

Page reference:

Para reference: 8.5.1 - 8.8.2

Rep Type: Objection

Comment:

See attached comment form and tables.

STRATEGIC OPTIONS PARAS 8.5.1 – 8.8.2

We object to the process of identifying and considering strategic options which has excluded the specific consideration of a new settlement at the former Airfield at Llandow. Options 4 and 8 refer to a new rural settlement but because of the assumption that a new settlement would have to be 4-5000 dwellings Llandow has not been considered. The proposal for Llandow is the only Candidate Site submitted for a new settlement and has not been given consideration. The UDP Inspector in his report (November 2000) stated "I believe the redevelopment of Llandow should be reviewed later in the plan's life...to define a new settlement at the objection site at this stage would be premature". Llandow should be considered as a strategic site and as such should be subject to a full sustainability appraisal. Up to now Llandow has not been specifically considered and if the draft Preferred Strategy is adopted by the Council then it will not be given consideration and will not be subject to the review as recommended by the UDP Inspector. This situation is totally unacceptable and makes the plan unsound.

Paragraph 8.6.3 states that the appraisal indicated options 5, 7 and 8 performed best against the SA objectives. However an analysis of options 5, 7 and 8 based on the Council's own scoring system indicates that option 8 overall performs the best. Option 8 refers to a new rural settlement and no appraisal has been undertaken specifically relating to Llandow new settlement. If it had been undertaken either under option 8 or in combination with option 5 then this would score even higher. It is considered that the Council should undertake an assessment which combines option 5 with Llandow or option 8 specifically relating to Llandow new settlement rather than a new rural settlement.

We have undertaken our own assessment which combines option 5 with Llandow or option 8 specifically relating to Llandow new settlement. This assessment is attached and is compared with Options 5 and 8. The combination of option 5 (or option 8) and Llandow does not only score higher than option 8 but also considerably higher than option 5 which is the Council's Draft Preferred Strategy. The combination of option 5 or 8 with Llandow has the strongest performance when measured against the 15 sustainability appraisal objectives. We request that our assessment is validated by the Council's consultant, Hyder (the costs incurred will be paid for by Barratt and Persimmon).

Paragraph 8.6.3 states that the benefits of option 8 would be more limited as the majority of development may be focused on the new settlement. We do not consider this to be the case in respect of the proposals for Llandow new settlement. The proposal that has been submitted for Llandow is for 2750 dwellings. When this matter was discussed at the stakeholders workshop the assumptions that were made was that a new settlement would be of a much larger scale and would take up to 80 – 90% of the housing requirement. This is not the case with regard to Llandow. On the basis of the dwelling requirement of 7500, Llandow would take up to 37% of the requirement and on the basis of the proposed 11000 dwellings, Llandow would take up 25% of the housing requirement. The assertion in paragraph 8.6.3 therefore that the benefits of option 8 would be more limited, as the majority of development may be focused on the new settlement cannot be substantiated.

8.7 Consideration of other plans, policies and programmes in determining the Preferred Option.

Paragraph 8.7.2 claims that the proposal for a new rural settlement would be contrary to the advice contained within Planning Policy Wales and reference is made to paragraph 9.2.3 of PPW. The housing section of PPW was revised by the Ministerial Interim Planning Policy Statement 02/2006 in June 2006 and the correct reference is therefore paragraph 9.2.7 of the Ministerial Interim Planning Policy Statement 01/2006 which now precedes the search sequence identified in paragraph 9.2.8.

The development of a new settlement at Llandow does not conflict with PPW. PPW advises that the search sequence should be: the re-use of previously developed land and buildings within settlements, then settlement extensions and then new development around settlements with good public transport links; and that a new settlement (on a Greenfield site) would need particular justification. This advice is clearly focussed on Greenfield sites. Sustainable development means choosing sites where previous development has occurred as well as choosing sites which can with present and / or improved infrastructure help to reduce the need to travel, or to travel as far by car. Llandow is substantially a Brownfield site, it is in a sustainable location adjacent to a railway line and will provide a sustainable mixed-use development. It will not compete with regeneration in Barry and other towns in the Vale and would offer significant advantages over the expansion of existing town and villages. Therefore it does not conflict with PPW.

Paragraph 8.7.3 repeats the concern that a new settlement would potentially detract or limit opportunities for regeneration in areas such as Barry and the re-use of existing Brownfield sites within existing settlements. Reference is made to a recent research document, "Best Practice in Urban Extensions and New Settlements" which states that a new settlement to be sustainable should be a minimum of 4000 – 5000 dwellings, as this is the minimum size of settlement to support a secondary school. This report includes 7 case studies, five of which are urban extensions and two are for new settlements. One of the new settlement case studies is of Dickens Heath, Solihull, which contains 1672 units (no secondary school), local shops, medical facilities other community facilities and a new primary school. The report states that a sense of community cohesion has been established as borne out in a range of retail, restaurants and commercial uses in the village centre. The comprehensive school at Solihull is three miles from the new settlement and as such is a similar situation to Llandow where the nearest comprehensive schools are only 2 – 3 miles away at Llantwit Major and Cowbridge. Despite it not having a comprehensive school Dickens Heath is considered to be a successful development.

We would accept that a new settlement which is remote from other settlements would have to be of a minimum size of 4-5000 dwellings to be sustainable. However, this is not the case with Llandow which is in a public transport corridor, adjacent to a railway line and is in close proximity to Cowbridge and Llantwit Major which have comprehensive schools.

Prior to the submission of Llandow as a Candidate Site, discussions also took place with the Vale of Glamorgan's Education Department who informed us that in the event that Llandow were to proceed a secondary school was not required as it was intended to focus attention on the rebuilding and reinvestment in Llantwit Major and Cowbridge comprehensive schools. These considerations have been taken into account in drawing up the proposals for Llandow and it is accepted that significant contributions would have to be made to Llantwit Major and Cowbridge comprehensive schools for further investment.

We therefore do not consider that it is necessary for Llandow to be a minimum of 4-5000 dwellings and that the proposal at Llandow for 2750 dwellings would provide a sustainable development. This was recognised in the Report of Consultations of the Stakeholder Workshop produced by Hyder in Para 2.5.8 which states " At Llandowthere is already an existing employment base which requires an improved transport networkwould result in a sustainable community where there is already a demand for such improvements". The concern therefore that is expressed in paragraph 8.7.3 that a new settlement of 4-5000 dwellings would not allow the Council to address economic and social issues elsewhere in the Vale is unfounded. The redevelopment of Llandow is not to be seen as being in competition with opportunities for regeneration in Barry and the other towns in the Vale. As is recognised by the Council the opportunities for regeneration in the towns of the Vale of Glamorgan are depleting and

will continue to do so. The major regeneration initiative in the Vale of Glamorgan is the Barry Waterfront which has already been acquired by national house builders who are committed to the scheme and it is likely that a significant element of the scheme will be completed prior to the implementation of the Llandow new settlement. Owing to the declining availability of Brownfield sites within the Vale, if Llandow is not allocated in the LDP then the alternative choice the Council have will be to allocate additional Greenfield extensions to the towns and villages. These sites will be entirely Greenfield, may be in special landscape areas and could increase the potential for coalescence of main settlements. If Llandow new settlement were to be allocated then there would be less of a requirement to allocate urban extensions.

