

PETITION

COMMITTEE DATE: 19/05/2021

APPLICATION No. **20/02634/MNR** APPLICATION DATE: 18/12/2020

ED: **CREIGAU/ST FAGANS**

APP: TYPE: Full Planning Permission

APPLICANT: Assura Aspire Limited

LOCATION: LAND AT RHYDLAFAR DRIVE, ST FAGANS, CARDIFF

PROPOSAL: CONSTRUCTION OF A NEW 2 STOREY MEDICAL CENTRE (D1 USE CLASS) AND PHARMACY (A1 USE CLASS), PARKING, LANDSCAPING AND ASSOCIATED WORKS

RECOMMENDATION 1 : That, subject to relevant parties entering into a binding legal agreement with the Council under the provisions of **SECTION 106** of the Town and Country Planning Act 1990, within 6 months of the date of this Resolution unless otherwise agreed by the Council in writing, in respect of matters detailed in paragraphs 5.1.2 and 5.1.6 of this report, planning permission be **GRANTED** subject to the following conditions:

1. C01 Statutory Time Limit
2. The development shall be carried out in accordance with the following approved plans and documents:
 - 1766-90 – Location Plan.
 - 1766-111 (REV N) – Proposed Site Plan.
 - 1766-201 (REV M) – Proposed Floor Plans.
 - 1766-202 - Roof Plan.
 - 1766-300 (REV E) – Proposed Elevations.
 - 1766-301 (REV B) – Proposed Visual.
 - Waste Management Strategy prepared by Peacock + Smith.
 - Transport Statement prepared by Asbri Transport document ref: T20.122.TA.D1
 - Ecological Technical Note prepared by Celtic Ecology dated 30/09/2020

Reason: To ensure satisfactory completion of the development and for the avoidance of doubt in line with the aims of Planning Policy Wales to promote an efficient planning system.

3. No clearance of vegetation shall be carried out other than in accordance with the Precautionary Method Statement comprising Appendix B of the Ecological Technical Note prepared by Celtic Ecology dated 30/09/2020.
Reason: In the interests of biodiversity and the avoidance of harm to

European Protected Species, in accordance with policies KP16 and EN7 of the Cardiff Local Development Plan.

4. No development shall take place until details of the junction between the proposed access road and the highway, including pedestrian crossing facilities, have been submitted to and approved in writing by the Local Planning Authority. The approved details shall be implemented prior to the development being put into beneficial use.
Reason: In the interests of pedestrian and highway safety and to ensure that the use of the proposed development does not interfere with the safety and free flow of traffic passing along the highway abutting the site, in accordance with policy T5 of the Cardiff Local Development Plan.
5. No development shall commence until a scheme, demonstrating the distance and relationship of the development, for the protection of the structural condition of the 40 inch water main located adjacent to the northern boundary of the development site, has been submitted to and approved in writing by the Local Planning Authority. The approved protection measures shall be implemented in full before any other development hereby permitted has commenced, and shall be retained at all times for the duration of the approved operations, including the restoration works.
Reason: To ensure that the proposed development does not affect the integrity of the public water supply system in the interests of public health and safety, in accordance with policy EN11 of the Cardiff Local Development Plan.
6. No development shall commence until details of a method statement and risk assessment for the protection of the structural condition of the strategic sewer adjacent to the development site has been submitted to and approved in writing by the Local Planning Authority. The approved protection measures shall be implemented in full before any other development hereby permitted has commenced, and shall be retained at all times for the duration of the approved operations including the restoration works.
Reason: To ensure that the proposed development does not affect the integrity of the public sewerage system in the interests of public health and safety, in accordance with policy EN11 of the Cardiff Local Development Plan.
7. No development shall take place until details showing the provision of cycle parking spaces have been submitted to and approved in writing by the local planning authority. The approved details shall be implemented prior to the development being put into beneficial use. Thereafter the cycle parking spaces shall be maintained and shall not be used for any other purpose.
Reason: To ensure that adequate provision is made for the secure parking of cycles, in accordance with policy T5 of the Cardiff Local Development Plan

8. No obstruction to vision exceeding one metre in height shall be placed within the visibility splays as defined on the plans accompanying the Transport Statement prepared by Asbri Transport, document ref: T20.122.TA.D1.

Reason: To ensure that the proposed development does not interfere with the safety and free flow of traffic passing along the highway abutting the site, in accordance with policy T5 of the Cardiff Local Development Plan.

9. Notwithstanding the details shown on drawing number 492.01 – Planting & Management Plan. - and the Soil Resource Survey, document no. AUR/05a_srs, this approval shall not extend to the details of landscaping and landscape management. Prior to the commencement of development, revised landscaping details shall be submitted to and approved in writing by the local planning authority, which shall include:

- a Soil Resource Survey and Report, prepared by a soil scientist. Soil physical characteristics should be recorded, photographed and submitted as evidence of the suitability of the soil for its intended end use, and a strategy for soil handling, storage and placement prepared.
- subject to the outcome of the soil assessment, an alternative plant schedule, scaled planting plan and tree pit section;
- amended tree species selection, which should focus on locally native trees;
- amended hedgerow planting details, comprising a mixed native hedgerow rather than a single species;
- details of on-site monitoring of landscaping implementation and an aftercare methodology.

The details shall be consistent with other plans submitted in support of the application and the landscaping shall be carried out in accordance with the approved design and implementation programme.

Reason: To maintain and improve the appearance of the area in the interests of visual amenity, in accordance with policies KP5 and EN8 of the Cardiff Local Development Plan.

10. Prior to the commencement of development, details demonstrating how vehicle access onto the site will be prevented when the premises are unoccupied shall be submitted to and approved in writing by the Local Planning Authority and the approved details shall be implemented and maintained thereafter.

Reason: To ensure that the amenities of the area are protected and in the interests of public safety, in accordance with policies KP5 and C3 of the Cardiff Local Development Plan.

11) Prior to the commencement of development, a scheme for the illumination of the external areas of the site, including car parking areas, shall be submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be implemented prior to the

beneficial occupation of the premises.

Reason: In the interests of amenity, crime prevention and safety, in accordance with policies KP5 and C3 of the Cardiff Local Development Plan.

RECOMMENDATION 2: The applicant is advised that a commercial contract is required for the collection and disposal of all commercial waste. By law (Environmental Protection Act, 1990, section 34) all commercial premises have a duty of care to ensure that their waste is transferred to and disposed of by a registered waste carrier. Owners or developers of commercial developments/properties who require Cardiff County Council to collect and dispose of their waste can contact the commercial services department c.services@cardiff.gov.uk

RECOMMENDATION 3: Records indicate that the proposed development is crossed by a 40 inch trunk watermain, the approximate position being shown on the attached plan. Dwr Cymru Welsh Water as Statutory Undertaker has statutory powers to access its apparatus at all times. The document 'Conditions for Development near Watermain(s)' is attached for your information. It may be possible for this watermain to be diverted under Section 185 of the Water Industry Act 1991, the cost of which will be re-charged to the developer. The developer must consult Dwr Cymru Welsh Water before any development commences on site. An easement of 20 metres should be maintained, 10 metres either side of the centre of the main. As the 40inch trunk main is a large diameter strategic asset, the developer is advised that the location of this asset will need to be confirmed on site prior to development in order to ensure the proposed development will not impact this asset. A trace of the water main will need to be conducted by Dwr Cymru Welsh Water's Operations Team, which will be at the developer's expense. The applicant is advised to call the DCWW Plan & Protect Team on 0800 917 2652 in order to arrange this.

RECOMMENDATION 4: The applicant is advised that they may need to apply to Dwr Cymru / Welsh Water for any connection to the public sewer under S106 of the Water industry Act 1991. If the connection to the public sewer network is either via a lateral drain (i.e. a drain which extends beyond the connecting property boundary) or via a new sewer (i.e. serves more than one property), it is now a mandatory requirement to first enter into a Section 104 Adoption Agreement (Water Industry Act 1991). The design of the sewers and lateral drains must also conform to the Welsh Ministers Standards for Gravity Foul Sewers and Lateral Drains, and conform with the publication "Sewers for Adoption"- 7th Edition. Further information can be obtained via the Developer Services pages of www.dwrcymru.com The applicant is also advised that some public sewers and lateral drains may not be recorded on maps of public sewers because they were originally privately owned and were transferred into public ownership by nature of the Water Industry (Schemes for Adoption of Private Sewers) Regulations 2011. The presence of such assets may affect the proposal. In order to assist in dealing with the proposal the applicant may contact Dwr Cymru Welsh Water on 0800 085 3968 to establish the location and status of the apparatus. Under the Water Industry Act 1991 Dwr Cymru

Welsh Water has rights of access to its apparatus at all times.

RECOMMENDATION 5: In the interests of security, the following recommendations are made:

- i) The buildings should be alarmed on all floors with the alarm system linked to a central monitoring station. All rooms where there is valuable equipment or information stored should be alarmed. Any alarm wires must be protected. Panic buttons linked to the alarm system should be installed at appropriate locations for use when staff are under attack or are threatened by members of the public especially in the pharmacy.
- ii) The outside and the main entrances into the buildings, vehicle entrances onto the site, the vehicle parking area and bike and bin stores should be protected by CCTV. The CCTV cameras should be located in elevated positions and in vandal proof housings. Ideally the CCTV would be monitored. The images produced must be admissible in a court of law and the General Data Protection Regulations (GDPR) must be complied with.
- iii) Access into the buildings from public areas into semi private and private areas should be controlled via access control e.g. fob, swipe card etc. Entry into all rooms where valuable equipment or information is located should also be controlled and these rooms must be kept locked when not in use. Access control should meet SBD standards and specifications.
- iv) The external doors of the medical centre and pharmacy, those separating public and private areas, and those protecting rooms where valuable property or information is stored should meet SBD standards i.e. PAS 24 2016 or equivalent. Glass in door panels or adjacent to door panels should be laminated. Doors in recesses of more than 600mm should be avoided. Fire doors must not have external door furniture fitted, and meet SBD standards and specifications. They must also be alarmed. Doors that are described as fire doors, or where fire performance is declared or implied, are required to have third-party certification for both security and fire performance. If the centre and especially the pharmacy are not protected by perimeter security, security shutters that meet SBD standards should be considered to protect the external doors especially all external doors of the pharmacy. Doors should also be protected against ram raiding.
- v) All vulnerable external windows should meet SBD standards i.e. PAS 24 2016 or equivalent and be third party tested and certificated. All glass in vulnerable windows i.e. ground floor windows within this development should be laminated especially the pharmacy windows. If the buildings are not protected by perimeter security, security shutters that meet SBD standards must be considered to protect the vulnerable windows. This is especially important in respect of the pharmacy.
- vi) Bin storage areas should be secure areas protected by solid lockable gates. Access into the bin store should be controlled by access control e.g. a digilock.
- vii) Careful siting of power trunking is required to ensure that computers and valuable equipment are kept away from windows wherever possible. High risk and mainframe computers should be secured in a purpose built

room in individual cabinets.

For further more detailed information please visit the Secured by Design website www.securedbydesign.com .

1. **DESCRIPTION OF PROPOSED DEVELOPMENT**

1.1 Background to the proposal.

The medical centre is intended to replace the existing GP surgery at Pentyrch, which currently provides services for the northern part of the Llandaff and Pentyrch Cardiff and Vale University Health Board (CVUHB) Practice Boundary. Services in the southern area are provided by the main surgery at 19a High Street, Llandaff.

1.1.1 The Pentyrch surgery is located in portacabins to the rear of the Village Hall. Prior to this it operated from a dedicated surgery located within a privately owned single storey building at the corner of Temperance court and Bronllwyn, Pentyrch. When the doctor who owned this building retired in 2010 it was sold and in 2014 it was demolished and replaced with a two storey building containing 6 flats.

1.1.2 When the surgery closed, in order to ensure a continuity of service a temporary facility was provided within portacabins in the car park of the Village Hall. This facility was granted planning permission for a temporary period in June 2013 (Ref: 13/00685/DCO) with a condition allowing the use for a period up to June 2016. This permission was subsequently renewed under application 16/01959 in December 2016, for a further temporary period up to until 01 January 2020.

1.1.3 The temporary facility within the portacabins has operated for approximately 8 years. Due to the nature and location of the premises there are issues with Health and Safety, privacy and confidentiality, and there is no space to expand the practice. The CVUHB therefore sought government funding for a new permanent replacement facility and in 2017 Welsh Assembly Government confirmed funding to meet the identified need for a new surgery to replace the Pentyrch Surgery as part of a wider £68m announcement for 19 new health and care centres. Delivery of the scheme was to be by 2021. Since that time, the health care provider has been working with NHS Wales to find a suitable location for the medical centre. That process has led to the identification of this site.

1.1.4 The practice area runs from Canton, Fairwater, Llandaff and St Fagan's in the south to the more rural area in the north, covering the settlements of Groesfaen, Creigiau, Pentyrch, Rhydlafar, Taff's Well and Radyr. It is considered that the facilities in the south of the area are acceptable and therefore the proposed facility is to provide a permanent location for services for the northern part of the practice area.

