

Welsh Government Ministers should save the trees, hedgerows and fields in Cefn Yr Hendy, Miskin” | “Dylai Gweinidogion Llywodraeth Cymru achub y coed, y gwrychoedd a’r caeau yng Nghefn yr Hendy, Meisgyn”

Additional information for Petitions committee from petitioner

Background and opinion of petitioner.

I ask the petitions committee and Welsh Ministers to save 49 acres of greenfields in Miskin, Pontyclun RCT.

These fields were historically agricultural with some lead mining in the 19th Century, and again agricultural use for generations - farm land for pasture and taking of silage. They are farmed to this day by a tenant farmer. The fields surround the north of the village of Miskin, border the small historic settlement of Mwyndy, are bordered to the West by Coed Yr Hendy (ancient woodland – Blanket Tree Preservation order TPO – 42 (2000) RCT), and are close to the River Clun and the Pant Marsh (of which part is a Site of Nature Conservation).

The fields were bought along with many other parts of ‘Central Llantrisant’ in the 1980’s by the forerunner to the Welsh Government (monies from the public purse).

For generations (over 70 years) local residents have used the fields for pastimes - walking, blackberry picking, playing with children etc and continue to do so to date. This has been done in peaceful co-existence with the farming activities.

I have seen the response of Mr Gething today regarding contracts. My question to that would be, why when permission was granted on some of these fields in 2008 for the Welsh Development Agency and Scarborough Developments to build 216 houses, (a related company to Talbot Green Developments which shares the same office with the previous ‘Scarborough developments’, in Scarborough England, which WG is acting with on this matter) did the plans then not come to fruition then? Not a breach of contract in 2008?

Even if we accept the argument that Welsh Ministers may have a duty to bring the fields to development – it does not mean all must come to development and it does not mean that plans cannot be more sensitively made to protect the health and wellbeing of children at YGGG Llantrisant and exclude the most Western access point proposed (See Map A2).

There are many reasons these plans concern us, not least the impact on the roads, and lack of more schools or health services, which are already

stretched in our area. You can forget trying to get a dentist appointment locally since Covid 19, unless you pay to go privately! How can this small village sustain c1000 new inhabitants?

I am concerned as to Defra reports on soil erosion - soil is already being destroyed faster than it can be created - and cannot see why Welsh Ministers would still see this land as being a good site for development given that, plus concerns raised by residents as to the impact of water run off from new building into the River Clun (north of the of fields, at edge of JKL on map – A1 appendix) as well as all we know now about the importance of sustaining nature, hedgerows and trees. The fields have 2 prominent Oak trees as well as a number of Oak saplings. The fields are full of wildlife, and the number of bats swooping at dusk is an amazing sight. A large number of birds, small mammals and insects make Coed Yr Hendy and the fields their home - where will the birds swoop to feed if they are built on? Build on these fields, and the impact on local wildlife will be disastrous.

I am aware of existing housing targets (more recently called into question as to accuracy) and point to the fact that Plasdwr housing development is a 10 minute drive from here, and that Rhondda Cynon Taff had 2785 empty homes in 2015 (their own figures).

This land was in the LDP for 400 houses and a school, and the plans approved at RCT planning committee and in 2018 planning permission was granted on it for 460 houses plus a school, with specified access points at areas where existing, old trees and hedgerows as well as saplings would need to be cut down. However the committee (at which I was present) heard that RCT had no money to provide a school at the site and funding would need to be sought at an unspecified point in time from the Welsh ministers to fund a school there. Outline planning permission for 460 houses and a school was again renewed in May 2021 from RCT.

Currently the land is open to tender from developers and I am aware developers are not including a school in their plans – therefore there will be a significant cost to the public purse, or a lack of a school. I am aware of other developments where developers have had to include and fund a school. Why not here? Appendix A3 contains a link to the sale, with a video where the scale of these fields can be seen. Please look at this and absorb the beauty of our Welsh countryside.

I applied for Village Green status on the land in recognition of the fact that people have been using these fields for decades for enjoyment, walking and play with children. We were not successful in the Village Green application to preserve this beautiful Welsh Land for community use. We met most of the stringent criteria but sadly in the Inspector's view, did not provide significant pastime use of the land from 1997-2000 (due to lack of witnesses at inquiry for that period). He did however recognise that there was otherwise "clear

evidence of the use of the site for lawful sports and pastimes” (Bedford 2019, p104).