Paragraphs 8.7.6 and 8.7.7 include the potential positive and negative effects of the Draft Preferred Strategy Option 5. All of the potential positive effects would equally apply to the combination of Option 5 (or Option 8) with Llandow new settlement. However, the potential negative effects in paragraph 8.7.7 would be reduced in the combination of Option 5 (or Option 8) with Llandow. Option 5 will inevitably lead to the release of some Greenfield sites on the edges of key, primary, secondary and minor towns and villages identified in the Draft Preferred Strategy. As the potential negative effects recognise many of the towns and villages are surrounded by Special Landscape Areas or are in close proximity to the coastline or SSSIs which will therefore restrict the potential for many settlements to expand. If Llandow New Settlement were to be included then the potential negative effects would be reduced.

Paragraph 8.8.2 recognises that the Draft Preferred Strategy would have the potential to positively meet the SA objectives for the urban south east but this may not be the case within the rural Vale. The paragraph states by way of example that the objective to provide a diverse range of local job opportunities may be greatest achieved in urban areas where existing employment land opportunities exist but this would be difficult in rural areas. However this is not the case if Llandow New Settlement were included as the proposal would provide the infrastructure to develop the additional employment land at Llandow which will not occur without the development.

Table 9 identifies the negative effects associated with the Preferred Option. All three of the identified negative effects would be reduced if Llandow settlement were included with Option 5 or Option 8. Table 9 recognises that a number of settlements are located in Special Landscape Areas, near to the coastline and SSSI's which means that there are constraints to their expansion. Llandow would reduce the need to expand these towns and villages. Similarly the development of Llandow new settlement would contribute to protecting, enhancing and promoting the quality and character of the Vale of Glamorgan's character and heritage by helping to protect the character and setting of its towns and villages.

Officer Response:

In developing the Draft Preferred Strategy, the Council initially developed and examined 6 spatial options (options 1, 2a, 2b, 3, 4 and 5). A rural new settlement able to promote sustainable self containment was considered as part of this process (option 4 refers). The 6 options were discussed at a stakeholder workshop and a further 3 hybrid options developed. Two of these additional options incorporated option 4 (option 6 and option 8). All of the options were subject to a Sustainability Appraisal (SA) contained within the Initial SA report. Although it is accepted that the new settlement identified in options 4, 6 and 8 was not site specific, the SA highlighted that some of the likely effects of developing a new settlement would depend on the location.

Llandow Newydd has previously been submitted as a candidate site as part of the LDP process. All candidate sites will be assessed in due course in accordance with the Council's candidate site assessment methodology. However, to fully respond to your ISA representation, the Council has undertaken its own SA of this strategic site in conjunction with option 5 (option 8a refers) which has been reviewed by an independent SA consultant. This revised options appraisal will be available as part of the Draft Deposit Plan. Although similar to option 8, the appraisal of option 8a identified more mixed benefits and negative outcomes with the Rural Vale than option 8. However, common to both options, was the limited ability to address outcomes through mitigation due to the relationship between the location of a new settlement and the ability to provide equal benefits across the area, including reduced scope for new development opportunities to address issues where they exist. The main issues for Option 8a are considered below.

Option 8a would allow for development in the South East Zone where affordable housing need is highest, this being in common with the Draft Preferred Strategy. However, the provision of a new settlement could restrict the extent to which housing need is delivered in the South East Zone as a significant proportion of the potential housing would be directed to Llandow Newydd. Development within the South East Zone (as with the Draft Preferred Strategy) would also provide the opportunity to develop brownfield sites in sustainable locations. This would also assist in tackling the causes of deprivation in these areas.

Like the Draft Preferred Strategy this option could contribute to a reduction in commuting as there would be more employment and service opportunities in the South East Zone that are easily accessible by a range of public transport options. The Llandow Newydd proposal, however, would be more reliant on car based journeys to and from essential services, facilities and employment. Whilst a park and ride facility is proposed a rail service is not.

The Llandow Newydd candidate site is relatively centrally located within the rural Vale and would deliver a significant proportion of the Council's Housing Requirement. The concentration of a large number of units on one strategic site, albeit sited within the rural Vale, would not address housing needs where they occur, or where anticipated growth is required. This could be detrimental to the vitality and viability of smaller rural settlements. Such an option would not influence or tackle the issue of housing requirements and affordability in those rural settlements. Affordability is a key concern to stakeholders.

Access to services may be enhanced for settlements within close proximity to the proposed Llandow Newydd site. However it is anticipated that the extent of the facilities provided would be limited due to the scheme only proposing 2750 dwellings, thereby clearly not delivering a fully self sustaining community. It is generally accepted that for a new settlement to be sustainable, (i.e. support a sufficient range of services and facilities) it would have to be of between 4000 and 5000 dwellings (see Best Practice in Urban Extensions and New Settlements, TACPA 2007, and Eco Towns Prospectus Communities & Local Government 2007).

As stated above existing rural accessibility issues may not be addressed since levels of development in the rural Vale would be concentrated in one location. Therefore, in the rural Vale access to and from settlements to services, facilities and employment opportunities would fail to be adequately addressed.

It is extremely unlikely that existing employment opportunities available at the Llandow Estates will serve the needs of the proposed new resident population. The development of Llandow Newydd would therefore increase peak time commuting.

The development of Llandow Newydd would result in the loss of 51 hectares of good quality Grade 3a agricultural land and 36 hectares of Grade 3b agricultural land (as verified by Reading Agricultural Consultants on behalf of the Council). The remaining Llandow Estates are proposed to be retained in their current use. Indeed although your candidate site includes the current Llandow estates, those estates are uses that already exist at the site and are outside of your control. The Council has already indicated that the existing Llandow estate sites should not form part of your

proposals.

The Council's Draft Preferred Strategy seeks to realise limited beneficial development in and adjoining existing sustainable rural settlements. This will result in sustaining existing services and facilities in appropriate rural settlements whilst at the same time allowing limited but necessary growth in the rural Vale.

The Council notes your comments regarding the performance of options 5, 7, 8 and 8a against the SA framework. However, in selecting the DPS, the Council also needs to consider the merits of each option against the impact of other plans, policies and programmes e.g. Planning Policy Wales, Wales Spatial Plan and Community Strategy.

The creation of a new rural settlement under either option 8 or 8a is considered to be contrary to advice contained within PPW / MIPPS 01/2006 (paragraph 9.2.7 refers) and would undoubtedly offer more limited environmental, social and economic advantages over option 5. You also claim that if Llandow Newydd is allocated in the LDP, there would be less of a requirement to allocate urban extensions. Whilst this is likely to be the case, urban extensions accord with the search sequence referred to in PPW and are considered to be a more sustainable approach to development. The WAG have also offered advice to officers on this issue and state amongst other things that "new settlements should only be proposed where such development would offer significant environmental, social and economic advantages over the further expansion or regeneration of existing settlements."

A new settlement in the rural Vale is likely to limit or prejudice the delivery of urban regeneration opportunities and development of other sustainable sites within existing settlements already benefiting from existing services and facilities e.g. Barry Waterfront. Such an approach would as a consequence be contrary to the Council's Community Strategy.

Whilst SA is a valuable tool in predicting the various effects of the options, it is ultimately the Council's responsibility as the plan maker to decide on a preferred strategic option taking into account all of the evidence, before it and following a full consideration of all relevant material factors.

Officer Recommends: Officer Recommends Change

(i) Amend PPW reference in Paragraph 8.7.2 to 9.2.7 (MIPPS 01/2006).

(ii) Update section 8.7 to refer to SA of option 8a.

Page reference:

Para reference:

Rep Type: Support

Comment:

(No Comment)

Officer Response:

Support is welcomed

Officer Recommends:

No change to ISA report

Page reference:

Para reference:

Rep Type: Support

Comment:

See attached table...

