parlour still contains many original in-situ features within. The most striking of these features is a large, bricked up, gable-end fireplace complete with chamfered wooden mantel-beam and stone jambs on either side. Surmounted above the fireplace is a large chamfered wooden floor corbel. Concealed within the stonework to the left of the fireplace is a stone spiral-staircase. This staircase is presently inaccessible and has been covered-up.



(Figure 3. View of the parlour area showing the fireplace and wooden corbel. The staircase is just out of view to the left)

The parlour's north wall is intact. If viewed from the outside, it is possible to discern a number of the original blocked-up window spaces with their wooden lintels.



(Figure 4. *View of Lower Cosmeston farmhouse from its south angle*)

Section two

The second section is located on the farmhouse's east angle. A section of the outer wall at the building's east extremity has been taken away to incorporate a large entrance (see figure 2). This part of the house is the smaller of the two ground-floor rooms and can only be accessed via its entrance.

This room contains an internal free-standing wooden staircase of relatively modern date which leads to an upper level (section 3). This upper level spans the entirety of the parlour-but does not extend to this small section of the house. This wooden staircase is likely to date from the time that the new Lower Cosmeston farmhouse was built.

This room contains many original features. The most apparent is a large internal chimney stack incorporated within the wall that divides this part of the house from the parlour. This stack contains an open fireplace with wooden mantel-beam and bread oven. Another large fireplace is to be found close to the chimney stack located within the north wall. This fireplace has partially collapsed within recent years.



(Figure 5. *View of the internal chimney stack. The external stairs are to the left of the stack*)

This room contains a number of stone flags and a large chamfered wooden floor corbel surmounted on to the east wall. This east wall contains a blocked-up second-floor window with large wooden lintel. This window appears to have been sealed during antiquity-evidence perhaps of window tax evasion, or possibly when an extension was built on to the east side of the farmhouse during the late nineteenth/early twentieth century. A blocked doorway is to be found some way up on the upper left side of the east wall suggesting that there was at one point an upper floor. It is difficult however to say with certainty when this floor level was swept away.



(Figure 6. *View of blocked-up window within the east wall*)

Section three

The third section consists of an upper-level which spans the length of the parlour. This upper level, although connected to the parlour via the spiral stone staircase concealed behind the parlour fireplace, is at present only accessible via the free standing stairs within the second room.

The upper-level, with the exception of two windows, one of which appears to have been altered at a later date, is devoid of internal features. The roofing and internal flooring are not original. It is difficult to say exactly when they were inserted, but it is likely that the originals were replaced at the time that the late Victorian period farmhouse was constructed. The building is presently roofed with corrugated iron sheets.



(Figure 7. View of the upper level of Lower Cosmeston farmhouse)

2. historical interest

Lower Cosmeston farmhouse has an historic connection to an important archaeological site, namely the medieval village of Cosmeston. Cosmeston is perhaps one of the most well-known and celebrated medieval villages not just within the Vale of Glamorgan, but the whole of Wales, on account of its reconstructed buildings and the vast amount of archaeological excavations undertaken within. This important association was completely overlooked within the Archaeological and Heritage Assessment commissioned by the Welsh Assembly Government.



(Figure 8. Cosmeston medieval village)

Lower Cosmeston farmhouse is a physical embodiment the socio-economic conditions that developed within the Cosmeston area and South Wales at large during the post medieval period. In the wake of the demise of the medieval feudal system of land tenure, there came the rise of both the gentry and the yeoman classes who replaced the enfeoffed knight in his manor and his, for the most part, unfree serf bondmen. These two new distinct social groups are intrinsically connected to Cosmeston, which during the post-medieval period was revived from a shrunken medieval village decimated by the Black Death, into a small but prosperous hamlet. Lower Cosmeston farmhouse is the last surviving tangible vestige of this socio-economic development within the Cosmeston area.

Lower Cosmeston farmhouse was almost certainly mentioned in the Glamorgan Hearth Tax Assessment of 1670. It is at present difficult to say with certainty which of the dwellings recorded in the Hearth Tax Assessment is Lower Cosmeston Farm; however, owing to the fact that just one of the dwellings in the assessment contained three hearths, as does Lower Cosmeston farmhouse, it is likely to be the same building which belonged to one Joseph Robbins (Parkinson, E. 1994, p-92).

3. Close historical associations

Lower Cosmeston farm was connected to a number of important families and individuals throughout the post-medieval period. Lower Cosmeston farmhouse was the dwelling of a yeoman farmer and the land at Lower Cosmeston Farm was held leasehold from successive post-medieval owners of the manor of Cosmeston. These close historical associations will be discussed below.

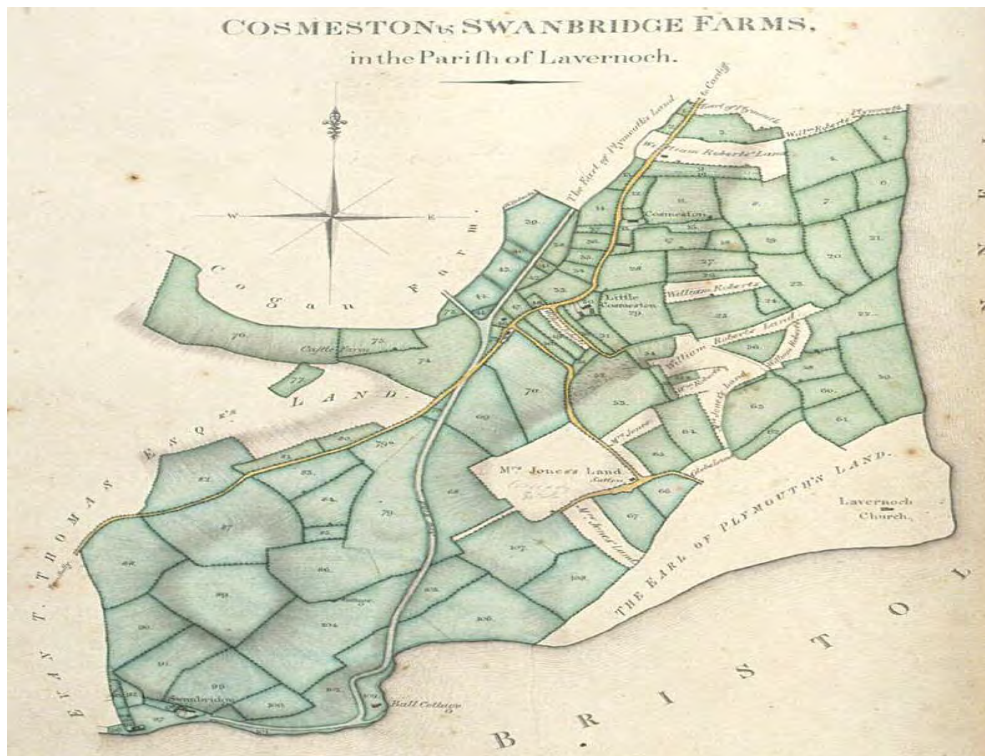
During the late medieval period Cosmeston was owned by Richard Beauchamp, earl of Warwick (Spurgeon et al. p-476). The lordship of Glamorgan, including the manor of Cosmeston then passed to Jasper Tudor from whom it eventually passed to the Crown. Cosmeston was purchased from Edward VI by Sir William Herbert in 1550 (Spurgeon et al. p-476). The Herbert's were an influential South Wales gentry family of which various members held the manor of Cosmeston from the middle of the sixteenth century through to the late eighteenth century from their manor house at Cogan Pill. Cosmeston was purchased by the Earl of Bute in 1793 and was held by the Bute family until the twentieth century.

A lesser stressed historical association, perhaps because of its restriction to academia, is that Lower Cosmeston farm is connected to an important ceramic assemblage-the largest stratified assemblage of pottery excavated from within South Glamorgan (Forward, A p-133). This ceramic assemblage, which has an unbroken chronological sequence dating from the medieval period through to the eighteenth century, has been fundamental in helping archaeologists to not only understand the evolution and development of Cosmeston as a settlement, but has also helped to elucidate 'economic networks', and the lives of the yeoman inhabitants of Lower Cosmeston farm (Forward, A. 2013, p-251). Lower Cosmeston farmhouse provides the physical context for this important post-medieval ceramic assemblage-something that has often been overlooked in the past when discussing this material

4. Group value

The group value of the farm buildings at Lower Cosmeston Farm was dismissed within the Archaeological and Heritage Assessment as being of '*limited heritage significance*' (EDP. P-32) on account of their relatively modern age and apparent deteriorated condition (EDP. P-32).

This assertion failed to consider the group value of Lower Cosmeston Farm's Georgian period outbuildings as a rare and intact surviving post-medieval farm complex within the Lavernock area. The two barns along with the farmhouse were noted on the Bute estate map of 1824 and were labelled as '*Little Cosmeston*'. A description of each is as follows.



(Figure 9. *The 1824 Bute estate map depicting Lower Cosmeston Farm, as 'Little Cosmeston'*)

Building A—a single-bay threshing barn constructed of local lias-limestone.

This threshing barn, which is located on the east side of the farmyard, by virtue of its absence on the Yates map of 1799, seems to have been constructed around the early 1800's. The threshing barn contains two large open cart doors and ventilation slits on either side of its east and west walls. Despite suffering minor damage to its west side entrance, this barn is in an otherwise excellent state of preservation retaining its overall structural integrity and its wooden roofing frame, beams and trusses. The roof is presently covered with corrugated metal sheets.



(Figure 10. *View of the threshing barn from its east angle*)

Building B. A three sectioned single-storey barn.

This barn is located on the west side of the farmyard and is likely to have housed animals, although it is possible that it was utilised for other purposes. The construction of the roof is comparable with the threshing barn indicating that these two barns were likely constructed at around the same time. The timber roofing of this building is, like the threshing barn, intact-but also exhibits a corrugated iron roof. Despite the addition of later, likely Victorian, period window surrounds and several small modern appendages on the outside of the structure, the barn remains in excellent intact condition throughout and retains its structural integrity.



(Figure 11. *View of the single storey barn from its east angle*)

The architectural unity of Lower Cosmeston Farm as a complete unit of post-medieval date is now something of a rarity within the Lavernock area. Every other post-medieval farm complex within the vicinity has been destroyed. These farms consisted of Upper Cosmeston Farm, which was noted on the 1824 Bute estate map as ‘*Cosmeston*’ and the 1878 OS map as ‘*Upper Cosmeston*’, was destroyed with the construction of the Morcom, and later the South Wales and Portland Cement and Lime Company offices. Sutton Farm, which was located on Fort Road, was demolished within the last few decades of the twentieth century for development, and Lavernock Farm, which was located at the end of Fort Road adjacent to St Laurence church, was also demolished and developed within recent years. Lower Cosmeston Farm now houses the only surviving and intact Georgian period farm complex within the Cosmeston, Lavernock and Penarth area.



(Figure 12. View of Yates 1799 map showing the locations of the now vanished Upper Cosmeston Farm which is labelled as 'Lower Penarth', Sutton Farm and Lavernock Farm. Lower Cosmeston farm is shown as 'Coston')

5. Age and rarity

As previously stated, Lower Cosmeston farmhouse is the only remaining example of a seventeenth century domestic residence left within the vicinity of Cosmeston, Lavernock and Penarth. Within the wider context of the Vale of Glamorgan this type of dwelling represents a finite group of buildings which have been diminished within the twentieth century and the early years of the twenty first century. A notable example of the destruction of a similar building is the demolition of Tal-y-Fedw, Llantrisant in 2014.

There may be better preserved examples of the same type of building throughout the Vale of Glamorgan, but each building, as well as being judged upon a set criteria, should also be judged upon its own merits and intrinsic value. Condition, often a primary prerequisite for listing consideration, should in this instance not be the sole prerequisite. Lower Cosmeston farmhouse represents a rare survival of a seventeenth century dwelling within the Lavernock vicinity, and to a lesser extent, on a regional level.

As a seventeenth century farmhouse dating before the year 1700 that despite modifications, is structurally sound and retains many original features (i.e., like its original form), Lower Cosmeston farmhouse, as stated within CADW's own guidelines, qualifies for listing consideration as being of architectural and historical interest.

Listing Precedents

The Archaeological and Heritage Assessment assessed Lower Cosmeston farmhouse almost entirely upon its condition. For example, the assessment states that '*none of the four building would meet the high threshold to be designated as a building of special architectural or historic interest because of the impact of more recent use and its impact upon the retention of the original historic fabric*' and '*Whilst it retains some aspects and features of interest, it is not recommended for conservation or retention*' (EDP, p-38)

As a rebuttal to the Archaeological and Heritage Assessment's somewhat cynical conclusion the author of this listing application can cite a number of precedents whereby historic buildings in a far more advanced state of deterioration than Lower Cosmeston farmhouse have been ascribed listed status by CADW primarily because of their historic interest and connections-not their condition. Two examples are as follows.

Cwrt-y-vil Grange, Penarth

Cwrt-y-vil Grange (18503) is a Grade 2 listed structure. Visually the remains of the grange consist of little more than a series of low-standing rubble filled walls almost completely devoid of any architectural character and features. These walls, some of which are of probable medieval/early post-medieval date, have derived their listed status not because of their condition or aesthetic value, but because of their 'historic fabric' and their historic association with St Augustine's Abbey Bristol (www.1)

Great Frampton House Llantwit Major

Great Frampton House (18841), Llantwit major is a Grade 2 listed building. This house being of early seventeenth century construction, with later eighteenth-century additions, is of a similar age to Lower Cosmeston farmhouse. Great Frampton farmhouse was severely damaged by fire in 1994 and was left a burnt-out shell-denude of all its original internal features. Structurally Great Frampton farmhouse was in

such a fragile state and in danger of total collapse, that internal scaffolding was required to retain its walls in-situ. A recent visit by the author has revealed that there are no original features retained within the structure. In contrast, Lower Cosmeston farmhouse is structurally sound and contains many original features (www.2)



(Figure 13. View of the interior of Great Frampton farmhouse showing its deteriorated and fragile condition)

Barns and stable range

Great Frampton barn and stable range (06303) are of the same late Georgian date range as the barn and stable complex at Lower Cosmeston Farm and are in virtually the same condition exhibiting the same type of modern corrugated roofing (www.3).

Conclusion

There is no doubt that Lower Cosmeston farmhouse has an intrinsic value as an historical building of considerable age and scarcity within its locality, and also to a lesser extent within the wider context of the Vale of Glamorgan. Lower Cosmeston Farm represents an important period in the history of Cosmeston, and physically embodies Cosmeston's post-medieval re-birth as a prosperous farming community forming as much as an integral part of the historic environment at Cosmeston as the reconstructed medieval village.

The author (s) of the Environmental Dimension Partnership Archaeological and Historical Assessment acknowledge that Lower Cosmeston farmhouse is a building of significant age and interest, but however weigh up the historical and architectural importance and condition of Lower Cosmeston farmhouse, and indeed the historic environment at Lower Cosmeston Farm at large, against the Welsh Assembly

Government's plans for development. Because of the Welsh Assembly Government's desire to construct houses the report recommends that Lower Cosmeston farmhouse and its outbuildings be demolished.

The demolition of such an important historic environment within the Vale of Glamorgan would be almost without precedent-and certainly not without controversy. The deteriorated condition of Lower Cosmeston farmhouse should not blind us to both its intrinsic and historical importance as the last surviving building of its type within the Cosmeston, Lavernock and Penarth area and what it historically represents '*a building of special interest which justifies every effort being made to preserve it*'.

The farmhouse at Lower Cosmeston Farm fulfils CADW's criteria for Grade II listed status and is hence worthy of retention on account of its age, rarity, structural integrity, the survival of many period features, its connection to the medieval village of Cosmeston and its contribution to the historic environment.

Bibliography

Forward, A. 2013. The Ceramic Evidence for Economic Life and Networks from the 12th to the 17th Century Settlement Sites in South Glamorgan.

RCAHMW. 1988. Glamorgan Inventory: Vol 4 part 2, Farmhouses and Cottages.

Spurgeon, C.J, et al. RCAHMW. 2000. The Later Castles.

Land at Upper Cosmeston Farm, Lavernock Road, Penarth-Archaeological and Heritage Assessment: Prepared by the Environmental Dimension Partnership on Behalf of the Welsh Assembly Government. 2019. (Report Reference edp5187_r003d).

Parkinson, E (Ed). 1994. The Glamorgan Hearth Tax Assessment of 1670. South Wales Record Society. Cardiff.

Internet References

[www.1 https://coflein.gov.uk/en/site/18503/details/cwrt-y-vil-grangecannon-court](https://coflein.gov.uk/en/site/18503/details/cwrt-y-vil-grangecannon-court)

[www.2 https://coflein.gov.uk/en/site/18841/details/great-frampton-farmhouse](https://coflein.gov.uk/en/site/18841/details/great-frampton-farmhouse)

[www.3](#)

<https://archwilio.org.uk/arch/query/page.php?watprn=GGAT06303s&dbname=ggat&tbyname=core&sesid=CHI2a7f65wz&queryid=Q931147001604864142>

47, BROCKHILL WAY, PENARTH, VALE OF GLAMORGAN, CF64 5QD

9 November 2020

Planning Department
Vale of Glamorgan Council
Dock Office
Barry Docks
CF63 4RT

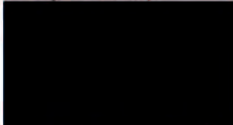
Dear Sirs

LAND AT UPPER COSMESTON FARM
PLANNING APPLICATION NO 2020/01170/OUT

This is to register my opposition to the above outline planning application and enclosed are my reasons.

In the circumstances outlined, I request that the Council grant a 21 day extension to the time allowed for submissions so that all Vale residents affected by the restraints of Covid 19 lock-downs are made aware of the application and have adequate time to respond. I request that this proposal be submitted to the applicant for consent.

Yours faithfully

A black rectangular redaction box covering the signature of the sender.

R H Wisenden FICE (retired)

LAND AT UPPER COSMESTON FARM, LAVERNOCK ROAD, LAVERNOCK

OUTLINE PLANNING APPLICATION FOR 576 DWELLINGS

APPLICANT - WELSH GOVERNMENT

OPPOSITION - ROGER H WISENDEN

MODUS OPERANDI

A couple of years ago the Welsh Government, acting within its own restrictive and grand- sounding strategy policies for the Welsh people and their environment, briefed planning specialists and supporting professionals. Details of the application proposals were eventually published and as a result KEEP COSMESTON GREEN - a gathering of alarmed local residents - was formed. I am a member but these are my own views.

A year or so ago, after two public consultations (organised by the Government's planners), notices of the planning application were displayed in prominent places stating that the application was about to be submitted. This, however, did not happen. The delay may have been due to amendments (there have been some) or the impact of COVID 19. The latter certainly curtailed public activities amongst which those of KEEP COSMESTON GREEN.

However, on the day the Government ordered a 16/17 day "fire break" lockdown, they submitted the planning application. The Government's own pandemic laws obviate public gatherings and information sources are in disarray, so the Government's timing is very much in their favour in reducing the level of opposition or otherwise to the scheme.

