| Representor ID and details: 3948/DP1 Mr Randall Davies   | •   |  |   |
|--|---|--|---|
| Date Lodged     Status     Petition and No.     Supporting Evidence       29/03/2012     M     0   |   |  | omments to be consiered by 'written representations' or do hearing session of Public examination? |
| 2a - Do you consider the LDP is Sound? Unanswered  | 2b - If you think that the Plan is unsound and do Procedural Tests - P1 - Unanswered      | es not not meet one or more test(s) of sour P2 - Unanswered  | ndness, please indicate which test(s) that it fails.  |
|  | Consistency Tests - C1 - Unanswered  Coherence and Effectiveness Tests - CE1 - Unanswered | C2 - Unanswered C3 - Unanswere nanswered CE2 - Unanswered CE | d C4 - Unanswered<br>3 - Unanswered CE4 - Unanswered  |
| 3a - Which part of the Deposit Plan are you commenting on?   | Policy Number: Paragraph N  |  | Constraints Map Appendices:   |
| sa - writer part of the Deposit Flamate you commenting on?   | MG2(33)   | lumber: Proposal Map:  | Constraints map Appendices.   |
| 3b - Do you wish to see any changes made to the Deposit Plan   | as a result of your representation? Unanswere   | ed (If "No" or "Unanswered" - go                             | to 3d)  |
| 3c - What changes would like to see made to the Deposit Plan?  |   |  | New Or Amended Site: Other (see Notes): Unanswered Unanswered                                     |
|  | Notes:  |  |   |
| 3d - If your representation relates to a new, deleted or amende  | d site, did you submit the site as a Candidate Sit<br>Site Name:                          | te? Unanswered (If "Yes", please gi                          | ve the Candidate Site Name and reference if known) Site Reference:                                |
| <ul><li>3e - Please set out your representation below:     At a crowded meeting of residents there was unanimous</li><li>1. The development does not conform to Council Policy (</li></ul> |   |  | , ,   |
| The development would be on prime and scarce agriculture.  |   |  |   |
| 3. Our village, situated at the entrance to the Vale is one occasions pheasants cavorting in the very fields that are p  |   | s readily apparent - tractors on the road, ho                | rses in the lanes, the aroma of muck spreading, and on  |
| 4. For the past 25 years I have travelled regularly to Culv further 50 plus houses would generate so much extra traff  |   | (despite traffic lights at Dyffryn Junction) ar              | nd there is congestion almost every day. Families in a  |
| 5. We have a beautiful church, a post box, but no shops.   |   |  |   |
| I do hope you will find these comments helpful and that a  | calamitous mistake can be averted.  |  |   |
| 3f - Please outline the changes you wish to see made to the D  |   |  |   |
| 4b - If you wish to speak, please confirm which part of your rep   | resentation you wish to speak to the inspector al   | bout and why they consider it be necessary                   | to speak at the hearing -   |