Officer Response:

The data provided is considered to be more relevant to the Approved Scoping Report. However, the Approved Scoping Report makes reference to the Local Biodiversity Action Plan which includes this data. In view of this no further changes are proposed.

Officer Recommends: No change to ISA report

Page reference:

Para reference:

Rep Type: Objection

Comment:

Overall the SEA does not appear to fully consider the impact of the preferred LDP strategy on the Historic Environment, in particular in Table 9 it suggests that CSP10 will protect the historic environment even though CSP10 only refers to the historic qualities of individual buildings and conservation areas and not archaeological sites or other features of the historic environment. Our suggested amendments to CSP 1 provide the necessary protection.

Officer Response:

Agree. The appraisal of CSP 10 against SA objective 9 highlights that although CSP 10 seeks to protect the cultural and historic qualities of individual buildings and conservation areas no specific reference is made to the protections of archaeology and other cultural assets outside built up areas. Accordingly, it is proposed to amend policy CSP10 to read as follows:

CSP 10: Built and Natural Environment

The Vale of Glamorgan's natural and built environmental assets will be protected and enhanced through:

- The promotion of high quality design that reinforces the local character of settlements, enhances landscape settings and respects the cultural and historic qualities of individual buildings, conservation areas, archaeological sites or other features of the historic environment;
 - Favouring opportunities for the creation, conservation or restoration of designated sites of national and local nature conservation interest.
-

Officer Recommends:

Officer Recommends Change

Amend CSP 10 bullet point 1

Page reference:

Para reference:

Rep Type: Comment

Comment:

9.1 Option 5

The preferred option should be amended to include the caveat as per Option 7 -
"Based on a sustainability test"

Officer Response:

Disagree. The Draft Preferred Spatial Strategy already states that other sustainable settlements will accommodate further housing and associated development. The Council has undertaken a sustainable settlements appraisal and the results of this study were used to inform area strategy policy 1: settlement hierarchy. Accordingly, only the towns and villages listed in this policy are considered to have a sufficient level of services and facilities to sustain further growth. Furthermore, it should be noted that the Council will be carrying out a sustainability appraisal of the proposed development sites at the deposit draft plan stage. The suggested caveat is therefore considered to be unnecessary.

Officer Recommends: No change to ISA report

Page reference:

Para reference:

Rep Type: Comment

Comment:

We note that:

- The Council's Initial Sustainability Appraisal Report, December 2007' is also available for inspection and comment;

Minerals

Note the sustainability objective relating to minerals in Table 3. Safeguarding mineral resources with potential for extraction by future generations is an additional element that could have been included. Table 5 could also have included the impact of mineral operations.

Biodiversity

It may be useful to include future work reference to the Council's biodiversity duty resulting from the Natural Environment and Rural Communities Act 2006 (NERC Act)

Officer Response:

Your comments regarding minerals are noted. However, the safeguarding of mineral resources is considered to be the LDP mechanism for meeting the SA objective. Accordingly there will be an appropriately worded policy in the Deposit Plan. The key sustainability issues in table 5 were identified by relevant stakeholders and the impact of mineral operations was not highlighted.

In terms of biodiversity, the Council's Approved Scoping Report (July 2007) refers to the NERC Act 2006 in Appendix 1 - Review of Policies, plans and programmes. However, this reference was inadvertently omitted from table 3 in the ISA Report. Accordingly, it is recommended that the NERC Act reference is added to the table.

Officer Recommends:

Officer Recommends Change.

Table 3, Biodiversity and habitat protection theme, add NERC Act to list of national key documents.

Page reference:

Para reference:

Rep Type: Comment

Comment:

Please see attached letter dated 26/02/08

"Ref:C.09.96.06/SOH/JH

Consultation Exercise: Consultation Draft Sustainability Appraisal Report for the Local Development Plan

Thank you for giving CCW the opportunity to comment on the SEA appraisal report for the Local Development Plan (LDP). Our comments are made in the context of our roles as consultation body under the Environmental Assessment of Plans and Programmes (Wales) Regulations 2004 and adviser to the Welsh Assembly Government on matters pertaining to the natural heritage of Wales and its inshore waters.

In general, CCW welcomes and supports this report. We have some comments, which are summarised below. We are pleased to note that many of our comments from the consultation on the scoping report (letter dated 19 March 2007) have been taken on board by your authority. We believe that this has resulted in a limited amount of comments from us at this stage.

SA/SEA of the Strategic LDP Policies

In Section 8.4, some conflicts between LDP and SEA objectives have been identified, namely on climate change and waste minimisation. We would have expected to see changes made to the LDP objectives, perhaps to include wording that would refer to sustainable levels of development, to avoid these conflicts. We suggest that where decisions have been made not to do this, justification is given.

In addition we would suggest that the following objectives do have a relationship and so the compatibility score should be changed from zero;

LDP 6 and SA 9 – we suggest that this is replaced with a '+/-' recognising the impact transport can have on the built and natural environment,

LDP 2 and SA 10- we suggest that this takes into account the desire to make a positive contribution to climate change and is changed to '+' if high quality environments are secured in new developments,

LDP 6 and SA 3 – we suggest that this should be '+' if greater access is provided to Vale residents,

LDP 7 and SA 12 – this should be altered to a '+/-' recognising the impact transport can have on the built and natural environment.

LDP 7 and SA7 – similarly these points are linked and if waste is minimised the environment should be enhanced.

LDP 2 and SA2 – climate change impacts may increase if the number of local facilities is enhanced as the SA objective suggests. This could be in terms of new buildings and developments on the flood plain.

LDP 2 and SA 14 – these two objectives are linked and we suggest should be given a rating of '+/-' as impacts of climate change may increase depending upon the scale and detail of work in town centres.

We also have concerns about statements in section 8.4.2 that negative and positive effects can be balanced out to produce a neutral effect. We suggest that at this early stage in the strategy development it is very difficult to state this for certain, particularly about issues such as greenhouse gas emissions. We suggest that where this practice has been used, it is highlighted using a '+/-' rating.

Assessment Tables

It is not clear from the assessment tables whether the full effects of the options and policies have been assessed. The SEA Directive stipulates that effects should include 'secondary, cumulative, synergistic, short, medium and long-term, permanent, temporary, positive and negative effects' (Annex 1 of the SEA Directive). We seek clarification whether this has been done in every case.

Mitigation

We do have some concerns about the efficacy of the strategic policies to mitigate for some of the predicted effects of the preferred option. Paragraph 8.7.7 details the potential negative effects of the preferred option. One of these points relates to landscape and the impact on special landscape areas. Core strategic policy 10 'Built and Natural Environment' is proposed to mitigate for any effects, but we do not feel that this policy is sufficiently strongly worded to ensure impacts are minimised. We suggest that there is a separate bullet point on landscape that incorporates the need to protect special landscape areas as well as landscapes of outstanding historic interest such as at Kenfig ('Merthyr Mawr, Kenfig and Margam Burrows').

Another perceived effect is on national and international designated sites. Core strategic policy 10, which is again proposed as the mitigation for any effect, only refers to national or local sites. We feel that this should be reworded to include international sites. Similarly in section 8.9.3, the need for landscaping on new developments is listed as desirable within the preferred strategy. However, this has not been included in core strategic policy 6 on Planning Obligations. We seek clarification on this.

Monitoring

We have concerns that the likely predicted effects in sections 9.1.2 and 9.1.3 do not relate to the monitoring proposed in section 10.2.2. We seek clarification on this as the SEA Directive states that monitoring should be carried out on the likely significant effects, both positive and negative, as predicted by the SEA (see Article 10.1 of the SEA Directive).