In view of COVID 19 and these unusual circumstances, I would request that the Vale of Glamorgan Council/Welsh Government grant an extension of time for the receipt of comments to the application. This would be fair and would avoid challenge but not the reputational damage already sustained.

PLACE

The brief that planners received from the Welsh Government is summarised by its own published vision - ".....high quality and sustainable development with strong identity and sense of place.....". Bear in mind that the full brief no doubt requests maximum density that the site could accommodate, even exceeding the numbers originally anticipated within the LDA.

The actual PLACE, using all our human senses, is RURAL green belt land enclosed by the coast, further farm land, a country park with its medieval village, and finally by the previous Cosmeston development which edges Penarth and was mostly built on recovered industrial land.

It is nonsense to view this site as URBAN, a term used frequently throughout the supporting documents. It is nonsense to try to make the development into a township complete with central square, prominent buildings, and rows of seven storey flats. In no human senses can this be the PLACE.

My personal sense of PLACE settles, in large terms, on Penarth which has the streets, the squares, the prominent buildings and, in small terms, my family home and garden.

This development scheme is an URBAN sprawl - squares, prominent buildings and seven storey flats, all out of character. The homes mostly have no garden or negligible space and have remote or street parking. Movement of service vehicles, deliveries or visitors is extremely restricted with no parking provision, eg Barry Waterfront and Penarth Heights.

The Welsh Government set the scene - "density, identity and sense of PLACE". The Government has applied to the local authority which has already, in principle, decided this site is for housing. What can we do to persuade the Government to review their own creation alongside their own ideals and stated strategies? Wellbeing for Wales, environment for Wales, forestry for Wales, all those idealistic chapters of intent over-ridden by the housing numbers game.

IDENTITY

Those very Welsh Government ideals could be advanced within this parcel of land they already own. Plant trees over the upper plateaus, improve and make safe the Wales Coastal Path, retain the farm and its ancient heritage, provide safe connections to the existing park and medieval village and so on, thus building on the identity all ready profound and loved - COSMESTON.

ACCESS

The OUTLINE application seeks planning consent for the access to the development retaining all other matters reserved. This enables the Welsh Government to sell the several parcels of land to developers allowing them some freedom to vary the designs within their section for which they then seek FULL planning consent. This procedure may preclude proper public scrutiny of several FULL consents due to their frequency and the passage of a long development period.

There are two vehicular access points proposed both on to Lavernock Road, both to be with central lane to turn right from the Barry direction. The planning team evidently discussed the feasibility of the extra traffic to and from 576 dwellings and a primary school. The highways authorities gave it the all clear. More nonsense!

Lavernock Road from the 40/30mph sign through to the junction with Westbourne Road is the proverbial "Rat Run". Deficiencies requiring attention are well known, have been high-lighted during the consultations but remain to this day. There appears to be no provision in this application for improvement despite the substantial Section 106 developer funds that would become payable if the scheme was to proceed.

No development, not the school nor any number of extra dwellings, should be granted consent until remedial measures are guaranteed. The safety and wellbeing of the existing residents and road users should be a priority anyway!

The road is B classified serving through traffic to Cardiff and beyond and to Penarth Town. It is also a residential street with houses, a public house/restaurant, two accesses to the golf club, a funeral home, a garage, Cosmeston Country Park with its three access points and two bus stops. It is subject to a 30mph limit.

The deficiencies are as follows:-

SPEED - there are a few tiny 30mph signs, too small, too spaced and the long straight by the park has none. There are no other traffic calming measures. There are no speed cameras. No mobile cameras have been seen for 5 years of my use. Enforcement and fixed calming measures are required urgently.

CROSSINGS - there is one pedestrian crossing at the park but no facility, crossing or pavement, for pedestrian access to the funeral home, golf club or the bus stop opposite Brockhill Rise itself accessing a Spar and some 250 properties. Pavements and a central island could be a solution coupled with above speed controls.

TRAFFIC- every busy period 7.30 to 9 am and 3 to 6pm causes queues either side of Westbourne Road, up said road and frequently up Brockhill Rise. This exacerbates the pedestrian problems above. "Near misses" are daily events.

- when the traffic is flowing, exiting Westbourne Road or Brockhill Rise is hazardous made even worse by excessive speeds in both directions.

- part time traffic lights at Westburne Road would break the free flow and help all of these risks.

LIGHTING - despite its classification Lavernock Road has no street lighting between Cosmeston Drive and the garage/golf club zone.

There can be no excuse for this being avoided, surely?

Penarth, 25 October 2020

To Head of Planning and Transportation
Vale of Glamorgan Council
Civic Offices
Holton Road
Barry, CF63 4RU

Representation by Clifftop Residents in response to the public consultation posted on 23 October 2020 in relation to the planning of 576 housing units on the land of

Upper Cosmeston Farm, Lavernock Road, Penarth

by the Vale of Glamorgan Council

To the Head of Planning and Transportation (Mr. Robert Lankshear)

Our concerns with this housing scheme have remained unaltered throughout all these years of public representations and depositions, **since the start in 2012 of the LDP process up to the most recent documents publicised by Asbri planning consultants.**

See also list of signatures submitted in response to last year's public consultation (attached)

At the beginning, we, the "Clifftop" residents, welcomed the chance of becoming involved in developing a positive, forward-looking and sustainable housing project that respects all the good things that make Penarth one of the best places to live in Wales (The Sunday Times, March 22, 2020).

Sadly, the government/planning officers never took our concerns seriously over all these years, leaving us with no choice but to oppose this project! Now, not only us the Clifftop residents but thousands of people living in the entire region stretching from Sully/Barry to Penarth are feeling short-changed by politicians who are supposed to represent them.

Initially, we requested that the new housing scheme would respect the tranquillity of our neighbourhood by making sure that the new residents of the colossal housing development would not have access to Whitcliffe Drive (and streets beyond). A small request really that would prevent an unimaginable daily traffic chaos when the avalanche of cars from the new housing development spill over into our neighbourhood in order to reach Lavernock Road, the bottleneck of daily commuting. Yet, road access involving our Whitcliffe Drive with keeps coming up in the planning documents.

The gross negligence of care provided by the government is astounding!

We understand the financial side of this project. However, instead of selling out an entire region, we urge the government to do what is mandated to do and implement new forward-looking policies that improve education and job prospects in the long run. There are no jobs or shops in the new "satellite town", which requires all people, including those living on social benefits, to commute on a daily basis. This is indeed backward thinking and contradicts numerous grand schemes proclaimed by this government, including those related to climate change and the planting of a million new trees.

In brief, since the government keeps ignoring our original concerns and requests, we, the Clifftop residents, oppose this new scheme based on:

1. Wrong location of new town
2. Traffic congestion throughout Penarth
3. Destruction of green land and loss of wildlife
4. Destruction of archaeological site
5. Conflict with environment agenda of Welsh Government
6. Backward thinking (ignorance of new housing opportunities in town centres)

For the Clifftop Residents,



Prof. Bernhard Moser
37 Whitcliffe Drive
Penarth, CF64 5RY

pho: [REDACTED]; e-mail: [REDACTED]

Penarth, in October 2019

Representation by **Clifftop Residents** in response to the public consultation held on Tuesday, 24 September 2019 in the Café at the Cosmeston Lakes Country Park.

Town and County Planning: Upper Cosmeston Farm, Lavernock Road, Penarth

Further to our Deposition (**Representor ID 3579**) during the public Hearing Session 24 on 24 January 2017 at Barry Docks (see attached copy of deposition letter), the Clifftop Residents reiterate that the new housing development should not endanger current life in our residential neighbourhood. Our two main concerns relate to access roads and proposed high-rise buildings in the new housing development.

We, the **Clifftop Residents**, will under no circumstances agree to

1. the use of Whitcliffe Drive and connecting roads (Stanton Way, Brockhill Rise) to Lavernock Road as access roads for commercial vehicles during the construction phases of the new housing development.
2. the use of Whitcliffe Drive and connecting roads (Stanton Way, Brockhill Rise) to Lavernock Road as access roads for daily residential traffic arising from the new village.
3. creation of high-rise buildings at the highest point of elevation, in plain sight of the entire neighbourhood.

We, the Clifftop Residents, request that Whitcliffe Drive will not be physically connected to any of the roads proposed for the new housing development. Installation of bollards is only a temporary measure and they can easily be removed permanently.

Therefore, we request that the land separating Whitcliffe Drive from the new housing development remains green wedge land, which is essential for maintaining the safety and identity of our current residential community.

Furthermore, the proposed high-rise buildings could indeed be called "feature buildings" but in the negative sense. This proposition is highly disrespectful of the entire clifftop neighbourhood whose residents were largely ignored during all phases of planning.

Clifftop Residents overwhelmingly agreed to support this petition (see attached list of signatures). The question remains whether the landowner (Welsh Government) continues to threaten the safety and wellbeing of our neighbourhood?

For the Clifftop Residents,

[Redacted signature]

Prof. Bernhard Moser
37 Whitcliffe Drive
Penarth, CF64 5RY

pho: [Redacted] e-mail: [Redacted]

Representor ID - 3579

Prof Bernhard Moser

37 Whitcliffe Drive, Penarth, CF64 5RY ([REDACTED])

Vale of Glamorgan Local Development Plan Examination

Invitation to Hearing Session 24: New Allocations (Barry Docks, 24. January 2017)

Statement pertaining to **MG2.23** – Land at Upper Cosmeston Farm, Lavernock

I am representing the residents at the Whitcliffe Drive in Penarth located adjacent to the proposed MG2.23 development. Whitcliffe Drive separates residential houses from the grassland at the Cliff Top, which is regularly used by dog walkers, local residents and visitors alike (Policy MG18 - Green Wedges). The Cliff Top also features the Welsh Coastal Path connecting the Penarth Pier with Sully. In 2012, we had already submitted a statement, including a cover letter and a common statement that was individually signed by the Whitcliffe Drive residents. Our present concerns do not differ from our previous statement submitted during the 2012 consultation period.

1. Whitcliffe Drive cannot give rise to a new access road to MG2.23

The construction traffic would endanger not only the Whitcliffe Drive residents but all residents living along the roads connecting Whitcliffe Drive with Lavernock Rd. Our residential roads are not built for heavy traffic. Similarly, once the MG2.23 development is completed, the residents of the "new town" would in effect overwhelm our neighbourhood when seeking access to Lavernock Rd on our side by driving through Whitcliffe Drive twice daily. It is anticipated that traffic congestions at the new Lavernock Rd access point at the MG2.23 site would force local residents to come through Whitcliffe Drive and, thus, destroy the tranquillity of our neighbourhood.

2. MG2.23 requires "green wedges" in order to accommodate the needs of its new residents

As pointed out in our 2012 submission (ID: 3579), the Cliff Top is an attraction for residents and weekend visitors. But it is too small to absorb the population of a new town. In order to maintain the high quality of life in our neighbourhood we request (in agreement with the MG18 "Green Wedges" policy) the planning of new park areas at the MG2.23 site. As an attractive idea we previously proposed a green corridor connecting the highly popular Cosmeston Park with the Coastal Path at the Cliff Top. Without adequate provisions for green spaces the new residential area would create unacceptable problems to its neighbourhood.

We recognize the need for new houses and support in principle the authorities in this endeavour. However, we are concerned about the U-turn taken by the authorities in the latest proposal for the MG2.2 site, including an increase of 245% in housing units to 576, which equates to the population of a small town. The potential impact of the latest MG2.23 plan on our neighbourhood and, indeed, on the quality of life in Southern Penarth, is catastrophic. Also, the Cliff Top residents refuse to be the scapegoats of poor housing planning.

Therefore, we ask from the planning authorities to agree in writing with the above concerns in order to secure our support in future discussions about the MG2.23 development.

Bernhard Moser
(for the Cliff Top residents)

[REDACTED]

The undersigned of the list agree with the petition by the Clifftop Residents
in October 2019

House No., Street	Name (in PRINT)	Signature	Date
37 Whitcliffe Drive	B. MOSER	[REDACTED]	26/9/2019
35 WHITCLIFFE DRIVE	B. SQUIRES	[REDACTED]	2/10/19
34, WHITCLIFFE DRIVE	R. HUDSON	[REDACTED]	2/10/19
33 WHITCLIFFE DRIVE	S. PRICE	[REDACTED]	2.10.19
31 WHITCLIFFE DRIVE	B. JONES	[REDACTED]	2.10.19
36 Whitcliffe Drive	K. Cullen.	[REDACTED]	3/10.19.
30 Whitcliffe Drive	JOHN G. EVANS	[REDACTED]	4/10/19
32 WHITCLIFFE DRIVE	S. SALAN	[REDACTED]	7/10/19

12/10/2019



The undersigned of the list agree with the petition by the Clifftop Residents
in October 2019

House No., Street	Name (in PRINT)	Signature	Date
27 Whitcliffe Drive	SONIA NEWBY	[REDACTED]	6.10.19.
22 "	P. STAFFORD	[REDACTED]	6.10.19
26 "	A. MASTERS	[REDACTED]	6.10.19
25 "	John Wreford	[REDACTED]	06-10-19
23 "	WAYNE STROBE	[REDACTED]	6-10-19
21 "	GERARD BATES	[REDACTED]	6-10-19
18 "	O. HASHIMI	[REDACTED]	6-10-19
18 "	N. Hashimi	[REDACTED]	6/10/19
14 "	Louise Johnson	[REDACTED]	6/10/19
14 "	Mark Dancy	[REDACTED]	6/10/19
24 "	m. Proctor	[REDACTED]	7.10.19
24 "	O. P. Lewis	[REDACTED]	7/10/19
19 "	JE Codd	[REDACTED]	7/10/19

12/10/2019



The undersigned of the list agree with the petition by the Clifftop Residents
in October 2019

House No., Street	Name (in PRINT)	Signature	Date
4 Whitcliffe Drive	Richard Jeremy	[REDACTED]	27/9/19
5 " "	By 6 other's Pegg	[REDACTED]	29/9/19
7 " "	MICHAEL HUDSON JOAN HUDSON	[REDACTED]	28/9/19 28/9/2019
8 " "	M WARRILOW	[REDACTED]	28.9.19
3 " "	DENNIS FOWLER	[REDACTED]	28.9.2019
9 " "	CLAIRE NELSON	[REDACTED]	29.9.19.
1 " "	ESME PEGG	[REDACTED]	29.9.19
2 " "	SACHA Llewellyn	[REDACTED]	30.9.19
1A " "	PATTY POWS	[REDACTED]	30.9.19
15 Craven Walk	Jane Thomas	[REDACTED]	30.9.19
12 " "	Liz Wood	[REDACTED]	30/9/19
9 " "	Val Heale	[REDACTED]	30.3.19.
7 " "	Nicola Johnson	[REDACTED]	30.9.19
5 " "	PETER WINTER	[REDACTED]	6.10.19
10 WHITCLIFFE DRIVE	MARK EVANS	[REDACTED]	8.10.19

12/10/2019

[REDACTED]

The undersigned of the list agree with the petition by the Clifftop Residents
in October 2019

House No., Street	Name (in PRINT)	Signature	Date
10 Whitcliffe Drive	Emma Hudson	[Redacted]	8/10/19
6 Whitcliffe Drive	Victoria Silva	[Redacted]	8/10/19

12/10/2019

[Redacted]

The undersigned of the list agree with the petition by the Clifftop Residents
 in October 2019

House No., Street	Name (in PRINT)	Signature	Date
11 WHITCLIFFE DR	MIKE & GUYANA EVANS		1/10/19
10 STANTON WAY	John ROSSER		02/10/19
10 STANTON WAY	JENNIFER ROSSER		02/10/19
17 Stanton Way	Barbara Philly		02/10/19
14 STANTON WAY	STEPHAN CLARK		02/10/19
14 STANTON WAY	KATHARINE CLARK		2/10/19
151 RLYMOUTH ROAD	STUART ROAD		2/10/19
9 Stanton way	CRAIG JONES		3/10/19
7, STANTON WAY	MIKE WALL		3/10/19
5 STANTON WAY	MIKE DAVID		3/10/19
5 STANTON WAY	Pat DAVID		3/10/19
1 HALTON CLOSE	SIMON STEELE		3.10.19
2 Halton Close	Maureen Thomas		3.10.19
2 Halton Close	Richard Thomas		3.10.19
3 HALTON CLOSE	H. WILCOX R. WILCOX.		3/10/19

13/10/2019

The undersigned of the list agree with the petition by the Clifftop Residents
in October 2019

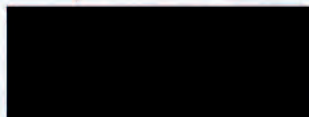
House No., Street	Name (in PRINT)	Signature	Date
6 Halton Close	VIV VINEY		2/10/19
7. HALTON Close	GEOFF THOMAS		8/10/19
- do -	NEERIS THOMAS		8-10-19
8 Halton close.	K P BIRD		8.10.19
" " "	CATHERINE K. BIRD		8/10/19
23, Knowbury Ave	JOAN JONES BIRD		8/10/19
27 Wolfe Close Barry	Jean Moore		13.10.19.
11. Stanton Way	Debbie Rees		13.10.19.
11, STANTON Way	Susan Rees		13.10.19
11. Stanton Way	Aled Rees		13.10.19
8 STRAUGHAN	Alex		13-10-19

13/10/2019

The undersigned of the list agree with the petition by the Clifftop Residents
in October 2019

House No., Street	Name (in PRINT)	Signature	Date
5, Knowbury Ave	BETH AUSTEAD	[REDACTED]	1/10/19
1, Knowbury Ave	ESME WILLIAMS.	[REDACTED]	3/10/19
3, Knowbury Ave	Mary Richards Davies	[REDACTED]	5/10/19
3 Knowbury AVE	DAVID A DAVIES	[REDACTED]	5/10/19
9 Knowbury Ave	JOHN WAREW	[REDACTED]	6/10/19
17 Knowbury Ave	DAVID LONG.	[REDACTED]	6/10/19
19 Knowbury Ave	JOHN O'CONNELL	[REDACTED]	6/10/19
21 Knowbury Av	D SWITSHIRE	[REDACTED]	6/10/19
16 Knowbury Av	J. McREA	[REDACTED]	6/10/19
8 KNOWBURY AVE	M.E.C JEVIS	[REDACTED]	6/10/19
6 KNOWBURY AVE.	G. POULSON	[REDACTED]	6/10/19
6 KNOWBURY AVE	J. POULSON	[REDACTED]	6/10/19
5 Knowbury Ave	Jessica Aistead	[REDACTED]	6/10/19
7 Knowbury Ave	Claire James	[REDACTED]	11/10/19
7 Knowbury Ave	Matt James	[REDACTED]	11/10/19

12/10/2019



The undersigned of the list agree with the petition by the Clifftop Residents
 in October 2019

