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The LDP Team,
Vale of Glamorgan Council

By Email: ldp@valeofglamorgan.gov.uk

Dear Sir /Madam

**VALE OF GLAMORGAN LOCAL DEVELOPMENT PLAN 2011-2026
HEARING SESSION 26A: MISCELLANEOUS MATTERS, AGENDA ITEM 5
REPRESENTOR ID: 7473
HMS CAMBRIA, HAYES LANE, SULLY CF64 5XU**

This Statement is submitted on behalf of Mark Donovan of Penarth Industrial Services Ltd (Representor ID: 7473), as landowner of HMS Cambria, in relation to the Vale of Glamorgan Local Development Plan 2011-2026 (LDP) Hearing Session 26a: Miscellaneous Matters Agenda Item 5. Agenda Item 5 states:

MD16A: Protection of Existing Employment Sites - What is the rationale for including HMS Cambria within the Existing Employment Site identified by at Policy MD16A: (3) Atlantic Trading Estate, Barry?

The Representor's position is unchanged from the representations submitted to the Matters Arising Changes Consultation – that is that HMS Cambria be excluded from the Existing Employment Site allocation identified by Policy MD16A: (3) Atlantic Trading Estate, Barry. The previous representations should be referred to for consideration, and are summarised below for completeness.

HMS Cambria is located to the southern end of Hayes Lane and adjacent to the coastline. It was previously occupied by the Royal Naval Reserves as a training facility. The operations associated with HMS Cambria are being re-located to Cardiff Bay. Images of the proposed facility are provided below:



Source: Reserve Forces and Cadet Association

It is accordingly evident that the use of facility and its land use context is distinct and separate from the Atlantic Trading Estate. As such, it is not considered appropriate for the site to form part of the proposed Existing Employment Site allocation with the adjacent Atlantic Trading Estate.

Notwithstanding the current position of the site, its previous use was predominantly residential in nature with the majority of buildings being dwellinghouses for naval personnel in post war years. Eight residential dwellings are currently located on-site. Images of the buildings on site are provided below:



Photographs of HMS Cambria

As can be seen from the images above and overleaf, the site has an underlying residential nature and character. Moreover, it is discreetly accessed from Hayes Lane, and does not share its approach or access point with the wider employment uses of the Atlantic Trading Estate. It is accordingly considered that the site's character is more akin to a residential settlement, as opposed to the Atlantic Trading Estate to the west and an Existing Employment site. Its residential character, along with the adjacent 'Spider Camp' site (which was used for barracks), is shown on the historical photograph below dating from 1968.



Historic Photograph (dated 1968) of HMS Cambria (adjacent to coast) and Barracks of Spider Camp (to the north)