Link to Village Green Inquiry

<https://www.rctcbc.gov.uk/EN/Council/CouncillorsCommitteesandMeetings/DelegatedDecisions/RelatedDocuments/Decisions/2019to2020/Section152CommonsAct2006%E2%80%93ApplicationtoRegisterLandatCefnYrHendyFieldsMiskinPontyclunasaTownorVillageGreen.pdf>

The enjoyment of so many families of their local green space will be destroyed. Our beautiful Welsh green fields will be destroyed (while many brown field sites remain undeveloped!). I do not need to repeat here the vast amount of evidence which shows the importance of nature, green spaces, and free and open space for children and adults, to our mental and emotional wellbeing.

I urge you to show the strength of the Assembly's commitment to all our futures, to the climate emergency declaration and see if you can help to save all, or some of these fields from unsustainable development. Not only will that maintain good living conditions for those living locally (no increase in traffic, pollution, demands on health services) but will enable local residents to continue to use the open space which has been highly valued for emotional and physical wellbeing for generations.

I also feel the news articles in which Welsh Government implores people to plant trees makes a mockery of us all. It is contradictory for them to tell us to plant trees when they are knowingly destroying established trees, saplings and ancient hedgerows (which can be seen in maps from 1800s).

If the fields are preserved, the tenant farmer would be able to continue to farm his sheep as he has for decades, support his family livelihood and maintain this land in its natural state. Daily we hear on the news that we are in a climate crisis, that we should plant trees. Welsh Ministers should not promote or allow the destruction of the fields, hedgerows and trees, that, after all, were bought from the public purse in the 1980s.

This land was in the Local Development plan for 2011 – 2021 for 400 homes and a new Primary school, with a Grade Separated Interchange to be provided to join the A4119. This was initially granted outline Planning Permission in 2018 by Rhondda Cynon Taf (RCT hereon) and this was renewed on 14th May 2021 and represents planning permission in principle. At present tenders are invited from house builders. I am aware that house builders are not including a primary school in their plans.

I am also aware that while the closing date for tenders was 20.9.2021 this has been extended following developers finding issues with the land which had not been identified correctly by the landowner in their own site investigations. Which begs the question what other issues have been overlooked or were recorded incorrectly.

A) Environment.

1. It is my view that the sale of the Greenfields land by Welsh Ministers is morally wrong and not in line with the legislation or principles they introduced in the Well Being of Future Generations Act 2015 (known as WBFG here on). Through destroying these fields and trees it also undermines the Sennedd's commitment to its own declared Climate Emergency.

How on earth can the wanton destruction of this land fit with us being a globally responsible nation?

How can it lead to a healthier Wales – it will lead to increased pollution in the area, further drain on local health resources and increased car journeys – especially if no school is provided? It will take away the leisure use that residents have proven their use of from 2000 to this day.

It also undermines the requests we, the public, hear from our Welsh Government about how we should live more sustainably, plant trees and look after our countryside (news articles Appendix A3). Continuing with the sale of this land will lead to established trees and hedgerows being cut down to be able to build and put roads in – see woodland specifically at circle B on map in appendix A2.

The hedgerows – in the fields will have to be significantly cut down to allow for houses and roads, and can be seen in maps from 1898. Once gone, these are gone for good.

<https://www.francisfrith.com/uk/mwyndy/maps> (maps over centuries showing hedgerows)

The fields themselves are full of wildflowers each spring and summer with wild orchids also (see photos from June 2021 in Appendix A4, in field B in Map under A1) – these will all be lost forever if built upon.

I am also concerned for the loss of these fields as carbon sinks and surface water run off. The northern reaches of the fields in question then slope down hill to the Afon Clun and the Pant Marsh (SINC) which is a site where the rare Small Scabious Mining Bee has been found, and planting done by conservation groups of the Devils Bit Scabious plant has been done in 2020. See Maps at A1 for a screenshot from the media posts of the map where it has been found in 2020. As of yet surveys have not yet been done by Buglife on these Greenfields or the fields at the northern edges – Map at A1, fields H-M) and the discovery of the bee in the area post-dates environmental surveys done for the planning application in 2017.