House No., Street	Name (in PRINT)	Signature	Date
5 KIMULSOM AVE, PARALT	ROSSET ALSTAD		12/10/19
15 Knowbury Avenue	Michelle EUS		12/10/19
11 Knowbury Ave,	PAT FORREST		12/10/19
11 Knowbury AVENUE	TED FORREST		12/10/19

12/10/2019



The undersigned of the list agree with the petition by the Clifftop Residents in October 2019

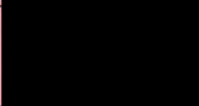
House No., Street	Name (in PRINT)	Signature	Date
2 STANTON WAY	SUSAN ANTONIAZZI		4/10/19
2 STANTON WAY	PAULO ANTONIAZZI		4 10 19
1 HALTON CLOSE	JAMES STEELE		11/10/19
1 HALTON CLOSE	MARISA SANCHEZ		11/10/19

13/10/2019

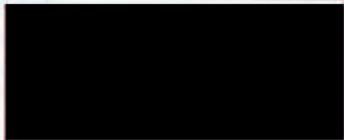


13/10/2019

The undersigned of the list agree with the petition by the Clifftop Residents in October 2019

House No., Street	Name (in PRINT)	Signature	Date
No. 1 Geyser	B. Thompson		12.10.19

13/10/2019



The undersigned of the list agree with the petition by the Clifftop Residents
 in October 2019

House No., Street	Name (in PRINT)	Signature	Date
12 CAYNHAM AVENUE CF64 SRR	NEILL SHAH	[REDACTED]	4.10.19
12 CAYNHAM AVE.	CONSTANCE SHAH	[REDACTED]	4.10.19
12 CAYNHAM AVE.	JOANNESHAM	[REDACTED]	4.10.19
2 CAYNHAM AVE	PAUL CASEY	[REDACTED]	04/10/19.
2 Caynham Ave	Dawn Casey	[REDACTED]	4/10/19.
8 Caynham Ave. CF64 SRR	PERELOPE WILLIAMS	[REDACTED]	5/10/19.
8 CAYNHAM AVE CF64 SRR	EMETH WILLIAMS	[REDACTED]	5/10/19
10 Caynham Ave CF64 SRR	ANDREA PERRY-JONES	[REDACTED]	5/10/19
10 caynham Ave CF64 SRR	ANDREA OWAIN JONES	[REDACTED]	5/10/19
10 CAYNHAM AVENUE. PENARTH CF64 SRR	STEPHEN JONES	[REDACTED]	5.10.19
14 Caynham Avenue PENARTH CF64 SRR	Michele LONG	[REDACTED]	6-10-19
14 Caynham ave. CF64 SRR	Michelle Long	[REDACTED]	6-10-19
16 Caynham Ave	JCRUMP	[REDACTED]	10.10.19
18 Caynham Avenue	NIGEL AYRES	[REDACTED]	10.10.19
18 Caynham Avenue	SARAH AYRES	[REDACTED]	10.10.19

The undersigned of the list agree with the petition by the Clifftop Residents
in October 2019

House No., Street	Name (in PRINT)	Signature	Date
20 Caynham Avenue	BETH ATKIN		11.10.19
20 Caynham Avenue	THOMAS ATKIN		11.10.19
8 DOVEDALE STREET BARRY	GILLIAN JEFFRIES		11.10.19
22 CAYNHAM AVE, PENARTH, CF645RR	ELIZABETH WARNE		11.10.19
22 CAYNHAM AVE, PENARTH, CF645RR	SIMON WARNE		11.10.19
22 CAYNHAM AVE PENARTH, CF645RR	JOSHUA WARNE		11.10.19
24 CAYNHAM AVE. PENARTH CF645RR	HEATHER BRIFFITHS.		12/10/19
24 CAYNHAM AVE. PENARTH, CF645RR	DAVID BRIFFITHS.		12/10/19
23, CAYNHAM AVENUE PENARTH. CF645RR	NIGEL HUGHES		13/10/19
23, CAYNHAM AVE PENARTH CF645RR	ANGELA CHURET		13/10/19
27 Caynham Ave Penarth CF645RR	ELIZABETH JAYNE MORTISHED		14.10.19
27 CAYNHAM AVE PENARTH CF645RR	MICHAEL MORTISHED		14.10.19
29, CAYNHAM AVE CF645RR.	MICHAEL CONWAY		15/10/19.
29. CAYNHAM AVE CF645RR	CYNTHIA CONWAY		15/10/19.
19 CAYNHAM AVENUE	STUART COSGROVE		16.10.19

Objection – Cosmeston Housing Development

The news of this development is strongly opposed by myself a resident of Penarth and all family/friends I have conversed with. I have not heard one person speak out in favour of this development. I object on the following grounds:

1. The road and public transport infrastructure is not in place to support the addition of 576 homes and on average 1000 cars (based on an average of 2 cars per household). Pre-Covid commuting and getting out of Penarth by 7.30am was mandatory. The road infrastructure does not support this plus with the developments off Cog Road there is already more stress on a struggling network. Are there plans to improve public transport that is both affordable, reliable and sustainable? Two access roads into Penarth (Redlands Road) which is already a commuter hell with the revised road network on Sully Road and additional housing.
2. Where are these families with children going to go to secondary school - has this been captured in current numbers in Stanwell/St. Cyres? The demand for Stanwell is already unprecedented.
3. The land forms part of our natural heritage and countryside. The Welsh coast line and the cliff path is already eroding in place as I walk there frequently. Has the environmental impact and loss of green space been considered in this application?
4. The plans include building on sites of Welsh national heritage - this is criminal. The green space between Sully and Penarth is already diminishing. To build on land with known remains and artefacts dating back hundreds of years should not be allowed. Does this count as part of our heritage and does it fit with The Welsh Government Future Generations Act?
5. Spaces in dentists and doctors - has this been considered? As this is almost impossible now on a straining health service.

1-2 Cosmeston Cottages
Lavernock Road
Lavernock
Vale of Glamorgan
CF64 5UQ

Vale of Glamorgan Council
Planning Department
Council Offices
Barry

Dear Sir/Madam

Outline Planning Application ref: Vale of Glamorgan 2020/01170/OUT 576 residential units at Upper Cosmeston farm, Lavernock, Penarth.

I am writing to object to the above planning application on the following grounds.

1. Non-conformity with the adopted Local Development Plan. The application site is larger than the area allocated for that purpose in the Vale of Glamorgan Local Development Plan 2017. The scale of the proposed development significantly exceeds the threshold of 150 dwellings to 6ha.
2. The additional area of land when taken together with the proposed development encroaches further into the Green Wedge identified in the Local Development Plan. This conflicts 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. This planning application clearly conflicts with this policy, given the number of proposed dwellings which include several high rise blocks and schools.
3. The proposed development would have a wide effect beyond the immediate locality. Extra traffic flows through Lavernock, Penarth and Dinas Powys to the extremely busy Merrie Harries Junction will only add to the current traffic congestion in the area. Traffic flows at the junction have already increased with the development at the Barry Waterfront and the current 250 houses currently under construction at Cog Road Sully. The proposed development would further increase this problem and whilst the applicant, Welsh Government, suggests Active Travel by means of walking and cycling would be encouraged current levels do not show this will happen, especially when you see the large number of vehicles attempting to access Lavernock Road from Cosmeston Drive during peak traffic flows. One only has to look at the current traffic congestion on our roads to show that people will use their cars to travel to work, shops, GP surgeries, dentists etc especially as there are no current local facilities in the area or any planned for this new development. Current proposals, by the local health board is to close GP surgeries in Penarth and move them to a health centre in Cogan, no one is going to walk or cycle this distance. Traffic generation from the proposed site and the resulting delays are causing widespread concerns and this proposal is in conflict with the applicants own policies that require careful consideration is given to the allocation

of new sites which are likely to generate significant levels of movement. These additional traffic flows will result not only in congestion and noise but also pollution for residents who are currently in poor air quality areas such as Cogan.

4. The Environmental Statement fails to address the importance of the land, its varied ecology and the historical significance of the post medieval buildings contained within the proposed site and its relationship with the Cosmeston Medieval Village located opposite.
5. The erosion of the green wedge and the closeness to the Wales Coastal Path would certainly have a detrimental and harmful effect if this planning application was to be passed. Any development on these fields will greatly affect the local wildlife, ecology and biodiversity here and in the surrounding areas,. The importance of the green wedge cannot be underestimated as an effective visual and practical buffer zone between Penarth and Sully and to maintain the rural feeling of the location. These green fields are part of the fast diminishing green wedge between Penarth and Sully which already represents virtually the last green area between a total urban link up stretching between the Eastern boundary of Cardiff to the West of Barry.
6. At a time when the applicant, Welsh Government, has adopted many policies to address climate change, Co2 levels and retain wildlife habitats, fauna and flora etc such as Welsh Government Sustainability Policy, Environmental Growth Plan for Wales, Environment & Climate Change Planning & Strategy, Environment Strategy for Wales, Environmental Principles & Governance in Wales, Woodlands for Wales, Well-being of Future Generations (Wales) Act' they have by this planning application ignored all their environmental standards and goals by concreting over 60 acres of farmland. It seems inconceivable that the Welsh Government seems determined on destroying a habitat currently helping to stave off the current Climate Emergency, signalled by both Welsh Government and the local Vale of Glamorgan Council, which if taken at face value would surely mean that their published environmental policies can only support the campaign to plant more trees and develop a community woodland for all to enjoy on these green fields. This current Coronavirus pandemic has shown us that people are seeking to connect more with nature and are searching for places to go to do this. We only have one planet, if we continue to build and concrete over these precious areas destroying the natural habitats for many species we also destroy our own environment. We need more green spaces not less. If we're really thinking about future generations then what they will need is more green spaces for both their physical and mental health and for the Welsh Government to think more imaginatively about what the public value most before it is all destroyed by more and more development of our vastly reducing green spaces.
7. Within the planning application I refer to the document Environmental Statement Volume 2 Chapter 9: Ground Conditions, Soils and Geology. I refer to the following parts of the report which are of significant concern. 9.3.1 The main impacts associated with this development are associated with potentially contaminated

soils, i.e. the impact of contaminated soils upon the proposed development, and the possibility of the construction and occupation of the proposed development causing ground contamination.

Site Description

- 9.4.1 The site is located within the boundaries of Lower Cosmeston Farm, Cosmeston. Due to the overall size of the site and differing anticipated geologies and ground conditions, the site was split into five areas to ensure ease of discussion and clarity of information that was provided for each area of the site. The areas that the site was separated into were determined as:
 - Area A – Comprising the West fields that make up the winter paddocks and fields associated with the livery;
 - Area B – The historic former quarry/infilled land now used as summer paddocks;
 - Area C – The historic former quarry and part of a former landfill;
 - Area D – The North/North East fields that are currently used for crop growth.
 - **Area E - The “Old Quarry”. This area was not accessible during the investigation, due to ecological constraints and no assessment was undertaken.**
- Anecdotal evidence from the farm tenant indicates that this area was also **used as a pyre for cattle, during the foot and mouth outbreak of 2001.**
- By 1940 the quarry excavations were noted to expand into Area C, whilst the quarries in Area B and Area E appeared to have been infilled. By 1965, the quarry in Area C was indicated to have been infilled.
- we understand that areas of **archaeological importance are present** in Areas A and C,
- The areas of archaeological importance communicated to ESP, prior to site attendance and **limited the investigation in some discrete areas of the site.**

- From the available information, we consider that the following features on site could prove sources of diffuse and **point source contamination that could impact on the development, environment or site users:**
 - Made Ground – general diffuse contamination (potential in all Areas);
 - Made Ground – infilled quarry (Area B);
 - Made Ground – landfill (Area C);
 - Made Ground – historic railway that bisects Areas B and D.
 - Made Ground – stockpiles of waste materials, fly tipping etc.
 - **Asbestos previously identified in work by Arcadis.**
 - Cattle Pyre in Area A.

Due to ecological, archaeological and other access restraints, some areas of the site were not investigated and

- Excavation may encounter perched water bodies and necessitate local dewatering to maintain a dry operational area. If not properly contained, contaminants from the water may leak into the underlying ground.
- Sulphate, which can aggressively attack building materials and structures, may be present at the site. The potential impact of chemical attack on building materials is considered to be a direct impact
- There is also the minor potential for contaminants to migrate along service trenches to uncontaminated soils.

The investigation has not been able to ascertain the groundwater levels within the wider landfill area off site. **It is reasonable to assume, based upon our findings, that the whole of the former landfill is unlined and any water (and contamination) within it, is directly connected to groundwater, as indicated by our monitoring.** The whole landfill in this instance will be acting as a 'bowl' or 'colander' as water will collect within it and form a preferential drainage pathway for water to flow

into it, but it will also allow groundwater to seep directly into the underlying strata. As such, it is **possible that contaminants may be flowing out of the landfill in other areas, i.e. not just from Area C investigated but the wider landfill to the south of Area C.**

Contamination

- 9.5.16 **The most sensitive on site receptors are considered to be the underlying Secondary A and B aquifers and the off-site Sully Brook.**
- 9.5.17 The environmental testing undertaken to date was aimed at providing an exploratory (preliminary) assessment of contamination potential and it was assumed from the outset **that supplementary testing may be required to further determine the risk posed.** Testing identified the presence of Arsenic and organic compounds (PAH and TPH) within shallow soil samples that exceeded the relevant guideline criteria utilised (residential with plant uptake) and are discussed further below. **In addition to this, significant variable and loose landfill deposits were identified in Area C which included domestic and commercial refuse and waste materials. The levels of arsenic and some PAH compounds are elevated above the generic assessment criteria in Areas B, C and D** and close to the guideline value for Area A. In addition to this, the presence of TPH compounds has been identified in Areas B, C and D.
- **Asbestos**
- 9.5.25 No evidence of asbestos was detected in any of the samples submitted to the laboratory by ESP, **however previous third party works identified asbestos at one location in Area B. It was advised that although no evidence has been identified in the ESP investigation, on any historic farmland such as the site, it cannot be discounted that former hollows in the site surface may have been infilled in the past, and asbestos containing materials (ACM) may have been included in the backfill materials.**
- Groundwater monitoring has shown that groundwater is expected to flow from the eastern parts of the site, through the landfill toward the western parts of the site, **eventually on to Sully Brook, which is likely to be an effluent stream. Thus, contamination in the groundwater will flow toward the west, toward Sully Brook.**

In addition to the above report, written by Consultants for the applicant The Welsh Government, anecdotal evidence provided to the “Keep Cosmeston Green Group” informs us that the land where the proposed development is to be built on was an

official Local Council refuse tip in the late 1970s. This wasn't a tip like we have today at recycling centres or licensed waste carriers depositing safely, it was more like fly tipping central and could be accessed at any time. Steel drums scattered all over the place displaying various chemical contents, asbestos material such as pipes and roofing was scattered in abundance.

The Vale of Glamorgan Council is legally obliged to keep records of this former landfill site and what was dumped there, when it closed and what actions were taken to make the site safe for the public, both then and in future years. These records should be made public and available to the Planning Committee prior to making a decision on this application.

The public and potential buyers of houses on this land will be alarmed at the high level of contaminants at this former tip for which residential planning is now being sought, PAHs (Polycyclic aromatic hydrocarbons), TPHs (Total Petroleum Hydrocarbons), arsenic, asbestos, a former cattle pyre, it's all there, on land that planning permission for the type of development known as "residential with plant up take", is being sought, that means families living in houses and digging in gardens. The effects of such "Contaminated Land" as defined by Part 2A Environmental Protection Act 1990 has caused concern in official quarters before.

It does raise questions in regard to the above and of more concern an area marked on the report as "landfill quarry", at area C on the plans. This area is to be "community allotments and orchards", an area, we are told, extensively dumped in back in the 1970s in an unregulated manner by anyone else who cared to deposit material at this unsecured site. I doubt anyone really knows what's buried there, having examined the plans this particular part of the area seems to have been omitted where "test pits and bore holes" are marked, hardly surprisingly considering what could be buried there.

Are families really expected to dig and grow things in an area containing potentially lethal chemicals, the effects of which are not disputed, exposing them to health risks. Harrowing research indicates "problems arise if materials containing asbestos are disturbed or damaged, asbestos fibres can be released into the air and breathed in by people. This puts them at potential risk of contracting a number of serious diseases later in life including mesothelioma and lung cancer" "children have an increased lifetime risk of developing mesothelioma if exposed to a given dose of asbestos". Research on health sites indicates there is NO safe minimal level of exposure to asbestos, which can trigger diseases.

8. Lower Cosmeston farm is the site of the only post medieval buildings discovered in the area. 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 was to proceed.

The farm house buildings at Lower Cosmeston Farm has been recognised by the Royal Commission on Ancient and Historical Monuments Wales as a rare surviving example of a single-unit, end-entry hearth passage house which 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'. RCAHMW criteria also states that any building older than C 1700 is automatically eligible for consideration regarding scheduling. In short, there is recognition 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.

If this housing development goes ahead then important archaeology will be destroyed and lost forever including these post medieval farm buildings mentioned in the Glamorgan Hearth Tax records of 1670. Research and investigations of the site have been carried out by local Archaeologists Mark and Jonathan Lambert who dispute the Welsh Governments earlier archeology investigations of the land. In response the Lambert Brothers have carried out an investigation of two trenches (Government investigations were all carried out above ground) The brothers discovered through two trial trenches there are archaeological remains of almost certain medieval date. They also uncovered hundreds of pottery shreds and various other small finds from this area. Given the close proximity of these archaeological remains to the medieval village of Cosmeston, there is undoubtedly a connection. Hence, 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.

Comprehensive reports on the significance of these post medieval buildings and the surrounding farmland is contained in their reports that can be found on their Hidden Glamorgan Website.

Rather than duplicate their reports I would urge you to read the following online links

http://glamorganhistoryandarchaeology.blogspot.com/2019/05/lowercosmeston-farm-development_23.html

<http://glamorganhistoryandarchaeology.blogspot.com/2020/04/archaeological-and-heritage-assessment.html>

9. Traffic congestion and lack of medical facilities..cogabn surgeryfacilities. buses full at peak times active travel cycling and walking

10. The Planning Application refers to 40% of the housing will be affordable housing. The question is what does "Affordable Housing" mean. When the Welsh Government Housing Minister, Julie James was challenged by Delyth Jewell SM saying "a staggering 78% of homes- that's 5564 sold through help to buy (an Affordable Home initiative) sold for a price over £150,000. Over 1000 homes that you count as affordable in the statistics sold for over £250,000. I cannot see how any reasonable person can count these homes as affordable. Is this not statistical manipulation on an industrial scale?"

Responding the Housing Minister said " I don't disagree at all that the definition of affordable is unhelpful and rather more flexible than we'd like in terms of what we're trying to do.

Since making that statement the Welsh Government, in their planning application, continues to insist that homes on the development will be "affordable.

