

Keep Cosmeston Green

Planning Objections

in regard to

Outline Planning Application No: 2020/01170/OUT

**proposed residential development, a primary school,
community space and public open space with all matters
reserved other than access**

**on land at Upper Cosmeston Farm,
Lavernock Road, Cosmeston**

by Welsh Government



Keep Cosmeston Green

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1. Introduction - Keep Cosmeston Green.

Keep Cosmeston Green was formed by a number of volunteers in order to oppose the development at Cosmeston on behalf of the residents of Cosmeston, and the surrounding communities of Sully, Penarth, and Barry,

Keep Cosmeston Green was party to a number of local community groups, “calling-in” the planning application to the Welsh Government Planning Directorate.

Keep Cosmeston Green also created a Welsh Assembly Petition entitled “Save the farmland and green fields at Cosmeston”, which received 5,272 signatures, and was laid before the Welsh Assembly Petitions Committee on three occasions.



Before and After (Pictures courtesy of Welsh Government)

2. Summary of Keep Cosmeston Green Objections.

The Welsh Government proposal does not conform with the adopted Vale of Glamorgan Council Local Development Plan 2017 with the overdevelopment of the site encroaching into the adjoining Green Wedge area. Such a large housing development cannot be considered an appropriate coastal development that requires a coastal location and will prejudice the open nature of the land and is incongruous to the rural and coastal landscape and the existing street scene of Lavernock Road and will have an unacceptable impact on the countryside and its biodiversity environment will have a significant harmful effect on the area as it lies between numerous wildlife areas with Cosmotron Lakes Country Park, to the West, Ty-r-Orsaf, Site of Nature Conversation (SINC) to the South and the Severn Estuary (Ramser), Special Protection Area (SPA), Special Area of Conservation (SAC) and Penarth Coast (SSSI) to the north, The development will be at significant risk from coastal erosion, likely to exacerbate future coastal erosion and will have a harmful impact on the Wales Coastal Path to which it adjoins. The increase in Surface Water Run-off from the development whose access, together with the school, is located in a flood zone, will lead to increased significant flooding in the area.

Contamination from an old Council waste site lying within the site, renders the site unsuitable for development and severe health risks can arise if certain hazardous waste materials become airborne or enter watercourses. The development proposals will have an adverse impact on the important architectural heritage and archaeological remains at the site and the developers plans to use the Grade II Listed farm buildings as a community building is ludicrous and does not adequately protect, conserve, promote and enhance the historic environment as a resource for the general well-being of present and future generations.

The isolated development and schools will exacerbate traffic, congestion, and pollution due to insufficient local facilities and amenity and an unsustainable highway infrastructure in the locality and surrounding areas and there will be detrimental loss of air quality in the area of the access to the site and school.

There are also concerns over the credibility of the traffic survey with understating the traffic for two new schools and delivery vehicles, and concerns over the credibility of their Environmental Impact Survey, and also concern as to a compliance requirement to Welsh Water’s requirement on nitrate levels in the ground.

Therefore, this inappropriate and unsightly over-development which prejudices the open nature of the land and the rural and coastal landscape and unacceptable impact on the countryside and its biodiversity environment should not be permitted.

3. Keep Cosmeston Green objections to the development are as follows.

The application **does not conform with the adopted Vale of Glamorgan Council Local Development Plan 2017 (LDP)**, and 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. 576 dwellings, including a number of multi-storied buildings and a primary school conflicts with this policy. Any encroachment into the Green Wedge area will lead to further future “rounding off” or “infill” development advancing towards Swanbridge and Sully leading to coalescence of Penarth and Sully which the Green Wedge area is supposed to prevent.

The proposed development is **incongruous to the rural and coastal landscape** being visible from both land and sea, and therefore should not be permitted. 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. The continued presence of proposed multi-storied dwellings will make building heights **incongruous with the existing street scene** of the Upper Cosmeston Farm and Lavernock Park developments adjacent to the proposed development.

The development will have an **unacceptable impact on the countryside and its biodiversity environment** which will 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 on the loss of arable and pasture farmland that contribute to the local amenity, character, and distinctiveness of the area.