Links - <https://twitter.com/buglifecymru/status/1330214727402876939>
<https://www.facebook.com/pontyclunenvironmentgroup/posts/2770150386566110>

<https://twitter.com/BuglifeCymru/status/1303964490623483904?fbclid=IwAR2UH8XI7n8qMC9zs-tBJOH3GziCKRdemizjwdFOAPJAygLbOcGFxjSFFvw>



BuglifeCymru on Twitter

“We were very excited to discover a 'new' population of Small scabious mining bee (*Andrena marginata*) last week as part of our @PostcodeLottery 'Searching for Scabious' project. This scarce and much declined bee was found at Pant Marsh in Rhondda Cynon Taf. 📷
(c) @olds_liam”
twitter.com

The Marsh Fritillary butterfly is also found in the Pant Marsh and I am exceptionally concerned that the ecological reports do not consider the impact of the increased surface water run off on the river and these insects. We do not get a second chance to conserve nature in these times. We all know the value of the environment to our future life on this planet.

The Pant Marsh is described by RCT’s Ecologist as a “original, flood plain grasslands site, very rare, species rich” and is currently under management by RCT as a nature reserve for 25 years. It is described as a fantastic habitat for hoverflies, marsh fritillary butterfly, grasshoppers, orb spiders and grass snakes. You can also see the planting of the Devils Bit Scabious and a description of it’s importance in the video link below (video by RCT’s own ecologist in September 2021). It also shows the Afon Clun and refers to existing water quality issues. Surely building and concreting over land so close, causing possible run off is irresponsible?

Video link: <https://youtu.be/QidTWtb8IA8>

Or search for Pant Marsh virtual video tour.

(you may hear the constant hum of the busy A4119 throughout too!)

The ancient woodland of Coed yr Hendy has a footpath running through it close to the edge with the fields in question. In wet weather this is incredibly boggy and you can see streams of water running through it (northward and downhill) from the fields. I do not need to be an expert in land drainage to know that building on the neighbouring fields will cause more run off downhill and that the ground will become even more boggy – causing to possible

monumental damage to this protected woodland. Politicians should recognize the experience of local people in knowing the lie of the land.

With the declared climate emergency in mind this is an opportunity for the Welsh Government to be climate-smart and save this greenfield site. A site that is a valuable natural resource and a carbon sink, something we desperately need in Wales today. "Greenfield land is most likely to have green habitat, such as trees, grasses, and hedgerows. The removal of these would mean the removal of key carbon sinks from an area. The role of soil should also not be overlooked; concreting over soil means that it cannot do its vital job in sequestering carbon" – SERA 2017 – link in A3

B) Traffic and pollution

I also note that the A4119, running along the side of some of the fields has extremely high pollution. There is an air quality management area ('Mwyndy') on the A4119 immediately bordering this site. The Rhondda Cynon Taff Council "Air Quality Progress Report 2019" shows that Nitrogen Dioxide (NO₂) readings for this AQMA have been above the EU and UK legal limit for the last 12 of 13 years. Link to information on Air Quality Management, Mwyndy RCT

[Agenda Item 4 - Protecting Improving Air Quality in Rhondda Cynon Taf \(rctcbc.gov.uk\)](#) (2015)

[Report.pdf \(modern.gov.co.uk\)](#) (2020)

To add a large house development which will primarily discharge onto that road is going to worsen those readings irrevocably, and is again not in keeping with the future generations principles.

c) Quality of the land

The land is agricultural yet the Agricultural Land Classification Survey completed for the planning application in 2017 was done via a desktop assessment which graded it at 'no better than 3b'. When we are looking at digging up 49 acres of Greenfields I would have expected closer attention to detail than this.

d) Education – new school issues

The provision of a new primary school is within the LDP however we understand from Mr Gething that this is not being insisted upon and there is no requirement for developers to include one in plans. Therefore are Welsh Ministers content that a new housing estate is sustainable on this basis?

1. The removal of the condition of the school means existing schools will need to absorb the extra pupils. It is proposed this is met with development monies, however, as the catchment area currently falls under Pontyclun PS,

this will mean extra pressure on an already strained school. Quoting a July 2016 Estyn report for the school, it states that classroom environment is under pressure, so much so that 'it inhibits classroom organisation and routine'. Therefore, how will the extra demand be met in an already over-capitated school?