In the latest Vale of Glamorgan Local Housing Assessment the cost of what the Council describes as an "entry level house" in Penarth is quoted as being £216,415. The Council has calculated that buying such a property would require a prospective buyer to have an annual income of £61,833 unless the purchaser could qualify for a 70% mortgage and then would need an income of £43,282. I would suggest that these incomes are, in the main, not being earned by young local people starting out buying their first homes which affordable housing is supposed to help. In addition it will not help in reducing the number of people go the council housing waiting list. The action of the planning applicant, The Welsh Government, is as their housing Minister said, "unhelpful" and has been included to influence the Vale of Glamorgans Planning Committee decision.

11. At a meeting of the Vale of Glamorgan Council a report was received of what work has been undertaken to develop a Climate Change Action Plan.

The report is part of the response to the climate emergency declared by Council in July 2019.

The Council heard of the changes needed to tackle climate change and the action plan will inform the Council how they will work in the future to reduce climate change. Stanwell Councillor Lis Burnett noted that planning policies to mitigate the effects of climate change are needed.

Plymouth Councillor Benjamin Gray said awareness was important for reducing climate change.

The committee is due to publish a full Climate Change Action Plan in April 2021.

If the Vale of Glamorgan Council is serious about addressing climate change then they should be protecting the countryside, planting more trees to combat Co2 levels not passing a planning application that will concrete over 60 acres of green fields, destroy habitats, rip up fauna & flora, wrench from the ground hedgerows and fell trees.

OBJECTION TO APPLICATION 2020/01170/OUT: UPPER COSMESTON FARM

There is a lot of detail submitted which appears to relate to matters to be reserved. From the outside, it appears this scheme has been agreed regardless of local comment.

Had I known about the LDP public consultation I would have objected to this site allocation.

Reasons for objection:

- Precedent for further building in the green wedge;
- Lack of detail of Whitcliffe Drive emergency access; potential inappropriate enhancements to the cycle route / it's replacement with a tram; impact of increased traffic;
- Unacceptable impact on European Protected Species, Species, other wildlife and habitats;
- Which application documents are to be attached to any consent granted;
- Inappropriate urban form and character;
- Ensuring an adequate buffer remains re: Cliff Path;
- Unsustainable development re: Community facilities.

These objections are explained below.

1 Expanding into the green wedge

The assessment of impact is inaccurate – expanding into the green wedge erodes it physically and visually.

It sets a precedent for the remaining green wedge to be developed by the Welsh Govt (WG) which owns a significant amount of land in the remaining wedge, although this would be against planning policy. Is this why a larger school is required?

In the Deposit LDP, 2012, large development sites were proposed to the NW of Barry. These were removed due to *'political concerns over impacts on local infrastructure and the erosion of the green wedge between Barry and Rhoose'*. The issues are no difference here.

2 Access and Transport

This application seeks for 'access' to be approved - no details of the emergency access off Whitcliffe Drive have been submitted, specifically what measures are to be used to prevent non-emergency vehicles using it?

There are references to the national cycle route being enhanced, although it is not stated what these are, where these enhancements are to be located and whether 'enhancements' form part of this proposal. There is potential for 'enhancements' to adversely affect residents and wildlife, such as through inappropriate lighting and path widening. The railway line is a strategic green corridor through lower Penarth on to Sully providing roosting/nesting sites and foraging habitat for wildlife including European Protected Species (EPS) and Protected Species under the Countryside and Wildlife Act 1981. It is also proposed as part

of the mitigation for the proposed development. As such it needs to be maintained as a dark corridor of appropriate width and connectivity to maintain its function as a green/wildlife corridor. Lighting causes light pollution for wildlife and residents. The transport study – ES app10.1 - says '*The route is primarily bounded by vegetation and therefore is an ecological environment. It should be noted that any lighting provision is likely to have an impact on this ecological environment during the hours of darkness*'.

Also lighting and inappropriate 'enhancements' can create spaces used for anti-social behaviour and can make properties more vulnerable to crime. Any 'enhancements' proposed should be properly consulted on with those living adjacent to the route.

The Design & Access Statement -states '*The width and alignment of the cycle route will be protected to allow for potential future changes in transport mode, such as tram systems.*' This is the first people living next to the route have heard of this. Are we to be consulted/have any say on this proposal? Is the national cycle/ pedestrian / horse route actually to be replaced by a tram system?

The transport documents submitted indicate that the junction with Westbourne Rd is already a problem at peak times and this will be a cause of significant delay by 2025 (PAC report appendices). It already takes 45 mins to an hour to get from this part of Penarth to the Baron's Court junction at peak times (7:30-9 am (pre-covid)). The transport documents do not assess the impact on all junctions on to Lavernock Rd, such as Brockhill Way and Charteris Close, which are located between the proposed development and Westbourne Rd junction. It is a problem getting out of these junctions between 7.30 and 9am Mon- Fri. This will increase significantly with the level of housing proposed at Upper Cosmeston Farm (potential for a minimum of 1000 cars) and Cog Rd (potential for a minimum of circa 700 cars) plus the traffic generated by the proposed school which will serve a wider area. Means of regulating traffic from the proposed development to Westbourne Rd junction needs to be addressed. Traffic management of this junction has been omitted from the transport assessment.

There is over-reliance on sustainable travel/cycling to reduce the impact of traffic associated with this development. People will use cars for quickness/convenience, to stay dry in inclement weather (it rains a lot in Wales), to do multi-purpose trips (dropping off/picking up children from school, travelling on to work/shops, etc.) so car sharing has limitations, especially with flexible working hours becoming increasingly normal. The Park and Ride facility is encouraging but there is no commitment to this. There is to be no additional bus service provision. The 94 bus is the most direct bus to Cardiff city centre and is already at capacity at rush hour. There is only one 94 bus after 6pm and none past 11pm from Cardiff. Also tickets are not interchangeable between bus providers. These sort of things need to be addressed at a higher level.

Air quality will be adversely impacted as a result of the increase in volume of traffic from this development and that at Cog Rd, especially at peak times when traffic is at a stand-still. Whilst the assessment says it is negligible impact, this additional vehicle pollution will impact on health and well being of all residents in the area.

3 Ecology including European protected Species (EPS) and Protected Species

Planning policy (PPW and TAN5) states that impacts on European Protected species and Protected species is a material consideration in the determination of a planning application and these matters should therefore not be left to reserved matters stage. With regards to mitigation, this needs to be dealt with at outline planning stage. The impact of the proposal on ecology is negative, permanent, and irreversible. It is an insensitive proposal that cannot

be argued to *'provide biodiversity and ecosystem resilience in accordance with the Environment Wales Act 2016 by protecting and enhancing the existing ecology on the site.'* As stated in supporting documents.

The Planning Statement is misleading in saying that there won't be an adverse effect on ecology. The ES chapter 8 states there will be permanent irreversible impacts on EPS through construction and operation (through disturbance, killing, injuring) and adverse impact to habitat important for foraging, dispersal, migration and breeding for species including dormice and bats. It continues there will be fragmentation of habitat, thus affecting connectivity and movement and range of species. Other people would not be able to get away with this. It is noted that the LPA screening opinion stated *'the development has potential for significant impacts beyond those of local importance for biodiversity despite the potential for mitigation through design.'*

The site supports, through its various habitats (mature trees, woodland, hedges, ponds, grassland, scrub, etc), a diversity of wildlife including bats and dormice (EPS), slow worms (protected species) and is an important county site for birds. This green field site is to be largely hard surfaced. Ecological surveys submitted conclude there will an adverse effect on ecology, specifically dormice and bats. The PEA, Biodiversity Surveys Site Management Plan and ecology surveys identify the importance of existing site habitat features – the railway line, trees, hedgerow, woods, - and state these need to be *'maintained', 'retained', 'enhanced'* including significant buffers for species to continue living as sustainable populations at this location. They state *'Avoid the severance or removal of linear features such as vegetated dismantled railway line, tree lines, hedgerows, vegetated ditches and woodland'*. However, the masterplan and DAS do not follow this through at all.

The former railway line is a key green corridor that runs North-south through the site. It is an essential corridor for wildlife including European Protected Species and other protected species as well as ecology generally. A minimum 'gap' of 24m is to be taken out of this in a location where dormice have been recorded to create an area of high human activity. This will irreparably fragment the corridor, restricting movement by species such as bats and dormice across the site and isolating populations to the north and south, and deter dormice from the area which poses the question will these populations remain viable? There are low records of dormice in the Vale of Glamorgan which surely makes this site important for dormice. Whilst mitigation is proposed, it does not adequately replicate what is being lost. Supporting documents state *'new planting as a resource for dormice will not mature in time and will unlikely balance those negative impacts immediately arising following habitat loss.'*

The 24m 'gap' is for a series of roads, cycle and pedestrian routes (hazards for wildlife) and will be lit according to highway standards. Lighting adversely impacts on nocturnal light sensitive species including dormice and bats and all nocturnal animals.

The DAS states *'Where corridors must be crossed, this will be minimised and tree canopies retained or created to allow wildlife passage at high level.'* This physically cannot be achieved with the 24m gap in the railway line.

Is the proposed central artwork really a dormouse bridge as indicated in plans? If so it can't function as one in the hub of a development which is meant to be the centre of human activity and will be lit up at night. And is it really going to span 24m?

The site is to be densely built up so there appears to be little room for wildlife, especially as the green spaces are to be green spaces for human use (see DAS and plans), conflicting with the needs of species (trampling and disturbance is mentioned throughout the ecology

survey reports). Where are spaces dedicated just for wildlife? Where are undisturbed dark corridors with buffers to be located for bats, dormice and other animals? The DAS states there will be *'pedestrian connections through landscape corridors'*. There are to be *'Stepping stones through hedgerow, low level lighting, paths through hedgerow'*. Providing lit paths next to green corridors and creating gaps through these will lead to trampling, disturbance and disruption to connectivity. Habitats for wildlife are not protected from people. How are habitats for wildlife to function? This concern is stated in supporting documents *'Increased recreational usage following occupation of the EIS site may affect sensitive woodland /hedgerow habitats through disturbances arising from trampling, increased noise, lighting, litter and insensitive management. With such effects considered to be negative, permanent, irreversible and of Local significance.'* It cites significant effects to include the following: *'• Effects of light and noise/visual/human disturbance to designated sites, habitats and species; • Increased risk of collision and predation to species; and • Alteration of surface water run-off/groundwater flow/site drainage.'*

It is noted supporting documents state *'The quality of the hedgerow network present onsite, in addition to being a habitat of principle importance for Wales, qualifies this feature as an IEF of Local Level importance.'* Supporting documents further state *'In addition to direct habitat loss, retained hedgerows, trees and woodland may be subject to indirect degradation impacts, such as soil compaction, damage to root protection zones and encroachment by machinery from adjacent construction works.'*

Documents raise problems of light spill on protected species stating *'such impacts can affect species through their physiology (such as through increased heart rates, metabolism and stress), and through their behaviour (such as through forced dispersal and/or displacement). Impacts could result in the abandonment of roosts, foraging territories and of commuting and dispersal corridors, which could significantly affect those species supported by the EIA site.'* This *'may also result in the isolation of, and reduced interactions between, populations necessary to maintain genetic diversity'*. *'Increased vehicular traffic arising following occupation could also increase levels of road-kill upon dormouse moving across the EIA site either during the day or at night time. The unmitigated impact of increased lighting and risk of collision upon dormouse can be characterised as a negative impact, with such impacts expected to be permanent and irreversible.'*

It is noted that mitigation is proposed comprising tokenistic planting to provide some limited east-west corridors. This, however, does not adequately replicate existing connectivity or sufficient habitats for wildlife and do not recompense the loss of the N-S corridor along the railway line. The indicated mitigation does not enable continued movement of species across the site.

The DAS states *'Preserving the existing nature corridors is essential to the protection of ecology found on the site.'* But the masterplan doesn't do this. Retaining existing key strategic green corridors and features, including their existing function, should have been the starting point to inform the development layout, however, the main corridor, the dismantled railway line through the site, is being carved up so it cannot function as a green corridor for species. In addition, the hedge is to be lost that borders Lavernock Road. The development has no regard for the existing function of site features. It is purely about placing as many buildings on this site. People who use the cycle/walking route may actually want to enjoy the sights and sounds of a green corridor not a housing estate with a hub of tower blocks.

The effect of construction noise and vibration on ecology has not assessed – it is proposed that the development be constructed over 7 yrs.

Parts of one ecological document have been redacted – what is being hidden? (section 8.4.74 and 8.4.75)

No watervole survey has been undertaken as requested by NRW.

All ecology is cited as of local significance in the planning documents. However, that doesn't mean it is of no significance – basically the applicant says it's ok to lose the ecology, but it is important locally. If you damage it to the extent proposed, you do not have a resilient ecosystem; this is contrary to the ethos of the Environment Act. Ecology is important for its own sake, for local people and as part of Wales' ecological resource and network. As such the layout needs to be significantly redesigned to keep the existing robust green infrastructure on the site with development fitting in round it – not sweeping away existing key green infrastructure to create a false development and tacking on some new planting as tokenistic compensation.

4 Application Documents

I object to the masterplan and other similar plans being listed as documents approved on any permission granted. The masterplan and many other documents cover matters to be considered at reserved matters stage, such as layout, landscaping, appearance and scale.

5 Urban Form

The proposed application site is located in an area typified by suburban development of 1-3 storeys and fields. Nothing higher than 3 storeys is appropriate. The application site is not an inner-city area or regeneration zone and buildings of more than 3 storeys cannot be justified in terms of their context. The mass and scale of a 4, 5 or 7 storey building is wholly inappropriate, and they are to be located at a high point in the site making it worse; they will be an eyesore for miles around, particularly as modern architecture simply does not replicate building design and quality to match that of landmark buildings, such as St Augustine's Church. (It is noted a bog-standard housebuilder is listed on the ownership certificates.)

Blocks of the scale proposed will dwarf other buildings on site in an oppressive way. Including 4-7storey blocks is just about getting as much housing on a site as possible and maximising profit. 4-7 storey blocks will be blots on the landscape, as shown in LVIA Volume 3, Appendix 7.2 LVIA Supporting Figures. The Design & Access Statement's reference to *'The site forms a natural counter-point to Penarth Head, celebrated by St. Augustine's church steeple'* to justify tower blocks is simply pure rubbish as is any claim that 7 storey, 5 storey and 4 story tower blocks are landmark features. A landmark feature would be denoted by something of significant architectural merit. The CGD show this is not the case. Tall, blocky inner-city type structures are inappropriate on an edge of town settlement.

6 Character

It cannot be argued that the development will *'have a positive development on the character and appearance of the surrounding area'*. The proposed development will completely change the character of a green landscape to a mass of concrete, a change that is irreversible. Currently, along the Cliff path there is a rural feel, as there is along Lavernock Road. This will be completely lost. In addition, the density/scale of development proposed is inappropriately out of character with that of other developments in the surrounding area. Supporting documents state the *'the development has the potential to significantly impact upon viewpoints'* and that *'There is likely to be a significant impact upon the immediate Coastal Path, which is an important route of certainly regional importance.'*

7 Cliff Path

A sufficient buffer needs to be left between the coastal path and the proposed development to allow for coastal erosion over the lifetime of the development.

8 Sustainable Community

It cannot be argued this is a sustainable development. 2000 people can easily live within the proposed development and the only community facility is to be a school. It is already difficult getting doctor's appointments at existing surgeries and finding an NHS dentist. No such facilities are proposed and as such it will place excessive pressure on already overstretched local services.

9 Not-Regeneration

The Planning Statement is disingenuous and misleading - the proposed development will not regenerate brownfield land or urban land. The land is green field and has an agricultural land classification.

Appendix L Cliff Inspection Records.pdf , this shows possible faults: what consideration has there been for this report?

The Arboricultural Technical Note recommends keeping as many trees as possible, the plans show that most of the surrounding trees and internal trees have been removed, why do the plans go against the recommendations of this report?

We have recently received information from the Vale Council that the school they propose to build on the Cosmeston Farm Development, is going to be for special needs children, to accommodate the overflow from Ysgol Y Deri. While I understand that there is a shortage of special needs places in the Vale but there is also a shortage of primary school places. If this development goes ahead, where will the children of this development be schooled? Our own experience of almost missing a place for our child at Evenlode was a very disturbing experience. We were faced with taking our child to Fairfield School, having to drive past Evenlode on the way. Fortunately, someone dropped out at the last minute, which meant that we were able to send our child to Evenlode.

I also understand that the majority of children who attend Ysgol Y Deri come from quite some distance from the school, therefore would it make more sense to build the special needs school in a more strategic location?

Objection to housing development Upper Cosmeston Farm.

We are the owners of 2 Upper Cosmeston Farm Penarth and wish to object to the development of a housing estate behind our home. These houses will cause an influx of traffic on an already overcrowded set of surrounding roads. We wish to see how you intend to manage the congestion and traffic, along with what consideration you have made to pedestrian routes. Due to the huge increase in vehicles being in the area, we wish to have a pollution assessment. This is a family estate with a large amount of children, therefore what speed limit will be implemented in order to prevent potential accidents.

Although the plans contain a school, this school does not fit the needs of the majority of the residents. All current mainstream English speaking Primary schools are full, and have waiting lists for applicants.

Our home is North facing and therefore receives the sun into our garden throughout the day and into the evening. Therefore we do not wish to have buildings blocking this lighting, and have concerns over our Rights to Light. We wish for a Daylight and Sunlight Assessment with a publicly issued report. Our property contains 14 solar panels. This ensures our efficient running of our home and pays back to the grid. Therefore if a building site was to be situated directly behind our home this would be affected. The large amount of dust created would result in reduced generation from our panels, which will be at their peak during the summer months, where the weather is at its driest and therefore they can not be naturally cleaned from rain. This will in turn affect our energy bills. These panels would therefore require cleaning, and not at our cost, and we would seek compensation for any potential loss of generation.

With the prospect of a housing development backing onto our home, we will be directly overlooked into our garden and home. This means our garden will no longer be private, it is currently not overlooked, even the direct next door neighbour can only see a small portion of the garden from their top window. We have 3 young children and therefore have huge concerns with this. With a new home looking over our garden this raises huge concerns with the safety of our family and property. With an increase amount of residents with the area crime rate is likely to increase. This in turn will increase insurance rates. With our property backing onto the new estate we are exposed to the potential crime, especially during the build. This is extremely worrying, especially if it puts our family at risk.

We wish for a Residential Visual Amenity Assessment to be undertaken. With these backing onto our home this will affect our visual. We are concerned over the potential noise and disturbance resulting from the use of the building site and then once occupied the new homes.

We bought this property due to the quiet surrounding and view of fields, therefore this will no longer be the case should this application be successful. Not only is this more green space being destroyed but the 300 year old farm house will no longer stand. I believe there is also the potential of World War II historical artefacts to be uncovered, based on the close proximity of other historical monuments and therefore an archaeologist assessment is required.

The proposals seem to involve more houses and a larger area than indicated in the council's local development plan.