We hope that these comments are helpful to you. However, should you have any queries, please contact Gayle Wootton in the first instance.

Yours faithfully
Dr Maggie Hill
Regional Manager South and East"

Officer Response:

The Council notes your comments regarding potential conflicts between the LDP and SA objectives. However, paragraph 8.4.2 of the Initial

sustainability Appraisal Report states that when taken cumulatively, the SA appraisal of the LDP objectives indicates that the LDP and SA objectives are generally compatible, with potential conflicts between certain objectives being offset by others. Furthermore, the core strategic policies and the detailed policies to be developed as part of the deposit plan will take this into account.

Your comments regarding the compatibility of some of the LDP and SA objectives are noted (Table 7 refers).

LDP 6 and SA 9 – You suggest that the zero score is replaced with a +/- score recognising the impact. However, the Council believes the score should be changed to a + as reducing the need to travel is likely to reduce the impacts of transport on the built and natural environment.

LDP 2 and SA 10 – You suggest that this takes into account the desire to make a positive contribution to climate change and is changed to a + score if high quality environments are secured in new developments. The Council agrees with this and will change table 7 accordingly.

LDP 6 and SA 3 – You suggest that this should be a + score if greater access is provided to Vale residents. The Council agrees with this and will change table 7 accordingly.

LDP 7 and SA 12 – You suggest that this should be altered to a +/- score recognising the impact that transport can have on the natural and built environment. However, the Council believes the score should be changed to a + as reducing the need to travel will reduce the impacts of transport on the built and natural environment.

LDP 7 and SA 7 – You suggest that these points are linked and if waste is minimised the environment should be enhanced. The Council agrees with this and will change Table 7 accordingly.

LDP 2 and SA 2 – You suggest that climate change impacts may increase if the number of local facilities is enhanced. The Council disagree and believe that any relationship would be minimal and not significant.

LDP 2 and SA14 – You suggest that these two objectives are linked and should be given a +/- score as impacts of climate change may increase depending on the scale and detail of work in town centres. The Council disagree and believe that any relationship would be minimal and not significant.

Your comments regarding paragraph 8.4.2 are noted. Accordingly it is proposed to change the –ve scores in table 7 to +/- scores to reflect the uncertainty of the effect at this stage.

Your comments regarding the assessment tables are noted. However, given the strategic nature of the strategy options to assist in identifying the preferred option, the assessment focussed on the spatial positive / negative effects. The strategic level of assessment does not allow for the assessment of the permanence and temporal nature of effects. Where cumulative / secondary effects are identified these are set out in the commentary boxes. The detailed assessment of the LDP policies at the next stage will allow for the consideration of the points raised.

Your comments regarding the second potential negative effect identified in paragraph 8.7.7 and the wording of core strategic policy 10 are noted. However, it is not proposed to amend the policy as it already seeks to protect 'natural environmental assets' which include special landscape areas and landscapes of outstanding historic interest. Furthermore, it is highly likely that there will be further policies on this in the Deposit Plan and they will be identified on a future constraints map.

The Council agrees with your recommendation to add international sites to the second bullet point of CSP10.

Your comments regarding paragraph 8.9.3 and CSP 6 are noted. However, the list in CSP 6 is not intended to be exhaustive and it is therefore not intended to add landscaping as recommended. In fact, it is considered that landscaping is more likely to dealt with by condition as opposed to a planning obligation.

Your concerns regarding the monitoring of the likely significant effects of the draft preferred strategy are noted. Paragraphs 9.1.2 and 9.1.3 list some probable positive and negative significant effects arising from the draft preferred strategy. However, it should be noted that these are reliant on the type, size and location of future development. The table in paragraph 10.2.2. on the other hand lists some likely significant negative effects that will have to be monitored regard

Monitoring when plan adopted

Officer Recommends:

- LDP 6 and SA 9 - Change score from 0 to + in compatibility table.
- LDP 2 and SA 10 - Change score from 0 to + in compatibility table.
- LDP 6 and SA 3 - Change score from 0 to + in compatibility table.
- LDP 7 and SA 12 - Change score from 0 to + in compatibility table.
- LDP 7 and SA 7 - Change score from 0 to + in compatibility table.
- Paragraph 8.4.2/table 7 - Change – score to +/- score for LDP 3/SA 6, LDP 5/SA7 & LDP7/SA1.
- CSP10 - Amend second bullet point to CSP10 "...sites of international, national and local ..."

Page reference:

Para reference:

Rep Type: Support

Comment:

We fully appreciate that the LDP covers future development for the whole of the Vale of Glamorgan but as members of Llancarfan Community Council we consider our remit is to support and protect the community we have been chosen to represent.

9.1 We support the Draft Preferred Strategy (Option 5) as we believe it offers protection to the majority of villages within our community. However St. Athan as a "key development opportunity" seems to rely on the TOTAL D.T.A. development taking place.

8.7.7 The village of Llancarfan identified in the SSA, as a minor settlement is in a designated Special Landscape Area. The existing settlement boundaries preserve and enhance the unique character of the village and should not be altered or extended.

Officer Response:

Support for the draft preferred strategy is welcomed with regard to St. Athan. The strategy will capitalise on the significant investment and employment opportunities arising from the defence training academy development. Additional development in St. Athan will also reinforce its role as a key settlement both locally and regionally within the context of the Wales Spatial Plan ensuring that the future investment delivers benefits Vale wide. The overall emphasis will be to ensure sustainable growth both locally and regionally. Your comments regarding residential settlement boundaries are noted. However this issue will form part of the deposit plan which will be consulted on in due course.

Officer Recommends: No Change to ISA Report

Page reference:

Para reference:

Rep Type: Comment

Comment:

The town council has no comment to express at this stage.

Officer Response:

Comment Noted

Officer Recommends:

No change to ISA Report

Page reference:

Para reference:

Rep Type: Support

Comment:

(No Comment)

Officer Response:

Support is welcomed.

Officer Recommends:

No change to ISA report

Page reference:

Para reference:

Rep Type: Comment

Comment:

Thank you for your letter of 11 January consulting Cadw on the above documents.

Cadw's comments on the Preferred Strategy are included in the Welsh Assembly Government's overall response. The comments are therefore limited to the Sustainability Report.

Page 15, Para 7.3.4

Although reference is made to the number of conservation areas there is little other reference to heritage assets. For information, our records show that there are:

107 Scheduled Ancient Monuments
733 Listed Buildings
18 Historic Parks and Gardens
2 Historic Landscapes.

Given their scale, and the earlier reference to Heritage Coast and Special Landscape Area, it may be particularly pertinent to refer to the Registered Historic Landscapes of Special Historic Interest at Merthyr Mawr, Kenfig & Margam Burrows (HLW(MGI)1) and Llancarfan (HLW(SGI)1).

Page 17, Table 4

The section on 'Degradation of cultural heritage...' focuses overly, given the largely rural nature of the vale, on listed buildings and would benefit from wider acknowledgement of other designated sites. Possibly the second indent could be expanded to read "Listed Buildings, Scheduled Monuments and other historic assets are protected by legislation and planning policy (but does not encourage enhancement)."

The same applies to the section above on "Impact of new development..." where the third indent could also be expanded.

Page 27 Section 9, Environmental Assets

On 'Landscape Quality', reference should again be made to the natural and historic landscape, through reference to the Register of Historic Landscapes of Special Historic Interest in Wales. CCW will, no doubt, make further reference to this and possible indicators.

'Historic townscape' is not a defined indicator and further clarity on this is needed. The plan should, perhaps, define those towns which are considered to be included in Historic townscape, probably a small number. This would then also identify the settlements considered as villages, which are greater in number, and possibly subject to greater threats from development.