2. One proposal is to have the catchment area amended to include Penygawsi and/or Tonysguboriau in Llantrisant and Talbot Green respectively. Both of these are not viable options.

Firstly, Tonysguboriau requires young children to walk along the A4119 up to Talbot Rd and then down to the school. Besides making very young children walk alongside the A4119 over the bridge where the pedestrian width is already too small, the walk of just over 2km is too far for 3-11 year olds to walk twice a day, particularly in British weather. The walk would require adult supervision which in today's world with both parents working, would not be possible.

In terms of Pengawsi, the walk is slightly shorter at 1.6km but is through a tunnel under the A4119, through wooded and undeveloped areas, past a grave yard and into the school. In 2008, Ian Jenkins who worked with the education department at RCT deemed expecting children to walk the route as unsafe for children to walk. Nothing has changed in the past 9 years to suggest that this decision could be overturned. Remember, these are 3-11 year old boys and girls.

3. If we put sustainability to one side, and assume that the trips to those schools would instead be made by car, then these extra trips at peak hours will need to be factored in to the traffic analysis. Both routes would require extra travel along the already over congested A4119. However, as developments are required to be sustainable, the car option needs to be excluded.

Therefore, should this proceed, a school must continue to be a requirement, not an optional item!

The only school in the village currently is YGGG Llantrisant, a Welsh speaking Primary school. It is clear it could not accommodate the needs of 460 new households. In 2017 there were 304 on roll with a capacity of 338 children. New building has been completed at the school in 2021 to accommodate existing children – how can it physically manage more children than it has capacity for? Also, if it is at capacity, and parents wish for their children to attend a Welsh Speaking primary – would they then be travelling to the nearest Welsh Primaries in Llanhari (3.4 miles) and Church Village (4.9miles) from Miskin.

Miskin is very much a family community, people raise their children here. I think from 460 homes even a lay person could estimate at least 460 new children to educate!

Lack of a school provision on the development goes against Welsh Government targets on class sizes, on encouraging use of Welsh (by causing YGGG Llantrisant to become oversubscribed) and is not sustainable as it will lead to hundreds of car journeys for children to attend school NOT in walking distance. The only school in walking distance is YGGG Llantrisant. The nearest English speaking primary school is Pontclyun Primary school (1.2 miles away). I don't know many Primary age children who would be walking there and back each day. Indeed, I see the parents driving them back and fore each day from Miskin!

Councillors of RCT approved the plans on the basis that a school was part of the masterplan, and a new school is referred to in the outline planning permission.

Welsh Ministers are doing an absolute disservice to children and young people by not expecting developers to build a school. If the Council of RCT state it is no longer a requirement, I would like to see the evidence behind this and why they are going against the adopted LDP. Welsh Ministers should have an interest in this as well, it should not just be residents advocating for children!

d) Plan not in line with the LDP.

I recognize the planning site is in the Local Development plan, however the adopted LDP for RCT clearly states a school, 400 homes and a Grade separated interchange with access to and from the A4119 must be provided. The Outline Planning permission granted in 2018 allows 460 homes and no grade separated interchange is required in a stark departure from the adopted Local Development Plan.

I will now discuss Western access point, which is to be off the existing roundabout by Ysgol Llantrisant, the village primary school. (see Map A2, circle A)

The LDP states that the access for the new estate should be via Grade Separated Junction, well away from the school. However the plan is for existing roundabouts for access. The roundabout and land leading towards the woods, by YGGG Llantrisant is NOT within the LDP for access or building.

YGGG Llantrisant is 20 footsteps away from the start of the proposed building site. Speaking from personal experience, crossing the road to take my

children to school there can already be hazardous. Adding to that building site traffic and increased traffic when the estate is built, will increase danger to children walking to school.

There will be increased pollution. The applicant's projected figures on pollution do not account for building site pollution and heavy plant machinery. I do not want children at that school to be exposed to diesel fumes in their formative years. You must also remember that children are being taught in that school with windows open due to Covid 19, and are likely to for some time. Air pollution has proven links to illnesses and breathing difficulties, especially for those with asthma.