1.2 The application.

The application seeks full planning permission for the construction of a single

storey / two storey building with a gross external area of 695 square metres, containing a medical centre and pharmacy, along with a 28-space car park, cycle parking facilities and landscaping.

- 1.2.1 On the ground floor there will be a reception and waiting area, 6 no. consulting rooms, 2 no. treatment rooms and a phlebotomy room, along with w.c.'s, baby changing and feeding facilities, utility rooms, storage and admin space. The pharmacy, with a floorspace of 75 square metres, will form the single storey element of the building and will be accessed independently as well as from the lobby of the medical centre. There will be stair and lift access to the first floor which will contain staff rooms, meeting rooms and records storage.
- 1.2.2 The public entrance to both the medical centre and the pharmacy will be on the north side of the building, fronting onto Rhydlafer Drive. The central element of this elevation will be a two storey gabled feature finished in natural stone and render, in contrast to the single storey pharmacy and 1.5 storey main surgery section, which will be in red brick. A canopy will extend across both entrances.
- 1.2.3 Vehicular access will be from Rhydlafer Drive on the north side of the site, with the car park located on the eastern side. The eastern boundary and the southern edge of the site will be landscaped. A strip of land to the south of the building will be left undeveloped to enable future widening of the A4119. Due to the level changes across the site, a gabion retaining wall will be built in the southern section of the site to provide level ground for the development.
- 1.2.4 Proposed opening hours of both the surgery and the pharmacy are 08:00 to 18:30, 7 days per week.

2. **DESCRIPTION OF SITE**

- 2.1 The application site is at the junction of Rhydlafer Drive and the A4119 Llantrisant Road, approximately 1.8 miles, by road, from the centre of Pentyrch, which lies to the north west. The site is bounded to the north and west by Rhydlafer Drive, to the south by Llantrisant Road and to the east by a footpath linking Rhydlafer Drive and Ffordd Gwern to Llantrisant Road, where there is a bus shelter. A narrow belt of trees separates the footpath from the application site.
- 2.1 The site covers approximately 0.39 hectares and comprises well-maintained, grassed highway verge. It is generally flat but the ground falls steeply along the southern boundary, with a maximum difference in levels of around 9m.
- 2.2 The surrounding area is characterised by modern, detached houses to the north and east, with an area of public open space and children's play area immediately to the north on the opposite side of Rhydlafer Drive. Across the highway to the west there is a single storey building containing a nursery and a shop. Beyond Llantrisant Road to the south is agricultural land and the junction with Crofft-Y-Genau Road, which leads to the village of St Fagans around 1.5 miles to the south. Large new areas of housing are being developed to the west along Llantrisant Road, approximately 1.3 miles from the application site, and

to the east around 0.1 miles away. The land immediately to the south east of the site, across Llantrisant Road, is also part of a strategic housing allocation.

3. **SITE HISTORY**

3.1 None.

4. **POLICY FRAMEWORK**

- 4.1 *Cardiff Local Development Plan 2006-2021:*
KP5 (Good Quality and Sustainable Design);
KP6 (New Infrastructure);
KP7 (Planning Obligations);
KP8 (Sustainable Transport);
KP13 (Responding to Evidenced Social Needs);
KP15 (Climate Change);
KP16 (Green Infrastructure);
EN8 (Trees, Woodlands and Hedgerows);
EN10 (Water Sensitive Design);
EN11 (Protection of Water Resources);
EN13 (Air, Noise, Light Pollution and Land Contamination);
T1 (Walking and Cycling);
T2 (Strategic Rapid Transit & Bus Corridors, Bus Corridor Enhancements);
T5 (Managing Transport Impacts);
T6 (Impact on Transport Networks and Services);
C1 (Community Facilities);
C3 (Community Safety/Creating Safe Environments);
W2 (Provision for Waste Management Facilities in Development).
- 4.2 *Supplementary Planning Guidance:*
Waste Collection and Storage Facilities (October 2016).
Planning Obligations (January 2017).
Planning for Health and Wellbeing (November 2017).
Green Infrastructure (November 2017).
Managing Transportation Impacts (Incorporating Parking Standards) (2018).
- 4.3 *Future Wales- the National Plan 2040.*
- 4.4 *Planning Policy Wales (Edition 11 – February 2021):*
2.2 All development decisions, either through development plans policy choices or individual development management decisions should seek to contribute towards the making of sustainable places and improved well-being.
2.27 Planning authorities should ensure that social, economic, environmental and cultural benefits are considered in the decision-making process and assessed in accordance with the five ways of working to ensure a balanced assessment is carried out to implement the Well-being of Future Generations Act and the Sustainable Development Principle. There may be occasions when one benefit of a development proposal or site allocation outweighs others, and in such cases robust evidence should be presented to support these decisions, whilst seeking to maximise contributions against all the well-being goals.

3.4 Meeting the objectives of good design should be the aim of all those involved in the development process and applied to all development proposals, at all scales.

3.6 Development proposals must address the issues of inclusivity and accessibility for all. Good design must also involve the provision of measures that help to reduce the inequality of access to essential services, education and employment experienced by people without access to a car. Design measures and features should enable easy access to services by walking, cycling and public transport.

3.9 The layout, form, scale and visual appearance of a proposed development and its relationship to its surroundings are important planning considerations.

3.11 Local authorities are under a legal obligation to consider the need to prevent and reduce crime and disorder in all decisions that they take.

3.21 The planning system must consider the impacts of new development on existing communities and maximise health protection and well-being and safeguard amenity. This will include considering the provision of, and access to, community and health assets, such as community halls, libraries, doctor's surgeries and hospitals. Health impacts should be minimised in all instances, and particularly where new development could have an adverse impact on health, amenity and well-being. In such circumstances, where health or amenity impacts cannot be overcome satisfactorily, development should be refused.

4.1.11 Development proposals must seek to maximise accessibility by walking, cycling and public transport, by prioritising the provision of appropriate on-site infrastructure and, where necessary, mitigating transport impacts through the provision of off-site measures, such as the development of active travel routes, bus priority infrastructure and financial support for public transport services.

4.1.31 Planning authorities must support active travel by ensuring new development is fully accessible by walking and cycling. The aim should be to create walkable neighbourhoods, where a range of facilities are within walking distance of most residents, and the streets are safe, comfortable and enjoyable to walk and cycle.

4.1.35 New development must provide appropriate levels of secure, integrated, convenient and accessible cycle parking and changing facilities.

4.1.50 A design-led approach to the provision of car parking should be taken, which ensures an appropriate level of car parking is integrated in a way which does not dominate the development. Parking provision should be informed by the local context, including public transport accessibility, urban design principles and the objective of reducing reliance on the private car and supporting a modal shift to walking, cycling and public transport. Planning authorities must support schemes which keep parking levels down, especially off-street parking, when well designed. The needs of disabled people must be recognised and adequate parking provided for them.

4.1.52 Parking standards should be applied flexibly and allow for the provision of lower levels of parking and the creation of high quality places.

6.4.5 Planning authorities must seek to maintain and enhance biodiversity in the exercise of their functions. This means development should not cause any significant loss of habitats or populations of species, locally or nationally and must provide a net benefit for biodiversity.

6.4.25 Planning authorities should protect trees, hedgerows, groups of trees and areas of woodland where they have ecological value, contribute to the

character or amenity of a particular locality, or perform a beneficial and identified green infrastructure function.

6.6.17 New developments of more than one dwelling or where the area covered by construction work equals or exceeds 100 square metres also require approval from the SuDS Approval Body (SAB) before construction can commence. Adoption and management arrangements, including a funding mechanism for maintenance of SuDS infrastructure and all drainage elements are to be agreed by the SAB as part of this approval. This will ensure that SuDS infrastructure is properly maintained and functions effectively for its design life.

4.5 *Building Better Places: The Planning System Delivering Resilient and Brighter Futures - Placemaking and the Covid-19 recovery* (July 2020).

4.6 *Technical Advice Note 12 - Design* (March 2016).

4.7 *Technical Advice Note 18 – Transport* (2007):

9.20 Planning authorities may use planning obligations to secure improvements in roads, walking, cycling and public transport, whether as a result of a proposal on its own or cumulatively with other proposals and where such improvements would be likely to influence travel patterns, either on their own or as part of a package of measures.

9.21 Circular 13/97 sets out the way in which planning obligations can be applied, but practical examples relating to influencing movement to a site include the funding of additional or improved bus services, commuted sums towards new or improved bus and rail interchanges, and improvements to pedestrian or cycle routes which go near the site or make it easier to access the site.

9.23 The objective of using planning obligations in relation to transport should be to secure satisfactory accessibility to sites by all modes with the greatest degree of access being achieved by public transport, walking and cycling. Where improvements to off site transport are necessary before development can take place, a contribution from the developer (payable to the local authority) may be appropriate.

5. **INTERNAL CONSULTEE RESPONSES**

5.1 *Transportation:*

The proposal is to establish a new medical centre with car parking. There are contradictory statements regarding;

- the size of the development (Design & Access Statement (DAS) medical centre – 611m² plus pharmacy 75m². TS – medical centre & pharmacy 797m².)
- number of consulting rooms (DAS – 6 x consulting rooms & 2 x treatment rooms; TS – 9 consulting rooms)
- car park (DAS – 41 spaces including 4 disabled bays; TS – 28 spaces including 3 disabled)
- external footpaths / footways (DAS min of 1.5m width; TS min 2m width).

5.1.1 It has been confirmed (by the Transport Consultant, email 28 April) that we are working with the Transport Statement (TS) and the site plan with regard to size

and numbers of parking spaces (28 including 3 disabled spaces). The TS states that all footpaths (internal) and footways (external) would be a minimum of 2m in width (para 4.3). This would be acceptable, although it is noted that the internal footpath includes a flight of steps. The internal layout does not include an acceptable ramped path within the site, for the less mobile of the visitors. An alternative path using the public footway avoiding the stepped access is illustrated.

- 5.1.2 Public transport access is outlined in the TS. The TS indicates that there are convenient bus stops (although the locations are not illustrated). The bus routes operate Monday to Saturday during the day with no evening or Sunday service. The railway station (Danescourt) is too far to be considered an acceptable walk, but is a 5 minute bus ride from the proposed site. However, there are numerous concerns expressed about the ability of residents from Pentyrch to access the proposed site. Following discussions with the applicant it has been agreed that a S106 contribution, amounting to **£15,000**, will be provided toward the cost of a community transport vehicle to support local community transport and a regular link between Pentyrch and the new site. This has been discussed with the council's public transport operations team.
- 5.1.3 The TS states that the access provides a satisfactory visibility splay. Additional detail on the visibility splay and the existing traffic speeds outside the site have been recorded and provided by the applicant. The applicant has provided a stage one Road Safety Audit (RSA) confirming the appropriateness of the access arrangements. It should be noted that the RSA highlighted shortcomings in the provision of pedestrian crossing facilities. The RSA identified that an uncontrolled crossing with the appropriate tactile paving would be required on Rhydlafar Drive and across the site access. The applicant has agreed to provide the appropriate crossing facilities during the detailed design of the site access.
- 5.1.4 The applicant is proposing 28 car parking spaces. As indicated within the TS the current SPG would allow a maximum of 18 car park spaces (2 spaces per consulting room). It is understood that the on-site parking has been agreed with the local community in response to objections to the proposed site. The applicant is therefore seeking to receive approval for 10 (or 55%) additional car parking spaces. It should be noted that three of the spaces are enlarged disabled parking provision. There are also three spaces which would be blocked in by other parked vehicles. The TS indicates that these spaces would be for staff use only. Again it is understood that the additional "blocked" spaces are at the request of the local community to accommodate staff parking. Transportation are not in support of the provision of non-compliant parking provision (exceeding the maximum stated within the Managing Transportation Impact SPG). It is however understood that the proposed site occupies what is currently a rural area with limited alternative modes of transport for patients visiting the centre. An additional hatched space is indicated at the end of the disabled parking bays. It is presumed this bay is to offer space for deliveries.
- 5.1.5 Cycle parking provision is stated to provide 18 secure covered cycle parking

places within the site. This would be in line with the minimum number of cycle spaces required for a development with 9 consulting rooms in the current SPG. However the site plan appears to indicate a maximum of 10 cycle parking spaces are provided. The applicant has confirmed that the minimum required number of secure and covered cycle parking spaces will be provided on site.

5.1.6 Conditions are requested relating to the design of the site access, cycle parking provision and visibility splays. A S106 contribution of up to **£5,000** is also required which will be used to propose, advertise and install additional waiting restrictions on Rhydlafer Drive.

5.2 *Waste Strategy & Minimisation Officer:*

The proposed bin store and submitted waste management strategy plan has been noted and is acceptable.

6. **EXTERNAL CONSULTEES RESPONSES**

6.1 *Welsh Water:*

We can confirm capacity exists within the public sewerage network in order to receive the domestic foul only flows from the proposed development site.

