

LOCAL DEVELOPMENT PLAN - INDEPENDENT EXAMINATION
Hearing Session 18 – Miscellaneous Policy Matters Thu 24 March 2016
Site MG2 (43) – Land to the East of St Nicholas
Statement by Dr Paul Williams (ID – 1165/1/1)
Development Management Policies

I have made many written objections to the LDP in the past. My statement below seeks to summarise some of the major objections made, setting them out roughly according to the agenda set for this hearing session, as far as it is possible to ascertain what each of the suggested agenda headings should encompass. In this statement the pertinent documents referred to are:

- 01: [The Vale of Glamorgan Local Development Plan 2011-2026 - Deposit plan written statement November 2013 \(Vog LDP Nov 2013\)](#)
- 10: [LDP Affordable Housing Background paper](#)
- 11: [LDP Affordable Housing Viability Study](#)
- 20: [LDP Findings of the Site Assessment Background paper](#)
- 21: [LDP Green Wedge Background paper](#)
- 24: [LDP Housing Supply Background paper](#)
- 31: [LDP Population & Housing Projections Background paper](#)

Does Policy MD1: ‘Location of New Development’ represent an appropriate policy relating to the development of unallocated sites

The document [01 - Deposit plan written statement November 2013 \(VoG LDP\)](#) states on page 94 under ‘Policy MD1 – Location of new development that [‘development will be favoured where it has no unacceptable impact on the countryside.’](#) Any development of this site and planning applications that are currently being considered have a major impact on the countryside. **The proposals to develop the land to the East of St Nicholas directly contravenes policy MD1. They have an unacceptable impact on the countryside**

The policy goes on to state: [4. In the case of residential development, supports the delivery of affordable housing in areas of identified need; There is no demand for affordable housing in St Nicholas](#)
[5. Has access to or will promote the use of sustainable modes of transport;](#)
The proposals’ increase in population, location and existing poor bus services will mean that each resident will have to have a car. This does not promote the use of sustainable means of transport.
[9. Does not have an unacceptable impact on green wedges, sites of importance for nature conservation, special landscape areas and / or the Glamorgan heritage coast.](#)
This proposed development obliterates part of the green field site that separate the City of Cardiff from the Vale of Glamorgan - this has an unacceptable impact on the existing green wedge.

The policy MD1 does represent an appropriate policy. However when this policy is applied to St Nicholas, it is obvious that developments such as those proposed fail completely to comply with these policies. Policy MD1 is very sensibly aimed at ensuring that developments do not have an unacceptable impact. The proposed LDP does indeed have a grossly unacceptable impact. The correct response is to reject the flawed proposed LDP, not change or reject the policy so that a ludicrous LDP can then be approved.

Do Policies MD2: ‘Place Making’ and MD3: ‘Design of Developments’ represent a suitable and appropriate policy framework relating to the design of new developments

- A are both policies necessary given considerable degree of overlap? Should they be merged?
- B should the requirement for energy assessments.... be included in the policy wording

The document **VoG LDP** states on pages 95–97 under ‘Policy MD2 – Place making that proposals should ‘ Respond appropriately to the local context and character of neighborhood buildings in terms of type, form, scale, mix and density. In the wake of this outrageous LDP having been proposed and submitted some time ago, planning applications have been made for the development of 100 houses on 3.9 hectares of land, a density of about 25 houses per hectare. This grossly exceeds the adjacent Conservation Area which has a density of less than 6 houses per hectare. **This is an urban degree of density that is completely out of context with the existing village and Conservation Area – one that would permanently ruin its character and amenity. This planning application directly contravenes policy MD2 (paragraphs 7.5 of the LDP and 4.5 of the Deposit LDP).** It is wrongly claimed at paragraph 2 of the Planning Statement that there is no planning history for the Site. Two planning applications for house construction on part of the Site were refused by VOGC on 10 January 1989 for the construction of 10 houses and on 22 May 1991 for the construction of 6 houses (ref 1988/01152/OUT). **The grounds for refusing permission for the construction of 6 or 10 houses apply even more to the proposed construction of 100 houses.**

In its representations to VOGC on the LDP, the Welsh Assembly Government stated that ‘Allocations in some minor rural settlements, for example, 100 units at St Nicholas and 120 units at Bonvilston **appear disproportionate to current services and facilities.**’ (paragraph B.1(d) of the Annex to the letter of 20 December 2013, VOGC reference P/POL/AMW/LDP3). **The scale of developed in this application is wholly disproportionate to the size of the current village.**

The policy MD2 does represent an appropriate policy. However when this policy is applied to St Nicholas, it is obvious that developments such as those proposed fail completely to comply with these policies. Policy MD2 is very sensibly aimed at ensuring that developments do not have an unacceptable impact. The proposed LDP does indeed have a grossly unacceptable impact. The correct response is to reject the flawed proposed LDP, not change or reject the policy so that a ludicrous LDP can then be approved.

Is Policy MD7: ‘Housing Densities’ appropriate? Is it sufficiently flexible to allow site by site negotiation where evidence suggests it would be justified?

The document **VoG LDP** states on pages 104 under ‘Policy MD7 – Housing Densities that there should be a minimum of 30 dwellings per hectare in Primary settlements and a minimum of 25 in minor rural settlements, and that lower densities will only be permitted where it can be demonstrated that:

1. Development at the prescribed densities would have an unacceptable impact on the character of the surrounding area;
2. Reduced densities are required as a result of previously unknown site constraints or to preserve a feature that would contribute to existing or future local amenity; or
3. The proposal is for a mixed use development where a residential use is the subordinate element of the proposal.

A minimum residential density of 30 dwellings net per hectare will therefore be required for new residential development within the key, service centre and primary settlements of the Vale of Glamorgan. Within the minor rural settlements of the Vale of Glamorgan new residential development at a lower density of 25 dwellings net per hectare will be permitted. This reflects the sensitive nature of many rural villages and the character of existing built form.

The 25 dwellings per hectare is greatly in excess of the currently existing density and so needs to be drastically reduced for any developments in the minor rural settlements to occur so as to be in keeping with the existing character of those settlements. This policy DOES need to be changed to prevent devastation of the character of rural settlements. Any developments should be restricted to existing dwelling densities to have a chance of preserving the character of these settlements for future generations. The application of this density of development in the proposed LDP for St Nicholas does indicate that this policy needs to be changed so as to permit only a much lower density of dwellings for minor rural settlements.