They will add an unacceptable strain on the already overburdened infrastructure. There is already a serious problem with traffic congestion in the area, and the likelihood is that many of the new dwellings will house residents who work in Cardiff and/or have school-age children. It is very unlikely that the majority of these will rely on public transport/cycling/walking - there is no safe, lit cycle path from Penarth to the centre of Cardiff, and it is only the fittest and most confident cyclists who undertake the journey; public buses take too long time and are too infrequent to be relied on for a daily commute for most people; and walking to the train station in Penarth is unrealistic (other than in the longer days of summer, it would be at least a 30 minute walk along an unlit unsafe cycle path). Additional journey times will add to the everyday stresses of people travelling into Cardiff, affecting their general well-being and the quality of their lives.

It is not possible to build new roads in this congested area.

The increased volume of traffic would add to the air pollution present in the area.

The doctors' surgeries in Penarth are already under strain – it is very difficult to get an appointment.

The effect on the local landscape will be considerable. It will completely change the nature of the rural footpath running from the end of the houses to Lavernock point (part of the Wales coastal footpath) and the views from Cosmeston Country Park. The proposals will detract from the rural character of the environment through which the footpath passes between the end of the cliff walk and the nature reserve at Lavernock point, and the attraction of the footpath to walkers. They are likely to have an adverse impact on the nature reserve at Lavernock point, which is a recognised landing stage for many birds of passage as well as a breeding ground for many butterflies.

The proposals will affect the Penarth Coast SSSI designation, particularly given the amount of erosion of the cliffs that has occurred in the past.

The area is also of considerable historical importance. The site is opposite the medieval Cosmeston village, and may well be of architectural importance itself. . Development of the site would lead to the loss of relatively high grade agricultural land which is in short supply in Wales.

The proposed plans show that there will be high level housing – these are ugly and out of keeping with the character of the area.

The proposals will encroach into the green wedge between Penarth and Sully, impacting on the identities of both areas.

The proposals take no account of the other large developments already being constructed in Sully and the surrounding areas. These mean that the issues referred to above are already being exacerbated, and any further development will inevitably make matters even worse.

1 Bittern Way

Penarth

CF645FS

17th October 20

07756441013

Cosmeston Housing.

Please accept my objection to the proposed housing development at Cosmeston:

1. Having read the planning report for the development of the 600 houses to be built at Cosmeston residents are alarmed at the level of pollutants described at this location in that report, and the potentially devastating effect these chemicals can have, not just on the site "end users", as families that are to be housed there, are referred to, but also to workers on the site and the residents of the Vale Cardiff and elsewhere if polluted materials are to be removed.

2. Listed on the planning application are several different pollutants contaminating this site, mentioned in the report, originally operated by the council in the 1970s, according to the report, & who are now to decide on awarding planning permission to the Welsh Government, the current owners.

3. Firstly arsenic, no doubt we can assume this isn't conducive to good health.

4. A "former cattle pyre", what pathogens are lurking in the ground we are yet to be informed of, but it appears to be a relic of the 1960s foot and mouth epidemic.

5. According to the report Polycyclic aromatic hydrocarbons (referred to as PAHs) and Total Petroleum Hydrocarbons (referred to as TPHs) are also located here, on land that planning permission for the type of development known as "residential with plant up take", is being sought, that means families living in houses and digging in gardens, also a school is to be located there.

6. A brief search on the internet reveals that these chemicals are carcinogenic and also cause damage to fetuses and the impaired development of young children and are also harmful to adults to,

<http://news.bbc.co.uk/1/hi/wales/1679102.stm>

"Toxicology advice on waste tip school"

7. The above link indicates there has been concern in Wales before on the development of these sites and the health risk to children. The Children's Commissioner and Welsh gov are not strangers to this.

8. Of more concern to the health of residents in the Vale and future residents at this site is another lethal material in the soils at this proposed housing development, we are informed of in the planning report, is asbestos, aka ACMs asbestos containing materials.

10. In its current state, buried under the soil asbestos does not prove a problem unless disturbed. However, asbestos was not disposed of under the stringent controls of the Disposal of asbestos regs 2012 back in the 1970s when the Council managed this site

11. However having briefly contacted some of the numerous firms of solicitors touting on the internet re asbestos claims I am informed great care needs to be taken in excavating asbestos and allowing it to become airborne, an activity that can result in expensive litigation if health is impaired.

12. I am also informed there should also be some sort of health and safety policy to reduce this risk to residents, "end users", people in the area and site workers. To date neither myself or other residents have been made aware of this. Does such a policy exist

13. Research on Medical sites and planners who have examined this site indicate that there is NO safe level of asbestos. One particle can bring on various diseases such as lung cancer

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14. The Welsh Government Asbestos management in schools policy (link above Para 2) states children have an increased lifetime risk of developing mesothelioma if exposed to asbestos. So why are children to be housed here, when it is acknowledged by medical authorities, civil engineers there is no safe level of asbestos

15. The land can be remediated by removing the contaminated soil but this would mean conveying it through the most densely populated areas of SE Wales ie Penarth, Cardiff , Barry and dumping it on another Welsh or English community.

16. A Local Authority can order the clean up of such land by the current owners. Will the Council order the current owners to clean this land to ensure the well being of Vale and Cardiff residents?

17. Rather than being a rural idyll as proposed to house young children on, a more apt description for this site is "Contaminated Land" as defined by Part 2 A Environmental Protection Act 1990, the council who are now to decide on planning permission, being the original polluters and the welsh gov the current owners, and the public caught in the middle. Divesting it to a developer as opposed to making it safe no doubt will be a less costly and more convenient option for both the welsh gov and the council. Is there a "conflict of interests" here. If the council grants planning permission the land then can be sold on. Shouldn't both parties have a responsibility being the current owners and original polluters to ensure this area is safe, regardless of the cost?

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/223705/pb13735cont-land-guidance.pdf

18. The responsibility for clearing up such land according to the Environmental Protection Act 1990 normally falls on the current owners or the original polluters, so is it right in this case the council should be allowing planning permission to the current owners. Should the view of other parties regarding the development of this land be sought ie Welsh Office , Environment Agency?

19. This type of land is supposed to be regulated by the Local Authority, in this case the tip was "managed" in the 1970s by the council, who are now being approached re planning permission by the Welsh Gov who are now the owners. What has been done by the Local Authority to identify and manage the risks caused by this contamination?

20. Every Local Council has a duty under Part 2 A of the Environmental Protection Act 1990 to devise a strategy to identify contaminated land and must actively take steps to reduce the risk to people and the environment , does housing families on such land constitute this or if planning permission is granted will the liability of the seller, in this case the Welsh Gov , be passed to a buyer ie a developer and then onto future owners of the land ie house owners.

21. Advice on the Act states that if we contact the council with our concerns they should take it seriously. There is considerable objection to this development regarding Health issues. What has the Local Authority done to

address concerns and identify such risks as per the Environmental Protection Act.

22. This site hasn't been touched since the 1970s, so what steps have been taken to make it safe?

23. While the planning report is lengthy it does raise questions into the above and more concernedly an area marked on the report as "landfill quarry", at area C on the plans. This area is to be "community allotments and orchards", an area extensively dumped in back in the 1970s in an unregulated manner by chemical companies and anyone else who cared to deposit material at this previously unsecured site. (I doubt anyone really knows what's buried there, having examined the plans this particular part of the area seems to have been omitted where "test pits and bore holes" are marked, hardly surprisingly considering what could be buried there)

24. If families are really expected to dig and grow things in an area containing potentially lethal chemicals, the effects of which are not disputed, exposing them to health risks, are there contingency plans regarding future and long term health problems.

25. I can recall visiting the site in the 1970s and it was a scene of carnage, fires burning, ACMs, chemical barrels and debris strewn all over the place, it's therefore understandable the issues raised in the planning report regarding contaminants that could affect public health.

26. Neither the Council nor the Welsh gov can deny knowing the history of this site if health problems arise in the future. To reassure public concern will the Local Authority or the Welsh Gov issue a statement acknowledging the history of this site as a refuse tip, and assure those concerned its safe to, house people on such a site and there is or isn't a need for contingency plans regarding any future health problems.

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Tim Hodgson

My objections are:

1. This is an unusual application, by a Welsh Government more intent on reducing the quality of life of local residents and visitors and more interested in financial gain than good planning. It is for one of the largest residential schemes in the Vale and moreover, the application is wrongly addressed as being in Penarth when it is actually in Sully and Lavernock, misleading local residents.
2. The proposals are contrary to current best planning practice: it is greenfield not brownfield, it has virtually no jobs except and so will encourage car commuting. The sketch schemes associated with it show high rise flats and long terraces of housing that are totally inappropriate in this area of mainly single/double storey housing and detached dwellings/short terraces.
3. The land is in a green wedge of long standing, and green wedge status, where the Local Development Plan (LDP) states development is not allowed - a dichotomy in the LDP. The Welsh Government owns 500 acres more are adjacent to the site. This proposal sets the precedent for the erosion of the green wedge and could eventually result mean in all the countryside between Penarth and Sully being developed.
4. Housing supply calculations in the LDP were increased at the Welsh Government's suggestion that the Vale of Glamorgan County Council's calculations were low., calculations based on the latest household formation rates during the LDP formulation process i.e. pre 2017. Those rates were quite high. However, in recent years they have fallen by a quarter. These should be used and would result in the housing demand calculated for the LDP being a third more than is actually needed - invalidating the LDP assessment. Moreover, the Environmental Statement Volume 2, Chapter 6 Planning policy submitted with this application states that a percentage 'of additional homes should be affordable' - it does not calculate need and then add 40% as affordable homes as the Vale's LDP does. Moreover, those housing demand calculations were introduced very late in the LDP) development process and did not give residents time to prepare objections, a very good reason for the Welsh Government to withdraw this proposal and organise a proper consultation. Page 58/9 of the LDP, shows where development should take place. For Sully it shows only:
'Primary Settlement Sully
Land west of Swanbridge Road, sully (part) 20ha 500 dwellings'
It shows no other land allocated for housing in Sully and Lavernock. This could completely mislead local people and readers of the LDP
5. The proposals will increase traffic flows near the scheme. The Welsh Government's traffic assessments show they will generate an additional vehicle movement every 10 seconds during the peak hour and even more at the height of the peak. With the additional movements from the Cog Road development under construction in Sully these flows could be 50% higher, with horrendous implications for the Merry Harriers junction and the junction at the other end of the Cogan Spur Road, increasing air pollution.
6. The area was very badly flooded in February 2020 and this development is likely to make it worse by increasing run off at times of high rainfall (see video: <https://www.facebook.com/100013275875113/posts/882146842237837>)
7. In the 1970s the local council used these fields as landfill sites for the disposal of waste, resulting in contamination. There are structures that look like methane distributors on site

and the EIA found asbestos. Of course, this contamination can be removed, contained or simply ignored but there are no proposals for this in the planning application.

8. This development will dramatically over-burden local schools, health and other facilities.
9. The site is next to Cosmeston Medieval village and there is valuable 15 Century archaeology, including a rare fireplace and more, at Cosmeston Farm and there are no proposals in the plans for the Archaeology to be assessed properly.
10. The site is also very visible from the Severn Estuary, coastal path and Cosmeston Lakes Country Park, especially if 9 storey flats are built at the highest point, turning the Country Park into an 'urban park'.
11. The site may be subject to coastal erosion and it is close to the Severn Estuary Special Area of Conservation (of European significance) and the Severn Estuary RAMSAR, of international importance to a variety of fish species and waterfowl. The noise from the construction phase is likely to affect the site and so could the occupied development.
12. The Welsh Government has many excellent Strategies for Bio-Diversity, Countryside, Woodlands, etc, but there has been only limited action to implement those strategies. It could use this site, or a mixture of agricultural activities and woodlands that could be used for farming/horticulture and made accessible to the public for walking, jogging, cycling and horse riding.

Finally, I have to comment that the timing is undemocratic - the Welsh Government submitted its planning application for this site on the same day it announced a complete Covid 19 lockdown in Wales. It took a year from the consultation stage to submitting a planning application but residents have been given less than three weeks to comment, with the letter formally telling me about the scheme arriving on October 30, 2020, so one week of the three allocated for residents to comment has been lost. Due to the current Covid lockdown, interested people cannot meet to discuss the application or even drop leaflets in to affected residents. You may be within the law but it is immoral to try to rush this scheme through during the Covid crisis and not in the spirit of the Welsh Government's Chief Planner's advice on how to act during that crisis, dated 27/03/2020. As a trained town planner, I am disgusted at the way you are treating residents and others.

OBJECTIONS TO THE PLANNING APPLICATION FOR UPPER COSMESTON FARM

I have objections to the planning application for 3 main reasons:

Firstly it will have an impact on the wildlife, the fields are habitat for foxes and field mice, bats are a common site around that area and wild birds such as owls and occasional buzzards have been seen.

Along the edge of the site on the coastal path wild flowers and butterflies have been seen in greater numbers this year. Any change in the environment will be detrimental to butterflies and bees which are already declining.

Secondly – The traffic along Redlands road and Lavernock road is already busy and it can sometimes be very difficult now to get out of the estate. People are being encouraged to cycle more, increased traffic from the new estate to Barry or Penarth will make the roads far more dangerous for cyclists and walkers. Traffic jams will become a common occurrence rather than rarity as it is now.

Finally – There would be an impact on tourism to Penarth, Penarth has built up a good reputation for local shops, our cafes and restaurants. I have noticed an increase in the number of people in the area, those just visiting for the day or staying in the nearby caravan park. They come for the coastal walks, the surrounding countryside and the Penarth town. Building more houses on the surrounding land alongside the coastal path and adding to the traffic will not encourage more visitors to the area.

Teresa Russell 01.11.20

In addition to the amendment in your letter of 30th October concerning Application No. 2020/01170/OUT/RL Land at Upper Cosmeston Farm I would like to highlight further omissions or errors in the documents submitted.

Firstly, the Upper Cosmeston Farm Masterplan Design & Access Statement (UCFMDAS) Part 1 2.6 incorrectly states that the “national speed limit applies across the site frontage” . There has been a 40 mph limit on the B4267 between the original Upper Cosmeston Farm and Sully for many years, probably decades.

Additionally, the schematic/layout plans in UCFMDAS Part 2 omit some 11 of the development site-bordering houses of the existing Upper Cosmeston Farm on no less than eleven plans in this document (3.2, 3.4, 3.5, 3.7,4.3 x3, 4.4 x4). Coincidentally, these 11 happen to be the established two storey houses which would be directly adjacent to and most overlooked by proposed three storey dwellings.

It is to be understood that this development in the Vale of Glamorgan Sully ward proposes 576 dwellings and a school in the southern part of the ward. The ward features existing caravan and holiday homes (UCFMDAS Part 1 2.2) particularly along the Fort, St Marys Well Bay and Beach Roads in addition to permanent residences. It is noted that an extensive development of homes has already been granted to Taylor Wimpey along land to the south of Cog Road.

This application would appear to promote a strong cycling initiative though extending the NCB88 cycle route though “Marconi’s Crossing” and “creating strong links between coast and Cosmeston Lakes” (UCFMDAS Part 2 5.1). Indeed the five UCFMDAS documents and the six UCF Design Code documents have over 100 references to cycle/cycling and the many layout maps throughout the application illustrate the proposed cycle routes.

It is noted that all vehicular access to the site, apart from emergency vehicles is proposed “via 2 new junctions along the Lavernock Road” (UCFMDAS Part 3 5.3) having rejected a single exit or roundabout (UCFMDAS Part 2 Option 1) in order to prioritise traffic on the Lavernock Road.

However, it is not until the 33rd document of the application and then only in the development Summary that identifies that “a dedicated pedestrian/cycling route runs along the western boundary of the site and is assigned accordingly” (Vol 2 Ch 10 10.4.6) **i.e the Lavernock Road**, - over which all private and public vehicular access is proposed - however the path is not delineated on any of the plans in this application.

Some may perhaps construe this to be obfuscation of the existence and significance of this much valued facility.

This dedicated cycle/pedestrian path lies on the south/eastern side of Lavernock Road from the “Harvester” to St Mary’s Well Bay Road and onwards to Sully on the the north/western side. This southern path is the preferred choice of many pedestrians/cyclists particularly from the caravan and holiday homes via St Mary’s Well Bay Road to Cosmeston Lakes, the Harvester (now Ego) and beyond if they want to avoid the Beach Rd/Swanbridge Rd/ Lavernock Rd crossroads and crossing over the Lavernock Road twice on unregulated crossings. Similarly this route would be the choice for many cyclists/pedestrians from Lavernock or Penarth to the seafront facilities at Swanbridge (Sully Island, Captain’s Wife etc).

Thus this proposal could appear to prioritise vehicular traffic rather than the stated objectives of prioritising cycling (UCFMDAS 2.1). Clearly, the increase in traffic flows and accident rates associated with replacing a simple farm entrance with the two proposed junctions would be a significant factor in this proposal.

In determining this factor, the assessment of transport in this application refers to the “two broad rule-of-thumb” (Vol 10 Ch 2 10.2.5) suggested by the IEA Guidelines Section 3.15 for the assessment of effect. Importantly, however, the IEA guidelines contain a *caveat* to these “rules” (IEA 3.16) clearly stating “the cumulative effect of a number of developments attracting additional traffic may need to be assessed”. The impact of the Cog Road and other developments “feeding” Lavernock Road do not appear to have been addressed in this report and could also be construed to be a significant omission since it has been suggested that the “new housing developments could result in over 4,000 more vehicle journeys a day along the main road from Penarth to Sully” (Barry GEM 2019).

To cater for these additional vehicles, this proposal provides for 975 parking spaces whilst the decade old 2011 census indicates over 800 cars could be expected to be owned by the occupants of the 576 dwellings of the development. With Vale residents having the highest rate of out-commuting in Wales (LDP), and with the majority commuting to Cardiff (UCFMDAS Part 1 2.1) it can be expected that no less than 70 % of these commutes will be by car to get to work. Consequently there will be a significant increase in “commuter” vehicles to Cardiff from the proposed Development with only two practical means of travel to Cardiff - namely the B4267/A4055 (Merrie Harrier) or the A4055/4160 (Barons Court) exits.

I submit that it would be undisputed public knowledge that these two exits are normally highly congested, much greater than your definition of “high” driver delay >3 minutes (Vol 2 Ch 10), particularly during the AM peak when vehicle queues exiting Penarth invariable stretch beyond Wordsworth Avenue and Plassey Street respectively. So to report that an increase of 140 and 122 vehicles on these two junctions (Vol 2 Ch 10 Table 10.8) during the AM Peak would be “negligible” is somewhat nonsensical.

Complementing the baseline traffic flows the Report (Vol 2 Ch 10) traffic collision data spans the same length of the B4267 between the A4231/A4055/Sully Moors Road roundabout junction to Llandough Hospital and, to be factually accurate , should state “that no less than 40 collisions within the 54 month period” (Vol 2 Ch 10 10.2.16) as there were almost certainly unreported mishaps, like minor shunts, that go unreported.

