

**Vale of Glamorgan**

**Local Development Plan (LDP) Examination**

# HEARING STATEMENT

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## Hearing Session 26A: Miscellaneous Matters

**Response by Hendre Ltd and Wells Investments (Reference 2439)**

January 2017



## Preamble

Asbri Planning Limited have been instructed by Hendre Ltd and Wells Investments to submit this Statement and attend Hearing Session 26A – Miscellaneous Matters scheduled for 26<sup>th</sup> January 2017.

It is accepted that the Session is not aimed at discussing matters previously covered in relation to specific Alternative Sites promoted. However, we wish to discuss the methodology applied by the Council in the identification of settlement boundaries in Minor Rural Settlements, particularly regarding the need for certainty in relation to future rural affordable housing sites in areas where a demonstrable need exists, and where such sites can support the long term viability of those villages.

## **Hearing Session 26A – Miscellaneous Matters**

The Matters to be Addressed under Questions 4 and 7 of the Inspector's Matters and Issues Agenda are responded to below.

### **4. Is the general methodology/ strategic approach to the delineation of the settlement boundaries at Minor Rural Settlements logical and appropriate?**

1. In the Council Response to LDP Hearing Session 12: Action Point 3 and LDP Hearing Session 1: Action Point 8, it is stated under Paragraph 4 that:-

*'The Council's Hearing statement for session 12 recognised that the settlements identified as Minor Rural Settlements are considered to play an important functional role within the rural Vale of Glamorgan and are considered to be sustainable settlements for the purposes of the LDP Strategy which are capable of accommodating further housing and associated development. Accordingly, in support of the LDP strategy which supports sustainable growth in these settlements, the Council **intends to enable development opportunities that can support of the long term viability of these important rural settlements.** Further to discussions at the hearing sessions, it is considered that the provision of settlement boundaries around them could provide **more certainty** to both local communities and prospective developers about the potential levels of growth in such rural locations.'*

*Therefore, the Council has decided to define settlement boundaries around all of the settlements included in the settlement hierarchy, including all the minor rural settlements as follows: Aberthin, Bonvilston, Colwinston, Corntown, Culverhouse Cross, East Aberthaw, Ewenny, Fferm Goch, Graig Penllyn, Llancarfan, Llandow, Llanmaes, Llysworney, Ogmored by Sea, Pendoylan, Penllyn, Peterston Super Ely, Sigingstone, Southerndown, St Brides Major, St Nicholas, Treoes, Wick and Ystradowen.'*

2. It is contended, however, that the boundaries subsequently drawn mostly reflect those applied in the previous Unitary Development Plan and do not adequately provide for sufficient growth to support sustainable growth, nor do they provide certainty, particularly regarding the location of affordable housing sites. The reasons are discussed below.
3. In the Council's response to Hearing Session 1 – Action Point 6, i.e. *'Are the allocations justified in light of the areas of highest need identified within the most up to date LHMA'*, it is stated under Paragraph 15 that :

*'The LHMA area of **Llandow / Ewenny** only provides some 58% of the identified affordable housing need in allocated sites. This largely reflects the rural nature of the area and the lack of suitable sites for allocation. The area does not host any key, service centre or primary settlements and other than the villages of Colwinston and Fferm Goch where allocations have been made, it only has a handful of the smaller minor rural settlements which scored fewer points in the sustainable settlements appraisal.'*

4. Consequently if the provision of affordable housing in this LHMA area is to meet identified needs, (of approximately 76 dwellings) there will be an emphasis on LDP Policy MD11 (Affordable Housing Developments Outside Settlement Boundaries). The policy largely reflects national policy in allowing rural exceptions sites outside established settlement boundaries, providing that sites are well related to the settlement pattern and of an appropriate scale.

5. The Policy previously applied only to rural areas, but this was changed as a result of Matters Arising Changes. It is stated in the amended text (Paragraph 7.53) that *'there may be instances where housing need arises outside existing residential settlement boundaries or within villages that are not included within the settlement hierarchy.'*
6. MD11 is a criteria based policy, Criterion 1 of which states that *'the proposal meets an identified need which cannot be identified within identified settlement boundaries.'* It is certainly the case therefore that in the Llandow/Ewenny LHMA area such an identified need exists.
7. In the above context Planning Policy Wales, Paragraph 9.2.16 is relevant. This requires local authorities to identify authority wide targets for affordable housing, with expected contributions from various sources, **including affordable housing exception sites.**
8. PPW Paragraph 9.2.18 further states that *'Local planning authorities **may identify** sites for up to 100% affordable housing based on criteria reflecting local circumstances which are set out in the development plan and **relate to the creation of sustainable communities.***
9. The above guidance therefore encourages the specific identification of locations where rural exceptions sites are likely to be considered acceptable in order to create sustainable communities, and also to identify expected affordable housing contributions from such sites. Registered Social Landlords will support future planning applications, and if no certainty is provided, public funds will be used for speculative proposals which are dependent on the interpretation of the policy criteria.
10. The reason for applying settlement boundaries was primarily to establish areas around villages where additional, limited development which reflected the scale of the settlement, could be allowed, rather than relying on a criteria – based policy. In reviewing settlement boundaries of Minor Rural Settlements through the LDP process, the Council has had an opportunity to specifically allow for sites which can deliver affordable housing and contribute to the sustainability credentials of those villages which are not proposed to accommodate housing land allocations.
11. By drawing boundaries which largely reflect those in the previous Unitary Development Plan, around those settlements, and which offer potential only for limited infilling, the methodology applied by the Council has failed to provide any certainty as to where exceptions sites will be permitted, or to support the long term viability of these 'important rural settlements', contrary to the Council's response as highlighted in Paragraph 1 above.

**7. Does the Plan comply with the advice relating to the tests of soundness set out at Section 8.2 of the Local Development Plan Manual, with specific reference to:**

**a. Whether the Plan has regard to well-being goals, as specified by the Well-being of Future Generations (Wales) Act;**

1. With reference to the above it is not considered that insufficient regard has been made to the Well-being goals, particularly in terms of **'A Wales of Cohesive Communities'**, where, by tightly drawing settlement boundaries, and not providing certainty as to where limited extensions to villages can be accepted which allow scope for the development of affordable housing sites, the goal of achieving *'attractive, viable, safe and well-connected communities'* is not likely to be met.