6.1.1 Surface Water Drainage

As of 7th January 2019, this proposed development is subject to Schedule 3 of the Flood and Water Management Act 2010. The development therefore requires approval of Sustainable Drainage Systems (SuDS) features, in accordance with the 'Statutory standards for sustainable drainage systems – designing, constructing, operating and maintaining surface water drainage systems'. It is therefore recommended that the developer engage in consultation with the Local Authority, as the determining SuDS Approval Body (SAB), in relation to their proposals for SuDS features. Please note, Dwr Cymru Welsh Water is a statutory consultee to the SAB application process and will provide comments to any SuDS proposals by response to SAB consultation.

6.1.2 Asset Protection

Our records indicate that the proposed development is crossed by a 40 inch trunk watermain, the approximate position being shown on the attached plan. Dwr Cymru Welsh Water as Statutory Undertaker has statutory powers to access our apparatus at all times. I enclose our Conditions for Development near Watermain(s). It may be possible for this watermain to be diverted under Section 185 of the Water Industry Act 1991, the cost of which will be re-charged to the developer. The developer must consult Dwr Cymru Welsh Water before any development commences on site. Please ensure easement of 20 metres is maintained, 10 metres either side of the centre of the main. As the 40inch trunk main is a large diameter strategic asset, we advise that the location of this asset will need to be confirmed onsite prior to development in order to ensure the proposed development will not impact this asset. A trace of the water main will need to be conducted by our Operations Team of which will be at the developers expense. We also advise that detail is also submitted in the form of

a Risk Assessment Method Statement (RAMS) prior to the commencement of development in order to ensure the integrity of this strategic public asset. Conditions are requested based on the above.

6.2 *Police Crime Prevention Design Advisor:*

Advice is given on:

- (i) **Perimeter security.**
The whole site should be protected by security fencing/railings at least 2.4 metres high meeting the Secured by Design (SBD) standard. Gates must be of the same height and specification as the fencing/railings and must be kept locked when the centre is unoccupied.
- (ii) **Vehicle access.**
Vehicle access onto the site should must be prevented when the centre and pharmacy are unoccupied.
- (iii) **CCTV.**
The outside and the main entrances into the buildings, vehicle entrances onto the site, the vehicle parking area and bike and bin stores should be protected by CCTV.
- (iv) **Signage.**
Signs should be sited advertising the fact that CCTV cameras are operating in the area.
- (v) **Lighting.**
The whole of this development, especially the vehicle parking areas, should benefit from lighting that meets the British Standard 5489.
- (vi) **Landscaping.**
Maximum surveillance must be maintained across the whole development site. Ideally plants and bushes would only grow to a maximum height of 1 metre. The view of the car parking areas from the buildings must not be obscured by trees or planting.
- (vii) **Vehicle parking area.**
The car parking area must be well lit and protected by CCTV. The perimeter should be clearly defined and access confined to the main vehicle entrance/exit points.
- (viii) **Bicycle stores.**
Bike stores must be secure, lit and overlooked by the building.
- (ix) **Bin stores.**
Bin storage areas should be secure areas protected by solid lockable gates.
- (x) **Building shell security.**
The buildings must be constructed of materials that are resistant to attack. The design must take into account the need to prevent features that aid scaling or climbing and hidden areas must be designed out.
- (xi) **Drainpipes.**
Rain water pipes should be either flush fitting (i.e. square profile) or concealed within the cavities.
- (xii) **Intruder alarm systems.**
The buildings should be alarmed on all floors. Panic buttons should be installed at appropriate locations for use when staff are under attack or are threatened by members of the public especially in the pharmacy.
- (xiii) **Access control.**

Access into the buildings from public areas into semi private and private areas must be controlled via access control e.g. fob, swipe card etc. Entry into all rooms where valuable equipment or information is located should also be controlled.

(xiv) Door security.

The external doors of the medical centre and pharmacy, those separating public and private areas, and those protecting rooms where valuable property or information is stored should meet SBD standards. Glass in door panels or adjacent to door panels should be laminated. Doors in recesses of more than 600mm should be avoided. Fire doors must meet SBD standards and specifications and must also be alarmed. If the centre and especially the pharmacy are not protected by perimeter security as outlined under point (i), security shutters that meet SBD standards should be considered to protect the external doors especially all external doors of the pharmacy. Doors should also be protected against ram raiding.

(xv) Window security.

All vulnerable external windows should meet SBD standards. All glass in ground floor windows should be laminated especially the pharmacy windows. If the buildings are not protected by perimeter security, security shutters that meet SBD standards must be considered to protect the vulnerable windows. This is especially important in respect of the pharmacy.

(xvi) Computers.

Careful siting of power trunking is required to ensure that computers and valuable equipment are kept away from windows wherever possible.

High risk and mainframe computers should be secured in a purpose built room in individual cabinets.

6.3 *Pentyrch Community Council:*

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.

6.3.1 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.

6.3.2 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:

6.3.3 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 Rhydlafer 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 Rhydlafer 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 Rhydlafer.

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 Rhydlafer. 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.

6.3.4 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 Rhydlafer 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.

6.3.5 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.

6.4 *St. Fagans Community Council:*

St Fagans Community Council recognises the need for the current Pentyrch surgery to move to new, more suitable accommodation. We also understand the need for increased GP capacity given the developments happening in North West Cardiff. However we are disappointed that this application is even being considered in its current state. The various documents contain numerous errors and/or contradictions, resulting in an unprofessional application. For example:

- The Technical Note Ecological Constraints and Measures to be Implemented quotes the client as Llanwern Community Council; since this is on page 1 it must have been seen by everyone who looked at the document. We are fully aware that templates are regularly used when preparing applications but we do expect the template to be applied to the subject in question. If the document's author, and anyone who proof read it cannot make the effort to correct such a basic inaccuracy we wonder how much of the document is merely 'template';
- Depending on the document/paragraph, the number of car parking spaces being provided is 25 (Transport Statement) or 28 (Planning Statement 3.12) or 41 (Design and Access Statement 4.22);
- The building opposite the site is either occupied by Curves Women's Gym (Design and Access Statement 3.3) or Cardiff Medical and Mobility (Transport Statement 2.4.7 and Planning Statement 5.13) when in fact it is occupied by Little Haven Nursery;
- Design and Access Statement 4.21 mentions a gross internal area of 686 sqm; Transport Statement 1.1.2 says up to 800 sqm; and
- Design and Access Statement 4.22 says 6 consulting rooms + 2 treatment rooms, Transport Statement 4.1.3 mentions 9 consulting/treatment rooms.

6.4.1 The mention of Curves Women's Gym is further evidence that this site has been under consideration for many years. It is disappointing that there was no consultation or engagement with the local community until so late in the process.

6.4.2 Transport Statement (TS)

We find this severely lacking and question the relevance of much of what is included.

Paragraph 1.1.2 mentions 28 car parking spaces, including 3 disabled. As we noted above, documents submitted with this application do not agree on the number of spaces to be provided.

Paragraph 2.4.7 mentions Cardiff Medical and Mobility being in the vicinity and states that this "would complement the provision of a Health Centre in the location ..". The building in question is occupied by Little Haven Nursery; their website advises that their "custom-designed nursery which was fully rebuilt and re-fitted to spec in 2018". When did the document author last give any serious attention to the area?

Paragraph 2.4.10 states Crofft Y Genau Road "provides an alternate route for vehicular movements travelling to west Cardiff". We understood that the LDP intention was to discourage use of Crofft Y Genau Road as a route to Culverhouse Cross and other areas to the west.

Paragraph 2.4.11 claims that Church Road, at 4.8m-6.5m wide is suitable for two-way vehicle movements. This may apply to cars in most places although the entrance to Pentyrch itself is narrower; a transit van with mirrors is around 2.3m wide. Two vans will be around 4.6m wide. They can pass but only with a few inches to spare. Delivery vans/light goods vehicles such as used for home grocery or parcel delivery are often wider. A transit van, such as used by some community transport groups, could not pass a delivery van. The statement is misleading. Hedgerows and trees along Church Road will require regular maintenance to ensure that the width of the road is not 'narrowed' by growth. We cannot accept the assertion at 2.5.11 that "there is no obvious highway...problem....which could be exacerbated by the proposed development". Church Road is not suitable for increased traffic levels.

Paragraph 2.4.13 mentions a speed limit of 30mph in Pentyrch; some of the village is subject to a 20mph limit.

Paragraph 2.5.8 We assume the reference to "vulnerable road uses" is one of the typos in the document, but we are not sure what point is being made.

We question the relevance of the quotes provided in 3.1. It might be true that "2 miles is a distance that could easily be walked by the majority of people" or that "Five miles is a distance that could easily be cycled by the majority of people". While the statements may be correct taken alone they are too simplistic to have much relevance. The fact that someone can walk 2 miles does not mean that they will do so, or that it would be sensible or practical to do so. It is highly questionable whether the majority of people will even consider walking along Church Road, which is relatively narrow in many places, has no footpaths and is windy with several bends that affect visibility. Much also depends on the circumstances; people who are unwell are less likely to walk or

cycle. Very few people will be prepared to cycle Church Road to visit a GP. The road is not flat and climbs by several hundred feet from Rhydlafar.

Paragraphs 3.2.6 and 3.2.7 acknowledges the lack of cycle routes but mentions that walking and cycling routes are proposed for Llantrisant Road, but there are no dates for completion. Much of TS focus is on Llantrisant Road but the practice area is much wider.

We can find no logic or relevance to the declaration that 3.2km is a “reasonable and appropriate distance”. For what exactly? St Fagans village area is not mentioned although that is within the catchment area for the practice, neither are other areas. Is this only about the presumed catchment area for the Rhydlafar surgery, not the practice?

6.4.3 Bus

Information on bus services is provided, but the services are limited to Llantrisant Road and do not cover much of the practice area. Paragraph 3.4.1 mentions that the closest bus stops are on Llantrisant Road. There is a bus stop on Rhydlafar Drive. The key point here is that there is no public transport between Pentyrch and the proposed development. This is confirmed in paragraph 3.4.6. The same applies to other parts of the practice area. We would comment further on this paragraph but it finishes mid sentence/paragraph “The health centre and local health” so we are unsure exactly what is being said.

No mention is made of the school pick-up and drop-off which are very close to the proposed site entrance. Or the traffic for the nursery - not surprising, perhaps, as the author is unaware of it.

6.4.4 Rail

We regard most of this section as irrelevant to the application. Radyr Station is described as 3.2km from the site, which may be correct, but the recommended walking distance to public transport is 400m to a bus stop and 800m to a rail station. We doubt that most people visiting the surgery will be looking to go from Danescourt to Cardiff Queen Street! What exactly is the point of the diagram of Danescourt Station?

6.4.5 Vehicular Access

We are concerned about the site access which will be close to the bus stop on Rhydlafar Drive. Paragraph 4.2.1 claims that a precedent for access has been set by the building opposite. But visibility to the nursery access will not be affected by waiting buses. Visibility to the surgery access will be affected when a bus is at the stop on Rhydlafar Drive. Other vehicles travelling down Rhydlafar Drive towards the site/Llantrisant Road will be forced to the centre of the road close to the proposed site access. Access will not just be required for cars; it must also allow for delivery vehicles and emergency vehicles; the latter in particular could require access at any time of the day.

We cannot find any evidence that gradient has been considered when assessing visibility. We dispute the claim at 4.2.5 that there will be sufficient visibility.

6.4.6 Paragraph 4.5.4 states that parking demand will be “around 40 vehicles”. We understand and support Cardiff’s wish to promote sustainable transport but do not believe that it should lead to artificial limits on car parking at health centres. 4.5.2 states that people “not feeling well enough to use either public transport or walk/cycle choosing instead the convenience of a private car.” This is a derogatory statement as for people who are unwell, or are taking a sick relative, or a parent with an ill child it is not just about convenience. The number of car parking spaces will not influence whether or not people drive to the surgery; it is wrong to suggest that it will prevent people driving. Failure to provide the appropriate number of car parking spaces will only result in parking on Rhydlafar Drive, which is likely to further impact visibility from the site access.

6.4.7 Paragraph 1.1.2 mentions providing ‘healthcare facilities for around 5,600 residents’. Paragraph 3.1.3 claims a residential catchment ‘of around 8,000 residents’ (admittedly within the questionable 3.2km distance), but this does not allow for ‘additional residential population’ from Plasdwr. We are unclear as to how many patients the surgery is being built for. This is important as it affects the car parking requirements. It is also worth noting the site allows no room for expansion, either of surgery facilities or car parking. In assessing the number of car parking spaces no account has been taken of the traffic visiting the pharmacy. This will not just be Pentyrch residents, but others when passing, for example when going to or from work or other activity.

6.4.8 Construction

Whatever is contained in the CTMP, construction will result in considerable inconvenience to Rhydlafar residents, and we suggest will create potential dangerous situations on the already ‘busy movement junction’ with Llantrisant Road and at the proposed site entrance.