This accident report indicates that of the 6 collisions involving cyclists 5 occurred at junctions (Vol 2 Ch 10 10.2.22) and would be consistent with national reports that “ two thirds of cyclists killed or seriously injured were involved in collisions at, or near, a road junction, with T-junctions being the most commonly involved“ (ROSPA 2016).

Yet this development proposes all vehicular access to 576 dwellings generating in excess of 400 “AM peak trips” (Vol 2 Ch 10 Table 10.7) via two new junctions across an existing cycle path, particularly well used by children over the summer months, when a major stated aim is to “prioritise cycling” (UCFMDAS 2.1).

Hence I cannot agree with the conclusion of 10.2.25 as there could well be a significant impact on the rate of collisions due to the new junctions but not by an increased traffic flow along the Lavernock Road *per se*.

In conclusion, this application would appear to conflict with objectives for quality of life and environment of existing local residents and visitors and perhaps, as due diligence may have fallen below expectation for this submission, it should be referred to impartial, professional peer review if not summarily rejected.

Council will £11m to spend on community

The council has agreed to spend £11 million on a range of community projects over the next three years. The projects include the construction of a new community centre, the renovation of a library, and the provision of a new play area. The council also plans to invest in a range of other community facilities, including a new sports centre and a new arts centre. The council's community investment programme is part of its wider strategy to improve the quality of life in the community. The council's community investment programme is part of its wider strategy to improve the quality of life in the community.

'Special school' to get £11m funding for building



Headmaster Alex Seabrook (left) stands in front of the school building. A special school has been built in 2007. (Left: Alex Seabrook)

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Headmaster Alex Seabrook (left) stands in front of the school building.

A special school has been built in 2007. (Left: Alex Seabrook)

Alex Seabrook

Headmaster, Special School

Alex Seabrook is the headmaster of the special school. He has been in the post for several years and has a wealth of experience in the field of special education.

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**Objection to Planning Application 2020/01170/OUT
Land at Upper Cosmeston Farm, Lavernock Road, Penarth
Outline application for residential development, a primary school, community
space and public open space with all matters reserved other than access**

It is my view that the land designated under this application should be retained as part of the vital green belt/wedge between Lavernock and Sully in order to preserve the fine coastal and rural aspect of the area. It should never have been included within the Vale Council Local Development Plan (LDP) in the first place. My understanding is that it was a last minute, block addition to the LDP, intended to achieve a theoretical housing target required under the Vale Council's Local Development Plan to which I have objected previously.

The development in question isn't organic in its scale and is proposed from flawed housing forecasts that are now out of date due to Brexit and the Covid19 global pandemic. The above points should be of fundamental consideration when judging this application and I also object to this development proposal on the following grounds:

1. Incongruous development density, height and building style in a rural setting opposite a Country Park.
2. The unnecessary destruction of rich wildlife habitat and ancient hedgerows.
3. Serious health risks arising from disturbance of old buried waste including asbestos, unregistered toxic/contaminated waste material and animal pyres where my home is approximately 150 metres downwind of the site and where wind is normally prevailing from the South West thereby placing my home and garden directly within the immediate airborne fallout zone of any disturbed material or odours.
4. Protracted nuisance from construction traffic along with noise and dust fallout that may last up to 10 years during development thereby detracting from the quiet enjoyment of my property in my retirement.
5. Increased traffic congestion and pollution on existing roads that already can't efficiently cope with current traffic volumes. This problem will be compounded by the large development currently underway in the adjacent Sully village.
6. Increased excess water run-off from development land where our main road already regularly floods in bad weather.
7. Destruction of farm and military structures that are either listed or of heritage value.
8. Unacceptable increased demand on already stressed Doctors/Dentists and Schools within the area.
9. As yet undefined highway and utilities diversionary works that will cause further nuisance and disruption to facilitate safe access and egress to and from the site along with undefined temporary works for the access of site construction traffic.

I am also particularly opposed the construction of a so-called landmark building on the clifftop along with many other tall flats. The proposed development is

already being referred to locally as the new 'Billy Banks' borne out of objections to its density, style and scale. Especially where there is an over reliance on the use of terraced properties and flats to meet the housing density target approaching 600 units.

Additionally, I would question the objectivity and impartiality of the Vale Council as a Labour administration tasked with judging this application, especially as they operate under a Welsh Labour Government who are seeking financial gain by selling this land for housing purposes at enhanced profit over the original purchase cost. The land was never originally purchased with the intention of using it for dense housing in a rural setting. If it isn't required for construction of the Severn Barrage then it should be returned to agricultural use instead of being cashed in as a windfall by adding planning value where the Labour administration have control of that process and where they have a vested interest in doing so. Therefore, a level of professional scepticism needs to be applied in honestly judging the validity of what I believe to be the core financial motive behind this inappropriate housing scheme that will totally blight the beautiful Country Park at Cosmeston Lakes for evermore. Please consider the development proposal in this wider negative context.

The designated land was originally purchased for the greater good in order to facilitate the provision of green energy under the now defunct Severn Barrage Project. It should therefore be returned for the greater good and not sold for short term profit for the benefit of the selected few.

53 Althorp Drive
Cosmeston
Penarth
CF64 5FJ

31st October 2020

Dear Mr. Robert Lankshear

I am writing regarding the outline planning application 2020/01170/OUT - Land at Upper Cosmeston Farm, Lavernock Road, Penarth

Having read information about the application, I am writing to object to the proposal.

I appreciate that it is necessary to build new homes and If the application was for a smaller scale development I would not be objecting. In my view this proposal is too large at the location chosen.

More specifically, my objection is for the following reasons:

Green Wedge designation: The site is in the Green Wedge which I understand is an urban containment mechanism intended to restrict the spread of built development beyond the Penarth settlement boundary. In my opinion the scale of this proposal should define it as 'inappropriate development' and it would completely change the nature of the land. I note that the applicant claims that the existing agricultural buildings at Cosmeston Farm set a precedence for built form on this land. I wholly disagree. The presence of agricultural buildings are to be expected in a rural area/Green Wedge and their presence should not be considered a precedence for this proposed **urban** development.

Traffic: The Environmental Statement (Chapter 10), considers the impact of additional traffic on local junctions. It does not however fully address the impact on the biggest traffic problem areas in Penarth at peak times – the Baron's Court junction and the junction between Redlands Road (B4267) and the A4055. At peak times traffic queues for over 1 mile at each of these junctions, with long driver delays. Although walking, cycling and public transport are available, it is reasonable to assume that there will be a large number of working people who will drive to work. If this is just 1 person in 20% of the homes, that will add 120 cars to these queues. This also raises concern over road safety, particularly for children walking to school.

Local services: A development of nearly 600 homes will put too much pressure on the already stretched services in Penarth, in particular the GP and dental practices and secondary school places.

Nature conservation: The proposed development has the potential to have a detrimental impact as it is sited between and in close proximity to two SSSI's – over 25ha at Cosmeston Lakes and the Penarth Coast.

I trust that the above objections will be taken fully into account in determining this outline application and I hope to see a smaller application for full planning in the future, that I can support.

Regards
Judith Cook

Cc: Cllr Mahoney, Cllr Penrose, Cllr Gray

10, Petrel Close,

Lavernock Park,

Cf645FT

15th November 2020

Objection to: Application ref. no:2020/01170/OUT

Dear Mr Lankshear,

I am writing to object wholeheartedly to the proposed building of hundreds of houses on the fields adjacent to my home. Having lived in Petrel Close for 22 years, I feel I know the land more than most. I am a keen runner and dog walker in the fields and roam around them and the coastline on a daily basis.

I have watched first hand the rapid erosion of the cliffs and footpaths on the edge of the fields. I see regular flooding of the fields in the many "sink" areas where water collects. As the soil is extremely clay-like, I can only suspect that subsidence of any homes built in these fields would be an extreme cause for concern. Indeed, we may even be experiencing this ourselves.

My daughter nearly drowned in an area that has obviously been dug out deeply and then filled with mud, manure and dead animals. This area is covered with top soil and is disguised. It can occasionally get so sodden, that you sink. I have found a dead horse, that had obviously had struggled in this sinking mud for a few days...the body gradually got sucked up into the mud.

I believe we have old Roman remains, potentially bombs that have not gone off, not to mention the remains of the old tip that has not been properly cleaned up and covered over. The gases from this are still leaking out. Surely this land is not solid enough for a building. We have 400 year old Farm house that should be able to continue for another 400 years.

Our field is a very important flight path for birds flying in from all over the world looking to shelter in Cosmeston Park. We have resident birds including sparrow hawks, owls and falcons.

As I am sure you are aware, the traffic is already a massive concern and will become more problematic now that the Sully new builds are underway. Commuting times and pollution will be doubled. As the planners before you had no foresight at all either, they have pretty much snookered your opportunity to reopen a desperately needed rail network to ease the congestion and pollution.

My advice to all planners today, is to consider already established buildings that are now needing a change of use. We will have a surplus of office space and retail units. Surely, we would be better placed to convert these buildings into appartments that could accommodate individuals, couples and families.

Please do not spoil our wonderful space where many people go to be at one with nature, to enjoy peace and fresh air. Health and wellbeing should be at the top of all agendas.

Regards in the hope of a reconsideration,

Debbie Birch-Hurst

**Objection to application 2020/01170/OUT/RL, land at Upper Cosmeston Farm,
Lavernock Road, Penarth**

I am writing to object to the outline planning that was recently put in to yourselves for the building of homes at the above location. I feel it is important to state that I do not disagree with the building of homes near my house, however I cannot support this application for the following reasons:

1. Proposal for a school - in multiple locations in the documents supplied the word 'if' is used for the building of the school. Currently primary schools in the local area are grossly over-subscribed with local children going to Dinas Powys, Barry or further afield. What assurances do we have that this will be built first or towards the beginning of the phasing of the build? Additionally the documents state that the Local Education Authority will find the school. Given the past and ongoing chronic under-funding of education how will this ever come to fruition? Can this be, at least, part funded by a CIL or other such initiative? Should this not be built then all the other points on traffic are null and void due to the need for parents to travel for schools further away than walking distance. Also the land for this is stated as insufficient for a two form entry school unless land is taken from the green space. Why is the required land not from the master plan area or is this so the scheme is more profitable? The more I read the documents the more the school seems to be an afterthought and this must be at the top of the priority list.
2. Traffic - currently it is difficult to leave Penarth by car after 0730 as the traffic is so bad. With the proposed homes being so far from the train station I fail to see how the extended walkway in the old train line will change this. The increase in traffic is likely to lead to gridlock at some points during the day without significant investment in the local infrastructure, such as the Dinas Powys bypass. The calculations used for this at the public consultation do not seem to take into account the addition of 800 plus cars at peak time. Without including those from the other new development proposed on Cog Road in Sully or the additional traffic if no school is built.
3. Medical provision - There is no provision for another doctor's surgery. Before the current pandemic to be seen at all you had to queue before 0800 for all appointments. I would expect more families to only exacerbate this predicament in future. How will this issue be addressed.
4. Land next to 4 Shearwater Close - this is shown in the outline plan as land for an open space. This is at the end of the shaded driveway for numbers 4, 5 and 6 Shearwater Close. There is a patch of this that has been used as common land by those in the Close for more than 12 years. We would need assurances that this land would still be 'common' and that there was no potential for this to be used as a thoroughfare.

5. Outline planning drawings - these show the existing houses boarded mostly by green spaces or parks. What assurances are there that this would continue to be the case and not changed at the next stage for more houses on this land?
6. Building heights - the proposal for the 5 and 7 storey buildings on the site are ridiculous. The argument that they form symmetry with the church at the other side of Penarth does not benefit anyone except those on the water or viewing this from England. The documents stress in multiple locations that they will not be seen from the road or other viewing points so who do they benefit? Or are these just to increase the profitability of the scheme? These heights are totally out of keeping with all other buildings in the immediate area.
7. Wildlife - almost all the surveys of wildlife were completed while the site was a working farm. This has not been the case for a year meaning that flora and fauna have started to reclaim this area. It has been noticeable the increase in wildlife from wildflowers to the appearance of a kestrel more recently. Before any building starts I firmly believe the ecological and wildlife studies should be done again so that appropriate mitigation measures can be taken and included with the planning application. Given the UK government's latest announcement for a 'Green Revolution' I would much prefer this were a wind farm or an area for the pledged trees to be planted. Obviously with appellate studies so as to increase and diversify the local wildlife.
8. Future proofing - I acknowledge that the outline plans for the homes state they will be carbon neutral. But they should also include provision of PV panels on each home, battery systems to locally site electricity from this, and ground or air source heat pumps for heating. This combination will allow for the smoothing out of the electrical supply for the charging of electric vehicles. The suggestion that only 5% of the flats will have EV charging points is insufficient for current demand let alone when fossil fuel vehicles are banned. Also having an average parking density of 1.5 per dwelling is also insufficient. If you visit any housing estate built to this standard there are multiple parking issues. Given the pandemic I think it unlikely that public transport will become as popular as in the past so this becomes even more important. Will the dwellings have electric bicycle charging points as well? 'Next-Bikes' will be insufficient for the full demand. The expansion of the existing cycle path is great, but will this be extended from the southern end of the site towards Sully?
9. Community centre - no provision has been made for a community hall or facility particularly if the school is not built. It will be very difficult to create and encourage an inclusive and cohesive community without such a provision. This would allow clubs to be formed and provide additional facilities for the local young adults.

As I mentioned at the start of this I understand the need for houses in the local area, but this has to be houses built in the correct way with the correct provisions for the new people in their new homes. I hope that you take these considerations into account in making your decisions.

Please could I raise the following points to be considered with the current proposals that have been submitted.

1. Electric car charging - There are a significant amount of parking spaces shown which are a good distance away from the houses and there seems to have been no thought to how residents should charge their EV's. There has also been no infrastructure suggested for charging of electric vehicles away from homes.

With more new EV's being sold than diesel cars in recent months, the adoption of EV's is only going to continue to increase. This will result in vehicles parked on pavements with wires trailing across footpaths. (This is already happening around estates where there are no proper driveways, owners are being forced to trail wires along the pavement or suspend them from near by trees.)

More consideration needs to be given for how EV's will be charged (both during the day and overnight) to keep the area safe and encourage people to adopt sustainable cars.

2. Transport - Commuting into Cardiff from Penarth during busy times can already take up to 1 hour (Pre-Covid and this is likely to return Post-Covid). Public transport is very poor this side of Penarth, there are very few buses, and the train station is a significant distance away that it's not viable to walk to as part of a daily commute. There has been no acceptance to the existing travel problems which have only increased since the recent nearby developments in Barry and will get worse by the already approved Sully developments.

Having schemes to encourage people to walk, car share or use bikes is unlikely to have any impact on solving the problems that this development will bring and are just words with no solutions. I would suspect that adding this amount of houses which will produce a large amount of traffic will without doubt cause even further problems.

The classification of Lavernock road as a carriageway should also be looked at as it is a one lane local B road with a 30 mile per hour limit and very often backed up with slow moving traffic.

I would object to the high-density plans submitted based on the already over congestion roads, and there have been no further solutions on how to solve the traffic problems.

3. Climate change - Beyond exiting building standards, there has been very little thought given to climate change and encouraging net-zero buildings. Given the impact that development like this are having on our environment, more thought could be put into sustainability. Maybe ideas such as a requirement to utilize roof space with solar panels or green roofs or more green space should be considered.

4. Self build plots - Although originally mentioned by Asbri planning in a Penarth town council meeting that there would be plots made available for self build homes, the submitted plans do not seem to have been included within the proposed plans.

Given self-builds are likely to encourage more sustainable and net-zero developments and help build a community with a unique character. I would like to object to not including any self-build provisions within the plans and would encourage part of the space to be designated for this type of housing.

5. Wildlife - The area is known as having lots of bats, and such a high density of housing would harm this protected species. Could a lower housing density be considered to help alleviate the impact to the local wildlife.

6. High rise buildings - There are proposals for flats of up to 9 stories high towards the top of the development. This is out of character for the area, and there are no other buildings of this height close by and as such, I would expect this to have a negative impact on the area.

7. Green space - These plans show a high density of housing compared with what exists on other estates close by, given the size of the plot, I would suggest that more open space between houses is considered to be in keeping with the local area.

APPLICATION No.
2020/01170/OUT/RL.

16-11-2020

6, Upper Cosmeston Farm
Lavernock,
Vale of Glamorgan.
CF64 5UB

Dear Sir,

We strongly object to the proposed development of land at UPPER COSMESTON FARM, Lavernock Rd, Penarth for the following reasons:-

1. This land has been designated a "green lung" between Penarth and Sully, and prevents "URBAN SPRAWL" as promised by our politicians.
2. There is no infrastructure to cope with heavily increased traffic, therefore, Lavernock Rd, Sully + Penarth would become gridlocked on a daily basis.
3. Sewage works will not be able to cope, we already have dreadful smells since the Cog developments in Sully.
4. The land is contaminated with ~~is~~

TOXIC CHEMICALS dumped during the second world war and is a great health hazard.

5 Flooding occurs on a regular basis in the fields and on Lavernock Rd, more buildings would exacerbate this tenfold.

6 Important ARCHAEOLOGICAL REMAINS have been discovered at Lower Cosmeston and surrounding fields and they must be preserved at all costs.

7 Vast swathes of woodlands and trees will be destroyed causing loss of a wide variety of wild life, BATS, DORMICE, BUZZARDS, SPARROW-HAWKS, PHEASANTS, SOOTS ETC. THESE are mainly protected species.

8 Greatly increased air-pollution, which our government is intent on decreasing not increasing!

9, Medical Centres and schools in
Penarth cannot cope with the
number of people they have now,
let alone with a huge
development such as this.

10 I strongly urge you to
reconsider this proposed
development which would be
detrimental to the whole of
Penarth area.

Signed,

[Redacted]

(MRS. W. W. YOUNG)

[Redacted]

(MR J. M. YOUNG)

14 Upper Cosmeston Farm

Penarth CF645UB

3rd Nov 2020

Town and country planning act

Application no. 2020/01170/OUT

Reason : objection to the development of land at Upper Cosmeston Farm.

The plans were submitted just on the fire break making it impossible for any meetings with the Welsh government about this project thus making it one sided. This issue should not be political but for the good of the communities.

We object to to the development of green areas instead of brown sites. The number of dwellings has risen from around 250 to over 570. Also, we were assured that the plans would take into consideration existing properties. These properties having been built on previously used areas. However this is not the case.

There is a row of eighteen houses running along the length of our row of houses.

As the land is higher, the new buildings would appear overwhelming especially if they rise to 14metres. This would also be light blocking for our property and feel invasive.

There also shows new hedgerows . These should include the natural,well established,open trees that currently run down our side of the field and being of benefit to the environment.

Traffic is another issue. People WILL use cars whether we like it or not. The increase in the number of cars that is bound to happen would cause chaos on the already very busy main road giving rise to more pollution for the environment . Even a young representative at your initial public consultation slipped up by saying people should ride bikes But went on to say she had driven to the meeting at Cosmeston because she lived in

Cogan !!