| Representor ID and details: 3949/DP1 Ms J.Jones  |   |
|--|---|
| Date Lodged     Status     Petition and No.     Supporting Evidence       29/03/2012     M     □     0     □ | e Additional SA SEA Rep format: 4a - do you want your comments to be consiered by 'written representations' or do  Comment form you want to speak at a hearing session of Public examination? Written   |
| 2a - Do you consider the LDP is Sound? Unsound   | 2b - If you think that the Plan is unsound and does not not meet one or more test(s) of soundness, please indicate which test(s) that it fails.  Procedural Tests - P1 - Unanswered P2 - Unanswered  Consistency Tests - C1 - Unanswered C2 - Unanswered C3 - Unanswered C4 - Unanswered  Coherence and Effectiveness Tests - CE1 - Unanswered CE2 - Yes CE3 - Yes CE4 - Unanswered |
| 3a - Which part of the Deposit Plan are you commenting on?   | Policy Number:     Paragraph Number:     Proposal Map:     Constraints Map     Appendices:       MG2(11).     MG12(11).     MG15.   |
| 3b - Do you wish to see any changes made to the Deposit Plan   | n as a result of your representation? Yes (If "No" or "Unanswered" - go to 3d)  |
| 3c - What changes would like to see made to the Deposit Plan   | ? New Policy: Amended Policy: New Paragraph: Amended Paragraph: New Or Amended Site: Other (see Notes): Unanswered Yes Unanswered Ves Unanswered Notes:   |
| 3d - If your representation relates to a new, deleted or amend   | ed site, did you submit the site as a Candidate Site? Yes (If "Yes", please give the Candidate Site Name and reference if known)  Site Name: Cowbridge Cattle Market Land west of Marley Tile Site, St Mary Hill Site Reference: 178/CS1 2440/CS2   |
| 3e - Please set out your representation below:<br>Policy MG2 (11) states that Cowbridge Cattle Market has    | s been allocated for residential development. This is unsound and objected to on the grounds that-  |
| The Cowbridge Cattle Market, which sells on average 50   | 0 head of sheep per week, is trading successfully and supporting the farming community of the Vale of Glamorgan and should not be closed.   |
|  | arking for up to 200 cars. Apart from an allocation of a small site adjacent to the town wall which would hold approximately 25 cars, no provision has been paces. The loss of car parking spaces would have an adverse effect on the trading community in Cowbridge and the attractiveness of Cowbridge as a   |
| Policies MG12 (11) and MG15 refer to a proposed site fo policy is objected to as being unsound               | r the replacement cattle market. This is a greenfield site and no proposals are made within the LDP for its purchase and development as a market. The   |
|  | Deposit Plan to make it sound (if relevant)  Intinuation of the Cowbridge Cattle Market in support of the agricultural economy of the Vale of Glamorgan and the provision of improved parking facilities a tourist destination and the trading community of Cowbridge.  |
|  | presentation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -   |
| , and a part of part of your to  | 1 ,   |

(ordered by Representation ID No.)

| Representor ID and details: 3950/DP1 G A Dalimore                |   |   |                                  |                                |  |                                |                  |
|--|---|---|----------------------------------|--------------------------------|--|--------------------------------|------------------|
| Date LodgedStatusPetition and No.Supporting Evidence20/03/2012M0 | Additional SA SEA                       |   | Rep format:<br>Letter            |                                | our comments to be cons<br>at a hearing session of F |                                |                  |
| 2a - Do you consider the LDP is Sound? Unanswered                | •                                       | ne Plan is unsound and<br>P1 - Unanswered | does not not meet<br>P2 - Unansv |                                | soundness, please indica                             | ate which test(s)              | that it fails.   |
|  | Consistency Tests -                     | C1 - Unanswered                           | C2 - Unansv                      | wered C3 - Unans               | wered C4 - Unansv                                    | vered                          |                  |
|  | Coherence and Effect                    | iveness Tests - CE1                       | - Unanswered                     | CE2 - Unanswered               | CE3 - Unanswered                                     | CE4 - Unanswer                 | ed               |
| 3a - Which part of the Deposit Plan are you commenting on?       | Policy Number:<br>MG2(19). MG2(20).     | Paragraph                                 |                                  | Proposal Map:                  | <u>Cons</u>  | traints Map                    | Appendices:      |
| 3b - Do you wish to see any changes made to the Deposit Plan     | as a result of your rep                 | resentation? Unansw                       | vered (If                        | "No" or "Unanswered'           | " - go to 3d)  |                                |                  |
| 3c - What changes would like to see made to the Deposit Plan?    | ? <u>New Policy:</u><br>Unanswered      | <del></del>                               | New Paragraph:<br>Unanswered     | Amended Paragrap<br>Unanswered | oh: New Or Amended Sit<br>Unanswered                 | e: Other (see No<br>Unanswered | otes):           |
|  | Notes:                                  |   |                                  |                                |  |                                |                  |
| 3d - If your representation relates to a new, deleted or amende  | ed site, did you submit t<br>Site Name: | the site as a Candidate                   | Site? Unanswere                  | ed (If "Yes", plea             | se give the Candidate Si<br>Site Reference:          | te Name and refe               | erence if known) |
|  |   |   |                                  |                                |  |                                |                  |

3e - Please set out your representation below:

As a resident of Dinas Powys I wish to express my concerns re. the implications of the effect that the proposed additional housing would have on the local highways network.

In Dinas Powys it is proposed that a minimum of 400 addition houses will be built on the St Cyres annexe and Caerleon Road, Both sites are on the Murch side of the community which is served by only two access points to the main road [A4055]. Both these junctions, namely the Infants School traffic lights at Murch Bridge and Cross Common Road at its junction with the A4055 are either at capacity or structurally suspect.