6.4.9 Design and Access Statement

We have already mentioned above some of the inaccuracies/contradictions in this; for example the reference to Curves Women’s Gym (3.3), 41 car parking spaces (4.22) when other documents mention a different number and the disparity in the number of consulting/treatment rooms and the internal sq. metreage. We are left wondering if Assura actually know what they will be building.

Curves Women’s Gym was closed many years ago. This shows how long this site has been under consideration; it is disappointing that there has been no consultation with residents until very recently.

The Site Context Plan at 3.1 shows the bus stops on Llantrisant Road but does not show the stop on Rhydlafar Drive.

We request that 41 car parking spaces (at least) be provided, as stated in paragraph 4.22.

Paragraph 4.34 states that land next to the A4119 will be left undeveloped for future highway widening, but the plans seem to cover the whole site.

Paragraph 4.41 acknowledges that the site is on a “busy movement junction”, but there is no mention of this in the Transport Statement.

Paragraph 7.05 mentions bus stops along Llantrisant Road but makes no mention of the bus stop on Rhydlafor Drive. The latter should be considered because of impact of parked buses on visibility and access.

6.4.10 Planning Statement

Several references are made to Rhydlafor Road (We do not know where this is!) including paragraph 2.6 which mentions bus stops including one “to the north eastern corner of the site on Rhydlafor Road”. We assume this means the bus stop on Rhydlafor Drive, which is missing from the Site Context Plan in the Design and Access Plan.

The Planning Statement fails to acknowledge that there is no public transport along Church Road.

Paragraph 4.10 quotes Planning Policy C1 and C6: “the facility would be readily accessible to the community it is intended to serve by public transport, walking and cycling.” Since none of these can realistically apply to Church Road it is questionable how much existing patients in Pentyrch are being considered; the surgery is not accessible to most existing patients by any of these means. “the facility will not lead to unacceptable parking or traffic problems”. Since the developers seem totally unaware of the nursery (according to paragraph 5.13 Cardiff Mobility Centre occupy the building) and make no mention of the school pick-up and drop-off it is difficult to see how they can claim this.

We understand that as part of this development Pentyrch village will lose their pharmacy. This will cause inconvenience to residents and result in more journeys being made as people need to go further to access the services provided. A pharmacy does more than dispense prescriptions from an associated surgery; it supplies a range of products and people are encouraged to contact the pharmacist for advice. As there is no bus service from Pentyrch (or other areas whose residents might use Pentyrch pharmacy) to the site and it is impractical to walk or, for many people, cycle along Church Road there will be an increase in car journeys. An increase in car journeys will result in increased greenhouse gas emissions. We can find no evidence that this has been considered. Although the increase in emissions will be minor compared to total Welsh emissions neither Cardiff Council nor WG can afford any incremental increase given the commitments in the Welsh Environment Act and the U.K. Climate Change Act. Additionally air pollutants generated such as NOx and SOx will have a slight detrimental effect on the residents of Rhydlafor.

Paragraph 5.4 claims that the site is not in close proximity to any sensitive sites; the Technical Note Ecological Constraints and Measures to be Implemented advises that there are 5 SINC's within 300m, including 2 just 100m away. We would expect these to be recognised as sensitive.

6.4.11 Drainage Strategy

The area surrounding the site is subject to problems caused by surface water run-off. We have been advised that the children’s playground at Rhydlafor is

experiencing ground water problems, the cause of which has not been identified. The playground is close to the site, around 50m. What investigations have been undertaken to confirm that the problem will not affect the site when it is built on?

Paragraph 2.16 fails to mention the small Nant Rhydlafer stream to the east of the site. Are the authors aware of this? It may be worth reconsidering the proposal to connect to a surface water sewer as it may be possible to channel run-off into this watercourse.

Paragraph 6.8 mentions rainwater harvesting. As the facility is being designed from scratch we believe that this environmentally friendly option should be reconsidered. Designing to use roof run-off water for toilet flushes will not add significant cost, would improve the green credentials of the building and may serve to further slowdown run-off.

Paragraph 6.27 deals with surface water sewer collection. Exceedances - the ability to deal with rainfall higher than the 1 in 100 year + 40% climate change allowance - will be dealt with as part of detailed drainage and levels design, with details provided to the SuDS review body for approval. We request that this is made a condition of any approval. Furthermore we request to be statutory consultees for the application to discharge this condition.

6.4.12 Military Activity

The Pre-Desk Study Assessment is for "New Medical Centre, Sachville Avenue, Cardiff." Unsurprisingly the information it contains is not correct for the Rhydlafer site where, for example, there was WWII activity. This is yet another example of the numerous errors referred to in our opening paragraph. Some are more critical to the application than others but together they result in an application that is not fit to be considered in its current state.

6.4.13 Letter from Peacock and Smith dated 15 January 2021

Although not part of the Planning Application we believe that we need to comment on this letter. The letter states that in advance of submitting the planning application 'we engaged with neighbours via a dedicated website and meeting with St Fagan's Community Council'. Ignoring the misspelling of St Fagans, we wish to make it clear that the meeting was at our request. Prior to our request for a meeting we received no consultation or communication from Peacock and Smith, Assura or anyone else involved with the proposed development. We have not seen the results of the survey, nor do we speak for residents of Pentyrch. We are not surprised by the claim that there is support for 'a modern building and improved patient services'. As stated above we understand the need to move to from the portakabins, but that is not the issue. The issue is the location for the modern building. The survey concentrated on facilities, not the location, so can hardly be taken as evidence of support for this development site.

7. **REPRESENTATIONS**

- 7.1 The application has been advertised by press notice, site notice and neighbour notification.

Objections have been received from 98 individuals and from the Rhydlafer Residents Group, and a petition of 59 valid signatures opposing the application has been submitted.

The reasons for objection are summarised as follows:

1. Highway safety
Increased danger, particularly to young and elderly residents, from increased volumes of road traffic. The Llantrisant Road junction is already very dangerous. The visibility splays proposed in the Transport Statement will not be achieved due to Rhydlafer Drive gradients and nearby bus stops.
2. Parking
There will not be enough on-site parking. Patients will park on the street, causing disruption to local residents and compromising visibility splays. It is estimated that overspill parking onto Rhydlafer Drive and surrounding residential streets will be as many as 40 cars during peak usage. Tesco was refused permission to turn the building across the road into an Express store because it could not provide enough parking spaces.
Photographs and videos of an organised demonstration of perceived parking issues have also been submitted.
3. Air pollution
Increased traffic will cause air pollution close to houses and a nursery.
4. Accessibility
People will not walk or cycle to the site as the roads from Pentyrch and Plasdwr are unsafe for pedestrians, wheelchair users and cyclists. The site is not accessible to people who cannot drive. There is no public bus service from Pentyrch meaning all visits will have to be made by car. There has been little consideration of the demographic nature of Pentyrch, with over 25% of its population being over 65 years of age. Patients who are less mobile or do not have transport are more likely to miss appointments or not attend the doctor if they need help.
5. Sustainability
Residents of Pentyrch will be wholly reliant on private transport to attend the surgery. This is unsustainable and contrary to Welsh Government objectives and green policies. Re-location of the pharmacy will also mean a 4 mile round-trip by car to obtain medical supplies.
6. Disruption during construction
There will be considerable disruption to local residents for a long period of time during site preparation and construction.
7. Noise
There will be an increase in noise. The quiet and peaceful character of the neighbourhood will be lost.
8. Light pollution
There will be an increase in light pollution from night time security lighting.

9. Hazardous waste
Hazardous waste will be stored and collected close to housing, play areas and child -care facilities.
10. Privacy
Loss of privacy to the garden and rear living space of a property on Ffordd Gwern due to overlooking windows and loss of trees.
11. Biodiversity
Trees and wildlife will be destroyed.
12. Visual amenity
A visually attractive area at the entrance to the estate will be lost. It would be better used as a wild flower meadow to encourage wildlife. It should have trees planted to shield the estate from the increasing traffic on Llantrisant Road.
13. Loss of open space
The proposed site is green belt and is implied Public Open Space. Its removal is contrary to the Green Corridor objectives of the County Council. The small remaining area of green space in Rhydlafer will be built on. It has been used by the public for decades and has been nurtured and managed by Cardiff City Council as a green space for residents to enjoy and to use. The proposal to build a surgery on this site would be a change of use, without consultation with residents, which may not be legal.
14. Design
The design of the new building is large and out of scale. It represents unacceptable over-development on a very small plot and will detract from the appearance of the area.
15. Flood risk
There will be a risk of further flooding/ excess water on Llantrisant Road.
16. Alternative location for surgery
There is land set aside in the Plasdwr development for a surgery – this facility should be located there. The majority of Plas Dwr residents would need to access this facility by car. New surgery facilities should be provided within the new Plas Dwr development, or within other new developments such as the new housing off Llantrisant Road south of Creigiau.
Five other sites were shortlisted, four of them in Pentyrch. One of these sites would be a better location to serve Pentyrch residents (particularly those who don't drive).
17. Alternative use of site
It would be more appropriate to build new executive homes on this site together with using part of the roadside land to improve traffic flow. This would provide far higher revenue for the land and a higher annual income from Council Tax.
18. Need for the development
The new surgery is not needed in this location as residents of nearby villages are already well served by surgeries (e.g. Radyr, Creigiau, Taffs Well, Danescourt). There is no rationale for supposing that they will use this new proposed surgery.
19. Usefulness
This facility won't be big enough to serve the residents of the large

number of new houses being built.

There is no evidence that the facility will provide a better service for patients or reduce waiting times for an appointment.

Welsh Government funding, announced in 2017, was to be made available to Pentyrch Surgery conditional upon its making 'a significant difference to the care people receive closer to home in their communities'. Due to its size and location it is unlikely that the building would be used by other delivery partners (e.g local authority , housing). The surgery would not share facilities such as parking, nor would it allow alternative uses. Therefore it is inconsistent with the declared Welsh Government strategy.

20. Loss of existing Pentyrch surgery and pharmacy

The Surgery and the Pharmacy are an integral part of the village community and it is important that they remain within the village. Loss of the surgery and pharmacy will add to the deterioration of the community hub of Pentyrch and will affect the mental health of residents.

21. Impact on existing business

There is an excellent pharmacy in Pentyrch – this development will affect their business.

22. Inaccuracies in the application

There are inaccuracies in the application e.g. it states that Cardiff Medical and Mobility operate from the retail unit opposite, which is untrue. The Medical and Mobility business operated a number of years ago. The unit has subsequently been a Spar grocery franchise, a NISA retail outlet, and currently operates as a Pre-School Nursery.

23. Lack of consultation

Local residents were not consulted. There was no attempt to involve patients/residents in any part of the process until the decision had been made and well advanced. Residents of Pentyrch should have been consulted as required under section 183 of the NHS (Wales) Act 2006. There has been no transparency whatsoever with site selection. Freedom of Information requests to the UHB have either gone unanswered or, provided little to no information particularly in regard to the scoring of the 5 short listed sites in Pentyrch compared to the one in Rhydlafer.

24. Motives of Council

If Cardiff Council approves this application it will be doing so in desperation for income and ignoring the concerns of residents.

25. Planning process

The Council is pushing through its own plans and not sticking to the rules it would use for other planning applications.

Cardiff Planning Department has not carried out any site visits to assess the size and suitability of this site for development or carried out risk assessments on the traffic, road safety, wellbeing or environmental implications.

26. Other considerations

The proposal does not accord with the Wellbeing of Future Generations Act or the 'One Planet Cardiff' report.

7.2 The objection from the Rhydlafer Residents' Group includes the results of a

survey which they carried out. 191 people responded. They state that the main findings were:

1. The majority of Rhydlafar residents are registered with Radyr surgery (82%). Only 5% are registered with the Pentyrch surgery.
2. 91% of Rhydlafar residents believe that the problems created by the surgery will outweigh the benefits. Their concerns include –
 - 'There will be inadequate parking on the site' (92%)
 - 'It will significantly increase the volume of traffic and cause congestion' (92%)
 - 'Road access onto the site could be dangerous' (85%)
 - 'It will make our roads less safe' (84%)
3. Overall, 86% of Rhydlafar residents oppose the development.