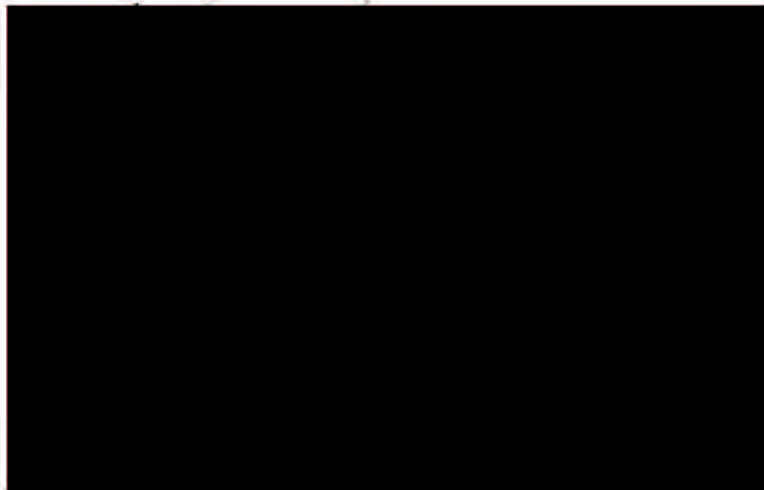
Finally, some of the most important reasons for objecting are of archeological and environmental interests .

Dormice, buzzards , hawks, foxes, woodpeckers, thrushes, fieldfare, voles, hedgehogs, bats, pheasants and many other birds have been frequent visitors. These WILL be affected.

The area does not have good drainage so promoting flooding. Even if a pond is in the plans will this turn into a lake?

There is a hazardous land fill area and although this is planned as a recreational area, only a small amount of disturbance of any of the asbestos or chemicals that were witnessed being buried here would have dire consequences. Something we have witnessed. Best to leave Pandora's box closed.

We do hope that all our voices are heard and objections taken seriously
Thank you



A SPECIAL school in Penarth is set to get a new £11 million building as pupil numbers shoot up

Ysgol Y Deri, which featured in the recent BBC documentary A Special School, was built in 2014 with space for 205 pupils. The school is currently over-capacity with 262 pupils, with those numbers expected to rise

Yale council wants to construct a new school building in Cosmeston, three miles away from the current site, with space for 150 pupils

The new school building would be built next to the planned housing estate at Llaner Cosmeston Farm. The Yale council would buy the land for the school from the Welsh Government, which currently owns the site.

Chris Britton, the school's headteacher, said: "Ysgol Y Deri was built six years ago. Since then we have seen the numbers of pupils with additional learning needs climb steadily. We now have over 300 pupils in a school that was built for 205.

"We desperately need to establish another school building as

Alex Seabrook

alex.seabrook@reachplc.com

we expect these numbers to keep on rising. We know that with the right support and the right environment these pupils can flourish. Mainstream schools cannot meet their needs and that's where we come in.

"We are the only special school in the Vale of Glamorgan so there is nowhere else for these children to go – unless it is to other local authorities or private provision which would be at huge cost to the council taxpayers.

The new school building would cater for primary age children and be built along the lines of Ysgol Y Deri to provide everything these children need to be happier and to succeed.

"It is a much-needed development to look after and educate the children with the greatest and most complex needs in our society."

While the new building won't be ready until September 2023, Ysgol Y Deri will have to provide

"temporary modular accommodation" at a cost of £700,000 to make space for expected rising pupil numbers in the meantime.

Paula Ham, the council's director of learning and skills, gave details about the pressures in a report to cabinet.

Ms Ham said: "The numbers of children and young people requiring a placement at Ysgol Y Deri has continued to increase and at a faster pace than previously predicted.

"The number of pupils leaving the school in the short to medium term is much lower than those entering, which is causing the significant pressure on capacity."

This summer 10 pupils left the school and 48 new pupils joined. Last year 25 pupils left while 39 joined; and the year before 18 pupils left and 39 joined, according to Ms Ham.

The council will first consult the public on the changes before applying for planning permission for the new school building.

This proposal extends beyond the published LDP area and into the green wedge which separates Penarth from Sully. It may encourage further greenfield development along Lavernock Road.

It extends to the cliff leaving only a 30m strip. The cliff is eroding and this is not addressed in the application or the geotechnical report. A cliff fall would remove a section of the Wales Coast Path which is a national asset, and there would be no room to reinstate it.

There would be significant proximity and visual impact for users of the coastal path and elsewhere, particularly of the 7, 5 and 4 storey apartment blocks which should be removed from the plans. The whole development should end further back from the cliff edge and be made significantly smaller.

Two additional road exits will be created onto Lavernock Road. If all 576 dwellings are built there could be an additional 1000 cars on Lavernock Road, plus more for the school coming from Sully and Penarth. The application acknowledges this will create additional traffic congestion at the Westbourne Road junction. I could not find information about the school on the planning application but understand from Penarth Times that it may not be a mainstream primary but an annex of Ysgol y Deri. There is no capacity in Sully or Penarth mainstream primary schools for the additional children from the current Cog Road development and this proposed estate.

Contrary to the application the proposed development is not close to any amenities other than the Spar on Brockhill Rise, which no longer has its Post Office. It is unlikely that most people will view that as walking distance. In the other direction the nearest shop is OneStop in Sully. For any other amenities it will be necessary for people to drive either to Penarth or Barry.

Sarah Salter
17 Clive Place
Penarth
CF64 1AU

Upper Cosmeston Farm development proposal.

Case No. 2020/01170/OUT

I am very concerned about this proposal due to a number of factors, the main one being the many protected and endangered species that have been found here. Ecological surveys supplied by the proposer have been undertaken between 2013 and 2018. With regard to the breeding bird survey dated 1017 - more of the species listed have been placed on the red or amber list since the survey was done. I note the presence of breeding Skylark, breeding Starling, breeding house sparrows and at least 4 pairs of breeding linnet and also present are song thrush, mistle thrush, grey wagtail and herring gull. All of which are now on the red list for endangered birds.

Present on the site from the Amber list of endangered birds are Stock Dove, Shelduck, Swift, Kestrel, House Martin, Willow Warbler Dunnock and breeding Bullfinch.

The area is considered to be of ecological and environment importance.

Thinking about the Cog Road development just down the road the following species were noted as present before the development was undertaken:- Skylark, House Sparrow, Herring Gull and Lapwing and the site was considered to have ecological importance to birds. As yet it is perhaps not possible to say what the impact of this development has been in the short term through loss of habitat and in the long term through factors such as light pollution, use of pesticides by residents, domestic cats, further loss of hedgerow by residents etc. I think it is safe to assume that much of the wildlife from the Cog Road development will likely be in the process of relocating to Upper Cosmeston Farm and that further ecological surveys need to be undertaken to ensure that the information is up to date.

Add to the mix the presence of dormice. In 2016 Britain's native dormouse had declined by more than a third since the year 2000 according to a report by wildlife charity, the People's Trust for Endangered Species.

The researchers assessed more than 100,000 records gathered from across the UK over 25 years.

The report says the dormouse is now vulnerable to extinction in Britain.

Their presence is a good indicator of animal and plant diversity in an ecosystem. A drop in its population can have a ripple effect within food chains and have dire effects to other wildlife populations.

Dormice in the UK are found mainly in southern England, southern Wales and along the English/Welsh border. However, these populations are considered extremely sparse and patchy. Dormice like to live in lots of woody vegetation, generally the succession stage of woodland growth. They are associated with scrubland, old overgrown hedgerows and old coppice woodlands. They use honeysuckle bark to weave their nests or nest in old birds nests. With much of the seeds disappearing from the fields as a result of the development and bird populations also under attack from domestic cats there will certainly be less in the way of birds nests.

When people live in close proximity to this kind of habitat they are in the habit of tidying it up, removing hedges for better sea views etc. This loss of habitat will be disastrous for both bird and dormouse populations.

In 2017, the dormouse population plummeted by 72% within the last 25 years.

They tend to be very slow breeders and do not disperse as well as other species. Their habitat tends to be of old woodland linked by well-established hedgerows. The growing human population, habitat fragmentation, the lack of management of woodlands or their removal, has caused the reduction of suitable habitat, leading to the drop-in dormouse population. As they do not disperse very well, any newly managed woodlands that have lost their dormouse populations may never regain them.

High volumes of housing units including taller residential structures will produce light pollution which will surely impact on the bats present on the site. Providing bat nesting boxes may mitigate to some extent but many will be forced to leave.

The good population of Slow Worms present on site will die. Any that remain will be decimated by domestic cats that inevitably come to the area.

All of the aforementioned wildlife will be supporting the predatory birds feeding at the site including Kestrels, Buzzards and Peregrine Falcons. Two pairs of Peregrine Falcons successfully raised their chicks to adulthood in 2020, one pair at Lavernock Point and one pair on Dock Beach cliffs. With a steadily growing population of peregrine's in this area it is vital that as much hunting ground as possible is available to them.

Hedgehogs too are under threat of extinction. If we do not act now to save our wildlife it will be too late. Locally present birds who may not be considered to be at risk in the County will disappear if we continue to look at sites in isolation from one another using old surveys and without considering the impact of one site on another.

The plans also involve eating into the green wedge area in order to provide a special educational needs facility. This will generate vast amounts of road traffic during school term time with pupils arriving in taxi's. One only needs to look at the taxi's lined up at Headlands School of a morning to see this in practice.

Obviously my preference would be for the Vale of Glamorgan to keep some really special mosaic habitat land for our wildlife for us and for future generations. Failing that then the scale and nature of the proposal needs careful consideration. Communal car parking with charging points, boardwalks to keep humans off the land, meadow creation, green roofs, rainwater collection, green walls and a much smaller scale project should all be seriously considered.

No doubt any development will include Section 106 monies. Perhaps some of this should be used to create safe passage tunnels for small mammals and amphibians across Lavernock Road as wildlife is so threatened by human action.

I object as follows:

- The application 'is not in accordance with the provisions of the Development Plan and may be of public interest' and so should be rejected. There are documents in the application that are wrong and the site is not shown on pages 58/509 as being in Sully - more reasons for rejection.
- This development will dramatically over-burden local schools, health and other facilities.
- Lavernock Road will struggle to cope with the extra peak hour traffic, as will the Merrie Harrier and Baron's Court junctions on the way to Cardiff. This will increase pollution.
- Extra run off will cause even greater flooding.
- The site was used for landfill in the past and there are no proposals in the application for remediation.
- Housing demand forecasts used in the LDP over-estimate housing need because they do not use the latest data on UK household formation and include double counting.
- The proposal is contrary to current best planning practice. It is greenfield, not brownfield and has no jobs thus encouraging car commuting. The sketch schemes associated with it show a form of development out of keeping with surrounding residential areas.
- It is in a green wedge, a status that states development will not be allowed.
- The site is alongside the Severn Estuary Special Area of Conservation and the Severn Estuary RAMSAR, which it may damage. It is close to the Cosmeston Lakes Country Park, which it will overlook, destroying the amenity and ambience, and to the Cosmeston Medieval Village and contains archaeological artefacts of great interest.
- The Welsh Government seems more intent on reducing the quality of life of local residents and visitors and more interested in financial gain than good planning. This application is for one of the largest residential schemes in the Vale but has not been properly consulted over. Moreover, the application is wrongly addressed as being in Penarth when it is actually in Sully and Lavernock. This misleads local residents.
- Finally, the timing is undemocratic - the Welsh Government submitted its planning application for this site on the same day it announced a complete Covid 19 lockdown in Wales. It may be within the law but it is immoral to try to rush this scheme through during the Covid crisis.

Penarth Civic Society

Comments on Upper Cosmeston Farm proposals.

The Penarth Civic Society is opposed to the proposed development at Upper Cosmeston Farm in Penarth.

While Penarth Civic Society (PCS) accept that more housing is needed we have questions about what type of housing is required and where it should be located. The site at Upper Cosmeston Farm has been allocated for housing in the Vale of Glamorgan LDP but the impact of this development should not be looked at in isolation but should be considered along with the proposed developments in Sully, Llandough and Cog Road, Penarth.

PCS has very serious concerns about the plan to develop this area on the following grounds:

- environmental issues and the impact on wildlife
- worsening already serious traffic congestion
- the effect on the already overstretched infrastructure of the town, notably schools.

If the development is to go ahead, PCS notes:

- A full impact study is required of road traffic in the area of the development and access / egress from the development, and peak traffic flows from the area into the main adjacent centres of Cardiff and Barry
- An up-to-date environmental impact survey is required
- It is essential that the infrastructure for this, and other developments, is in place before detailed plans for this site are produced
- Positive action is required for the immediate and longer-term protection of wildlife and their habitat including tree planting, wildlife corridors and light pollution mitigation
- Plans should be sensitive to the context consisting of high-quality site layout and environmentally sustainable buildings
- Plans should be visually appropriate to the context with the existing tree line as the visual high point for the development. There should be no medium-rise flats
- Plans should take full account of the needs for mixed development including fully integrated social housing and cohousing for retired persons

Specific comments on the planning application

Environmental issues

We are very concerned about this proposal due to a number of environmental factors, and in particular the protected and endangered species that have been found here. The ecological surveys supplied by the proposer were undertaken between 2013 and 2018 and will now be out of date due to other developments locally, and to changes in risk levels.

A full and up to date investigation of the presence of all wildlife including newts, bats, mammals and birdlife (including migration routes) is required.

Dormice. By 2016 Britain's native dormouse had declined by more than a third since the year 2000, according to the wildlife charity, the People's Trust for Endangered Species. The growing human population, habitat fragmentation, the lack of management of woodlands or their removal, has led to this decline. The presence of dormice is a good indicator of animal and plant diversity in an ecosystem. A drop in the population of dormice can have a ripple effect within food chains and have dire effects to other wildlife populations.

The habitat of dormice tends to be of old woodland linked by well-established hedgerows such as is found at Upper Cosmeston Farm. When people live in close proximity to this kind of habitat they typically 'tidy it up' (for example, removing hedges for better sea views). This leads to a loss of habitat which would be disastrous for dormouse populations.

Dormice tend to be very slow breeders and do not disperse as well as other species, so any areas that have lost their dormice populations may never regain them.

Bats. High volumes of housing units including taller residential structures will produce light pollution which will impact on the bats present on the site (see Supporting Documents Vol 3 8.2). Providing bat nesting boxes may mitigate to some extent but many will be forced to leave.

Slow worms. The good population of slow worms (see Supporting Documents Vol 3 8.6) are likely to die during the building process. Any that remain will be decimated by domestic cats that will inevitably come to the area.

Hedgehogs. While hedgehogs are not specifically covered in the application appendices, they are officially classified as vulnerable to extinction by the International Union for the Conservation of Nature. It is estimated that their numbers have fallen from 30 million to one million in the last forty years and by about 50% since 2000.

Birds. With regard to the RSPB breeding bird survey dated 2017, more of the species listed have been placed on the red or amber list since the survey was done. We note the presence of breeding skylark, starling, house sparrows and other nesting birds.

Many of the species mentioned above will be supporting the predatory birds feeding at the site including kestrels, buzzards and peregrine falcons. Two pairs of peregrine falcons successfully raised their chicks to adulthood locally in 2020, one pair at Lavernock Point and one pair on Dock Beach cliffs. With a steadily growing population of peregrines in this area it is vital that as much hunting ground as possible is available to them.

Locally present birds who may not be considered to be at risk in the County will disappear if we continue to look at sites in isolation from one another and without considering the impact of one site on another. As yet, it is not possible to know what impact the Cog Road development is having on wildlife through loss of habitat and in the long term through factors such as light pollution, use of pesticides by residents, domestic cats, further loss of hedgerow by residents. It is, however, reasonable to assume that birds and other wildlife disturbed from the Cog Road development will relocate to neighbouring sites including Upper Cosmeston Farm. Up-to-date ecological surveys need to be undertaken to ensure that the information on potential damage is up to date.

If we do not act now to save our wildlife it will be too late.

Transport

As a whole, Penarth has good public transport and, specifically, links to Cardiff. This proposed development, however, combined with those in Sully, will impact on Lower Penarth where public transport is more limited (nominally 30-minute intervals) and needs to be upgraded with more frequent services, particularly at peak times.

The development proposals place very little significance on the increase in traffic especially at times of peak morning commuting traffic. The consultants' report seems to suggest that alterations to the traffic light sequences in Lavernock Road would mitigate against the worst traffic build up. We feel that this seriously underestimates the existing traffic problems and the inevitable traffic increases from this and other local developments in the Penarth area.

Traffic passing along Lavernock Road between 7.30 and 9 am is a steady stream and exit from Cosmeston Drive and Brockhill Rise are already particularly difficult. In addition to existing housing, there is a Spar supermarket, a community centre, Glamorgan Golf Club and a funeral home served by this section of Lavernock Road. A significant amount of traffic turns from Lavernock Road into Westbourne Road with much of this traffic using Windsor Road or a route through the Marina to access Cardiff to avoid the queues on Redlands Road.

During the morning peak traffic time there are significant delays further along Lavernock Road/ Redlands Road. Particular problems are experienced near St Cyres School at the beginning of the day, and there are typically extensive delays at the Merrie Harrier junction, from both Redlands Road and Dinas Powys. These delays continue despite recent traffic management works at the Merrie Harrier and the Windsor Road corridor, the need for which were identified in the Vale of Glamorgan Local Transport plan 2015 -2030.

It is well understood that there are very limited opportunities in the Penarth area for new or wider roads and the existing system has to cope with whatever demand is created. A park and ride scheme for Cosmeston (Vale of Glamorgan Local Transport Plan 2015-2030) has been suggested in response to existing traffic problems. This will however put buses right within peak commuting traffic and do little to alleviate traffic congestion or shorten travel times.

Within the development there is a concern that the 'emergency' vehicle link to Whitcliffe Drive will provide the opportunity for misuse by frustrated commuters looking for an alternative exit particularly at peak morning times, unless it is securely controlled.

The other very sizeable housing schemes being planned, and in some cases built, for Sully and Cog/Sully Road will also have significant impacts on infrastructure in this area and these need to be considered together with Upper Cosmeston Farm. This is not a one-off development.

Existing paths and rights of way

The coastal path seems to have been excluded from the proposals because it falls under the remit of the Vale of Glamorgan Council. The present coastal footpath should be upgraded at least to Lavernock Point and accommodation for some re-routing of the footpath will be necessary in the coming years as coastal erosion makes inroads to the cliffs.

There is a very real risk that householders adjacent to the coastal path (the 'premium' sites) will clear trees and hedges to give a better sea-view. There is plenty of evidence that this has already happened elsewhere in Penarth. This would diminish the experience of using the path, and prevention of this should be built into the plans.

The retention and upgrading of the existing railway embankment across the site is an important and significant proposal that will create a skyline and tree-lined pathway. The extension of the cycle route from Cosmeston Drive to Lavernock, with links to the coastal path, would give cyclists, wheelchair users and pram walkers access to a much-improved network of pathways.