'Historic townscape', the indicator chosen is the [number of up to date] Conservation Area Appraisals, which is fine. The Preferred Strategy, however, uses the Buildings At Risk Register, which is sensible, and should also be used as an indicator in the SA.

'Historic townscape' – given the rural nature of the Vale there should be an indicator on the historic environment outside developed areas. One indicator might be the condition of monuments sourced from Cadw's Quinquennial Review of the Condition of Scheduled Ancient Monuments. An indicator assessing the number of historic parks and gardens affected by development proposals would also be appropriate.

'Number of new developments...' is a good indicator but Cadw is listed as a data source. I am not aware that Cadw holds such information. Again it could be linked to the council's Buildings at Risk Register.

Page 28, Section 11, Cultural Heritage

There is crossover with Section 9 and the same points apply, particularly with regard to the historic environment outside townscapes (scheduled and unscheduled archaeology and registered historic landscapes, parks and gardens).

Officer Response:

Page 15 paragraph 7.3.4

The lack of reference to heritage assets in paragraph 7.3.4 is noted. It is therefore proposed to amend the relevant section of paragraph 7.3.4 and also update paragraph 3.7 in the Approved Scoping Report. The Council's records show that there are more scheduled ancient monuments and listed buildings in the Vale than stated in your representation and these figures are reflected in the amendments to both documents. In addition, the Council is currently undertaking a review of all its conservation areas and the number may therefore change in due course. For this reason the word "Presently" has been introduced in the revised text.

Amend paragraph 7.3.4 to read:

"The Vale of Glamorgan benefits ...

....Around half of the Vale's coastline falls within the designated Glamorgan Heritage Coast and a vast area of the authority has been designated as Special Landscape Area. In addition, there are 18 historic parks and gardens and 2 registered historic landscapes of special historic interest. In terms of built heritage, the Vale has 127 scheduled monuments, 738 listed buildings, and a list of locally important buildings and structures. Presently, there are 38 conservation areas, including one in Penarth which is afforded special protection under Article 4 of the Town and Country Planning (General Permitted Development) Order 1995. The abundance ..."

Page 17 Table 4

Agree.

Amend second bullet point for Degradation of cultural heritage and historic environment to read as follows:

•"Listed Buildings, Scheduled Monuments and other historic assets are protected by legislation and planning policy (but does not encourage enhancement)."

Amend second bullet point for Impact of new development on built and natural environment to read as follows:

•"Habitats, biodiversity, listed buildings, scheduled monuments and other historic assets are protected by other legislation (but does not encourage enhancement)."

Page 27 Section 9 Environmental Assets

Agree. Add Register of historic landscapes of special historic interest as an additional data source to landscape quality indicator.

It is accepted that further clarity is needed on the historic townscape indicator. However, instead of listing the towns and villages considered to be included in the historic townscape it is proposed to amend the indicator to read as follows: "Condition of conservation areas, listed buildings, scheduled ancient monuments and historic parks and gardens."

Agree. Add buildings at risk register as an additional data source to historic townscape indicator.

Agree but no further change required to historic townscape indicator as it makes reference to both scheduled ancient monuments and historic parks and gardens.

Comments regarding the data sources for the "number of new developments ..." indicator are noted. Delete reference to CADW in the data source and add VOGC buildings at risk register.

Comments in respect of cultural heritage and historic environment are accepted. Amend historic townscape indicator to read: "Condition of conservation areas, listed buildings, scheduled ancient monuments and historic parks and gardens."

Add buildings at risk register as an additional data source to historic townscape indicator.

Officer Recommends:

Officer Recommends Change.

Page 15 para 7.3.4 - Amend Para 7.3.4 as shown.

Para 3.7 - Update paragraph 3.7 in Approved Scoping Report to reflect changes to Para 7.3.4 in ISA report.

Page 17 Table 4 - Degradation of cultural heritage and historic environment: Amend 2nd bullet point

Page 17 Table 4 - Impact of new development on built and natural environment: Amend 2nd bullet point

Page 27 Section 9 - Environmental Assets - Add new source to landscape quality indicator.

Page 27 Section 9 - Environmental Assets - Amend historic townscape indicator.

Page 27 Section 9 - Environmental Assets - Add new data source to historic townscape indicator.

Page 27 Section 9 - Environmental Assets - Update sources for "number of new developments which bring historic buildings back to beneficial use" indicator.

Page 27 Section 9 - Environmental Assets - Amend historic townscape indicator for cultural heritage and historic environment.

Page 27 Section 9 - Environmental Assets - Add new data source to historic townscape indicator.

Page reference:

Para reference:

Rep Type: Support

Comment:

(No Comment)

Officer Response:

Support is welcomed

Officer Recommends:

No change to ISA report.

Page reference:

Para reference:

Rep Type: Comment

Comment:

Within the 15 key sustainability objectives on Para 5.2 forming the basis of the S.A. are:

-Provide for people's housing needs / to maintain, promote and enhance the range of local facilities / to maintain and improve access for all / to maintain, protect & enhance community spirit / provide a high quality environment within all new developments / to protect, enhance & promote the quality & character of the Vale's culture & heritage / to reduce need to travel & enable use of sustainable modes of transport / to provide for diverse range of local job opportunities / to maintain & enhance the vitality & viability of the Vale's town, district and local centres / to promote appropriate tourism.

We suggest that these policy objectives, or part of these can be provided as mix use developments benefiting Cowbridge, Llantwit Major, St. Athan and surrounding areas, with a base in Llandow.

Llandow is at mid distance from Cowbridge and Llantwit Major and very near to St. Athan.

In these local centres (Cowbridge, Llantwit Major, St. Athan) it appears that there is no suitable land available to establish a centre with diverse community services for the whole local area.

Whether a new settlement in Llandow is successful or not, in Llandow, East of Llantwit Major road, there is land with Brownfield history (former RAF aerodrome) which can be used as a mix development for:

- a) Small enclave of "live - work" type of dwelling with attached small workshop for young entrepreneurs working from home in their workshop / science / IT room etc. This dwelling type is not found in any standard development
- b) An hotel that can be well designed to cater and promote tourism to this area of the Vale
- c) A social club, to promote interaction, community spirit and cohesion. This would be a membership social club, providing social and cultural services to these communities, including theatrical and artistic activities etc.
- d) A suitable sports complex with covered swimming pool, tennis courts etc. This will also be a paid membership facility, and because of its modern and well designed facilities and amenities, it will be highly successful, and attractive to all users in the locality
- e) Last but not least, a home for the elderly can be established, well separated from the other developments, and with some sheltered bungalows, designed in conjunction with the home. This development will benefit from well designed and landscaped open areas of amenity for the users.

All the above developments can be designed so that they are well screened from the Llantwit Major road, from each other, and from the nearby countryside. They can be located within a site of 40-45 acres with one, or maximum two points of access from the road.

This proposal would achieve lifting up the well being, culture, and health of the community which it serves. It would be a huge planning gain, at the same time of being a huge community gain, using well the availability of brown field land east of the Llantwit Major road, strategically located between Cowbridge, Llantwit Major, St Athan and surrounding Vale areas.

The Vale needs now, this type of bold development, to provide for non existing similar facilities in this area and to respond to the expected new employment and population increase in and near St. Athan, Llantwit Major, Cowbridge and surrounding areas.

The present representation as noted above is both;

- a) In support of the main aspects of the Vale's Draft Preferred Strategy
- b) An objection to dismissing Llandow as only a minor settlement, and
- c) A comment to highlight the vision and possibility of establishing these developments in Llandow and possibility of establishing these developments in Llandow, East of Llantwit Major road, because of its geographical location, regardless of whether a new town is established in the area.