7.3 19 individual representations have been received in support of the application. Reasons given for supporting the proposals are summarised below:

1. The current surgery is in a portacabin in Pentyrch and is not fit for purpose. It is cramped, facilities for disabled patients are not ideal and there is little privacy, which is an additional source of stress to many patients. Also, the surgery was not able to operate under Covid restrictions due to an inability to make the required changes.
2. The demand for appointments currently outweighs the availability of staff/space. The proposed medical centre, being much bigger than the current surgery, will offer a far more suitable appointment system.
3. Many residents of Pentyrch have been obliged to obtain medical services outside of the village due to the closure of the original GP surgery, and the present surgery, due to its limited size, is unable to accept the volume of patients who would like to return.
4. This move will enable the Practice to expand the scope and range of service provision. There is an ever increasing demand on doctors and pharmacists to provide a wider and more diverse service – an appropriate building is needed to enable this. Many of the services that should be available to patients are currently limited and could be expanded at a better surgery. Patients often have to travel to Llandaff because certain services are not available at Pentyrch or because the Pentyrch surgery is not open on that day.
5. The proposed new building will also serve as a hub for evidence-based research, innovation and education, which will transform future practice and care.
6. The new development will be easily accessible from the main road, with ample car parking facilities, and will be only 2 miles from the current unsuitable surgery.
7. The site is suitable for the proposed use – it was formerly Rhydlafar hospital land.
8. Residents' concerns about additional traffic are unfounded.
9. The provision of a 'flexi' bus service covering Pentyrch, Rhydlafar, Creigiau, Gwaelod y Garth and Taff's Well would resolve most of the objections to the application.
10. This is the best and only way to secure the continued provision of Medical Services for the area. The Practice was unable to identify a

suitable and viable alternative within the village. The failure to secure a new surgery site presents a very real risk that the village could lose its Medical Practice altogether. The need for proper provision of full Medical Services, meeting the needs of the public it wishes to continue to serve, far outweighs the understandable concerns that have been expressed as to the precise location.

11. The quality of the service, the attitudes of the staff, the availability of appointments and the breadth of services available are more important factors than the location of the premises.
12. The relocation of the surgery closer to the site of housing development in the area will match patient demand. The housing development will lead to a busier junction with Llantrisant Road but also improved traffic management and public transport links.
13. The grassy area that is being proposed for development has never been used for recreation. Playing fields and a playground exist 50 metres away across the road from the proposed site.
14. The area including the nursery, playing fields and GP surgery, would become a hub for the community.
15. The new surgery will be easier for patients from Creigiau and elsewhere to access and will be closer to them.
16. Traffic through Pentyrch itself will be reduced.
17. The pharmacy will be happy to move – currently a little over half of its trade comes from the Pentyrch GP surgery. The move will give the business security and a better working relationship with the practice. It is intended that it will offer a delivery service for medication.

7.4 Mark Drakeford MS and Kevin Brennan MP have made the following comments:

There is a clear and urgent need for a new facility for Pentyrch Surgery and we welcome the fact that funding has been secured for this through the Welsh Government's £68 million fund for new primary care facilities.

We are always keen to encourage investment in local services in Cardiff West, and we have consistently taken the view that this must be done in consultation with the local population to ensure that developments maximise the potential benefits and minimise the potential challenges for the communities in which they are located.

With this in mind, we want to highlight some of the points which have been raised with us by local residents which need to be considered as part of this planning application.

1. Patients currently enrolled at the surgery will need to be able to access the new site from Pentyrch village. It would not be desirable for all of these patients to travel in cars along Church Road, and many will not have cars. Assurances will be needed about how patients will be able to travel from Pentyrch to Rhydlafer.
2. Disruption to the roads surrounding the proposed site needs to be minimised. A number of options for mitigation could be considered,

including varied working hours, additional car parking spaces and continued use of the virtual consultation systems which have been developed during the Covid-19 pandemic.

3. The safety and wellbeing of local residents should be at the heart of the new surgery, with due consideration given to this as part of every decision taken. Almost all other GP surgeries in Cardiff West are located within residential areas, and in all cases they work happily alongside their neighbours and have a positive impact in the local community.

8. **ANALYSIS**

8.1 The application site falls within the settlement boundary as defined by the adopted Local Development Plan proposals map and has no specific designation or allocation, therefore the proposal raises no land use policy concerns and is considered acceptable in principle.

8.2 LDP policy C1 (Community Facilities) is relevant to proposals for new and improved health facilities. This policy encourages new health facilities subject to the following criteria being satisfied:

- i. The facility would be readily accessible to the local community it is intended to serve by public transport, walking and cycling;
- ii. The facility would not unduly prejudice the amenities of neighbouring and nearby residential occupiers;
- iii. The facility would not detract from the character and appearance of a property or the locality;
- iv. The facility will not lead to unacceptable parking or traffic problems;
- v. The facility is designed with the greatest possible flexibility and adaptability to accommodate additional community uses without compromising its primary intended use.

8.3 Considering each of these criteria:

i. Accessibility

This issue has caused the most concern amongst residents of the area. The medical centre is intended to replace the existing GP surgery at Pentyrch and provide an enhanced service within the Llandaff and Pentyrch Cardiff and Vale University Health Board (CVUHB) Practice Boundary; however, there is currently no public transport facility linking the new site with Pentyrch, which is around 1.5 miles away, and the road between Pentyrch and Rhydlafer is narrow and lacks a footway, making it unattractive to most people as a walking or cycling route.

8.3.1 In order to resolve this issue, the applicant has agreed with the Council's Transportation officers that a financial contribution will be paid towards the provision of a community bus. Although the site will still be difficult to reach from Pentyrch by bicycle or on foot, there will be a public transport service for those without a car. It is also noted that the practice area covers places such as Radyr, Creigiau, Groes-faen and the new housing being developed along Llantrisant Road close to the application site, which is to incorporate footpaths,

cycle routes and a public transport service. For patients from these areas, travel to the new surgery will therefore be easier than to Pentyrch. On balance, therefore, it is considered that the proposed facility is acceptable in terms of accessibility as it will be readily accessible to the local community it is intended to serve by public transport, walking and cycling.

8.4 ii. The amenities of neighbouring and nearby residential occupiers.

There are no residential properties immediately to the south, north or west of the application site. The nearest houses are to the north west (on Cae Garw Bach, approximately 40m away) and the east (on Ffordd Gwefn, on the opposite side of the footpath and belt of trees). The property on Cae Garw Bach is in an elevated position in relation to the application site and is screened by trees. It has no windows facing towards the site. The garden of the nearest house on Fford Gwern is located at a distance of more than 40m from the proposed building, and more than 14m from the car park, and is separated from the application site by a belt of trees, which are protected by a Tree Preservation Order, and a public footpath. The house itself is more than 65m from the proposed building and does not directly face towards it. Therefore it is considered that there will be no loss of amenity to nearby residents as a result of loss of privacy, loss of light, overbearing impact or general disturbance. Furthermore, the opening hours of the medical centre and pharmacy will be 08:00 to 18:30, therefore there will be no activity on the site at 'unsociable' hours, and there will be no large goods vehicles visiting the site regularly or noisy air conditioning units or other external plant.

8.5 iii. Character and appearance of the area.

The area around the application site is characterised by detached, two storey houses and landscaped green space, with a single storey commercial building on the opposite side of the road junction. There is currently open farmland to the south and east but the land to the south east will become open space within a housing development in the future, as it forms part of a strategic housing site (Plasdwr). The application site is currently a large area of maintained grass highway verge, therefore no trees or other important landscape features will be lost if it is developed. The building itself is well designed, with appropriate detailing and a consistent treatment on all sides, and finished in materials to harmonise with existing buildings in the locality. Its scale and appearance are considered appropriate for this key, corner location. Landscaping will also provide a green setting and partly screen the development. The existing belt of trees on the eastern boundary will be retained, which will assist in integrating the development into its surroundings. Overall, it is considered that the proposed development is appropriate to the character and appearance of the surrounding area and will have no adverse impact on visual amenity.

8.6 iv. Parking/traffic.

The Transport Statement and additional information provided by the applicant's Transport Consultant has been reviewed by the Council's

Transportation officers, who raise no objections to the application. With regard to highway safety, they confirm that there will be satisfactory visibility at the site access and that a pedestrian crossing will be provided on Rhydlafer Drive and across the access. No concerns are raised regarding highway and pedestrian safety or increased traffic in the area.

8.6.1 With regard to parking issues, the proposed number of car parking spaces (28) significantly exceeds the maximum allowed by the current Supplementary Planning Guidance 'Managing Transportation Impacts (Incorporating Parking Standards)' (2018), which is 18 (2 spaces per consulting room). The purpose of setting a maximum limit for car parking spaces is to manage demand for travel by car so as to encourage the use of sustainable modes of transport. A 55% over-provision of car parking spaces would usually be unacceptable; however, in this instance it is recognised that currently there are limited opportunities for patients to access the site by alternative modes of transport, although this will improve as the nearby housing sites are developed (for example, there will be a dedicated cycleway along Llantrisant Road from the east). Transportation officers have therefore raised no objections on parking grounds, subject to conditions requiring adequate cycle parking facilities and subject to obtaining a financial contribution from the developer for the installation of additional waiting restrictions on Rhydlafer Drive.

8.7 Adaptability.

This is a requirement that would normally be applied to new, non-commercial facilities used by local communities for leisure and social purposes, such as leisure centres, libraries etc. Medical centres are included within this policy but, due to the nature of their use, it would not normally be appropriate for them to also accommodate other community uses.

8.8 The proposals are considered to satisfy the above criteria and to comply with LDP policy C1 for the provision of new community facilities.

8.9 Trees and landscaping.

Another significant aspect of this proposal is landscaping and the impact on existing trees and hedgerows, given that there is a belt of trees on the eastern boundary of the site that are protected by a Tree Preservation Order. LDP policy EN8 states that 'development will not be permitted that would cause unacceptable harm to trees, woodlands and hedgerows of significant public amenity, natural or cultural heritage value, or that contribute significantly to mitigating the effects of climate change.'

8.9.1 Although no Tree Assessment is included in the application, it is evident that the proposals avoid development close to the protected trees by placing the building towards the western side of the site and retaining the area adjacent to the trees for landscaping. It is noted also that there is a watermain easement in this location, which prevents built development. There will, however, be hard surfacing for the car park relatively close to the eastern boundary and site levels may also need to be altered. Conditions should therefore be used to ensure that there is no damage to tree roots as a result of the development

and that trees are protected during construction.

8.9.2 The submitted landscaping scheme includes tree planting, wildflower seeding and the introduction of a new hedgerow around the site boundary, and is broadly acceptable. However, the species of tree to be planted should be amended to locally native species and the hedgerow should be made more diverse, which will have a greater benefit in terms of biodiversity. The final scheme may also need to be amended as the submitted soil resource survey does not include considerations such as the structural and textural characteristics of the soil and the suitability of the soil to support the proposed landscape functions. Further details can be required by condition.

8.10 Other issues have also been raised by objectors and supporters of the scheme. These are considered as follows, with reference to section 7 of this report:

8.10.1 Objections

1. Highway safety

This issue is addressed above. Highways/Transportation officers have raised no concerns regarding increased volumes of traffic or pedestrian/highway safety.

2. Parking

This issue is discussed above. Highways/Transportation officers have raised no concerns regarding parking, and the waiting restrictions to be introduced on Rhydlafar Drive will protect visibility splays. There is no evidence of planning permission for use of the neighbouring building as a convenience store ever being refused. With regard to the photographs and videos submitted, the applicant has responded as follows : *'These were taken at an event organized by Rhydlafar residents on 19th November at 10:30. Potential objectors were invited to take part in a 'photo opportunity' requiring cars to be parked for approximately 15 minutes. These photographs are now being circulated to local resident and local members and uploaded onto the LPA website, out of context, implying that this is the current parking situation. The photographs are a false representation of the current situation deliberately designed to mislead members of the public and elected members. Furthermore, these photographs seek to raise objection to a proposal for essential investment in NHS services during a time when Covid restrictions are in place – restrictions which seek to protect the NHS. Whilst we are aware that the Council's highways officers know the site well and will attend site visits prior to making their formal comments, those who are adhering to lockdown regulations may not consider a site visit as essential and may be misinformed by these deliberately misleading photographs. Were anyone content that making a site visit – even remaining in their car – complied with the restrictions, we would encourage them to visit the site at any time to form their own opinion.'*

3. Air pollution

Any increase in traffic will be minimal and will cause an insignificant amount of air pollution, particularly in the context of the increase in traffic

movements along Llantrisant Road as a result of the new housing developments.

4. Accessibility
This is discussed above.
5. Sustainability
Although some patients will have to travel further to access the medical centre, others will not have to travel as far as they do at present, and as there will be a community bus service provided between the application site and Pentyrch, residents will not be wholly reliant on private transport. The medical centre will also be accessible to many of its patients, notably residents of the Plasdwr development, by walking and cycling. It is not considered that there are grounds for refusal of the application for lack of sustainability.
6. Disruption during construction
A construction management scheme can be required, which will minimise disruption caused by building works. Matters such as dust and noise are controlled under environmental health legislation. It would be unreasonable to refuse planning permission on the grounds of any temporary disturbance that would be caused by construction.
7. Noise
Medical centres tend not to be inherently noisy. There are in any case no houses immediately adjacent to the proposed building and any additional noise from cars will be insignificant, given the site's location adjacent to the A4119 Llantrisant Road.
8. Light pollution
A condition can be used to ensure that any lighting on the site is appropriate and causes no disturbance to nearby residents or to wildlife.
9. Hazardous waste
The application includes a waste management strategy which the Council's Waste Management officer finds acceptable. The only waste generated by the medical centre will be the usual clinical and office waste, which any surgery generates, including that in Pentyrch, which is in the village centre close to houses and a community hall.
10. Privacy
There will be no windows facing towards the garden of the property on Ffordd Gwern at a distance of less than 43m (ground floor) and 47m (first floor), and no trees are to be removed as part of the development. The separation distance between the new windows and the existing house is even greater. These distances, along with the retention of the trees, are considered to be adequate for the protection of privacy. The normally accepted minimum distances between first floor windows of a new development and the garden and habitable room windows of an existing dwelling are 10.5m and 21m respectively.
11. Biodiversity
No trees will be lost and the existing mowed grass does not support a diverse range of species. The new development will improve the biodiversity of the site by introducing more trees and creating small areas of wildflower meadow.
12. Visual amenity
The vacant grass verge is not considered to be a particularly attractive

area. The new development will include trees and wildflower planting and will help to shield the residential area from the effects of traffic on Llantrisant Road.