When talking about our children's wellbeing, we are also talking about RCT's and Wales' economic future and wellbeing. You must look at the long term, Welsh Ministers have legal responsibility to take actions to stop problems happening. Again I say, the LDP did not include this piece of land for a reason.

Would you be happy for your children to attend the school with a building site starting 20 steps away?

I also refer you to the planning appeal of 2008 which made an approval for only 216 Homes on the land to be provided with the Grade Separated Interchange.

Welsh Ministers, in their role as landowners here, should want to be in keeping with legislation and principles of fairness. By themselves going outside of the LDP they give green light to any other developer that LDPs are not worth the paper they are written on, nor the time of council officers or Assembly staff involved in the painstaking completion of them.

e) Pressure on local health services

I would like to draw your attention to one of the five ways of working set out in the WCFG Act to help public bodies achieve the 7 principles of the Act. Namely, "Prevention" - How acting to prevent problems occurring or getting worse".

Even before Covid 19 the nearest hospital, the Royal Glamorgan Hospital was under pressure. On 11.1.2017 Wales Online reported that the A&E department at the Royal Glamorgan Hospital was in crisis and scenes were beyond words. It was reported that elderly patients lining the corridors on trolleys waiting to be seen, current waiting times can be between 4 -6 hours. Cwm Taf Health Board were quoted as saying **"there is a high level of demand at the Royal Glamorgan Hospital" they also said "the escalation levels at RGH are currently between 3 (severe pressure) and 4 (extreme pressure)".**

460 additional homes could potentially generate a further 1150 patients for this hospital this is based on the developer's calculation of 2.5 people per household.

This amount combined with other committed development in this area will exacerbate the services and have a detrimental impact on the quality of care received by its patients.

In 2017 my neighbours sought to register their 3 year old son for dental care locally, on being told no NHS dentists could register him, she sought via help via her MP Owen Smith. Mr Smith contacted the Health Board and my neighbour was provided with a response in writing from Alison Williams Chief Executive of the Cwm Taf Health Board wrote " unfortunately at present the one dental practice in Pontyclun and two in Talbot Green are **NOT** in a position to accept new patients", she also said " we are continually reviewing access to dental services across Cwm Taff and are aware that there is a high demand in the Taff Ely area". She was advised to contact other dentists, with the closest being in Pontypridd, 7 miles away.

Again I return to my point that this is not a sustainable development. All of the above health issues have exacerbated. I have not been able to get routine dental care for myself locally since March 2020 and have paid to go privately. Not everyone is able to do this. This is therefore not only unsustainable development it is also discriminatory to those on low incomes. The "More Equal Wales" and "A Healthier Wales" principles in WGFG Act I feel are relevant here. We already know that Dental decay in children in Wales and especially in RCT is at shocking levels - with the local health board Cwm Taf quoting 44% of children in RCT as having dental decay
<https://cwmtafmorgannwg.wales/services/primary-care-community-services/baby-teeth-do-matter/>

The added pressures on Cwm Taf health board owing to Covid 19 are continuing and I repeat, further local development is not sustainable.

f) Loss of open space

While much of the above relates to the loss of open space I will briefly mention that the plans for 460 houses on the site (c1150 residents) does not meet the Fields in Trust nor RCT's Policy AW6 (Point 10) regarding open space. Open space in Wales follows the Six-acre Standard as set out by Fields in Trust.

First published in the 1930's the Guidance is based on a broad recommendation that 6 acres (2.4 hectares) of accessible green space per 1,000 head of population enables residents of all ages to participate in sport and play; 75% of local authorities adopt this or an equivalent standard (2014 Fields in Trust / David Lock Associates Survey).

<https://www.fieldsintrust.org/guidance>

RCT's AW6 policy point 10 states **"10. Open space is provided in accordance with the Fields in Trust Standards"** -

http://www.cartogold.co.uk/rhondda/text/05_aw_policies.html

If we turn to look at the proposed map we can see that they are calculating small pockets of open space towards this, which in actual fact not functional open space. It is paying lip service to policy and I cannot see how they have included 2.4 hectares in open space (for 1000 residents) in fields which are 19.8 hectares.

While the developers may state the land that borders the fields at the north is open space – this is not accurate, it is not part of this parcel of land, it is not owned by Welsh Ministers (so how can they declare it's future designation?) it is used consistently for farming and it leads to the Pant Marsh which is protected in it's own right.



