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VALE OF GLAMORGAN LOCAL DEVELOPMENT PLAN EXAMINATION

ADDITIONAL HEARING SESSIONS

HEARING SESSION 24 - NEW ALLOCATIONS

Statement on behalf of The Saving Sully Group

Policy MG2.23 – Land at Upper Cosmeston Farm, Lavernock

Representor ID – 5752

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1.0 INTRODUCTION & BACKGROUND

1.1 This Statement is prepared on behalf of the Saving Sully Group and outlines their objections and concerns with regards to the proposed extended residential allocation on land at Upper Cosmeston Farm, Lavernock.

1.2 **Policy MG2 – 23** allocated 7.8 ha of land at Uppers Cosmeston Farm for 235 residential units. Representations and objections to that allocation were submitted at that stage. Those representations remain.

1.3 As part of the Examination process and a review of the housing figures a need for an additional 600 dwellings was identified. Within the Matters Arising Changes document, the Council aimed to meet this shortfall by way of the following sites:

- New allocation at Llantwit Major 72 units
- New allocation at Oak Court Penarth 145 Units
- Inclusion of the recently granted consent for residential development at Darren Farm, Cowbridge
- An extension to the Pencoedtre site at Barry
- A major extension to the original residential allocation at Upper Cosmeston Farm, Lavernock

1.4 The MAC document increases the Upper Cosmeston Farm allocation from 235 units on 7.8 ha to 576 units on 22.8 hectares. This is an increase of 341 dwellings and represents a 145% increase. This is considered wholly unacceptable for a village settlement such as Lavernock.

2.0 SITE ASSESSMENT ISSUES AS IDENTIFIED ON THE AGENDA

2.1 This section addresses the issues identified by the Inspector on the submitted agenda.

(a) What is the size of the site / how many units are proposed?

The amended site area now extends to 22.8 ha and a total of 576 units are proposed. This equates to a gross density of 23.7 dwellings per hectare.

(b) What is the current status of the site?

The land is currently agricultural land and is therefore a greenfield site. It is considered that greater emphasis should be directed towards brownfield land within the built-up area. In addition, the site falls within the Green Wedge and this designation would need to be deleted. This is inappropriate. The site also falls close to the cliff face and coastline area. Built-up development, is therefore, also inappropriate and would have a detrimental impact on the locality.

(c) Would the allocation contribute towards the Plan's aims, objectives and overall spatial strategy?

It is clear that the increased allocation at Upper Cosmeston Farm would assist in meeting the shortfall in housing numbers which has already been identified during the Examination. However, it is considered that the provision for these additional units should be directed towards brownfield sites initially. Such brownfield sites should be primarily be identified within the major settlement areas such as Barry, Penarth & Cowbridge - although consideration should also be given to other major brownfield sites such as Llandow or St Athan. These sites are of a sufficient size to allow for a critical mass of development to provide the necessary supporting infrastructure. Development now proposed at Lavernock is disproportionate to the size of the existing settlement.

(d) Are there any significant constraints / barriers that would impact upon delivery or associated problems that would make the allocation of the site unacceptable?

It is considered that there are major constraints & associated problems with the development on the Upper Cosmeston Farm site. The concerns of my clients have already been details in the previous submissions.

However, the main issues can be summarised as follows:

<u>Scale</u> – The scale of the proposed additional dwellings more than double the size of the allocation. This is disproportionate to the size of the existing settlement and will have a detrimental impact on the village. Coupled with the recently approved development for 350 units at sully, which is anticipated to increase further to 500, will result in over 1000 dwellings between both Lavernock & Sully. The settlements have only limited facilities which cannot support such a major increase in the population.

<u>Highways & Traffic</u> – A detailed highways report by Corun Consulting Engineers has previously been submitted. This latest report highlighted that the significant increase in scale will only further exacerbate the highway and transport concerns originally raised by Corun in 2013.

The most recent Corun report (28th October 2016) highlights the need for additional highway works would be necessary and that significant increase in traffic level is of primary concern.

The Corun report concludes "Due to excessive vehicular speed within Sully, poor accident record which has deteriorated, and a site that will be heavily dependent on private car use, residential development of the site (MG2 – 23) should not be permitted, whether for 235 or 576 residential units, as it will have an unacceptable impact on Sully residents, in particular road safety".

<u>Green Wedge</u> – The extended residential allocation necessitates the deletion of the Green Wedge designation which covers the site. The Green Wedge designation has been in place for some time was done in order to prevent coalescence and the area remains an important area of open space, close to the cliff face, an area of coalescence which should be protected.

(e) What are the timescales proposed?

These representations are objections on behalf of local residents, who have no control over the potential development programme, although it is understood that there has been developer interest relating to the site.

3.0 CONCLUSION

3.1 In conclusion, this Hearing Session is held to examine the proposed new allocations for inclusion within the LDP. These specific representations relate to the proposed increase in the residential allocation at Upper Cosmeston Farm, Lavernock from 235 dwellings to 576 units. This is considered to be wholly unacceptable and the proposal should be rejected.

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4th January 2017