NB The above is copyright.

Re: Vale of Glamorgan Pre-deposit Consultation Documents (draft LDP preferred strategy and initial sustainability appraisal)

I would like to clarify that it was not my intention to object to the Council's procedure in this respect. The copyright not was more to guard off from other unknown sources. Therefore I confirm that I have no objection for the Council to use the information provided, in the manner you informed.

Officer Response:

Your comments regarding the suitability of a new mixed use development in Llandow (east of Llantwit Major Road) are noted. Llandow is identified as a minor settlement in area strategy policy 1. For the purpose of the sustainable settlement appraisal the Council estimated the population of Llandow to be 185, which is below the secondary settlement cut off point of 400. Furthermore the village lacks any kind of retail facility and is poorly served by public transport. Accordingly Llandow is deemed to be suitable only for sensitive infilling and/or minor extensions. The site referred to in this representation has been submitted as a candidate site and will be assessed in due course in accordance with the Council's approved candidate site methodology.

Officer Recommends: No Change to ISA report

Page reference:

Para reference:

Rep Type: Support

Comment:

My clients are promoting the release of additional land on the edge of Cowbridge for residential development. The site is well related to the existing settlement form and the town centre and would be suitable for a minor rounding off of the settlement and as an exception site for affordable housing. In this context they would hope to achieve exceptional design qualities which would be compatible with its landscape setting. Indeed they are thinking of an exemplar development with about 20-30 homes, using innovative sustainable techniques, and offering Cowbridge good quality affordable accommodation which it currently lacks.

In relation to the assessment of sites against the LDP Preferred Strategy it is therefore argued that an amended Preferred Strategy as highlighted in Section 4 should be adopted, i.e.

"Concentrate development opportunities in Barry, and the South East Zone. The St. Athan area to be a key development opportunity. Other sustainable settlements to accommodate further housing and associated development based on a sustainability test."

If the above option were applied, particularly with an emphasis on sites for affordable housing on the edge of appropriate settlements and of a scale in keeping with that settlement there would be a level of certainty in housing provision to address the lack of affordable housing in rural settlements. The Option would thus address SA Objective 1 more positively than is suggested in the Appraisal Matrix.

Objective 12 in relation to the strategy option suggested will not conflict with sustainability objectives. The provision of affordable housing in villages will encourage those who work locally in the rural economy, e.g. engaged in agriculture or tourism to continue living near their place of work.

Officer Response:

The Draft Preferred Spatial Strategy already states that other sustainable settlements will accommodate further housing and associated development. The Council has undertaken a sustainable settlements appraisal and the results of this study were used to inform area strategy policy 1: settlement hierarchy. Accordingly, only the towns and villages listed in this policy are considered to have a sufficient level of services and facilities to sustain further growth. Accordingly the addition of the statement "based on a sustainability test" is considered to be unnecessary.

Your comments in respect of affordable housing are noted. However, in order for an emphasis to be placed on affordable housing there would have to be specific reference to this in the description of the option and this would have to be re-assessed. Notwithstanding the above, the SA has demonstrated that the draft preferred strategy (option 5) will provide opportunities for people to meet their housing needs (SA objective 1) and reduce the need to travel / enable the use of more sustainable modes of transport (SA objective 12) in both the urban south east and the rural Vale. In view of the above, no further changes to the ISA Report are proposed.

Officer Recommends: No change to ISA report

Page reference:

Para reference:

Rep Type: Support

Comment:

(No Comment)

Officer Response:

Support is welcomed.

Officer Recommends:

No change to ISA report.

Page reference:

Para reference:

Rep Type: Support

Comment:

(No Comment)

Officer Response:

Support is welcomed

Officer Recommends:

No change to ISA report.

Page reference:

Para reference:

Rep Type: Support

Comment:

(No Comment)

Officer Response:

No comment.

Officer Recommends:

No change to ISA report.

Page reference:

Para reference:

Rep Type: Support

Comment:

(No Comment)

Officer Response:

Support is welcomed.

Officer Recommends:

No change to ISA report.

Page reference:

Para reference:

Rep Type: Support

Comment:

(No Comment)

Officer Response:

Support is welcomed.

Officer Recommends:

No change to ISA report.

Page reference:

Para reference:

Rep Type: Support

Comment:

See attached photo.

My interest in the LDP is purely environmental. We have a number of problems which are easy to overcome.

Transport is obviously going to be a hard nut to crack as this is a local but mainly a national solution. The most urgent thing is we need an integrated transport system similar to that operated in Switzerland. I know the Vale can't operate such a system, but you can develop plans which would marry into a whole system.

Refuse is a big problem, we can't go on producing the amount of waste that we do. Some of us are making the effort to recycle, but many more don't. People have to realise we can't go on tipping rubbish into the ground. Packaging must be vastly reduced.

Climate change is happening now, anyone that doesn't recognise it hasn't really thought about it seriously. The change is not like opening a door, the change is gradual - as is happening now. It will be like going down a hill in a car without brakes. To stop climate change we need real joined up thinking world wide. Judging by what is happening now - I have serious doubts.

Officer Response:

Your comments in relation to transport, refuse and climate change are noted. The Initial Sustainability Appraisal Report and Draft Preferred Strategy contain SA / LDP objectives and core strategic policies which relate to these issues.

Officer Recommends: No Change to ISA Report

Page reference:

Para reference:

Rep Type: Objection

Comment:

Whole vision built on premise that does not have to be followed. i.e. population growth. Population growth has to be curbed to preserve the planet, particularly in such a small country. Nor should a particular housing figure apply to each area without consideration of whether it should or could contain it. The answer should be that we have no need or room for 7,500 units, particularly if immigration was controlled.

SA is an incoherent repetitive jungle of information, most of which is unnecessary to make an informed decision on the planning question. This is exacerbated by its dual purpose of appraising during and after the Draft Preferred Strategy.

Officer Response:

The vision seeks to clarify the main purpose of the LDP and provides a framework for developing policies as well as measuring its development and success. The Council has a statutory responsibility to ensure that a sustainable supply of housing land is maintained to meet the projected housing requirement over the lifespan of the LDP. A draft topic paper has been produced to support the population and housing projections contained in the Draft Preferred Strategy. The 7500 dwelling requirement meets the needs of the Vale of Glamorgan and is derived from the Welsh Assembly Government regional housing requirement figure referred to in the Wales Spatial Plan.

Your comments regarding the SA are noted. However, as part of the LDP process, the Council is required to undertake a sustainability appraisal of the Plan which incorporates the requirements of the SEA Directive as transposed by the SEA Regulations. The SA process seeks to improve the sustainability performance of the Plan by testing its various components against sustainability objectives and is an integral part of the LDP process.

Officer Recommends: No Change to ISA Report

Page reference:

Para reference:

Rep Type: Objection

Comment:

In relation to the assessment of sites against the LDP Preferred Strategy my clients consider that an amended Preferred Strategy (a combination of Options 2b and 5) should be adopted, i.e.

"Concentrate development opportunities in Barry, and the South East Zone. The St. Athan area to be a key development opportunity. Other sustainable settlements to accommodate further housing and associated development based on a sustainability test."

With an addition to the last sentence to the effect

"...Other sustainable settlements, ... and closely linked settlements which share a range of facilities... to accommodate further housing and associated developments based on a sustainability test."