The 400 houses would generate between 600 to 800 additional cars in both directions, particularly at peak times,. The additional traffic would have a profound and adverse impact on the community as the existing roads are under great pressure now.

Further, I am concerned that there have not been any proposed extra community facilities of substance. A local church is in desperate need of a permanent base, the local sporting facilities are not adequate for the present demand and medical services are restricted due to the limitations of space at the Dinas Powys Surgery premises on Cardiff Road.

There appears to be no serious consideration having been given to other views as to the future possible use of St Cyres Annexe, Murch Road. It is worth noting that the school buildings are in good condition although in need of a little investment. To simply seek to tear down the school without any reference to the community needs would be a shameful waste. I also have concerns regarding the capacity of the local schools to accommodate the extra pupils due to the additional houses.

Then there is the wider consideration of the Plan. Up to 10,000 additional houses are planned, many in the south east area of the Vale, e.g. 2,000 units already having been approved at the Waterfront, Barry.

Much of this traffic will be funnelled through Dinas Powys and join the ever lengthening queues leading to and from the Merrie Harrier. The proposals in Sully, Penarth, Lavernock and the land adjacent St Josephs' School, Sully Road will only add to the existing congestion at this junction.

Already the air pollution levels are excessive. The Nitrogen Dioxide [N02] levels are recorded as being 43.8 units with the maximum recommended level being 40 units along Cardiff Road, Eastbrook. An increase in vehicles, particularly standing traffic, would exacerbate the situation. The level of other emissions such as CO (carbon monoxide) and Particulates [PM105] are not available but need clarifying

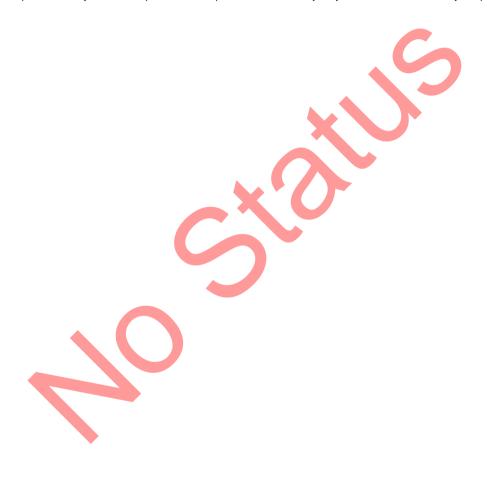
The Deposit plan does not indicate what measures will be taken to encourage the availability and use of public transport. I understand that there is a serious lack of rolling stock in Wales and providing extra trains will be a major challenge. Additional buses would simply be caught up in the traffic chaos the extra housing would cause.

(ordered by Representation ID No.)

Representor ID and details: 3950/DP1 G A Dalimore

The increase in population only exacerbates the already existing problem of parking in the Health Centre.

- 3f Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
- 4b If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -



| Representor ID and details: 3951/DP1 Mrs C.A.Wilson   |  |  |   |                                       |
|---|--|--|---|---------------------------------------|
| Date Lodged     Status     Petition and No.     Supporting Evidence       29/03/2012     M     □     0     □  | Additional SA SEA  |  | 4a - do you want your comments to be con<br>you want to speak at a hearing session of l |                                       |
| 2a - Do you consider the LDP is Sound? Unanswered   | 2b - If you think that the Plan is unsound Procedural Tests - P1 - Unanswe   |  | or more test(s) of soundness, please indic  | cate which test(s) that it fails.     |
|   | Consistency Tests - C1 - Unanswe<br>Coherence and Effectiveness Tests -  |  | d C3 - Unanswered C4 - Unans<br>- Unanswered CE3 - Unanswered                           | wered<br>CE4 - Unanswered             |
| 3a - Which part of the Deposit Plan are you commenting on?  | Policy Number: Para  | graph Number: Prop   | oosal Map: Con:   | straints Map <u>Appendices:</u>       |
| 3b - Do you wish to see any changes made to the Deposit Plan  | as a result of your representation? U  | nanswered (If "No"   | or "Unanswered" - go to 3d)   |                                       |
| 3c - What changes would like to see made to the Deposit Plan?   | New Policy: Amended Policy Unanswered Unanswered Notes:  |  | mended Paragraph: New Or Amended Si<br>Inanswered Unanswered                            | ite: Other (see Notes):<br>Unanswered |
| 3d - If your representation relates to a new, deleted or amende   | d site, did you submit the site as a Cand<br>Site Name:  | idate Site? Unanswered   | (If "Yes", please give the Candidate S<br>Site Reference                                | •                                     |
| 3e - Please set out your representation below: Please accept this letter as evidence of my support for the order of importance. I doubt very much if the existing road services. There would be an obvious reduction and destru landscaping and forming possible tourist attractions could These items above form part of my support for the LDP. | I infrastructure could cope with any altera-<br>lection to open areas used for general leis<br>be vastly reduced and affected. | ttions. Safety factors would hure activities. Wildlife and oth | nave to be considered concerning schools,<br>her ecological/environmental issues would  | hospitals and other local community   |
| 3f - Please outline the changes you wish to see made to the D   | eposit Plan to make it sound (if relevant)   |  |   |                                       |
| 4h - If you wish to speak please confirm which part of your rer   | presentation you wish to speak to the ins  | pector about and why they co                                   | onsider it he necessary to speak at the hea   | oring -                               |

| Representor ID and details: 3952/DP1 Sally Richmond  |   |
|--|---|
| Date Lodged     Status     Petition and No.     Supporting Evidence       29/03/2012     M     0   | Additional SA SEA Rep format: 4a - do you want your comments to be consiered by 'written representations' or do Comment form you want to speak at a hearing session of Public examination? Written  |
| •  | 2b - If you think that the Plan is unsound and does not not meet one or more test(s) of soundness, please indicate which test(s) that it fails.  Procedural Tests - P1 - Unanswered P2 - Unanswered   |
|  | Consistency Tests - C1 - Unanswered C2 - Unanswered C3 - Unanswered C4 - Unanswered   |
|  | Coherence and Effectiveness Tests - CE1 - Unanswered CE2 - Yes CE3 - Unanswered CE4 - Unanswered  |
| 3a - Which part of the Deposit Plan are you commenting on?   | Policy Number: Proposal Map: Constraints Map Appendices:  |
|  | MG2(1 <mark>3)</mark>   |
| 3b - Do you wish to see any changes made to the Deposit Plan   | as a result of your representation? Yes (If "No" or "Unanswered" - go to 3d)  |
| 3c - What changes would like to see made to the Deposit Plan?  | New Policy: Amended Policy: New Paragraph: Amended Paragraph: New Or Amended Site: Other (see Notes):  Unanswered Unanswered Unanswered Unanswered Unanswered   |
|  | Notes:  |
| 3d - If your representation relates to a new, deleted or amende  | d site, did you submit the site as a Candidate Site? Yes (If "Yes", please give the Candidate Site Name and reference if known) Site Name: Land to west of St Athan Road Llandlethian, Land to east of St Athan Roa Site Reference: 2446/CS1, 2446/CS2                  |
| 3e - Please set out your representation below:   |   |
| <ul> <li>I often walk in this field with my family and dog using the</li> <li>Driving from St Athan it is clear that this field sloping dow</li> </ul> | n from Windmill Lane is the main part of a sweeping vista which is visually spectacular, save our special landscape area.  If into the flood plain, noise and light pollution into the countryside and the field is outside the existing Cowbridge settlement boundary. |
| Cowbridge cannot support this development!   |   |
| 3f - Please outline the changes you wish to see made to the D<br>Have candidate site removed and include as a green wed                                |   |
|  | resentation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -  |

# Vale of Glamorgan Council - Local Development Plan DEPOSIT PLAN (February 2012) - REPRESENTATION DETAILS: (ordered by Representation ID No.)