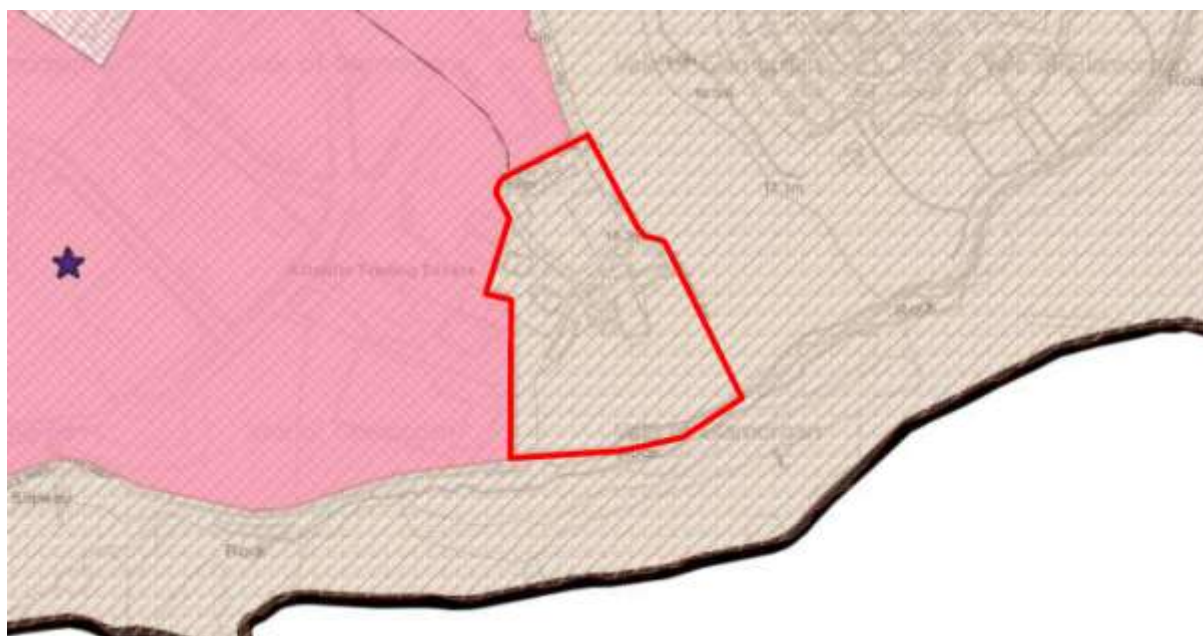
Whilst the site is positioned adjacent to the east of the Atlantic Trading Estate, where a range of business uses are present, to the east of the site is located the former Sully Hospital, which is now in residential use. Residential uses are also located to the north of the site at Hayes Road and Bendrick Road. In addition, it should be noted that the site lies within proximity of a proposed Housing Allocation within the LDP (MG 2 (16) for 55 units.



Aerial Photograph: illustrating HMS Cambria, employment uses and other residential uses (existing and allocated)

In addition to the differences in character between the site and surrounding employment uses in the area, there is a substantial change in levels between HMS Cambria and the Atlantic Trading Estate. This ensures that there is an element of visual separation between HMS Cambria and the Estate.

In planning policy terms, the site is currently not allocated for any particular use, and is within a 'Countryside' location, as shown on the UDP extract below:



UDP Proposals Map Extract: Site Edged Red, Employment Allocation EMP1(1) shaded pink

In light of the residential character and nature of the site, and it being discrete and separate from the employment uses of Atlantic Trading Estate, it is considered more appropriate for the extent of the proposed Existing Employment allocation to follow the alignment as currently shown for Employment Allocation EMP1(1) within the UDP.

By way of additional context, as identified within the Representor's representations to the Matters Arising Changes consultation, proposals for the site are currently being advanced in conjunction with being worked up in conjunction with the Former Spider Camp Land and Land at Hayes Wood. These two parcels of land are described relative to HMS Cambria (a) and shown on the aerial photograph below:

- b) Former Spider Camp Land: Located to the north of HMS Cambria, and to the west of Hayes Lane, which is comprised of currently vacant land and includes some derelict structures and hardstanding areas, albeit substantially cleared. The land was a former barracks site, and therefore has previously been in residential use. The site therefore represents previously developed, brownfield land.
- c) Land at Hayes Wood: The site is located to the east of Hayes Lane which is currently undeveloped and bound by the access road to Atlantic Trading Estate to the north and Hayes Wood to the south.



Aerial Photograph

In conclusion, it is considered that the active protection of 'Employment Uses' at HMS Cambria is not considered appropriate – not least given the site's existing and historical context. Accordingly, it is considered, for the reasons aforementioned and to ensure the Plan's soundness, that HMS Cambria be excluded from the Existing Employment Site allocation identified by Policy MD16A: (3) Atlantic Trading Estate, Barry.

We look forward to attending the hearing session in due course. In the meantime, we hope and trust that all is in order with this submission. Please do not hesitate to contact us in the event that further information is required or considered beneficial.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Geraint John', with a stylized flourish at the bottom.

Geraint John
Director
Geraint John Planning Ltd.