If the above option were applied, particularly with an emphasis on sites for affordable housing on the edge of appropriate settlements and of a scale in keeping with that settlement there would be a level of certainty in housing provision to address the lack of affordable housing in rural settlements. The Option would thus address SA Objective 1 more positively than is suggested in the Appraisal Matrix.

Objective 12 in relation to the strategy option suggested will not conflict with sustainability objectives. The provision of affordable housing in villages will encourage those who work locally in the rural economy, e.g. engaged in agriculture or tourism to continue living near their place of work.

Officer Response:

Your comments regarding the draft preferred strategy are noted. The Council previously considered a combination of options 2b and 5 (option 7). Whilst option 7 scored well against the SA objectives it was considered that the distribution of future development on the basis of existing levels of population within settlements was too simplistic in planning future development. For instance, it ignores factors such as the role and function of existing settlements and their ability to accommodate growth. Furthermore, it was considered that distributing growth in this manner would limit the flexibility of the Plan to respond to potential unplanned circumstances, which could undermine the overarching strategy.

The recommendation to also include "closely linked settlements which share a range of facilities" or add a specific reference to affordable housing would result in the need to re-assess the SA of option 7. The first point has to some extent already been undertaken by the Council in the Sustainable Settlements Appraisal (e.g. Cog and Sully, Boverton) and is reflected in the draft preferred strategy (area strategy policy 1: settlement hierarchy refers). Although it is possible that a re-assessment of the option may demonstrate that option 7 has a positive effect in rural areas this does not over ride the comments in the above paragraph.

Officer Recommends: No Change to ISA Report

Page reference:

Para reference:

Rep Type: Comment

Comment:

My Clients are promoting the release of additional land on the edge of the Cowbridge for residential development. This site is well related to the existing settlement form and the town centre and would be suitable for a minor rounding off of the settlement and as an exception site for affordable housing. In this context they would hope to achieve exceptional design qualities which would be compatible with its landscape setting. Indeed they are thinking of an exemplar development with about 20-30 homes, using innovative sustainable techniques, and offering Cowbridge good quality affordable accommodation which it currently lacks.

In relation to the assessment of sites against the LDP Preferred Strategy it is therefore argued that an amended Preferred Strategy as highlighted in Section 4 should be adopted, i.e.

"Concentrate development opportunities in Barry, and the South East Zone. The St. Athan area to be a key development opportunity. Other sustainable settlements to accommodate further housing and associated development based on a sustainability test."

If the above option were applied, particularly with an emphasis on sites for affordable housing on the edge of appropriate settlements and of a scale in keeping with that settlement there would be a level of certainty in housing provision to address the lack of affordable housing in rural settlements. The Option would thus address SA Objective 1 more positively than is suggested in the Appraisal Matrix.

Objective 12 in relation to the Strategy Option suggested will not conflict with sustainability objectives. The provision of affordable housing in villages will encourage those who work locally in the rural economy, e.g. engaged in agriculture or tourism to continue living near their place of work.

Officer Response:

Candidate sites will be assessed in due course in accordance with the Council's approved candidate site assessment methodology.

Your comments regarding the draft preferred strategy are noted. The Council previously considered a combination of options 2b and 5 (option 7). Whilst option 7 scored well against the SA objectives it was considered that the distribution of future development on the basis of existing levels of population within settlements was too simplistic in planning future development. For instance, it ignores factors such as the role and function of existing settlements and their ability to accommodate growth. Furthermore, it was considered that distributing growth in this manner would limit the flexibility of the Plan to respond to potential unplanned circumstances, which could undermine the overarching strategy.

The recommendation to also include "closely linked settlements which share a range of facilities" or add a specific reference to affordable housing would result in the need to re-assess the SA of option 7. The first point has to some extent already been undertaken by the Council in the Sustainable Settlements Appraisal (e.g. Cog and Sully, Boverton) and is reflected in the draft preferred strategy (area strategy policy 1: settlement hierarchy refers). Although it is possible that a re-assessment of the option may demonstrate that option 7 has a positive effect in rural areas this does not over ride the comments in the above paragraph.

Officer Recommends: No Change to ISA Report

Page reference:

Para reference:

Rep Type: Comment

Comment:

9.1.2. - reduced the need to develop on Greenfield site.

9.1.3. - rural settlements - negatively affected by development

Living in Walterston, building in such an area would change and destroy this environment.

Officer Response:

The draft preferred strategy seeks to maximise opportunities to re-use existing Brownfield sites within existing settlements that are well served by a range of transport modes and contain various services and facilities e.g. Barry Waterfront. This approach to development accords with the search sequence identified in Planning Policy Wales. Nevertheless, it is recognised that there are a number of potential negative effects associated with the draft preferred strategy such as the one you refer to. Accordingly, the LDP will need to include policies that ensure that future development proposals mitigate against these. Your comments in respect of Walterston are noted. However, under the current draft preferred strategy no significant residential development is proposed in this settlement and therefore its character is unlikely to change during the LDP period.

Officer Recommends: No change to ISA report.

Page reference:

Para reference:

Rep Type: Support

Comment:

Support

Officer Response:

Support is welcomed.

Officer Recommends:

No change to ISA report

Page reference:

Para reference:

Rep Type: Objection

Comment:

Very blinkered and not wide ranging though being given to the whole proposal.

Officer Response:

Comments are noted.

Officer Recommends:

No change to ISA report.

Page reference:

Para reference:

Rep Type: Support

Comment:

I would like to provide the following comments:

Table 5;

Transport and accessibility –
Congestion at peak times on key routs to Cardiff
Increased car ownership
Increased commuter distances to work
Environmental impact of Vehicular traffic

Employment –
Limited employment opportunities in the Vale
Reliance on travel to work by car
Reliance on Cardiff / Bridgend for employment

All the above would be made worse by the proposed development at Llandow Newydd

Housing –
Care needs to be taken to avoid building affordable housing that would be taken up people. Working in Cardiff and other area of employment and not by those who want to live and work in the Vale re avoid development (such as Llandow Newydd) that would become dormitory town rather than a sustainable community. The solution is to provide affordable housing by expanding existing towns and villages to retain the community while avoiding new settlements.

Table 8

To use land effectively and efficiently –
Retain green field land. Much of the proposed Llandow Newydd development is an Greenfield – not brown fields the developers claim.

In the current UDP it states “parts of the former airfield are successfully used for farming purposes notably grazing and cereal production.” Para 5.4.15. to which Para 8.7.3 refers. Which states that Llandow Newydd development would not be a sustainable settlement.

The council should persist with its current policy on new development (UDP 1996 – 2011 Para 4.1.6) which states “council should remain strongly opposed to the concept of new settlements as such settlements would not relieve the pressure for development around existing villages”.

Officer Response:

The Council notes your concerns regarding the impact of a new settlement at Llandow Newydd on factors such as transport / accessibility and employment. Llandow Newydd has been submitted as a candidate site as part of the LDP process and does not form part of the draft preferred strategy. All candidate sites will be assessed in due course in accordance with the Council's candidate site assessment methodology. If the site is deemed to comply with the draft preferred strategy, the concerns that you have raised are likely to be identified as part of the Sustainability Appraisal (stage 3 refers).

The Council agrees with your remarks on affordable housing. National planning guidance emphasises that new settlements should be considered as a last resort and favours the more sustainable approach of expanding existing settlements where infrastructure, services and other facilities already exist and can be enhanced if required.

Your comments in respect of the Greenfield issue at Llandow Newydd are noted. National planning guidance states that wherever possible previously developed (brown field) land should be used in preference to Greenfield sites, particularly those of high agricultural or ecological value. This issue will be examined in more detail as part of the candidate site assessment process.