CONCLUSION

I would like to thank you for taking the time to read through this. As you can see there are many issues which I think are important. I summarise by stating that the plans are not sustainable and there is no 'place making' at the heart of them and therefore not in keeping with Planning Legislation in Wales. It is an 'add on' to a tiny village with no new services that would enhance the lives of new or existing residents.

I think this petition raises so many issues that it is right it is thoroughly debated by Welsh Ministers. This are not solely planning matters but it goes to the heart of what residents in Wales need from our Government – fair, principled decision makers who respect and value our country and

countryside and recognize that decisions today impact on all of our wellbeing tomorrow.

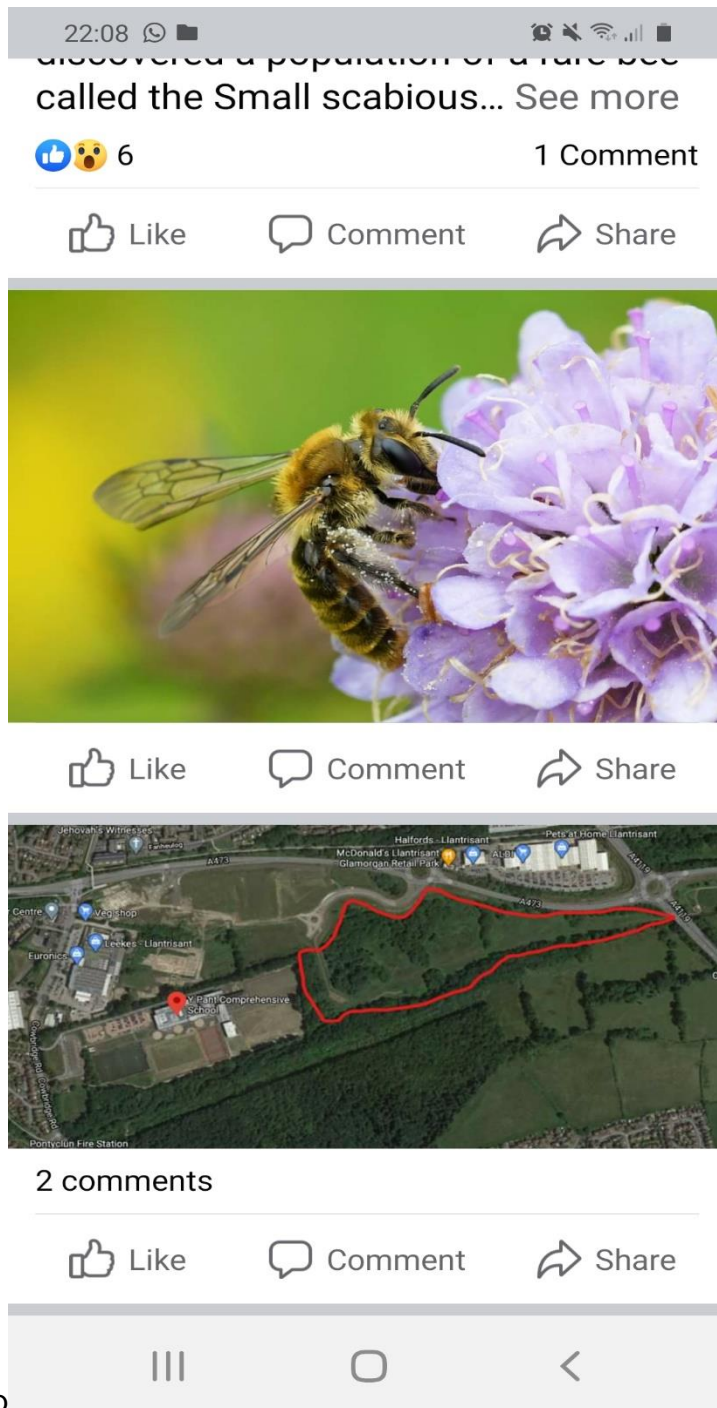
I urge Welsh Ministers to uphold the principles of the WBFG Act, to show commitment to the declared Climate Emergency and desist in their plans for the sale of the fields. If they cannot, they should amend the plans. Welsh Ministers should be leading the way ethically and practically. I can recycle and reuse, walk not drive, and plant as many trees as I can in my garden for the rest of my life – none of this will ever have the positive environmental impact that this single decision by Welsh Ministers could have in terms of the climate and wellbeing.