| Representor ID and details: 3953/DP1 Alun Jones   |   |
|---|---|
| Date Lodged     Status     Petition and No.     Supporting Evidence       28/03/2012     M     0  | Additional SA SEA Rep format: 4a - do you want your comments to be consiered by 'written representations' or do you want to speak at a hearing session of Public examination?   |
| 2a - Do you consider the LDP is Sound? Unanswered   | 2b - If you think that the Plan is unsound and does not not meet one or more test(s) of soundness, please indicate which test(s) that it fails.  Procedural Tests - P1 - Unanswered P2 - Unanswered  Consistency Tests - C1 - Unanswered C2 - Unanswered C3 - Unanswered C4 - Unanswered  Coherence and Effectiveness Tests - CE1 - Unanswered CE2 - Unanswered CE3 - Unanswered CE4 - Unanswered   |
|   | Policy Number: Paragraph Number: Proposal Map: Constraints Map Appendices:  |
| 3b - Do you wish to see any changes made to the Deposit Plan  | as a result of your representation? Unanswered (If "No" or "Unanswered" - go to 3d)   |
| 3c - What changes would like to see made to the Deposit Plan?   |   |
| •   | d site, did you submit the site as a Candidate Site? Unanswered (If "Yes", please give the Candidate Site Name and reference if known) Site Name:   |
| In Dinas Powys it is proposed that a minimum of 400 addit directions, particularly at peak times. The additional traffic  To add to that there are already 2000 houses approved at drive through Dinas Powys, using both the main road and is Dinas Powys expected to take?  As it is, residents within the older part of the Village are already Pen-y-Turnpike. Theses roads are subjected to strear particularly standing traffic, would exacerbate the potential Further, I am concerned that there have not been any properties the present demand and medical services are restricted did the Deposit plan does not indicate what measures will be trains will be a major challenge. Additional buses would sin | Ins regarding the implications of the effect that the proposed additional housing would have on the local highways network.  It is nevitable that many of the additional vehicles arising from that development will also through the village centre, down Mill Road and up Pen-y-turnpike. St. Andrews Road and Britway Road will also be affected. How much more traffic eady affected at present by the amount of traffic coming from the Barry direction that travels on the alternative route through Station Road, Mill Road as of cars, particularly at peak times. Michaelston-le-Pit would also be affected at its junction with the Pen-y-Turnpike Road. An increase in vehicles, |
| 3f - Please outline the changes you wish to see made to the De  | posit Plan to make it sound (if relevant)   |
|   | resentation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -  |

(ordered by Representation ID No.)

| Representor ID and details: 3954                             | /DP1 Mr David Barnes     |   |  |                              |                                |   |                                  |                  |
|--|--------------------------|---|--|------------------------------|--------------------------------|---|----------------------------------|------------------|
| Date LodgedStatusPetition and N29/03/2012M0                  | lo. Supporting Evidence  | Additional SA SEA                       |  | Rep format:<br>Letter        | , ,                            | our comments to be co<br>at a hearing session o | •                                | •                |
| 2a - Do you consider the LDP is Sound                        | d? Unanswered            | Procedural Tests -                      | he Plan is unsound and P1 - Unanswered C1 - Unanswered | P2 - Unans                   | wered                          |   |                                  | that it fails.   |
|  |                          | Coherence and Effect                    | tiveness Tests - CE1                                   | - Unanswered                 | CE2 - Unanswered               | CE3 - Unanswered                                | CE4 - Unanswe                    | red              |
| 3a - Which part of the Deposit Plan are                      | you commenting on?       | Policy Number:                          | <u>Paragrap</u>  | h Number:                    | Proposal Map:                  | Co  | nstraints Map                    | Appendices:      |
|  |                          | MG2(16)                                 |  |                              |                                |   |                                  |                  |
| 3b - Do you wish to see any changes n                        | nade to the Deposit Plan | as a result of your rep                 | oresentation? Unansv                                   | vered (If                    | "No" or "Unanswered            | " - go to 3d)                                   |                                  |                  |
| 3c - What changes would like to see made to the Deposit Plan |                          | New Policy:<br>Unanswered               | Amended Policy:<br>Unanswered                          | New Paragraph:<br>Unanswered | Amended Paragram<br>Unanswered | h: New Or Amended :<br>Unanswered               | Site: Other (see N<br>Unanswered | <del></del>      |
|  |                          | Notes:                                  |  |                              |                                |   |                                  |                  |
| 3d - If your representation relates to a                     | new, deleted or amende   | ed site, did you submit s<br>Site Name: | the site as a Candidate                                | Site? Unanswer               | red (If "Yes", plea            | ase give the Candidate<br>Site Reference        |                                  | erence if known) |
| 2a Diagon ant out your representation                        | n halaw                  |   |  |                              | <b>*</b>                       |   |                                  |                  |

3e - Please set out your representation below:

Response to The Vale of Glamorgan Local Development Plan (LDP) 2011-26

To the Planning Commission of the LDP

We fully understand the need for further residential developments in order to meet the demand for new homes. The plans for site location MG2 (16) include the construction of 450 "dwellings", which is a massive expansion of the Lower Penarth residential area with enormous impact on an already densely populated part of Penarth.

