

ATISN 17525 ITEM 001

**Iles, Nicholas (CCRA - Planning)**

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**From:** (CCRA - Planning) on behalf of Planning Directorate Mailbox  
**Sent:** 10 May 2023 11:03  
**To:** Decisions Branch - Ministerials/Gweinidogol - Cangen Benderfyniadau  
**Subject:** FW: 066/2023 Call In Request: RCT Housing Application No 22/0676/10 (WDL Homes)  
**Attachments:** Review Letter FINAL.docx; Abernant Residents Action Group Letter FINAL.pdf  
**Categories:** Green category

Please see the email below which has been sent to the Planning Directorate Mailbox. Could you please deal with the query or pass to a relevant colleague for action.

**I would be grateful if you could notify me when the correspondence has been replied to so that it can be recorded in the correspondence log.**

Many thanks,

**Implementation and Performance Branch  
Planning Directorate  
Welsh Government  
Tel :  
<mailto:>**

**From:** Abernant CommunityActionGroup  
**Sent:** 10 May 2023 10:51  
**To:** Planning Directorate Mailbox ; Abernant CommunityActionGroup  
**Subject:** 066/2023 Call In Request: RCT Housing Application No 22/0676/10 (WDL Homes)

Dear Sir/ Madam

Further to our correspondence with Ministers regarding the proposal to develop 299 residential homes on the former Aberdare hospital site and a designated SINC. We are writing to you to undertake a Call in request under your powers set out within Section 77 of the Town and Country Planning act 1990, Section 12 of the Planning (listed buildings and Conservation Areas) Act 1990 and Section 20 of the Planning (Hazardous Substances) Act 1990, to review the decision of the RCTCBC Planning Committee made on 23rd February, 2023 to grant planning permission to WDL Homes Ltd for 299 homes on a Sinc and Former Miners Hospital grounds.

We attach a letter detailing our concerns regarding the decision to grant approval and we request your support to get this decision reviewed.

The decision to grant approval does not comply with the sustainable development principles enshrined in key Welsh Government strategy and policy relating to climate change and biodiversity protection and our attempts to highlight the considerable environmental impacts of the development have been paid lip service to by the Local Planning Authority within the planning application process.

We respectfully request your support this Call in request, to review this planning decision.

Kind Regards,

(on behalf of)  
The Abernant Community Action Group

----- Forwarded message -----  
From: **Abernant CommunityActionGroup**  
Date: Sun, 12 Mar 2023 at 16:32  
Subject: Appealing a Planning Decision  
To:

Dear Julie and Lee,

We hope this email finds you both well.

Further to our correspondence last year regarding the proposal to develop 299 residential homes on the former Aberdare hospital site and a designated SINC, we are writing to you to request that you review the decision of the RCTCBC Planning Committee made on 23rd February, 2023 to grant planning permission to WDL Homes Ltd.

We attach a letter detailing our concerns regarding the decision to grant approval and we request your support to get this decision reviewed.

The decision to grant approval does not comply with the sustainable development principles enshrined in key Welsh Government strategy and policy relating to climate change and biodiversity protection and our attempts to highlight the considerable environmental impacts of the development have been paid lip service to by the Local Planning Authority within the planning application process.

We respectfully request your support to review this planning decision and provide a steer on action that can be taken to get this case reviewed independently.

Kind Regards,  
Abernant Community Action Group

Dear Julie James (Minister for Climate Change) and Lee Waters (Dep. Minister for Climate Change)

RE: Rhondda Cynon Taf Planning & Development Committee meeting 23 February 2023  
Agenda item 5; WDL Homes (Application No 22/0676/10)

We write to you, as Minister and Deputy Ministers for Climate Change, urging you to consider reviewing the decision of the RCTCBC Planning Committee on February 23, 2023 granting planning permission to WDL Homes to build 299 residential homes at Abernant, Aberdare on a designated Site Of Nature Conservation Value (SINC).

I attach documents submitted to the Planning Committee by the Abernant Community Action Group and residents of Abernant that provide the basis for our objections to the afore mentioned development.

In addition to formalising our objections through the planning application process, we also held public meetings and presented a petition containing nearly 300 signatures to the local planning authority.

We have engaged our public representatives and kept them informed of the objections of the community. At the 23<sup>rd</sup> February planning committee meeting, two of our local Councillors raised concerns about the decision as did three other Planning Committee members who voted against the planning application. Four members of the Abernant Community Action Group spoke in opposition at the meeting.

We are concerned on two counts about the decision to grant planning approval to WDL Homes:

1. The process that is followed in making planning decisions and
2. The impact of this planning application decision on the community of Abernant and the wider Aberdare community.

## 1. Process

1.1 There seems to be a disconnect between policies at Senedd level and the *application* of Welsh Government policy, strategy and legislation by the Local Planning Authority in making planning decisions. We are aware of key policies and legislation which provide strategic guidance on how to tackle climate change and promote biodiversity protection by working alongside communities. These include: ***Future Wales the National Plan 2040, Wellbeing of Future Generations Act (Wales) 2015, Planning Policy Wales Edition 11, Prosperity For All: Welsh Strategy, Wales Transport Strategy 2021***. It is our view that the planning decision in relation to WD Lewis Homes at Abernant, Aberdare does not meet the requirements detailed above.

1.2 We are concerned that the planning decision was made without reference to a current Local Development Plan (2006-2021). We are aware that the local authority is now consulting on a revised Local Development Plan. The Revised Local Development Plan Delivery Strategy document states that the revised LDP is not anticipated to be approved until October 2025. To base a planning application decision on an out of date plan that does not adequately align to the abovementioned Welsh Government strategy, policy and legislations relating to Environmental Impact considerations is unacceptable.