S Seymour 27.9.2021

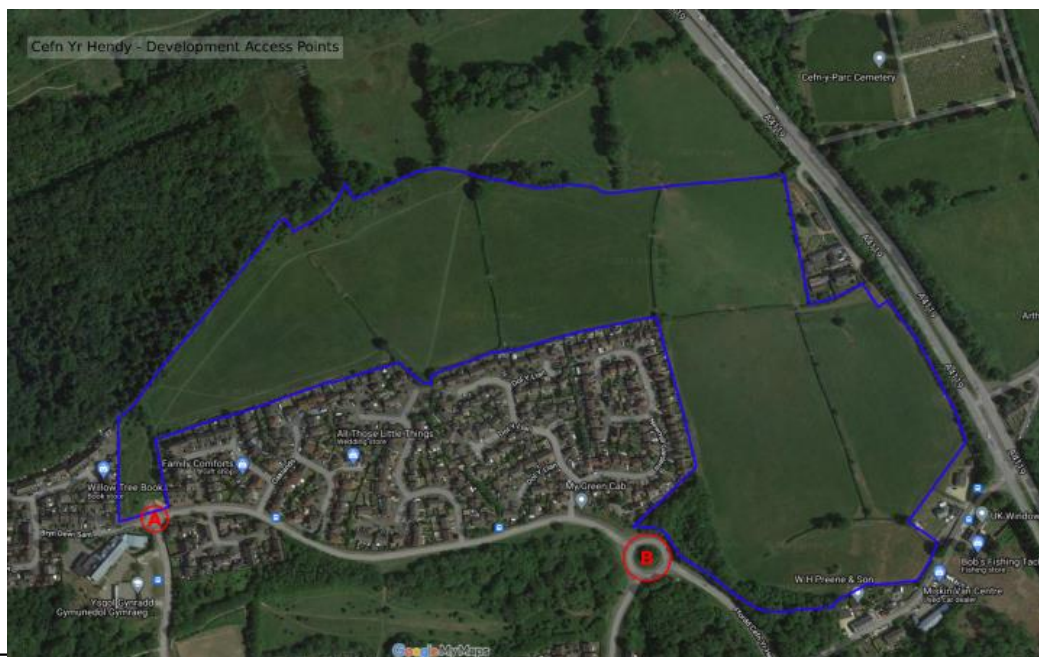
Appendix

A 1. Google Map of area with map Key





A1 – Scabious bee map



A2 –

A3. News articles

WG urges residents to plant trees -

https://www.bbc.co.uk/news/uk-wales-58259637?fbclid=IwAR1vkdp3lOkfWvzl3nzdubCAUFdfwjiDH_M20HKPP5Wx5vwLMbd-Os0Cnm8

Article regarding development from SERA

https://www.sera.org.uk/designing_development_to_deliver_on_nature_climate_and_housing?fbclid=IwAR3FXia_5Kky5r6iV1Sm29WwCZKt8fOtd7_yLxozPYWpoeZUIHcrE35h9w

Natural Resource Wales – wildlife and plant species at crisis

<https://www.bbc.co.uk/news/uk-wales-58641886>

Link to advert for sale of fields including video

<https://www.brutonknowles.co.uk/property-search/development/property/5335--1184990142?fbclid=IwAR2UH8Xl7n8qMC9zs-tBJOH3GziCKRdemizjwdFOAPJAygLbOcgFxiSFFvw>

Link to current RCT Local Development Plan. This land is described as Policy SSA8 – Mwyndy Talbot Green and covers areas in Talbot Green and not solely these fields. For ease – this part refers to Cefn Yr Hendy area

