

ATISN 17525 ITEM 001A

Abernant Residents Action Group Letter: Objection to Planning Application for 299 residential homes on former Aberdare Hospital site

Ref: 22/0676/10

Mr J - Planning Officer

Date: 31.7.2022

The community of Abernant currently consists of approximately 687 properties with a small primary school, one corner shop, one small children's play area, a village pub and the Aberdare golf course.

We as residents have estimated, based upon the evidence submitted by Asbri on the number of homes and taking into consideration that the vast majority will be large 4 beds (173), the population at worst case scenario will increase by just over 1,000. This is proposed as the first development of potentially 3 such developments in total, two others of which are due, we understand, for submission to the Local Planning Authority in September 2022.

The ***Well-being of Future Generations (Wales) Act 2015*** requires public bodies to work alongside the communities which they represent to improve the social, economic, environmental, cultural well-being of Wales. Public bodies must consider the long-term impact current decisions have on future generations.

RCTCBC Commitment

RCTCBC's own well-being position in ***A Carbon Neutral Council by 2030*** refers to the "need to think about the long term impact of our work" and wanting to be a "net-zero Green House Gas council by 2030 and commits the Authority to deliver a vision for RCT "to be the best place in Wales to live, work and play where people and businesses are independent, healthy and prosperous" through their 3 priorities People, Places and Prosperity. (Corporate Plan)

RCTCBC Corporate Performance Report 2021/2022 refers to the need for the Authority to talk to residents and communities about where we should develop and build new homes and commercial opportunities and where we need to protect our natural resources" (p41).

The same report states that *"making sure that our plans for what and where we build does not add more carbon to the air, protects our biodiversity and the carbon stored in soils, trees and other plants across the County Borough and references to helping to make sure that new houses are not built on land that hasn't already been built on and people can get to them without a car (p66).*

The proposed development conflicts with the commitments articulated by RCTCBC. Below, we have outlined the main reasons for our objections to this planning application.

1. Road Infrastructure Capacity

Referencing to RCTCBC's Corporate Plan and Welsh Government strategy and policy in regards tackling air pollution, a key thrust is on reducing car usage as a means of reducing carbon emissions, alongside creating an accessible and integrated public transport system, including cycling infrastructure, and reducing traffic pollution in residential and school zones. ***Future Wales the National Plan 2040*** even goes as far as to state *"Planning Policy Wales will also require planning authorities to refuse planning permission for car dependent developments which would otherwise encourage car use and undermine sustainable travel"* p.85 The proposed development includes scope for 988 parking spaces which directly conflicts with Welsh Government strategic direction and Planning Policy Wales guidance.

Furthermore, ***Future Wales the National Plan 2040*** states that *"Planning authorities should also challenge perceptions that housing needs to be built with parking on plots, which promotes car-dominated developments and promotes different ways of dealing with cars that encourages a reduction in car use and increases active travel & use of public transport"*. P.86

We need a transport system that's accessible, efficient, and sustainable for people to be able to move more easily and safely "door to door". We currently have ONE active travel route in Cynon that consists of the Cynon trail which does not link to the wider highways network in Cynon. Therefore, at present, we do not have a fully operational Active Travel system in place to support a shift to walking, cycling and public transport.

It is our belief as residents of Abernant, that the proposed development on the former Aberdare Hospital site contravenes the aforementioned Welsh Government, Planning Policy Wales policies and RCTCBC's own well-being position articulated in *A Carbon Neutral Council by 2030*.

It appears that the development proposals merely pay lip service to The Wales Transport Strategy and Policy Planning Wales guidance; failing to offer tangible evidence and plans for creating sustainable, low carbon housing developments that meet the needs of existing and future generations.

The current site design proposals clearly illustrate that this is a car dominated residential development which is likely to significantly increase the volume of traffic in the locality and further add to congestion which is already problematic at peak times.

The proposed development of 299 new homes is likely to result in 600 additional cars competing for access and use of the existing road infrastructure at Abernant Road and surrounding areas (based on conservative estimates assuming that each property will have 2 vehicles minimum).

Based on WDL transport volume modelling, we are expected to believe that up to 300 new homes and an associated 600 additional cars (conservatively) is likely to generate an additional 131-136 vehicular movements at peak periods. This appears to be a gross under estimation of the likely additional movements during peak periods and fails to take into consideration the **cumulative impact** of traffic at Abernant Road, Cwmbach Road, Wellington Street as well as adjacent roundabouts at the bottom of Abernant Road and Commercial Street which are *already* congested at peak times. Therefore, WDL's assertion that this will result in a "*marginal increase in congestion and delay*" requires scrutiny and further **independent** validation.

