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PENTYRCH COMMUNITY COUNCIL



CYNGOR CYMUNED PENTYRCH

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Development Control
Cardiff Council

By Email

Dear Sirs,

20/02634/MNR CONSTRUCTION OF A NEW 2 STOREY MEDICAL CENTRE (D1 USE CLASS) AND PHARMACY (A1 USE CLASS), PARKING, LANDSCAPING AND ASSOCIATED WORKS LAND AT RHYDLAFAR DRIVE, ST FAGANS, CARDIFF

PCC recognizes that this is a controversial application in the local community and, like many others, PCC regrets that the village of Pentyrch will be losing a much-valued facility and community service.

PCC objects to this application on the grounds set out below. In summary:

- Transport – the ability of the people to reach the new site by public transport, private vehicles and active travel is not sufficiently detailed and the various local issues not properly recognized in the application. It should be a condition of any potential consent that the proposed improvements and active travel routes must be in place before surgery is built.
- Parking spaces on site are insufficient. The application documents recommend 40 spaces and this is reduced to 28 as a compromise having considered the 50:50 modal split. In an area with poor public transport, none from Pentyrch to the site and no safe walking or cycling route from Pentyrch our residents will have no choice but to drive or use taxis. We also question the reality of unwell people walking/cycling to the surgery.

The proposal is described in the planning application documents as a replacement medical centre to provide a service to the northern part of the area covered by the Llandaff and Pentyrch Surgeries. The practice has an existing surgery in Llandaff covering the southern area, and the proposal is described as the replacement of the existing surgery based in Pentyrch. The application documents and attached maps indicate that the northern area includes the villages of Pentyrch, Taffs Well, Creigiau, Groesfaen, Radyr and also Gwaelod-y-Garth.

Cardiff Council's Pre-Application Advice makes it clear that the application would need to demonstrate that the proposed development would be readily accessible to the local communities it is intended to serve by public transport, walking and cycling. Unfortunately, the application fails to adequately address these issues as follows:

Transport

The Transport Assessment by Asbri submitted as part of the planning application is considered to be seriously deficient as it only addresses the transport issues along the A4119, Llantrisant Road – a route which realistically only has relevance for the communities of Groesfaen, for parts of Radyr and, to a lesser extent, Creigiau. The transport issues for those living to the north of the proposed site are almost completely ignored.

The Assessment claims that patients could walk or cycle up to 3.2kms to and from the northern area. This demonstrates that the developer has no understanding of the actual nature of the site within its location. The route from Pentyrch to the site, along Church Road, is a narrow country lane with no footpath or verge of any sort, is without street lighting and would only be cycled by the most experienced and fittest of cyclists. The route from Rhydlafar to the centre of Pentyrch gains in altitude by about 120 metres (400 feet) – and to suggest that patients could walk home from the surgery is like asking someone to walk from Pentyrch up to the top of the Garth Mountain!

Pentyrch village has only a single bus service and no other public transport. The bus service is normally hourly during the day and does not serve the Rhydlafar area. It goes in the opposite direction into Cardiff via Whitchurch.

The applicant's statement on Active Travel at Para 3.2.6/7 states that the only cycle routes which are proposed are along Llantrisant Road with no known timescale for provision and completion. Para 3.4.6 mentions 'various community transport operators' but these are not identified and are unknown. Part of this critically important paragraph has presumably been deleted as there is an incomplete sentence at the end of the paragraph.

The Planning Statement provided is inaccurate in relation to these travel issues in numerous places, for example:

Para 2.5 claims 'the site is easily accessible by pedestrian routes'.

Para 3.13 claims '.....ease of access for pedestrians...or cyclists.....from the village direction....'

The Application clearly fails to meet the requirements of the extant LDP Policies, most notably KP13 relating to sustainable neighbourhoods; KP14 relating to Healthy Lifestyles; and also fails to comply with Planning Policy Wales Section 4.4 which requires that 'community facilities continue to address the requirements of residents in the area' and are expected to be close to the communities they serve.

The Conclusion to the Planning Statement claims at Para 5.28 that 'It has also demonstrated that sufficient multi-modal access can be achieved via an established and proposed network of active travel routes'. This is clearly untrue as there are no Active Travel Routes connecting the northern parts of the Practice Catchment area to the site at Rhydlafar.

In conclusion, it is currently impossible for residents of Pentyrch, Gwaelod and Taffs Well to access the proposed new surgery by public transport or by walking, and it is virtually impossible by bike. It is only possible to travel by private cars or taxis. **The Community Council therefore strongly Objects to the Application on the grounds of the non-existent public transport provision, nor are there options available for Active Travel, to a site which is significantly remote from the communities it is intended to serve.**

It is the Community Council's view that to enable this proposal to meet the needs of the community which it is intended to serve, and as an absolute minimum, a new public transport

service needs to be put in place, and operating at a sufficient level, prior to the Surgery being relocated from Pentyrch to Rhydlafor. If the authority decides to grant Consent then a full and proper Public Transport Plan and its implementation should be made a Condition of any such Consent.

Further, essential improvements to the local Active Travel Network (including for Pentyrch) should be identified and included as part of the Conditions to any such planning consent.

Car Parking

The Transport Assessment from Asbri states at Para 4.5.2 'Due to the nature of the proposal it is considered that a larger proportion of individuals will either be driven or drive to the health centre. This is as a result of patients requiring medical attention often not feeling well enough to use either public transport or walk/cycle to the doctor's surgery choosing instead the convenience of a private car.'

Para 4.5.4 states 'The parking accumulation exercise demonstrates that directly comparable health centres can generate parking demand for around 40 vehicles.'

The scheme, however, only has provision for a maximum of 28 spaces. The site has limited or no public transport connections to the communities it is intended to serve, and also has poor Active Travel options. It is clear therefore that the vehicle trip movements to the site are likely to be at least as high as Asbri's own assessment: a requirement of 40 spaces. With insufficient car parking provision patients will inevitably have to park on Rhydlafor Drive, adjacent to a bus stop, and also including one used by School Buses. The road is on a difficult bend and visibility for drivers, pedestrians and cyclists will become obscured by a line of parked cars thereby increasing the danger to all road users, including children.

The Community Council strongly Objects to the Application on the basis of inadequate car parking provision when considering transport needs, safety considerations and the location of the proposed development.

Highway Safety

The increase in vehicle movements is likely to cause local congestion at the dangerous junctions between the A4119 and Rhydlafor Drive and the A4119 and Crofft y Genau Road. We ask that consideration be given to making these junctions safer.

The Application includes Crash Data for the last 5 years for adjacent highways – but anecdotal evidence of residents suggests that this data is under recorded. Many minor incidents and near misses occur in this location on Rhydlafor Drive and its approach to the Llantrisant Road, as well as at the Crofft-y-Genau junction. The long bend on Rhydlafor Drive, the blind approach, the entrance to the Little Haven Nursery (for young children), and the significant slope all conspire to add to driver distraction and error. There will be a significant increase in the number of vehicle movements at this location, as a result of this proposal and also due to the large-scale housing developments nearby. The Community Council believes that inadequate consideration has been given in the Assessment to these issues and, with the known highway safety concerns at this location, asks that the Authority should give careful attention to this issue and to give full consideration to improving the safety of these junctions.

Yours faithfully,
Helena Fox
Clerk to Pentyrch CC
cc Cllr Gavin Hill-John, Cllr Graham Thomas