Cefn-yr-Hendy

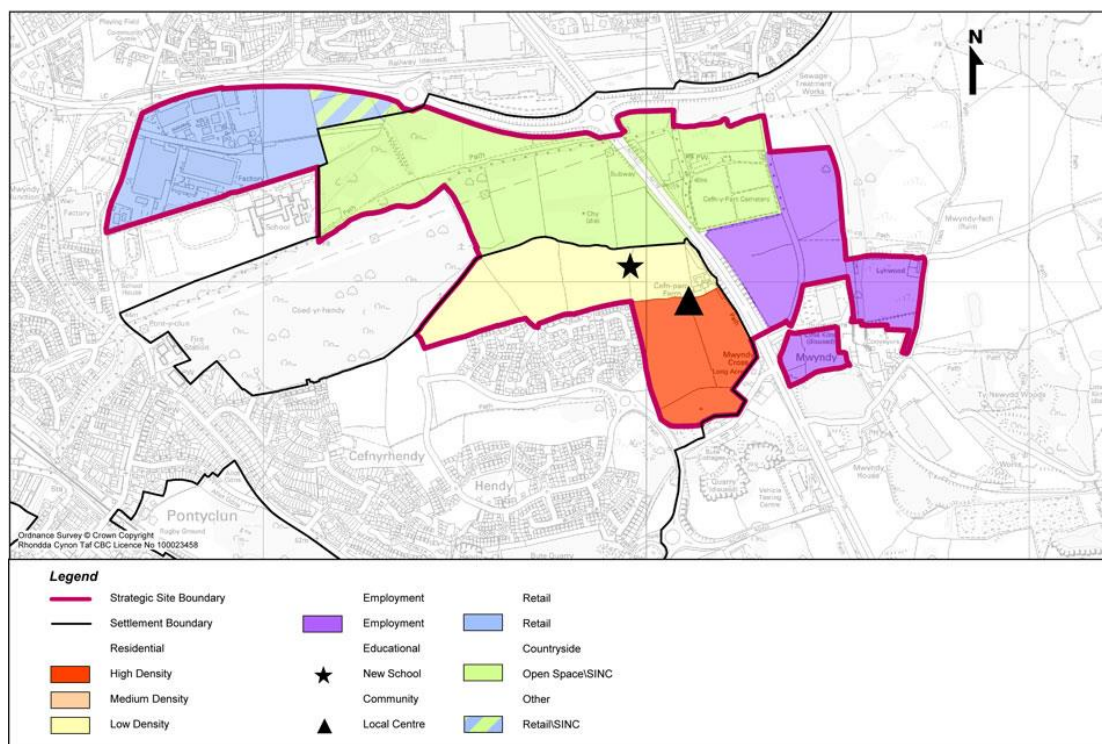
f) Residential development of 400 dwellings adjoining the existing residential area, served from the existing spine road roundabouts, new primary school and local centre. The residential development will be built at a range of densities, with higher density development to be constructed between the

existing housing development and the A4119 and lower density to be constructed on land adjacent to existing housing development on the northern boundary of the site. Consideration will be given to locating the proposed primary school in the central section of the site close to Cefn-parc Farm. In order to protect wider visual amenities a landscape buffer will be placed along the northern boundary of the site. The proposed local centre will comprise a maximum of 200m² net sales floorspace, designed to cater for local residents. Typically, this would include a mixture of convenience and comparison floorspace.

6.139

Phasing – To reduce the risk of an over-supply of comparison goods floorspace significantly in advance of the identified need for that floorspace, the retail development of the Cowbridge Road area shall be carried out in two phases. Until 1 June 2016 the construction of new retail floorspace will be limited to a new convenience goods floorspace of 3,700m² (net), new comparison goods floorspace of 2000m² (net) and the replacement of the existing Leekes floorspace with an equivalent amount of new comparison goods floorspace to that existing on those premises at the date of the adoption of the LDP. In the Mwyndy Cross and Cefn-yr-Hendy areas, no more 25% of dwellings and 25% of gross employment buildings floorspace shall be completed before the proposed A4119 grade-separated junction is open. In the Cefn-yr-Hendy area, no more than 75% of dwellings shall be completed before the proposed local centre is completed.

Policy SSA 8-Mwyndy / Talbot Green Area - Indicative Concept Plan



(Note the LDP map does not show use of either existing roundabout or the parcel of land near roundabout marked A on Map A2)

[Rhondda Cynon Taf Local Development Plan up to 2021 - Adopted March 2011 \(cartogold.co.uk\)](http://cartogold.co.uk)

A4 – photos of the fields





END