The Council welcomes your support for the draft preferred strategy and notes your views on new settlements. Although the Council looked at some new settlement strategy options (i.e. options 4, 6 and options 8), there was concern that they may detract or limit opportunities for regeneration in key areas such as Barry where there are brown field sites well served by existing services and facilities. In addition, national planning guidance contained within Planning Policy Wales (2002) states that new settlements should only be proposed where such development would offer significant environmental, social and economic advantages over the further expansion or regeneration of existing settlements.

Officer Recommends: No change to ISA report.

Page reference:

Para reference:

Rep Type: Objection

Comment:

It would be better to locate new development at Llandow airfield.

Officer Response:

The Council disagrees with your view that it would be better to locate new development at Llandow Airfield. A stand alone new settlement option (option 4) as well as two hybrid new settlement options (options 6 and 8) were considered by the Council in developing the draft preferred strategy. However, the sustainability appraisal of all of the options clearly demonstrated that the draft preferred strategy (option 5) would deliver the most sustainability benefits in both rural and urban parts of the Vale of Glamorgan.

Officer Recommends: No change to ISA report

Page reference:

Para reference:

Rep Type: Comment

Comment:

As has been well recognised for many years, Green Belt of all kinds in many different landscapes and both rural and urban areas serves an important function for wildlife and for people; Green Belt also plays a crucial role in ensuring the sustainability of our communities. Yes, Green Belt areas do also include areas of the country which are not designated as being of Outstanding Natural Beauty (ONB) but this does not mean they are not beautiful in their own distinctive way, nor does it mean that they are therefore worthless.

The UK Government has already pledged itself to following the principles of sustainable development - which means ensuring that our development does not have adverse impacts on the future environmental as well as economic sustainability of our environment and our communities - it does not mean ensuring a sustained rate of economic development and therefore their own policies regarding development, biodiversity, and the health, well-being and standard of life of British citizens by acting to strengthen the protection of green belt areas now.

This means that developers and planners need to start being more imaginative in terms of how and where new developments take place - continuing to chip away at our valuable green spaces IS not the answer Affordable housing needs to remain affordable, all citizens should have free and easy access to quality open green spaces, including woodlands and meadows and rivers, allotments, sports pitches, and clean fresh air and the sounds and sights of birds and insects and trees and flowers - and freely-flowing Rivers!

Green Belt needs increased protection now - particularly those areas close to and within existing urban areas, as it is, Green Belt is already being constantly chipped away slice by slice and the Government needs to act now to increase the protection of our existing Green Belt areas, already under considerable threat, if we are to conform to any sense of sustainable development and ensure our communities and our environment can sustain a decent quality of life for ourselves and for future generations

Such a huge increase in house building could sharply raise the rate at which countryside is built on and adds to the environmental damage associated with house building - more climate-changing greenhouse gas emissions, increased road traffic and congestion, more strain on water sources, and increased quarrying in the countryside. We want to see policies which would create more affordable housing, make better use of previously developed or 'Brownfield' land and promote urban regeneration

We want development that protects the countryside, promotes urban renewal and improves everyone's quality of life.

Green Belts keep the city in the city. It protects the countryside from urban sprawl, encourages urban regeneration, stops towns from merging into each other and protects the countryside setting of historic towns and Cities.

Over 800 hectares a year are disappearing under development and with them the clear distinction between city and country or between two towns.

These are valuable open areas of land that help protect the distinctive identities of our communities and which need to be given long term protection from urban development.

Once back land development, it is unlikely to ever be converted back to Greenfield use.

Destruction of the natural habitat of some animal and plant species, loss of agricultural land results in loss of production and loss of employment, reduction of or complete loss of amenity or recreational value, negative effect upon transport and energy use, loss of the green belt of difference, be they cities, towns, suburbs, villages or hamlets of housing.

We completely object to such the idea of defacing such a beautiful landscape for the purpose of housing development.

Officer Response:

The Draft Preferred Strategy refers to a proposed housing requirement figure of 7500 over the Plan period, which accords with the regional housing requirement figure. Further details can be found in the council's draft topic paper 'Population and Household Projections'. Your comments with regard to the impact of new house building on the built and natural environment are noted. However, the Council's draft preferred strategy seeks to maximise opportunities to re-use existing Brownfield sites within existing settlements that are served by a range of services and facilities. Objective 3 in the Draft Preferred Strategy seeks to ensure that new housing contributes towards the provision of affordable housing in identified areas of need. In addition, core strategic policy 5 refers specifically to affordable housing and covers factors such as need and methods of deliverability. Your comments regarding green belts are noted. However, this matter will be considered in conjunction with adjoining local authorities at the deposit plan stage.

Officer Recommends: No change to ISA report.

Page reference:

Para reference:

Rep Type: Support

Comment:

The projected increase in the required number of households required for SE Wales (18.3%) seems very large but may be appropriate taking into account increased longevity with a significant ageing population. At least some of this requirement will therefore be for accommodation suitable for older people in established communities with retail and other resources in close proximity (walking distance). A sequential and staged approach to development based on established communities will also best meet the Strategic LDP Objectives (paragraph 8.3.1). This will encourage existing and newer social and retail facilities to thrive, while avoiding any sudden or unpredictable strain on them.

The Vale of Glamorgan has distinctive urban areas (some of which are deprived) and other more rural areas. Development and support should be primarily targeted at urban settlements in the South East Zone where they are most needed and can be best utilised (i.e. Option 5) while preserving areas of the Welsh rural environment for future generations (paragraphs 8.7.2 and 8.7.3). Directing development in this way will also reduce a tendency towards ever increasing distances of travel for work and leisure (paragraph 8.3.1 Objective 6)

Officer Response:

Your support for the Initial Sustainability Appraisal Report is welcomed. The proposed LDP housing requirement figure of 7500 is based on the South East Wales regional household projections. These indicate that the number of households will increase by 18.6% between 2003 and 2021. The Draft Preferred Strategy seeks to ensure that new housing contributes towards the creation of sustainable communities by providing a range and choice of housing and contributes towards the provision of affordable housing in areas of identified need. The spatial strategy aims to primarily focus new development opportunities in the south east part of the Vale and other sustainable settlements where there are considered to be good levels of existing services and facilities. This approach will assist in reducing the number of trips and distance travelled by Vale residents.

Officer Recommends: No change to ISA report.

Page reference:

Para reference:

Rep Type: Support

Comment:

ISA Comments

- I live in a Vale village and so would support any development which provides an appropriate, safe and non obtrusive infrastructure (i.e. roads/transport) away from smaller settlements.

- Likewise developments should enhance and take into account the impact on established population. So further housing as mentioned around bigger towns - I would support. Any further housing should be supported by facilities - school, health centre and not be stand alone which would further increase traffic.

-Vale is a beautiful, unique and special area - lets keep it that way whilst supporting future needs.

M Evans

Officer Response:

The Draft Preferred Strategy seeks to concentrate development opportunities in the South East zone where the highest concentration of people and majority of services and facilities can be found. In addition, the Draft Preferred Strategy also favours additional residential development in the St. Athan area and in other sustainable settlements identified in Area Strategy Policy 1: Settlement Hierarchy. Core strategic policy 6 states that the Council will seek planning obligations where appropriate to secure improvements in infrastructure, facilities and services appropriate to the scale, type and location of the proposed development. The LDP vision seeks to create "a place that is safe, clean and attractive, where individuals and communities have opportunities to improve their health, prosperity and well being, and where there is a strong sense of community in which local groups and individuals have the capacity and incentive to make an effective contribution to the future of the area."

Officer Recommends: No change to ISA report.
