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Aelod Cynulliad dros Bontypridd
Assembly Member for Pontypridd

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Mr Gareth Davies
Rhondda Cynon Taff CBC
Sardis House
Sardis Road
Pontypridd
CF37 1DU

Dear Mr Davies

Re: Planning application reference: 18/0872/13

Outline planning application for the construction of c.440 homes on land at Ystrad Barwig Isaf, Crown Hill, Llantwit Fardre, Pontypridd, CF38 1BL

I am the elected Assembly Member for Pontypridd and the proposed development is in my constituency.

I wish to object to this application, which I believe to be unsustainable. I have met with the Managing Director of Llanmoor Homes (the developer) and informed him of my strong opposition. I have received representations from concerned constituents on this matter and I have discussed the issues with the Future Generations Commissioner and the Practice Manager of the local GP surgery, whose views have helped inform my submission.

I fully support local residents and Councillors in resisting this development. I campaigned alongside local people against this development when the original application was made in 2015 (ref: 15/1295/13), and I believe that the same concerns apply to this new application. Indeed in some cases, the situation has deteriorated further, increasing risk to the local community.

My opposition is based on a range of factors including the environmental impact

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of increased traffic, road safety concerns on Crown Hill and the development's lack of alignment with the Wellbeing of Future Generations Act 2015. I will however, confine my comments to three key areas, namely:

1. Flood risk
2. Deterioration of core local services
3. Lack of adequate local transport infrastructure

Flood Risk

The proposed site is situated on a C2 flood plain. The Planning Inspectorate report dated 05 July 2017, which recommended that the original application be refused was very clear as to the inappropriateness of the site in this respect stating:

"Irrespective that the majority of the site is not located within zone C2...the proposed scheme has to be considered in its totality and the fact of the matter is that at present part of the proposal is where vulnerable development would be sited; in such instances TAN 15 makes it quite clear that highly vulnerable development should not be permitted."

The original scheme (for 660 houses) included some constructed within the C2 zone. Whilst I recognise that the new application is for fewer homes (440), with none built directly on the C2 flood zone, the Planning Inspectorate was nevertheless also clear that this scenario would not give rise to a different decision:

"...or that following the proposed mitigation works all of the site would be removed from zone C2... the proposed scheme has to be considered in its totality."

The Planning Inspector's recommendation to refuse the application was ultimately accepted by Lesley Griffiths AM, Cabinet Secretary for Energy, Planning and Rural Affairs who stated:

"[The Inspector] notes paragraph 6.2 of TAN 15 leaves no doubt as to what is required and is quite categorical, highly vulnerable development, such as the residential development proposed, should not be permitted in Zone C2 of the floodplain."

It is also clear that the development doesn't meet the criteria for the Local Authority to exercise its discretion afforded by the regulations (which I understand, remain unchanged from 2015), as the development is not part of a Local Authority regeneration initiative or strategy to sustain and existing settlement; nor is it necessary to contribute to key employment objectives.

The plans for the new development indicate that its footprint remains unchanged and that it would be built in a flood risk area, making the development vulnerable. I believe that any reasonable interpretation of the regulations would arrive at the same conclusion and would submit that it is not in the public interest to pursue this application.

Deterioration of core local services

In my submission to the Planning Inspectorate's enquiry I highlighted the growing pressures on local services and in particular access to GP services, as a result of the many new housing developments in the area.

The area is served primarily by the Parc Canol GP Group Practice, which has a patient list of 17,500 people. In April 2017 I met with the Practice Manager who told me that – at that time - the surgery had a capacity shortfall of 300 appointments per week.

The Ystrad Barwig development would generate c.1000 additional patients, which represents an increase of 6% for the practise. I have received an updated impact assessment from Parc Canol's Practice Manager Sarah Moore who states:

“As we have already outlined, we are stretched to the limit with our current numbers and envisage that an increase of this size would have the following impact:

- Worsened access for existing and new patients – waiting time for a routine appointment is currently 4 weeks – this would deteriorate.***
- Worsened waiting time for patients with routine problems to be investigated – GPs would have no additional time to deal with the administration of test results, secondary care referrals, private medical reports so all of these would take longer than at present to process***
- Due to the lag between patient list size increase and GMS monies increasing, the practice would have to manage with existing clinical***

resource until increased GMS funds enabled recruitment further down the line

• Additional stress within the practice could well lead to sickness absence."

The challenges around healthcare capacity are complex, but it is absolutely clear that new housing developments play a significant role. As the local Assembly Member, my responsibility is to represent the interests of all constituents who will be affected by this development and I do not believe that a sustainable decision can be made without the voice of healthcare providers being properly heard.

Whilst GP practises are not currently statutory consultees within the planning process I believe we have reached the point where we need to pause and take stock. I believe that before any further large-scale planning applications for the area can be considered, a full strategic risk assessment of the impact on delivery of core services should be undertaken.

Lack of adequate local transport infrastructure

The proposed development will add significantly to the volume of traffic in the area. Despite the welcome improvements to the A4119/A473 junction, the area is often choked with traffic, particularly at peak commute times.

The Ystrad Barwig development is only one of a number of proposed or approved large-scale residential developments in the immediate, including those at Cwm Isaf farm, Cefn yr Hendy and Cwm Coke Works that will exacerbate the situation. I fear that the words of former Transport Minister Edwina Hart AM, responding to a question from me in 2015, are becoming increasingly prophetic:

"Where we've got massive housing expansions, or we've got new industrial estates coming on, we've got to sort out the transport infrastructure. Because if we don't sort it out it'll be absolute chaos on some of the existing roads."

I continue to raise this central issue of a sustainable transport solution for Taff Ely with Welsh Government Ministers and within submissions to planning consultations. In my view, the South Wales Metro provides a sustainable and accessible long-term solution, but until then I cannot support any development which reduces wellbeing and quality of life, whether that means reduced air quality or residents leaving ever earlier for work and getting home later.

The impact of proposed and approved developments nearby exacerbate the issues I have highlighted in respect of provision of GP services and transport infrastructure. I note that the Welsh Government is currently consulting on delivery of housing through the planning system (WG35350), which emphasises the need for sustainability. I believe that a robust assessment of sustainability is not possible without considering the cumulative impact of developments in the same locality and I would urge the Local Authority to undertake such an assessment for this proposed development.

In conclusion, I believe that this is an unsustainable development, which poses direct risks to the existing community in terms of flood prevention, access to GP services and adding to the significant transport challenges in the area.

Finally, I would emphasise that the development does not meet the requirement of TAN 15 as determined by the Planning Inspectorate in 2017 and therefore likely to be rejected again for the same reasons. I would ask the Local Authority to consider the reputational implications of progressing this application through (inevitably) to the planning inspectorate review stage at an unnecessary expense to the public purse.

I submit that this application should be rejected and I would be grateful if you would put this submission before the members of the Planning Committee.

Yours sincerely,



Mick Antoni

Assembly Member for Pontypridd

12 September 2018

cc.

Ms Jane Cook, Director of Planning and Regeneration.

Mr Simon Gale, Service Director, Planning, RCTCBC.

Cllr J. James

Cllr M. Diamond

Members of the Planning and Development Committee

Cllr. Sharon Rees (Chair)

Cllr. Gareth Caple (Vice-Chair)

Cllr. Jill Bonetto
Cllr. Danny Grehan
Cllr. Jack Harries
Cllr. Gareth Wyn Hughes
Cllr. Pauline Jarman
Cllr. Wayne Owen
Cllr. Stephen Mark Powell
Cllr. Julie Williams
Cllr. Richard Yeo