The development site lies 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. 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 development will result in a **great loss of biodiversity** and any future planned 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. will have a **significant harmful effect on the area**. A proposed residential development of 576 housing units, a primary school, and possible community facilities is considered as **overdevelopment of the site**.

The development will be **at significant risk from coastal erosion** due to its closeness to the cliff edge. 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 at the adjoining Cliff Walk 9 approx 15 m from the cliff edge in close proximity to the proposed development site and may indicate there is geological movement occurring in the cliff itself and the proposed development may **exacerbate future coastal erosion**. 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. The closeness of the development lying directly adjacent to and overlooking the coastal path may have a **harmful impact on the Wales Coastal Path** and to its users.

The entrance to the development off Lavernock Road lies within a flood zone incorporating Sully Brook and has experienced many occasions of flooding during heavy rain making the road nearly impassable. **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. There was extensive flooding at this location on 23rd December 2020 and global warming will increase the likelihood of future flooding here. 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, 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, schools and community facilities will significantly increase the risk and degree of flooding to the surrounding areas. It is noted that the Cog Moors Waste Water Transfer Station is severely overloaded and frequency of waste water dumping in the Bristol Channel at Lavernock is forever increasing. It is concerning that the developers and Council have designated Sully Brook as a Main River, suitable

to take any surface water run-off, even though the Brook here lies within a flood zone and flows through further flood zones at Cog Moors and Sully Moors.

Contamination within the site renders the site unsuitable for development as the Local Authority allowed domestic, commercial, and chemical waste to fill the 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. The applicant's Environmental Statement states that testing and investigations found; the presence of asbestos containing materials (ACM), sulphates (aggressively attacks building materials and structures), arsenic and organic compounds (PAH and TPH which are carcinogenic). 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. **There are also concern as to a compliance requirement to Welsh Water's requirement on nitrate levels in the ground.**

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 of insufficient significance, and the architecture of Lower Cosmeston Farm as not worth retaining and limited heritage significance'. This is in total contrast to the research and investigations of two local archaeologists who have recently discovered through two trial trenches archaeological remains of almost certain medieval date. 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 and CADW granting Grade II listed building status to the original Cosmeston Farmhouse (Reference Number: 87852), The developers suggestion that the Listed Farm Buildings be used as a community building is ludicrous and **does not adequately protect, conserve, promote and enhance the historic environment as a resource for the general well-being of present and future generations.**

The development will exacerbate increased traffic, congestion, and pollution as there are **not enough local facilities to make the development sustainable.** Many of the essential services and facilities including schools, health facilities, libraries, leisure centres, Penarth Town centre, mainstream supermarkets and employment areas are all further than the maximum permitted walking distance of 2km. Many of the walking/cycle routes have poor or non-existent street lighting and would not be very safe or convenient and more so in inclement weather. Public transport is intermittent and undependable and journey times can make travelling onerous. **Highway infrastructure in the locality and surrounding area is unsustainable** and travel routes are regularly congested especially at various pinch points such as Merrie Harrier and Barons Court, Leckwith, Cardiff Bay and Culverhouse Cross junctions. The applicant states that there will be a **detrimental loss of air quality in the area of the access to the site and school.** The Vale of Glamorgan Council Education Department have also submitted an application to develop a 150 place Special Educational Needs School (a satellite operation to Ysgol y Deri), which cause increased traffic congestion volumes with the additional vehicles necessary for the delivery of pupils, staff, and services to the school. There is a **lack of provision to comply with clean air requirements and to comply with the Wellbeing Act,**

The development will have an impact on catchment area pupil numbers and will exacerbate the shortage of Nursery and Secondary school places available, which is already experienced. Although a primary school has been initially proposed at the site, the development will only intensify the shortage of nursery and secondary education.

There are also concerns over the credibility of the traffic survey with understating the traffic for two new schools and delivery vehicles, and concerns over the credibility of their Environmental Impact Survey.

4. Conclusion

Therefore, this inappropriate and unsightly over-development which prejudices the open nature of the land and the rural and coastal landscape and unacceptable impact on the countryside and its biodiversity environment should not be permitted.

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