13. Loss of open space

The application site is not 'green belt' – it is within the settlement boundary as defined in the Local Development Plan – and it is not designated Open Space, nor is it within a defined Green Corridor. This is not the only 'green space' in Rhydlyfar – there is a large area of public open space immediately to the north of the application site. The application site has not been 'nurtured and managed by Cardiff City Council as a green space for residents to enjoy and to use' but is highway land which has been maintained as a highway verge. No separate application is needed for a change of use of the land, and residents have been fully consulted on the proposals for the new medical centre in accordance with planning legislation.

14. Design

This issue is discussed above. The design of the proposed building is considered to be acceptable and appropriate to its context. It will not represent 'overdevelopment' but will be surrounded by landscaped space, incorporating the existing belt of trees, and will have an adequately sized car park.

15. Flood risk

The site is not within an area categorised as being at risk of flooding therefore this is not a planning issue. Surface water drainage for the development will be dealt with via a process which is separate from planning permission. The development requires a sustainable drainage system to manage on-site surface water. Surface water drainage systems (SuDS) must be designed and built in accordance with mandatory standards for sustainable drainage published by the Welsh Ministers. These systems must be approved by the local authority acting in its SuDS Approving Body (SAB) role before construction work begins.

16. Alternative location for surgery

This facility will be separate from that provided within the Plasdwr development and will have a different catchment area. If it were provided within the new housing development, it would be even further from Pentyrch. It is noted that other sites in Pentyrch were considered by the applicant but these were all rejected. The reasons for this are not given but in any case it is not possible to insist that the applicant develops one particular site in preference to another.

17. Alternative use of site

The Local Planning Authority must consider the acceptability of the development that has been applied for, irrespective of whether others may prefer an alternative scheme. The amount of revenue generated is not a material planning consideration.

18. Need for the development

The applicant has identified a need for a new medical centre and has secured funding for its provision from the Welsh Government. The proposed facility will provide a permanent location for services for the northern part of the practice boundary and there is no reason to believe that residents will not use it.

19. Usefulness
There will be other facilities to serve residents of the new developments. It is clear that the new medical centre will provide a much better service than is currently possible in the temporary facility in Pentyrch and that, being larger and providing a greater range of services, it is likely to result in reduced waiting times for appointments. It is considered that it will achieve the Welsh Government's funding requirement by providing a much greater range of healthcare facilities within the community, in a 'state of the art' building. The point regarding alternative uses is discussed above.
20. Loss of existing Pentyrch surgery and pharmacy
The local planning authority has no powers to prevent the closure of GP surgeries or pharmacies. This is not a material planning consideration. Refusing planning permission for the replacement surgery would not mean that the existing surgery had to be retained: it is noted that Pentyrch has previously been left without a GP surgery for several years after the previous one closed and no alternative was provided.
21. Impact on existing business
The current owner of the pharmacy in Pentyrch has indicated a willingness to move to the new site and that it will be advantageous to the business to do so.
22. Inaccuracies in the application
The identified inaccuracies are not material to the consideration of the application.
23. Lack of consultation
Any legal requirements of the Health Board to consult local residents about its proposals are entirely separate from the planning process and are not material planning considerations.
24. Motives of Council
The Council as Local Planning Authority has no regard to any financial implications of the development. Only material land use planning matters are to be taken into consideration when the application is determined. The concerns of residents are set out in this report and, as far as they relate to material planning issues, they will be considered in the determination of the application.
25. Planning process
The plans have not been produced by the Council and the planning application is being processed in exactly the same way as any other. Site visits have been carried out by the case officer and the observations of technical consultees on issues such as traffic, road safety and environmental matters, have been obtained and are included in this report.
26. Other considerations
The aims of the Wellbeing of Future Generations Act will be taken into consideration when the planning application is determined as any statutory body carrying out a planning function already has a duty to exercise those functions in accordance with the principles of sustainable development. The aims of 'One Planet Cardiff' are contained in Local Development Plan policies, which are taken into consideration when planning applications are determined.

8.10.2 Support

1. Poor conditions in the current surgery
This provides a background to the application but is not a material planning consideration. The application must be determined on its own merits.
2. Demand for appointments
Although the need for larger premises which can offer more appointments has been identified by the applicant, this also is not a material planning consideration.
3. Patients who would like to return to the practice
This is noted; however it is not a material planning consideration, although it does indicate that there is a demand for larger premises.
4. Improved scope and range of service provision.
This is noted.
5. Research, innovation and education
This indicates that the new building will accommodate ancillary uses and will not simply be a replacement for the Pentyrch GP surgery. It is therefore more easily accessible to many future users in this proposed location than it would be in Pentyrch itself.
6. Accessibility
This is discussed above.
7. Suitability of proposed use
The fact that the land was once part of the grounds of a hospital is not relevant to the determination of this application. The character of the area has changed since that time.
8. Traffic
Concerns about traffic are discussed above.
9. Bus service
There are proposals for a community bus service which will be part funded by the applicant. This issue is discussed above.
10. Risk of loss of practice
This is noted. However, the potential loss of a medical practice from an area is not a material planning consideration but is a matter for the Health Board. The Planning Committee must consider this application on its own merits and come to a balanced view as to whether the benefits of the proposed development outweigh the concerns that have been expressed, and whether those concerns form reasonable grounds for the refusal of planning permission.
11. Quality of service
The suitability of the location of the premises is a material planning consideration, whereas the quality of the service offered is not.
12. Relocation closer to housing developments
It is for the Health Board to determine the level of patient demand. The improvements to the road junction and public transport as a result of the new housing developments will make the medical centre more easily, and safely, accessible.
13. Use of site for recreation
This is discussed above. Residents may have used the site informally for dog walking etc. but it is not designated open space, unlike the park

- and playground opposite.
14. Community hub
It is agreed that the medical centre would bring more activity to this part of the community, which may become a 'hub'.
 15. Easier access for patients from Creigiau and elsewhere
This is acknowledged elsewhere in this report.
 16. Traffic through Pentyrch
Any reduction in traffic in Pentyrch is unlikely to be noticeable.
 17. Relocation of pharmacy
This is noted, although it is not a material planning consideration.

8.10.3 The comments of Mark Drakeford MS and Kevin Brennan MP are noted. The points that they raise are covered elsewhere in this report. The suggestion of varied working hours and continued use of the virtual consultation systems which have been developed during the Covid-19 pandemic are not matters which can be controlled by the planning system. Additional car parking spaces would be contrary to the Council's, and Welsh Government's, policies relating to sustainable transport.

8.10.4 Both the Pentyrch Community Council and St Fagans Community Council have submitted lengthy objections to the application. The points raised in their representations are addressed in the responses to the objectors' comments, as set out above.

8.11 Conclusion.

This application has generated a great deal of concern, particularly regarding transport issues and the loss of the Pentyrch GP surgery. However, the proposed development complies with local and national planning policies and will provide a much improved and more comprehensive health facility, albeit more remote from many of the practice's existing patients. The main issue of concern, which is the current lack of public transport links between Pentyrch and Rhydlafer, will be addressed by the provision of a community bus service, part funded by the developer. On balance, it is considered that there are no reasonable grounds for the refusal of this application and approval is recommended, subject to conditions and to the signing of a S106 obligation requiring the provision of a financial contribution towards the provision of public transport facilities and waiting restrictions on Rhydlafer Drive, as detailed above.

9. OTHER CONSIDERATIONS

9.1 *Crime and Disorder Act 1998*

Section 17(1) of the Crime and Disorder Act 1998 imposes a duty on the Local Authority to exercise its various functions with due regard to the likely effect of the exercise of those functions on, and the need to do all that it reasonably can to prevent, crime and disorder in its area. This duty has been considered in the evaluation of this application. It is considered that there would be no significant or unacceptable increase in crime and disorder as a result of the proposed decision.

9.2 *Equality Act 2010*

The Equality Act 2010 identifies a number of 'protected characteristics', namely age; disability; gender reassignment; pregnancy and maternity; race; religion or belief; sex; sexual orientation; marriage and civil partnership. The Council's duty under the above Act has been given due consideration in the determination of this application. It is considered that the proposed development does not have any significant implications for, or effect on, persons who share a protected characteristic, over and above any other person.

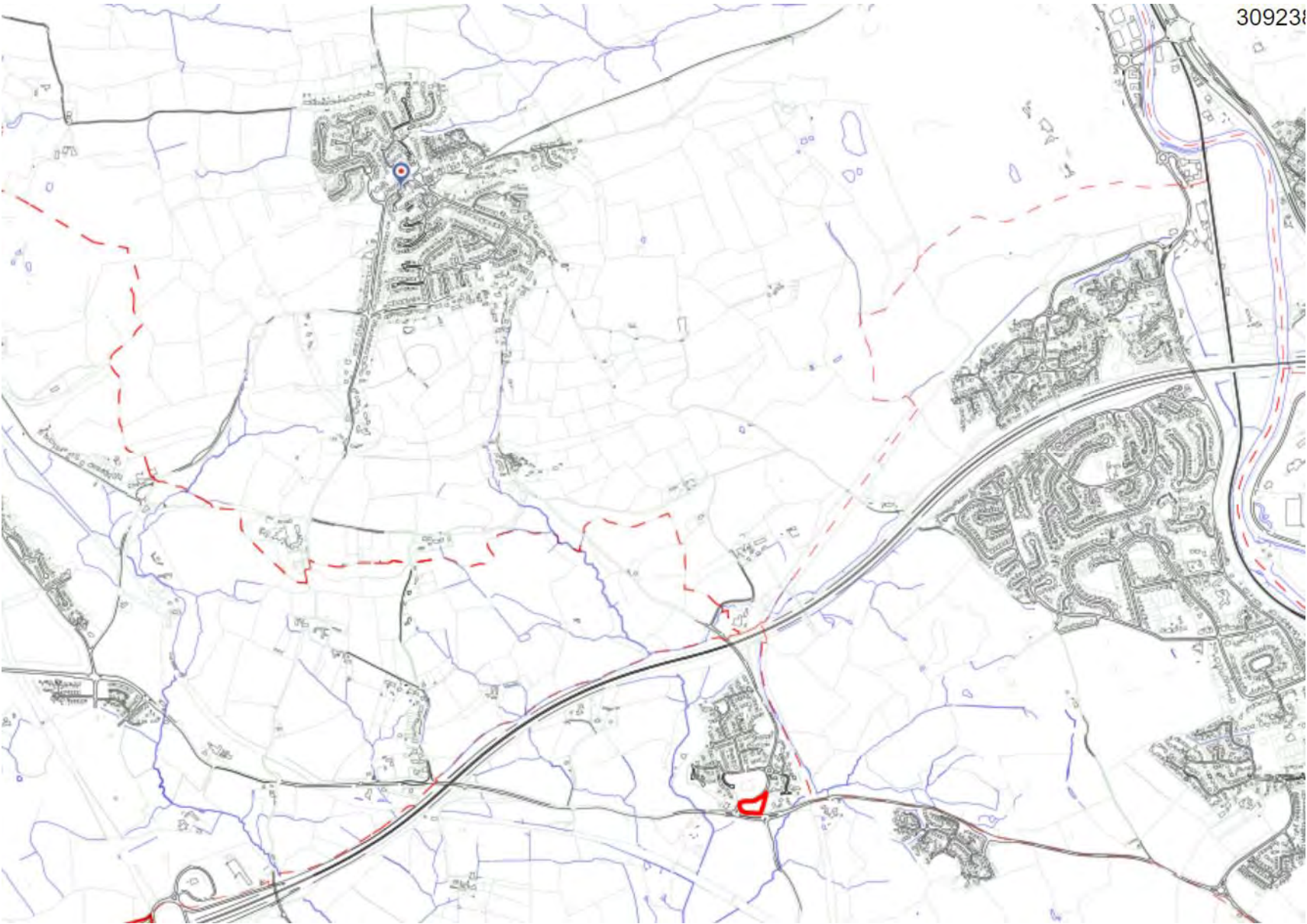
9.3 *Environment (Wales) Act 2016*

The Environment (Wales) Act 2016 imposes a duty on the Local Authority to seek to maintain and enhance biodiversity in the proper exercise of its functions. and in doing so to promote the resilience of ecosystems. It is considered that the proposed development does not have any significant implications for, or effect on, biodiversity.