The Asbri Traffic Assessment conducted near the entrance to the Aberdare Hospital site does not take into account the increased traffic volume as a result of Aberdare Community School and College both of which were constructed after the closure of the hospital.

Any increase in traffic volume – inevitable given that the development as it currently stands proposes 3 parking spaces for the larger 3/4/5 bed properties as well as one to two garaging spaces per property – will be unsustainable.

2 Local Housing Market Needs and Affordability Considerations

The current development proposals raise a number of pertinent questions from both a housing need and housing affordability perspective.

The development plan does not in our view meet the housing needs of the population of the catchment area, or of Cynon Valley residents. Cynon Valley has an ageing population and there is a growing need for bungalows and alternative accommodation in the area.

Currently, almost 20% of the population in RCT is over the age of 65. (RCTCBC Corporate Performance Report 2020/2021 Plan (p.18). The provision of bungalows and alternative housing needs for an ageing population is not evident in this development. By 2043 the proportion of RCT residents over the age of 65 is expected to climb by 18.2% to 57,429 (stats Wales) - see Council's Corporate Performance Report 2020/2021 (p.20).

RCTCBC Local Housing Market Assessment - Summary Report: Highlights the need for smaller affordable housing units across RCT reflecting social trends in household composition. There is a high prevalence of single person households, single parent households and households comprising couples with no children, which would suggest a growing need for smaller properties over the last decade in RCT. (p.17).

Nearly 3,000 private sector homes were vacant for 6 months or more across the County Borough in April 2016. The provision of new housing is not the only means of increasing housing supply (p.10).

It is concerning to us to read that "stats show that many have borrowed close to their margins of affordability to secure a 75% mortgage. This may be feasible in the short term, yet could have implications after 5 years when the additional interest repayments commence and household circumstances may change". (p20)

This evidence therefore demonstrates to us that there is a need for **affordable** housing. Provision of Executive homes on this scale does not meet the most urgent needs of current residents of Cynon Valley, or of our most vulnerable residents. Such developments may however meet the

profit requirements of the developer. At a time when Cynon Valley residents are facing one of the worst cost of living crises in living memory, people's housing needs need careful assessment and support.

Furthermore, the ***RCTCBC Local Housing Market Assessment 2017/18 – 2022/23 Report*** (LHMA) identifies a shortfall of 737.51 affordable units per annum based on the existing backlog of need, projected newly arising need and supply due to come forward over the next five years (LHMA, p10).

According to the LHMA, the housing need shortfall comprises 467.47 social rented units and 270.04 intermediate units, primarily in the form of Low-Cost Home Ownership (LCHO). According to the RCT LHMA report, the housing need shortfall "*indicates the scale of housing market failure within RCT*" (LHMA, p.11)

Furthermore, the LHMA cites that based on the household projection variant data provided by Welsh Government "*most of the growth over this time is expected to come from additional single person households, two person households without children and lone parent households with 1 child. Conversely, larger households are set to remain stable or decline over the next five years*". (p.8).

On the basis of the WG household projection variant data referenced to in the LHMA; there is an obvious disconnect in the assertion that the proposed development of the former Aberdare Hospital site will positively contribute to addressing priority housing need shortfall identified in the LHMA, which clearly states an anticipated decline in larger households based on Welsh Government household projection variant data.

The LHMA also highlights important affordability considerations. Referencing to the variance in household income across RCT, the LHMA report cites Office for National Statistics data for average gross annual household income in RCT which is £30,160. (LHMA, p4).

Therefore, on the basis of RCT's own housing need assessment, demographic trend data referenced within the LHMA (based upon WG 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 as defined in RCT's LHMA.

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

The proposal to build 269 4 and 5-bedroom homes brings with it a potential associated council tax banding increase for Abernant residents, due to a net property value increase due to more large homes. This has the potential to increase the council tax burden on existing residents at a time when there is the biggest cost of living crisis seen in a generation.

Are RCTCBC able to advise residents whether this development will result in an increase in council tax due to the impact of higher cost homes impacting council tax banding thresholds?

3.0 Environmental Impact

The proposal to build on a SINC and Greenfield site, which includes an established broad-leaved woodland conflicts with the RCT's ***Local Development Plan Supplementary Planning Guidance: Nature Conservation*** (adopted March 2011) and the principles defined in the Welsh Government ***Wellbeing of Future Generations Act, 2015***, which advocates for a more globally responsible Wales, a more sustainable and resilient Wales and a healthier Wales.