We have the following concerns, which need to be included in the early planning phase of such a large development site:

- 1. Traffic (residential and construction) It is absolutely impossible to use the current residential roads off Lavernock Road (Brockhill Rise, Caynham Avenue, Stanton Way and Whitcliffe Drive) for feeding into the new development site. The construction traffic would lead to serious traffic congestions and would have a serious impact on the Cliff Walk recreational area. The same holds true for the traffic by the new residents once construction has been completed. We, therefore, strictly object to any idea involving the current residential roads (Brockhill Rise to Whitcliffe Drive) in order to gain access to the MG 2 (16) site.
- 2. Recreational area The Cliff Walk is a very busy recreational area in Lower Penarth that attracts a multitude of dog owners (irrespective of the weather) as well as many walkers and cyclists (especially on a clear day). The MG 2 (16) development site with its planned 450 dwelling would cause a "collapse" of the current restricted belt of park area along the cliff top. We, therefore, demand that the new site create its own recreational area, which may be an extension of the existing Cliff Walk.

Additional Remarks

I am very concerned at the extra traffic generated as our present needs are insufficient to cater for the current volume of traffic

(plus additional letter below)

I am personally alarmed at these proposals for te further development of housing in this area of Penarth beyond Cliff Walk and the affect on the roads in Penarth.

- 1. Penarth's main roads are already in a state of gridlock from 07:30 in the morning to Cardiff both from the Windsor Road exit and the Redlands Road exit. The road from Dinas Powis & Barry is also gridlocked at the "Merrie Harriers" junction. These traffic jams all culminate at the Barons Court traffic lights which seem to have directly adversely affected traffic flow after the replacement of the roundabout.
- 2. The existing roads are at saturation point and these traffic jams also now occur during normal parts of the day as well.

Representation ID No.)

Representor ID and details: 3954/DP1 Mr David Barnes

- 3. The roads in the Penarth area are already in a very poor state of repair, far worse than any other area that I go to.
- 4. The above is well known to the Council and Planning Departments.
- 5. The Esplanade & Cliff Walk including the Whitcliffe Drive area are very popular amenity facilities and there is already insufficient car parking in the area for the current number of users. Any possible development will place more pressure on this area and the plans should therefore include relief for this problem for the Whitcliffe Drive area and provide an extension of the Cliff Walk.
- 6. Where is access going to be for this development, the current side roads cannot bear any more traffic?

Surely attention should be given to the above matters before any further developments of agricultural land are even considered.

- 3f Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
- 4b If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -



(ordered by Representation ID No.)

| Representor ID and details: 3955/DP1 J E Jackson                 |  |   |                              |   |   |                             |                 |
|--|--|---|------------------------------|---|---|-----------------------------|-----------------|
| Date LodgedStatusPetition and No.Supporting Evidence28/03/2012M0 | Additional SA SEA                            |   | Rep format:<br>Letter        | ,                                       | ir comments to be consider a hearing session of Pul | •                           | •               |
| 2a - Do you consider the LDP is Sound? Unanswered                | •  | ne Plan is unsound and<br>P1 - Unanswered | does not not meet o          | ` '                                     | oundness, please indicate                           | e which test(s) t           | hat it fails.   |
|  | Consistency Tests -<br>Coherence and Effecti | C1 - Unanswered iveness Tests - CE1 -     |                              | ered C3 - Unanswe<br>CE2 - Unanswered C |   | red<br>CE4 - Unanswere      | ed              |
| 3a - Which part of the Deposit Plan are you commenting on?       | Policy Number:<br>MG2(19). MG2(20)           | <u>Paragraph</u>                          |                              | Proposal Map:                           | Constra   | aints Map                   | Appendices:     |
| 3b - Do you wish to see any changes made to the Deposit Plan     | as a result of your repr                     | resentation? Unansw                       | ered (If "                   | No" or "Unanswered" -                   | go to 3d)   |                             |                 |
| 3c - What changes would like to see made to the Deposit Plan?    | New Policy:<br>Unanswered<br>Notes:          |   | New Paragraph:<br>Unanswered | Amended Paragraph:<br>Unanswered        | New Or Amended Site:<br>Unanswered                  | Other (see No<br>Unanswered | tes):           |
| 3d - If your representation relates to a new, deleted or amende  | ed site, did you submit t<br>Site Name:      | he site as a Candidate                    | Site? Unanswere              | d (If "Yes", please                     | give the Candidate Site<br>Site Reference:          | Name and refe               | rence if known) |