This planning decision illustrates ill-considered land use, a lack of priority weighting given to tackling climate change and promoting biodiversity protection and an evident lack of alignment with Welsh Government strategy, policy and legislation that requires public bodies to go beyond lip service and to take decisive action to address climate change and biodiversity loss.

1.3 As local residents we would also like to draw your attention to the difficulties we face when challenging local authority planning processes and decisions. The Abernant Community Action Group is made up of a mixture of people from young working families

to retirees who do not have a background in formal planning application process. While the local authority has fulfilled its obligations in terms of consultation; as residents the process is not conducive to fostering meaningful community engagement and participation. The planning application process appears to be weighted in favour of the developer - who we have learnt is the only one who can appeal against the decision, hence our view that the process does little more than pay lip service to community objections and concerns.

1.3 It is our view as local residents that much of the reasoning around the decision to approve this housing development is not evidence based. It was stated during the meeting that this is one of the most sustainable developments that has come before the Planning Committee. The rationale for this statement was that the development is located in close proximity to Aberdare train station and Aberdare bus station. Proximity to transport networks is not evidence of it being a 'sustainable development'. This assertion is naïve at best and demonstrates a fundamental lack of understanding of what sustainable development principles in the context of the planning application process.

The development plans, in their current form, are not conducive to changing people's behaviour in regards private vehicle usage. Nor do they encompass a Placemaking approach to current and future community needs within the area of Abernant. This could be a precedent to further developments in the area potentially doubling the number of new properties in the area. We are aware of a pre-application for such a development on land nearby by another developer, yet the planning application process seems not to evaluate the cumulative impact of multiple developments in the same locality indicating that the current planning process is inherently flawed.

As local residents we do not currently have access to any discussion, documents or other information with regard to this application but we know that if it goes ahead it will add to all the concerns raised in the attached documentation with regard to the current approved development.

## **2. The impact of this planning decision**

**2.1** The proposal in the WD Lewis development is to build 299 houses on 17 hectares of greenfield land and a designated SINC. The plans reflect provision for 988 parking bays. On page 66 of ***RCTCBC Corporate Performance Report 2021/2022*** it clearly states that the authority needs to be *“making sure that our plans for what and where we build: don’t add more carbon to the air, protect our biodiversity and the carbon stored in soils, trees and other plants across the County Borough. Helping to make sure new houses are not built on land that hasn’t already been built on and people can get to them without a car”*. Again, there is clearly a disconnect between policy and application.

**2.2** It is not evidenced that this development will meet housing need in the area. We have a crisis of affordability in terms of housing need. Referencing the RCTCBC Local Housing Market Assessment, the proposal to build 269 4 and 5-bedroom executive homes raises significant questions about the extent to which the proposed development addresses local housing needs as defined in RCT’s Local Housing Market Assessment.

The development clearly fails to meet the housing need outlined in the RCT Local Housing Market Assessment report, falling short in relation to addressing the priority housing need for smaller homes to accommodate single person households, two person households without children and lone parent households with 1 child and an ageing population.

Furthermore, the proposed development, in favour of 4- and 5-bedroom executive homes, makes the majority of houses out of financial reach for the majority of RCT residents, based upon ONS average household income data.

Therefore, on the basis of RCT’s own housing need assessment, demographic trend data referenced within the LHMA (based upon Welsh Government household projection variants) and average household income for RCT, the proposal to build 299 homes; of

which 269 are 4/5-bedroom Executive homes raises significant questions about the extent to which the proposed development addresses local housing needs.

**2.3** Planning Policy Wales requires planning authorities to refuse planning permission for car-dependent developments which would otherwise encourage car use and undermine sustainable travel” (p85, *Future Wales the The National Plan 2040*). Furthermore, Planning authorities should “promote car-free and low car developments in accessible locations”. (p86), yet you will see from the attached documentation the significant concern of local residents with regard to the potential increase in car usage within the village of Abernant if this development goes ahead as planned. This scheme would facilitate a car dependent approach and not a modal shift to sustainable transport.

**2.4** We were interested to read the content and recommendations of the independent panel which were commissioned to review future road investment in Wales, in particular the Cynon Gateway North proposal. The panel's recommendations in our view could arguably be relevant to the WDL Housing development that we are opposing in that “ its construction would result in substantial increased emissions of carbon; there would be impacts on sites that are protected for their environmental value and it would facilitate a car dependent approach to economic development” (p286).

The panel moved on to say that in the “context of the Wales Transport Strategy and Future Wales, all developments should be designed to minimise car dependence, with low car parking provision, good active travel connections and planning agreements to secure good public transport” (p289). We need a fully functioning evidence based sustainable transport package implemented *before* any consideration is given to future planning applications. There is little evidence we believe to adequately demonstrate that this was considered when giving approval to allow WDL to go ahead and begin developing in the current policy context.

Please consider reading through our findings that we have researched thoroughly, at times late at night after working a full day. During the Planning Committee meeting, one of the speakers from Abernant Community Action Group referenced to your statement that:

*“In this decade, Wales has to make greater cuts in emissions than we have in the whole of the last three decades. Greater cuts in the next ten years than in the whole of the last 30 – that what the science says we need to do.*

*We know what it coming – our task is to future proof Wales”.*

We urged the Planning committee members to act on the significant adverse environmental impacts posed by this development and to ensure that planning decisions are consistent with national and international legislation and policy.

We are concerned that the need to take decisive action by challenging planning decisions of this nature has fallen on deaf ears and we welcome your steer on how this decision can be reviewed.