Lower Cosmeston Farm Buildings

While the existing farm buildings of Lower Cosmeston Farm are in a generally poor condition, they should be retained to maintain a link to the historical context of this area and provide continuity in linking old Penarth to the new development. They can find new uses in either residential, commercial or community uses.

The farmhouse is of particular interest being a rare example of a single unit, end entry, hearth passage building dating from the C 17th and is mentioned in the Royal Commission

Archaeological and Heritage Assessment, Historical Monuments, Farm Houses and Cottages, Wales 1988.

Schools

PCS recognises the need for additional school capacity to cater for any additional housing and this is addressed in the plan. However, while PCS supports Welsh-medium education, we understand that all English-medium schools in Penarth and Sully are over-subscribed. If the proposed new primary school is to be a Welsh-medium school, this will add significantly to peak traffic as children will need to be taken by car to English medium schools that are further away, and children attending the new school will need to be transported there from elsewhere in the Vale.

While there is a path through Cosmeston Country Park that students can use to access both Stanwell School and St Cyres School, this will only be a fair weather / summertime route as early afternoon darkness will prevent its use in the winter months.

The separate proposal for a 150 pupil Ysgol y Deri 2 to be built adjacent to the Upper Cosmeston Farm site will further create significant extra traffic as the vast majority of these children will be brought to school in a taxi or minibus. This needs to be considered together with the Upper Cosmeston Farm housing proposals and not in isolation.

Community centre

Consideration should be given to for Section 106 monies to be spent on alternative options to a new community centre. The potential for enhancement of the existing Lower Penarth Community Centre on the adjacent Brockhill estate should be explored as this is within easy walking distance from the new development. Alternatively, some of these funds could be directed towards wildlife protection initiatives such as small mammal routes (see below).

General Planning Issues

The Penarth Civic Society accepts that more housing is needed but questions the type of housing and its location. Should this development proceed however, the PCS believes that this site, currently owned by the Welsh Government, provides an ideal opportunity for a high-quality development that is both an exemplar of sustainable design, and meets the housing needs of different groups.

The Vale of Glamorgan Council has acknowledged the Climate Change Emergency. It should work with the Welsh Government to create a housing scheme that demonstrates a real commitment to the Well-Being Act and the other environmental and social policies that the Council supports. We believe that if this development is undertaken, it would provide an opportunity for a sensitively conceived, high quality housing scheme with a focus on building for low energy use, and planning for reducing car travel. Examples of low energy

use include those currently being proposed in York, where the city plans to build Britain's biggest zero carbon housing project (The Guardian 5th October 2020). The Vale of Glamorgan could also be guided by the Passivhaus standards which are championed in the UK by the Passivhaus Trust and which apply to all new housing in Germany.

Too many housing developments in the UK necessitate the use of the private car. This site is adjacent to an established settlement and proposes (rightly) a mixed-use development which can be further enhanced with the objective of limiting the need for travel (particularly car use) by including essential community facilities on site. This requires that infrastructure is put in place ahead of, or at least as an integral part of, any new residential development, as is the case in many European countries. Too often in the UK we are focussed on numbers and the quality of the housing is very secondary. This needs to change so we can design and build housing and associated facilities to meet the needs of the future.

Sustainable design

Our preference would be for the Vale of Glamorgan to keep this really special mosaic habitat land for our wildlife, and for us and for future generations.

Failing that, the scale and nature of the proposal needs careful consideration. A much smaller scale project and a focus on sustainability should be seriously considered. For example:

- Zero carbon dwellings with highly insulated well-sealed dwellings that are well-orientated
- Green roofs
- Low energy/district energy scheme/use of renewables
- Low car use design – car pool / car share schemes combined with an excellent public transport system
- Vehicular access to be carefully designed and focussed on the essentials – accessible, emergency, taxis, delivery, maintenance and removal vehicles.
- Encourage active travel, for example by providing excellent walking and cycling routes, cycle storage and space for cycle rental schemes
- Building a proportion of live/work properties to encourage working from home
- Communal open spaces
- Respect for the site, in allowing the landscape to retain existing connectivity by raising buildings and walkways off the surface of the ground
- Requiring street lighting that minimises light pollution
- Creation of safe passage tunnels for small mammals and amphibians across Lavernock Road which would to a small degree mitigate for the loss of habitat (Section 106 monies).

Creating a mixed development

PCS requests that this development provide a fully integrated range of housing types and planning features to meet the needs of the local community. This could include:

- Affordable and social housing
- Cohousing for older people
- Live-work housing to support working from home

Summary of comments

The PCS opposes this development.

In the event of this proposal being accepted:

- This site offers the Welsh Government the opportunity to build an environmentally friendly scheme of UK wide importance, including low/zero carbon buildings and proposals for managing car use.
- It is essential that the infrastructure for this, and other developments, is in place before detailed plans for this site are produced. Further clarity is needed on a number of infrastructure issues including schools.
- A full impact study is required of road traffic in the area of the development and access / egress from development and peak traffic flows.
- An updated environmental impact report is required to ensure that effective wildlife protection plans can be put in place.
- There needs to be real attention paid to ways of protecting the natural environment including long-term protection of the existing site hedges and tree planting including the coastal path hedge and the railway embankment route.
- The existing tree line on the old railway embankment should be the visual high point for the development. The medium rise flats are inappropriate in this semi-rural

setting in the Green Belt between Penarth and Barry. This development should not see the 'creeping urbanisation' which has been resisted by the Vale of Glamorgan Council for a long time.

- The development should require the integration of affordable housing and space for cohousing communities.

PCS 30/12/2020

6 Thorn Grove

Penarth

Vale of Glamorgan

CF64 5Bz

26th October 2020

To: Vale of Glamorgan Planning department

FAO: Planning Officer Case reference 2020/01170/OUT

Dear Sir / Madam,

We object to the development at Upper Cosmeston Farm above on the following grounds:

- Unnecessary development of green belt land adjacent to a protected habitat in Cosmeston Lakes. Brownfield and empty / derelict properties (e.g. garage on Windsor Road, redundant boarded up space on Hickman Road, large empty properties on Bridgeman Road) should be managed first before destroying the environment.
- Penarth has had numerous new developments built already. E.g. Caversham Park, Regents Gate, St Josephs School site, St Cyres School site, Church in Wales Primary School site, Penarth Heights. There has been numerous units built in the last 15 years expanding a town without any additional road capacity or new infrastructure. If new houses are required then these could be better shared through northern and western parts of the Vale. Pressure on local infrastructure including GP's, dentists, school places and so on is huge.
- loss of the distinctness of Penarth as a local town as it meets other villages on all sides - distinction between Penarth and Dinas Powys barely exists now new developments have taken place between Penarth and Dinas Powys boundary, are already underway on Cog Road, Sully.
- Density of housing is far too great in the proposals and people will rely on the car requiring many more car parking spaces than those provided. Developments such as Caversham Park, Regents Gate, and Penarth Heights show that there is too little parking provision insisted upon at the development stage. As a result cars are regularly blocking pavements and traffic flow. The above names estates all rely on parking on pavements which causes issues for pedestrians.
- The additional traffic which will flow onto Lavernock road will be immense and traffic already queues down Lavernock road and Redlands road. The air quality will be further negatively impacted and pedestrian safety will be compromised. It is already difficult for people to leave their drives on these roads. It often takes a considerable amount of time to exit the junction at Brockhill Rise, opposite the Westbourne road will be subject to additional traffic, and in its straight stretch from Archer road onwards to Lavernock road there is regular speeding. Congestion is a concern currently before the occupation of the permitted development at Cog Farm Sully.

- There is lack of pedestrian facilities already in this area of Penarth, especially to enable pedestrians to cross the lower Penarth end of Lavernock / Westbourne road. e.g. No crossing between the one which serves Cosmeston Lakes only, and the crossing on Westbourne Road near its junction with Clinton road. It is dangerous to cross in this area due to speed and volume of traffic and the numbers of children who need to cross here from the existing lower Penarth housing estates for school. A crossing is required to provide access to bus routes, sports facilities and local schools. Furthermore use of the railway path to provide pedestrian / cycle access to Penarth town centre is only possible in daylight hours due to a lack of lighting, therefore this isn't a safe walking route to the development as suggested on the development outline.

- The inclusion of buildings over three stories is completely out of keeping with this area of Penarth. Granting permission for this type of high rise development will only set a precedent for further developments of this nature. Once built the argument for restricting the height of other nearby developments e.g. Whitcliffe Drive, The Paddocks where development height has been restricted, will be removed.

I urge you to respect the nature of the environment and consider guidance under the adopted LDP as well as traffic information from pre pandemic studies.

Yours faithfully,

Mr and Mrs W Williams.

5 Thorn Grove

Penarth

Vale of Glamorgan

CF64 5Bz

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I urge you to respect the nature of the environment and consider guidance under the adopted LDP as well as traffic information from pre pandemic studies.

Yours faithfully,

Mrs E and Mr N Schroeter

Philip Rapier,
11 Roxburgh Garden Court,
Plymouth Road
Penarth

CF64 3DX

1 Dec 2020

Senior Planning Officer,
Vale of Glamorgan Council

Re. Planning Application 2020/01170/OUT Land at Upper
Cosmeston Farm

Dear Senior Planning Officer.

I am writing to object strongly to planning application
2020/01170/OUT – Land at Upper Cosmeston Farm , Lavernock
Road, Earth

I am writing to register my objection to the application for a 576
Housing Development at Cosmeston

The basis for this opposition is that granting this application will
not promote the aims and objectives contained in the Welsh
Government and therefore Applicants own Publication Well
Being of Future Generations Wales Act 2015 (Essentials)

**The concerns in this respect are so great that the
Application has given rise to a Petition with 5267
signatures being submitted to the Welsh Government.**

The Petition which is to be debated in the Senedd asks the Welsh Government to adhere to its own legislation's requirements as outlined in the Well Being of Future Generations Wales Act 2015 (Essentials)

Cosmeston is a unique primarily rural location and lies within the Council's responsibility for their own designated Conservation Areas of the Country Park and the Vale of Glamorgan section of the Wales Coastal Path.

The applicants are the Welsh Government and again are clearly not complying with their own Practice Guidance Notes.

Placemaking in Rural Areas

Paragraph 3.34 –clearly states.

“The countryside is a dynamic and multi-purpose resource. In line with sustainable development and the national planning principles and in contributing towards placemaking outcomes, it must be conserved and, where possible, enhanced for the sake of its ecological, geological, physiographic, historical, archaeological, cultural and agricultural value and for its landscape and natural resources.

The Development is stated as being a model and “sustainable” but there are is no use of Solar Power on the Houses and no clear plan for the later addition. Slope of the Roof in the majority of the dwellings does not face South. This suggests no thought has been given to adding Solar Panels.

The Photoshop predicted images in the Application show the houses encroaching on the skyline from the Wales Coastal Path and are insufficiently landscaped when viewed from Cosmeston Country Park.

The importance of Historical sites have been pre-emptively trivialised by the Applicant.

At a time when Agricultural Land is declining in the Vale. The land is described as low grade by the Developer.

Modern Agricultural Soil Improvement Techniques would allow the Land to be farmed at full potential.

The application is detrimental to the aims and requirements of the Welsh Governments own Policy on Planning Population Control in accordance with Welsh Government Code of Practice Guidance Note Planning Policy Wales Edition 10 2018.

Population numbers of the Lavernock Ward of which Cosmeston is a part of are grossly underestimated.

The Application takes no account of seasonal increase of Population in the Holiday Chalet and Caravan Parks

There are 782 Electors in the Lavernock Ward a Sub District of the Sully Community Council. When adding those residents under voting age the total Population increases to approximately 1000

However this is artificially low as the Population is increased by the Residents of Lavernock Point Holiday Village, and Bay View Caravan Parks who are permitted to reside ten months of every year. There are restrictions on commuting to work or schools for Residents of the Caravan Parks but the reality is there are no other easily enforceable bye laws restricting occupancy or travel.

Caravan Parks are no longer inspected by the Vale of Glamorgan Council.

The Application is for 576 dwellings and it is reasonable to assume this will increase the permanent Population to an estimated 1500.

The Holiday Village and Caravan Parks add to the Population between February and November each year.

Bay Caravan Park Lavernock has 308 Caravans

Lavernock Point Holiday Village has 72 Chalets

On the basis of a minimum of 4 Occupants per Unit of accommodation this increases the Population by c.1600.

Between February and November each year the total Population of Lavernock of which Cosmeston is part becomes c.4000.

Building 576 homes with a Parking Space and typically three occupants per household would mean increasing the permanent Population by 1800 bringing the Total Population after Development to a more realistic level of 5600

Education

Approximately 500 of the Upper Cosmeston Development Residents number will probably be children of School Age.

The Vale of Glamorgan Schools are already oversubscribed in the Barry Area. These children are predicted to be transported to Penarth Schools from 2021 Onwards so then those will also become oversubscribed.

The provision of the Development Special School will not be sufficient to meet the needs of the Development.

The Application fails to address the lack of Comprehensive School Welsh Language places in Barry and there being no such places in Penarth.

Traffic and Air Quality.

The Development does not conform to the aims and objectives of Welsh Government Published Guidance Note

Air quality and the Well-being of Future Generations (Wales) Act 2015

There is no mention of Solar or Wind Power in the Plans.

Air Pollution is a hazard from additional Road Journeys generated.

This Development is in a part of the village that already suffers from severe traffic congestion, speeding and flooding problems.

This is already a strain on the Police and Emergency Services.

The Police and Local Authority have placed Digital 30 mph Traffic Calming Signs in place as Cosmeston Residents have to contend with Speeding Motorist who Shortcut their journey to

Cardiff to avoid the permanently polluted and gridlocked Dinas Powys Roads.

According to the Vale Council's Website Traffic estimates for the B4267 and A4160 Average a total of 24000 Vehicle journeys per day at the Merrie Harrier. (East to West and West to East) Assuming 50 per cent of the vehicles travel through Cosmeston it equates to 750 vehicles average per hour travelling through the Village. This is consistent with Residents own observations and far higher at peak times.

The addition of c 570 Vehicles from the Development will add to serious Traffic problems in Penarth. The Merrie Harrier Junction cannot cope with capacity and present and one mile traffic jams are the norm throughout the day.

The congestion is so bad that Commuters join the unclassified Plymouth or Westbourne Roads rather than proceed to the junction with A4160 at the Merrie Harrier,

They then proceed to Windsor Road A4055 as a shortcut to the Cogan Spur Traffic Lights on Penarth Road. This Development will aggravate further Traffic Congestion in the Penarth Town Centre Town and will lead to the return of unacceptable Air Pollution Levels at Windsor Road Cogan.

The number of School Runs by parents will increase this

Pollution caused by traffic jams will rise to a dangerous level and are already at borderline danger levels on Windsor Road.

The Development is opportunist and merely superficially addresses sustainability and should not be allowed to proceed for the sake of the Well Being of Future Generations.

Yours faithfully,

Philip Rapier

71 Lavernock Road,
Penarth,
CF64 3NY.

Mr Robert Lankshear,
Head of Planning and Transportation,
Vale of Glamorgan Council,
Civic Offices,
Holton Road,
Barry,
CF63 4RU.

9th November 2020

Dear Mr Lankshear,

Comments on 2020/01170/OUT – Upper Cosmeston Farm, Lavernock Road, Penarth

You will have received comments on many different aspects of this planning application, but I would like to concentrate on transport as follows:

- 1) Both the Non-Technical Summary (Item 11.2) and the Summary and Conclusions (Item 12.7.2) to the Environmental Statement claim that the Development will result in “*Enhancements to the highway network*”. **This statement is incorrect.** There are no enhancements to the highway network included in the Development. One of the main problems with the Development is the absence of improvements in local infrastructure.

=====Comments on Environmental Statement, Volume 2, Chapter 10: Transport =====

- 2) The transport report is unrealistic. The majority of houses these days have at least two cars, making about 1,100 additional cars. Table 10.7 in the transport report gives a total of 482 residential car journeys (departure and arrival) across the morning and afternoon peak periods. If all 1,100 cars were used this would be 2,200 journeys so the report is assuming only 22% of vehicles are used during peak periods.
- 3) The application should demonstrate how the mitigation measure to overcome the queues and delays envisaged at the Lavernock Road/Dinas Road/Victoria Road junction will be implemented (Table 10.13, Driver Delay) without significant expenditure for physical modification of the junction. Currently there does not appear to be sufficient space to incorporate a right turn lane of any length without modification to the junction, and even with modification the length of the right turn lane would be very limited.

The junction on Lavernock Road on the southern side has houses either side and on the northern side a house on one corner, thus limiting the modifications possible. By extending the tarmacked area over the grassed areas on the Dinas Road side of the junction some widening of the junction could be achieved, but only to a limited extent.

- 4) The report states that the additional traffic from the Cog Road development has been taken into account (10.8.4), but does not explain how, thus casting doubt that it has been sufficiently accounted for.
- 5) The report makes no mention of the traffic impact from the Scholars Park housing development in Dinas Powys on the Merrie Harrier junction (Cardiff

Road/B4267/A4055 and A4055/B4267/Andrew Road junctions). This additional traffic would not have been present when the traffic counts were undertaken in November 2018. There are already long queues to get out of Penarth via the Merrie Harrier junction at peak periods and the additional traffic from Sully, Dinas Powys and Penarth will make the situation significantly worse.

- 6) The report uses idealistic and unrealistic assumptions on use of walking, cycling and public transport (10.6.3-10.6.6). The distances to amenities and facilities in the centre of Penarth are too far for most people to walk or cycle on a regular basis, particularly in poor weather.
- 7) The possible metro link to Lower Penarth (10.4.30 and 10.4.31) should not be included in the mitigation measures as it almost certainly will not happen for many years, if at all.
- 8) The impact on traffic flows at the Cefn Mably lights (B4267/Stanwell Road/Lavernock Road) has not been considered.
- 9) If the proposed school within the development is a Special Needs or Welsh Medium school then the impact of traffic flow needs to be re-assessed because these types of schools will require more transport from outside the area than has been assumed in the report.

In addition to the above comments on transport I would like to point out that:

- 10) Apart from the provision of a primary school no other amenities are included. The doctor's surgeries in Penarth are already oversubscribed. The lack of a local shop within the development will encourage further road use.

Yours sincerely,

Stephen Sims

We note that the boundaries of this planning application include part of the trackbed of the disused Penarth to Sully railway. As there has been significant housing development in the Cosmeston area since the line closed and the current application allows for up to 600 additional houses, there is a case for a future light / heavy rail link from Cosmeston to Penarth station (some 2.5km). Therefore, we ask for a condition to be made in the outline planning consent (if granted) to retain the trackbed, free from development for such use in the future, as shown on the masterplan submitted with the application. Sufficient space for a station should also be reserved. Most of the route between the area covered by the application and Penarth station is currently used as a cycle / foot path and is potentially available for conversion to a light / heavy railway (the path would need to be relocated of course), except for a small amount of development near Penarth station.