

Examination Statement



Bilfinger GVA
St Catherine's Court
Berkeley Place
Bristol
BS8 1BQ

Vale of Glamorgan Local Development Plan

Hearing Session 24 – New Allocations
Examination Statement on behalf of St Modwen
(in relation to land at Sully Sports & Social Club)

Representor ID - 7459
January 2017

1.0 Introduction & Background

- 1.1 This statement seeks to build upon the detailed representations submitted by GVA on behalf of St Modwen Developments Ltd in relation to the Matters Arising Changes Consultation (MAC) in October 2016. St Modwen's interest relates to the identified new housing allocations and the implications for their land interests at Sully Sports and Social Club in South Road, Sully.
- 1.2 The site at Sully has been subject of a hybrid planning application (2015/00843/FUL) for the redevelopment of the existing sports club to provide new club facilities including club house, all weather and grass pitches, gym and caravan site on approximately half of the site and upto 200 dwellings on the remainder of the site. Whilst the application was refused by the Development Control Committee in November 2016 the reasons for refusal focus solely on the basis of the site being situated outside (but adjacent) to the settlement boundary and inside the green wedge. The officer's committee report confirmed that there were no technical reasons for refusal and there were no outstanding 'technical' objections to the scheme. The proposals provided a fully compliant Section 106 package and officers acknowledged within the report that the location is sustainable so there was no overall conflict with the development strategy of the Plan. Furthermore officers recognised that material weight should be given to the fact that residential development would enable the long term future provision of sports and community facilities.
- 1.3 We believe that the Council has failed to demonstrate a sound and evidenced approach leading to the identified new allocations. We see no justified evidence to explain why the new allocations have been considered ahead of the land at Sully Sports which out performs the new sites when assessed against the Council's own Sustainability Appraisal (as demonstrated within our previous representations to the MAC consultation).

2.0 Site Assessments

What is the size of the site/ How many units proposed?

- 2.1. We refer to the 'sites' as those listed within the agenda being MG2.11 West of Pencoedtre Lane, Barry, MG2.XXA Former Eagleswell Primary, Llantwit Major, MG2.23 Upper Comeston Farm, Penarth and MG2.XX Adjacent to Oak Court, Penarth. The allocations appear to be made on grounds of convenience rather than being based upon sound and considered evidence. We have not seen a robust and justified site capacity assessment to confirm that the dwelling numbers proposed can actually be delivered.

What is the current status of the land?

- 2.2 Unlike the land at Sully Sports and Social Club the 'sites' are as far as we are aware in public ownership and are not being actively promoted through the Local Plan or application process by developers or house builders. We are also not aware of any formal marketing process for bringing these sites to the market. Furthermore we understand that the Comeston Farm site includes an existing livery business which may be lost should the development proceed. The Sully Sports site will provide a completely contrary position on the basis that the proposed development will actually secure the future of the existing club facilities and jobs, which would otherwise be lost. The Sully scheme will also deliver additional new jobs and significantly improved and enhanced community and sporting facilities.

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

- 2.3 Our MAC representations have demonstrated that the selected new allocations are not the most appropriate options in terms of meeting the sustainability objectives of the Plan. In particular we have demonstrated that the allocation at Upper Comeston Farm (Extension to Site MG2 (23)) performs very poorly in meeting the sustainability credentials, it is in fact the worse of all of the new sites as shown the table below (extracted from our previous representations to the MAC consultation).

2.4 Furthermore the proposed allocations are not the most appropriate in terms of deliverability and therefore contribution towards meeting the Plan's housing requirements in the short term. The land at Sully Sports Club would contribute towards meeting the Plan's aims, objectives and being in accordance with the overall spatial strategy.

Effect summary table including Sully Sports Site

Rank	Most Sustainable to Least Sustainable	Site	++	+	0	-	--	?	+/-
1		Sully Sports Club (Planning application 2015/00843/FUL)	6	6	1	2	0	0	0
2		Land Adjacent to Oak Court Penarth (XX)	6	5	2	0	0	0	0
3		Former Eagleswell Primary School (XXA)	4	4	6	1	0	0	0
4		Land West of Swanbridge Rd, Sully (MG2 (46)) – SA Addendum 2015	4	3	7	0	1	0	0
5		Extension of land to West of Pencoedre Lane, Barry (MG 2 (11))	2	5	5	3	0	0	0
6		Upper Comeston Farm (Extension to Site MG 2 (23))	2	6	2	4	0	1	0

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

2.5 We note that there have been significant numbers of objections to the proposed new allocations in the MAC consultation, most notably with regards to the land at Upper Comeston Farm. We have highlighted a long list of constraints within our representations and we note that further MAC response comments appear to focus

on significant technical and landscape concerns with regards to the Comeston Farm scheme. The Council's evidence does not at this stage provide sufficient reassurance that these issues can be overcome.

- 2.6 Whilst the Council has indicated that they have consulted with technical officers and statutory consultees on the proposed allocations these responses appear to have been undertaken at very high level and in a very short timescale. The responses cannot have been considered in any level of detail or on a comparable assessment to a scheme subject of a planning application such as Sully Sports which has been confirmed as 'technically' sound in planning terms with no statutory technical objections.
- 2.7 The Comeston Farm site has significant infrastructure requirements including a new primary school which will have major delivery implications. At this stage we have not seen a robust viability appraisal of the site and therefore any confirmation that the scheme can be delivered or if a policy compliant affordable housing provision can be made.

What are the timescales proposed?

- 2.8 The strategic nature of the Comeston Farm site (given the wider development area) will raise concerns regarding the overall timescale for deliverability of the site. The other sites appear to remain within public ownership and therefore questions arise regarding timescales for bringing them to the market and final delivery.

3. Any Other Matters

- 3.1 We seek further confirmation that the Council's assessment of the proposed new allocations within the MAC consultation are robustly considered as from the outside the exercise appears to have been fast tracked without sufficient due diligence. There is no formal evidence of consideration of alternative sites despite officers confirming to us that the Sully Sports site was considered in a shortlist of sites in the lead up to publication of the MAC consultation document. No reasons can be given as to why the Sully Sports site was discounted despite clear evidence that we have provided (within our response to the MAC consultation) to demonstrate that it out

performs the chosen sites when assessed against the criteria that the Council used to make these allocations.