The ***Wellbeing of Future Generations Act, 2015*** requires all public bodies in Wales to work to improve the economic, social, environmental and cultural wellbeing of Wales and to consider the long-term impact of decisions to enable current and future generations to have a good quality of life. Planning Policy Wales considers a Placemaking approach to developments and is clear on

the need to encompass policies that are in line with the *Wellbeing of Future Generations Act, 2015* in ALL planning developments.

The proposal to build 299 new homes on a SINC and predominantly greenfield site raises a number of critical questions in relation to the environmental impact of the proposed development and whether it meets the 'sustainable development' principle defined in the *Wellbeing of Future Generations Act, 2015*.

Specific concerns relating to the environmental impact of the proposed development include:

3.1- Biodiversity Loss impacts caused by developing on a SINC

Biodiversity is defined as the 'variety of life' and includes plants, animals (species), the places they inhabit (habitats) and the relationship between them (ecosystems).

Soils also have an important biodiversity value, with at least half of all species living below ground. Soils are also significant carbon stores. The primary threats to Welsh soils are from climate change and the decline in organic matter from soil sealing (for example by buildings and roads), from contamination, including acidification and eutrophication, soil erosion and degradation of soil structure and soil loss due to extraction of soil during development.

Ecosystem services are benefits provided by the natural environment that benefit people (Defra, 2007). Some, such as food, fuel, recreation and appreciation of nature are well recognised. Other ecosystem benefits which indirectly support human health & wellbeing include:

- Climate regulation
- Purification of air and water
- Flood protection
- Soil formation and nutrient recycling

3.1.1 – Protected Sites

As a designated SINC, the presence of habitats and species is considered to be of principal importance in Wales (as required under Section 42 of the Countryside and Rights of Way Act, 2000) and must be a material consideration within the planning process.

Referencing to AW8 – The Protection and Enhancement of the Natural Environment within the **RCT Local Development Plan Supplementary Planning Guidance: Nature Conservation** (adopted March 2011) it states that "*Rhondda Cynon Taff's distinctive natural heritage will be preserved and enhanced by protecting it from inappropriate development. Development proposals will only be permitted where:-*

- 1) *They would not cause harm to the features of a Site of Nature Conservation Value (SINC) or Regionally Important Geological Site (RIGS), unless it can be demonstrated that:*
 - a) *The proposal is directly necessary for the positive management of the site; or*
 - b) *The proposal would not unacceptably impact on the features of the site for which it has been designated; or*
 - c) *The development could not reasonably be located elsewhere, and the benefits of the proposed development clearly outweigh the nature conservation value of the site" (p.4).*

Building on an established broad-leaved woodland and SINC not only conflicts with RCT's own Planning Policy defined in the *Local Development Plan Supplementary Planning Guidance: Nature Conservation* but also is in direct opposition with the biodiversity duty for public bodies under Section 40(1) of the *Natural Environment and Rural Communities Act, 2006* (NERC) and the sustainable development principle defined in the *Wellbeing of Future Generations Act, 2015* which seeks to ensure that the needs of the present are met without compromising the needs of the future generations to meet their own needs.

The proposed development is clearly NOT required for the positive management of the site. The proposed development has obvious adverse environmental impacts in relation to habitat destruction, biodiversity loss, air and noise pollution as well as potential adverse impacts from being situated on a flood zone. Given the recognised nature conservation value of the site, why are brownfield sites not being sought for residential developments such as this?

The proposed development is a prime example of ill-considered land use and development and reflects a blatant disregard for the protection and conservation of natural habitats and designated sites of important nature conservation value.

3.1.2 – Habitats and Species

SINC designation has been assigned to the site on the basis of the presence of habitats and species that are of principal importance in Wales as defined by Welsh Government. ***Action for Nature: the Local Biodiversity Action Plan (LBAP), October 2000*** for Rhondda Cynon Taff lists the habitats and species of special importance in RCT informing the SINC criteria for the Mid Valleys area of South Wales.

A material consideration in the planning application process must be ecological connectivity and habitat fragmentation issues. Small, isolated populations of species are far more likely to be vulnerable to extinction compared to populations that can disperse and interbreed with other populations.

According to the ***Local Development Plan Supplementary Planning Guidance: Nature Conservation*** (adopted March 2011), *“the effects of climate change are likely to increase local extinctions amongst small, isolated populations. It is therefore important to maintain and enhance ecological networks and semi natural habitats”* (p.6). In light of this guidance, the proposal to build on a SINC and greenfield site is in conflict with mitigating the likely adverse effects of climate change through biodiversity conservation and enhancement and is ill-considered.