9.4 *Well-being of Future Generations (Wales) Act 2015*

The Well-being of Future Generations (Wales) Act 2015 places a duty on the Welsh Ministers (and other public bodies) to produce well-being objectives and take reasonable steps to meet those objectives in the context of the principle of sustainable development. The duty to improve the economic, social, environmental and cultural well-being of Wales, in accordance with the sustainable development principle, under section 3 of the Well-Being of Future Generations (Wales) Act 2015 (the WBFG Act), has been considered and account has been taken of the ways of working set out at section 5 of the WBFG Act in the determination of this application, and it is considered that this decision is in accordance with the sustainable development principle through its contribution towards one or more of the well-being objectives referred to in section 9 of the WBFG Act.



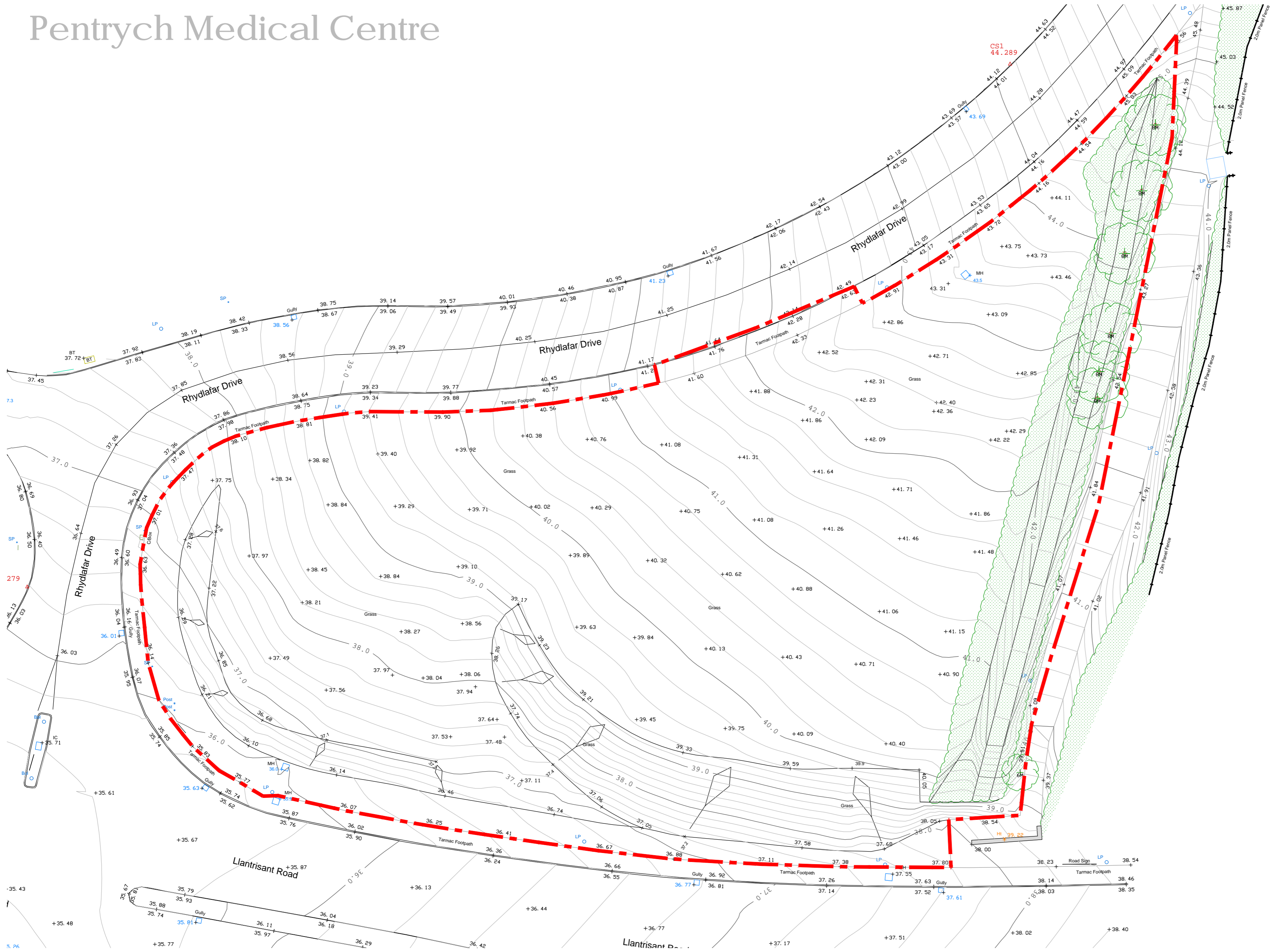




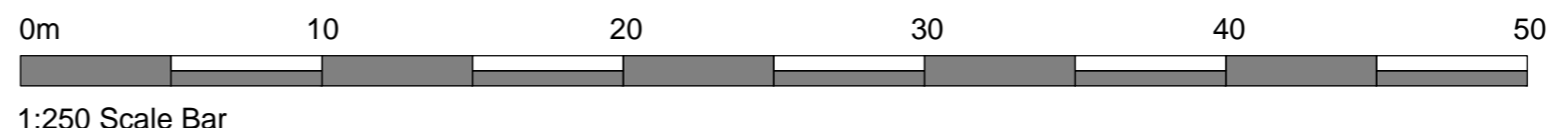




Pentrych Medical Centre



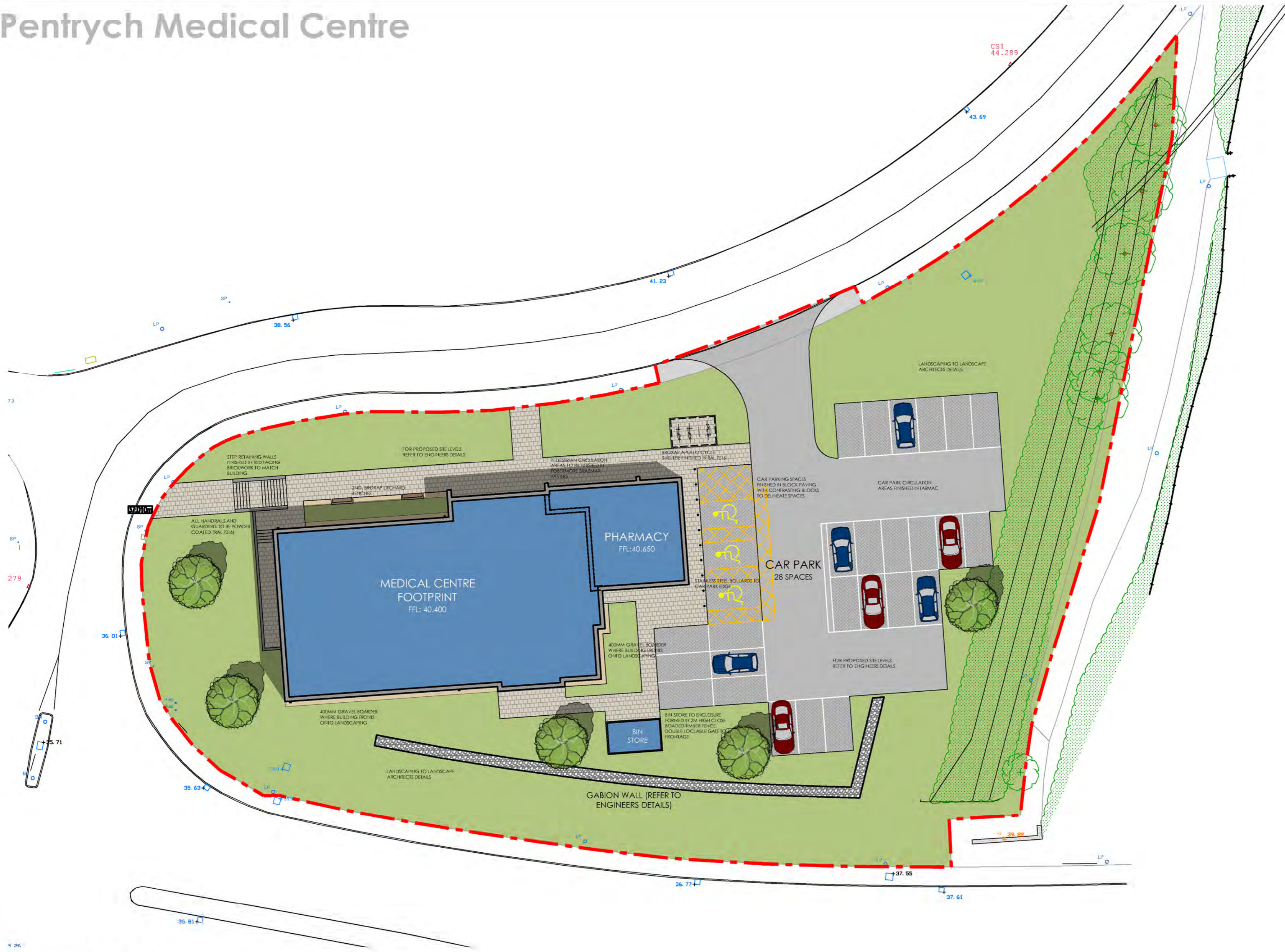
Existing Site Plan
scale 1:250@A2



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| Rev Date | Note |
| Status: | PLANNING |
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| Client: | ASSURA |
| Project: | New Medical Centre Pentrych |
| Drawing title: | Existing Site Plan |
| Drawing number: | 1766-105 |
| Revision: | |
| Date of first issue: | 08-12-20 |
| Scale / Paper size: | 1:250 / A2 |
| Drawn by / checked by: | CC / SW |

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Pentrych Medical Centre



Proposed Site Plan
scale 1:250 @ A2



1:250 Scale Bar

Rev Date Note

Status:
PLANNING



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Pentrych**

Drawing title:
**Proposed Site
Plan**

Drawing number:
1766-111

Date of first issue:
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Proposed Elevations...



North Facing Elevation
scale 1:100@A1



West Facing Elevation
scale 1:100@A1



East Facing Elevation
scale 1:100@A1



South Facing Elevation
scale 1:100@A1

EXTERNAL FINISHES

- ① LOCAL STONE
- ② WHITE THROUGH COLOUR RENDER
- ③ SLATE EFFECT ROOF TILES
- ④ RED FACING BRICKWORK
- ⑤ POLYESTER POWDER COATED ALUMINIUM, (RAL 7012).
- ⑥ POLYESTER POWDER COATED ALUMINIUM WINDOWS - (RAL 7012).
- ⑦ RAINWATER GOODS 150x150mm SQUARE SECTION POWDER COATED ALUMINIUM (RAL 7016).
- ⑧ PV CELL LOCATION
- ⑨ POWDER COATED ALUMINIUM ROOF WINDOWS
- ⑩ INTAKE/EXTRACT LOUVRE, COLOUR TO MATCH ADJACENT MATERIAL
- ⑪ GAS BOILER FLUE
- ⑫ LOCATION OF GREEN GRP INCOMING GAS BOX
- ⑬ DOTTED LINE DENOTES POWDER COATED BALUSTRADE FINISHED IN RAL 7016

| | | |
|---|----------|--------------------------------|
| E | 11-12-20 | Minor revisions |
| D | 08-12-20 | General amendments |
| C | 30-11-20 | M&E information added. |
| B | 30-09-20 | Revised to suit latest scheme. |
| A | 06-05-20 | Material amendments. |

Rev Date Note

Status:
PRELIMINARY

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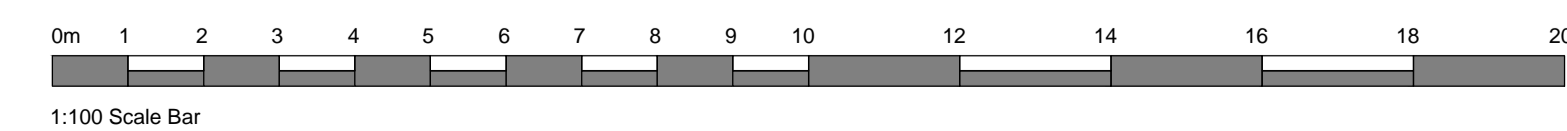
Project:
**New Medical Centre
Penlyrch**