The mitigation measures outlined by WDL in the PAC do little to instil confidence that habitat preservation is deemed to be a high priority. WDL's response to the concerns expressed about loss of trees within the PAC report indicates that *“the layout has sought to retain higher quality individual tree specimens and groups”* (p.14). This response lacks quantitative and qualitative data. How many trees will be cut down? What types of trees will remain? What are the criteria used to assess the 'quality' of trees? Who defined these criteria?

Similarly, the PAC report indicates that a Preliminary Ecological Assessment has been undertaken and that the result of these surveys has informed scheme design. Whilst the proposed

measures sound reasonable on paper, they merely pay lip service to habitat conservation and the reality is that they will do little to offset the irreparable habitat and biodiversity loss that will result if the proposed development goes ahead.

3.1.3 – Protected Species

Within proximity to the proposed development site are a number of protected species. The presence, or likely presence of a protected species is a material consideration in the planning application process as stated in the *Local Development Plan Supplementary Planning Guidance: Nature Conservation* (adopted March 2011), p6.

Barn owls, swifts, martins, badger, bats and hazel dormice are all examples of species that have been surveyed within 8 miles of the site.

Many of the species that are home to the site (or likely to be present) are protected under The Conservation (Natural Habitats etc.) Regulations, 1994 and the Wildlife and Countryside Act, 1981 (amended). Species that are very likely to be present at the site include barn owls, badgers, martins and swifts. Similarly, reptile species including adders and the smooth snake are present at the site. We have seen adders at the site first-hand.

Bats, hazel dormice are protected species under *The Habitats Directive 92/43/EEC* on the conservation of natural habitats and of wild fauna and flora, 1992 as well as *The Conservation (Natural Habitats, etc) Regulations listed as protected species* (under Schedules 2 and 4). Bats in particular are notoriously difficult to assess since it is difficult to predict where they may be roosting and foraging.

Another key consideration is that pollinators are under threat. Three bumblebee species have become extinct in recent decades. The European Red List for bees reports that almost one in ten species of wild bee face extinction and over the past 50 years, half of the bee, butterfly and moth species studied in the *State of Nature, 2013* report have declined.

There is a **direct** link between species decline and changes to intensification of agriculture which has resulted in destruction of habitats. Further habitat loss is driven by increasing urbanisation and development which is resulting in habitats becoming increasingly fragmented.

Given the biodiversity implications of developing in a SINC site, we request that an independent Ecological Survey be undertaken and the findings shared with stakeholders to inform discussions about the viability of the development from an ecological and biodiversity and habitat conservation standpoint.

3.2 - Air pollution

Based on conservative estimates, 300 homes will result in an additional 600+ vehicles, assuming each of those homes will have at least 1-2 additional vehicles. Increased vehicles in the locality presents obvious associated adverse air pollution impacts.

Tackling poor air quality is a national priority reflected in the Welsh Government strategy *Prosperity for All*. The increased nitrogen dioxide emissions are likely to adversely affect air quality in the locality.

Air pollution is a significant environmental determinant of health & wellbeing and the proposed development conflicts with policy direction at a national government level in regards addressing air pollution in Wales.

Constructing 922 (minimum) and 988 (maximum) parking bays within the site plans indicates that there is a need for 900+ vehicles at the proposed site. The scale of the proposed development presents obvious air pollution impacts and associated public health implications.

The level of projected vehicle usage directly reflected within the site plans directly conflicts with the overarching goal of the Welsh Government to reduce reliance on single occupancy vehicles. The plans do little to encourage residents to move away from private vehicles as their primary mode of transportation. Likewise, the existing proposals do not indicate charging points for electric vehicles; indicating that the environmental impact considerations and mitigation measures are superficial at best.

What are the estimates for nitrogen dioxide emissions for the proposed development during the development phase and when the development is fully completed?

What has the total carbon footprint for the proposed build has been calculated at?

3.3 - Noise Pollution

The associated noise pollution from the building of the houses and the exponential increase in vehicles will generate **significantly** higher levels of noise. The proposed new bus route will again have a significant impact on noise and pollution levels for existing residents.

What measures are being proposed to eliminate and mitigate the impact of the additional noise pollution the proposed development will inevitably bring?

4. RCTCBC Local Development Plan (LDP)

The existing LDP, which is currently under revision, is out of date and is not fit for purpose as it does not reference or meet the requirements of new legislation such as the ***Wellbeing of Future Generations (Wales) Act 2015*** and Planning Policy Wales Edition 10. It is dated 2006-2021, which in itself means it cannot meet the requirements of more recent legislation. With this in mind we would argue the case that such a development of this scale and design would not meet the local authorities revised LDP which would need to comply and reflect such policies/legislation. Asbri makes references to meeting the current LDP requirements however we strongly urge the need to see action on changing how our infrastructure is planned and designed now. This position suggests that no decision in relation to the proposed development at the old Aberdare Hospital can or should be made without the availability of a current LDP.

5. Placemaking approach

It is our view as residents that this plan does not represent a placemaking approach.

Such an approach considers the context, function and relationship between the development site and its WIDER surroundings. It is our view that this development focuses on being considered on its own merit in isolation from the wider community. That cannot be allowed to continue.

We have to state that it is our belief that the existing infrastructure and services in the community of Abernant cannot sustain such a development. It does not have the road infrastructure or the

health and education service provision to support this development. We note with added concern that this current planning application is the first of three proposed housing developments .

The expansion of Abernant with the potential growth of approx 500/600 new properties in 3 separate locations (different developers) gives great cause for concern in relation to infrastructure capacity as it currently stands.

It cannot be allowed to go ahead without clear commitments by the developer to ensure that any and every additional infrastructure and service provision requirement is costed by them and forms part of their costs. RCT council tax payers cannot be expected to bear any such additional costs.

Conclusion

1. The proposed development of the former Aberdare Hospital site doesn't meet the priority housing needs defined in the RCT Local Housing Market Assessment (LHMA) for low-cost homes to accommodate single person households, two person households without children and lone parent households with 1 child. Based on Welsh Government household projection variants, the RCT LHMA recognises that *"larger households are set to remain stable or decline over the next five years"*. (p.8).
2. The scope of the development in favour of large executive homes conflicts with identified local housing need stated in the RCT Local Housing Market Assessment report, therefore on this basis alone, how can it be considered fit for purpose? Furthermore, the proposed development places the purchase of the 4- and 5-bedroom homes out of financial reach to the majority of RCT residents, based on affordability.
3. The level of projected vehicle usage directly reflected within the site plans directly conflicts with the overarching goal of the Welsh Government to reduce reliance on single occupancy vehicles. The plans do little to encourage residents to move away from private vehicles as their primary mode of transportation.
4. Most concerning is the fact that the proposed development reflects short-term, ill-considered land use and development. The proposal to build on a SINC highlights an alarming disregard for the protection and conservation of natural habitats and designated sites of important nature conservation value. Not only do the proposals conflict with RCT's

own planning guidance defined in the *Local Development Plan Supplementary Planning Guidance: Nature Conservation* (adopted March 2011) but they also fail to satisfy the 'sustainable development' principle defined in the *Wellbeing of Future Generations Act, 2015* which seeks to ensure that the needs of the present are met without compromising the needs of the future generations to meet their own needs.

The proposal to develop on a SINC is in opposition with both National and EC principles on protecting and conserving biodiversity – considerations which are **national and global priorities for nature conservation and effective action on climate change**.

In light of the fact the final Planning Report by the local authority has yet to be finalised we will of course consider submitting further letters should it be deemed necessary in response to any additional findings from Highways and/or other specialist agencies/services.

We therefore wish to state our clear objection to this planning application and respectfully ask that it be rejected in its current format by the Planning Committee of RCTCBC.

Abernant Residents Action Group:

References

- (1) Well-being of Future Generations (Wales) Act 2015
- (2) Future Wales the National Plan 2040
- (3) Prosperity for all: Welsh Strategy
- (4) Llwybr Newydd: Wales Transport Strategy 2021
- (5) Transport for Quality of Life: Making Transport Fit for the Climate Emergency Ian Taylor & Lisa Hopkinson Dec 2020
- (6) Active Travel Wales Act 2013
- (7) Planning Policy Wales Edition 10 (Dec 2018)
- (8) RCTCBC Revised Local Development Plan 2020-2030 (RCT Local Development Plan 2006 -2021). Review Report 2019
- (9) RCTCBC Corporate Annual Performance Report 2020/2021
- (10) RCTCBC Corporate Plan 'The Way Ahead' 2016-2020
'Making a Difference' 2020-2024
- (11) Local Housing Market Assessment (Summary Doc) 2017/2018 - 2022/23
- (12) Asbri full planning application on behalf of WD Lewis Developers (including associated documentation submitted during consultation period)