Drawing title:
**Proposed
Elevations**

Drawing number:
1766-300

Revision:
E

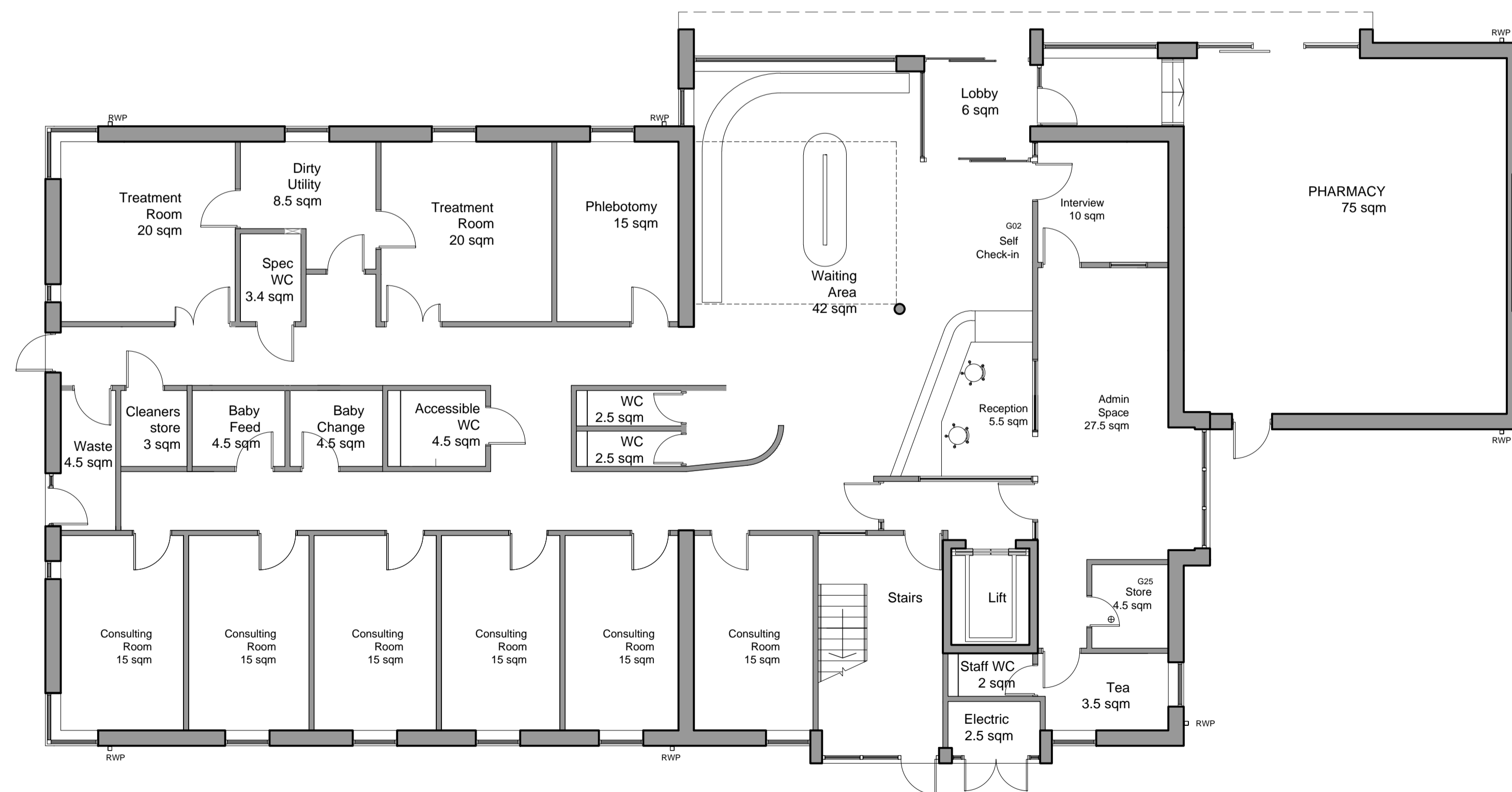
Date of first issue:
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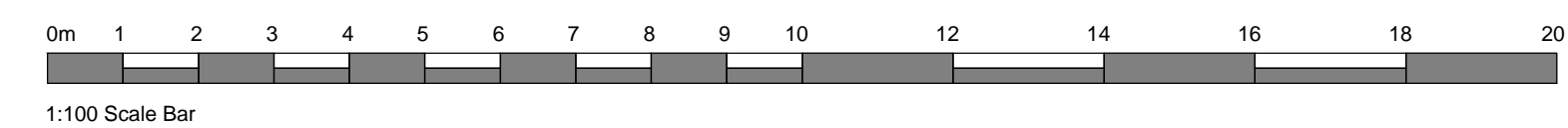
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Proposed First Floor Plan
scale 1:100@A1



Proposed Ground Floor Plan
scale 1:100@A1



Rev Date Note

Status:
PLANNING

Client:

ASSURA

Project:

New Medical Centre

Pentyrch

Drawing title:

Proposed

Floor Plans

Drawing number:

1766-201

Revision:

M

Date of first issue:

13-03-2020

Scale / Paper size:

1:100 / A1

Drawn by / checked by:

CC / SW

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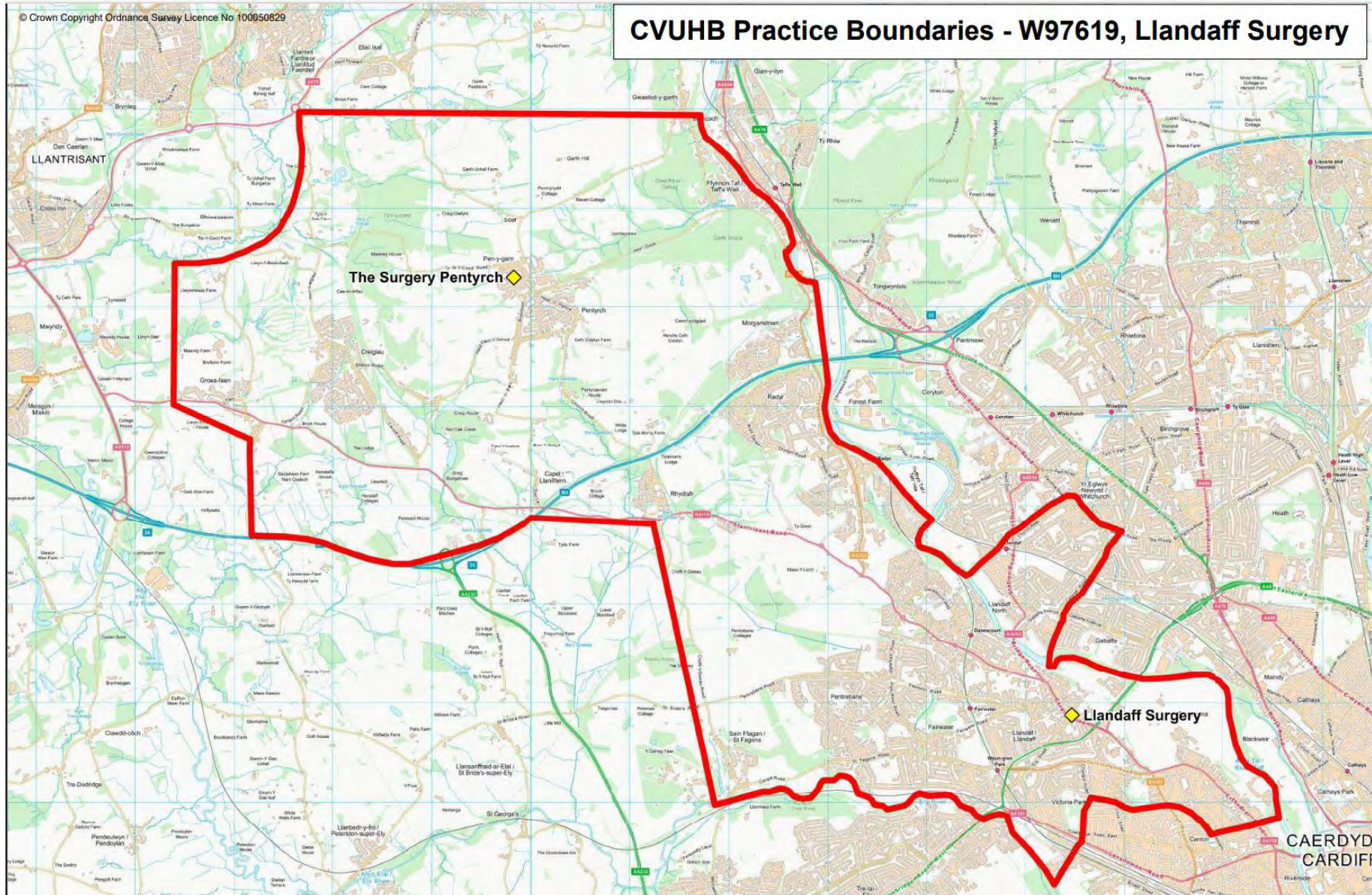
New Northern Medical Centre for Llandaff and Pentyrch Surgeries
1766-301 (rev B) Proposed Visual looking towards entrance from Rhydlafor Drive
December 2020

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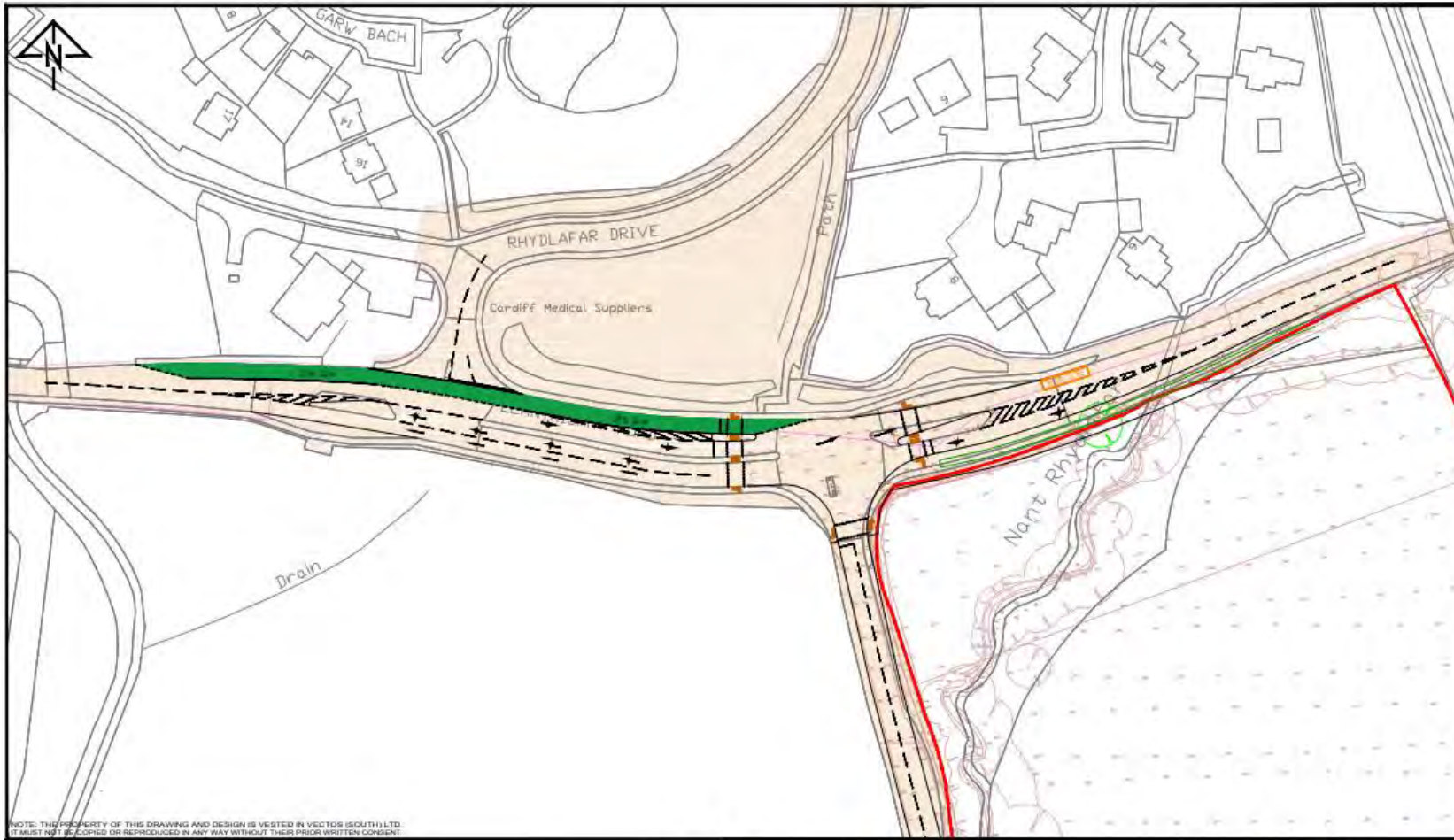


CVUHB Practice Boundaries - W97619, Llandaff Surgery









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| REV | DETAILS | DRAWN | CHECKED | DATE |
|-----|---------|-------|---------|------|
| - | | | | |

Notes:

1. This is not a construction drawing and is intended for illustrative purposes only.
2. White lining is indicative only.

Legend:

Extents of Adopted Highway

North West Cardiff

Llantrisant Road Junction / Croftt Y Genau Junction 1

| | | | |
|-------|---------|----------|--------------|
| DRAWN | CHECKED | DATE | SCALE |
| AP | LIS | 26.09.16 | 1:1000 at A3 |

Redrow Homes

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| | |
|----------------|----------|
| DRAWING NUMBER | REVISION |
| W141304_A01_J1 | J |