3e - Please set out your representation below:

As a resident of Dinas Powys I wish to express my concerns re. the implications of the effect that the proposed additional housing would have on the local highways network.

In Dinas Powys it is proposed that a minimum of 400 addition houses will be built on the St Cyres annexe and Caerleon Road, Both sites are on the Murch side of the community which is served by only two access points to the main road [A4055]. Both these junctions, namely the Infants School traffic lights at Murch Bridge and Cross Common Road at its junction with the A4055 are either at capacity or structurally suspect.

The 400 houses would generate between 600 to 800 additional cars in both directions, particularly at peak times,. The additional traffic would have a profound and adverse impact on the community as the existing roads are under great pressure now.

Further, I am concerned that there have not been any proposed extra community facilities of substance. A local church is in desperate need of a permanent base, the local sporting facilities are not adequate for the present demand and medical services are restricted due to the limitations of space at the Dinas Powys Surgery premises on Cardiff Road.

There appears to be no serious consideration having been given to other views as to the future possible use of St Cyres Annexe, Murch Road. It is worth noting that the school buildings are in good condition although in need of a little investment. To simply seek to tear down the school without any reference to the community needs would be a shameful waste. I also have concerns regarding the capacity of the local schools to accommodate the extra pupils due to the additional houses.

The three is the evidence in the Plan He to 40,000 and its allowed as a sixth and the Web and the Web

Then there is the wider consideration of the Plan. Up to 10,000 additional houses are planned, many in the south east area of the Vale, e.g. 2,000 units already having been approved at the Waterfront, Barry.

Much of this traffic will be funnelled through Dinas Powys and join the ever lengthening queues leading to and from the Merrie Harrier. The proposals in Sully, Penarth, Lavernock and the land adjacent St Josephs' School, Sully Road will only add to the existing congestion at this junction.

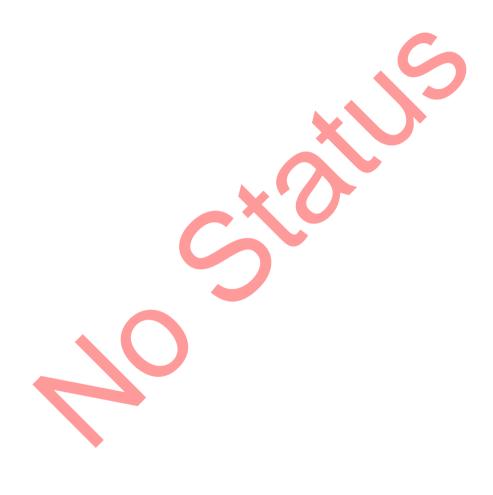
Already the air pollution levels are excessive. The Nitrogen Dioxide [N02] levels are recorded as being 43.8 units with the maximum recommended level being 40 units along Cardiff Road, Eastbrook. An increase in vehicles, particularly standing traffic, would exacerbate the situation. The level of other emissions such as CO (carbon monoxide) and Particulates [PM105] are not available but need clarifying

The Deposit plan does not indicate what measures will be taken to encourage the availability and use of public transport. I understand that there is a serious lack of rolling stock in Wales and providing extra trains will be a major challenge. Additional buses would simply be caught up in the traffic chaos the extra housing would cause.

(ordered by Representation ID No.)

Representor ID and details: 3955/DP1 J E Jackson

3f - Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)



(ordered by Representation ID No.)

| Representor ID and details: 3956/DP1 Anne Fowler   |   |  |                              |                                |  |                              |                |
|--|---|--|------------------------------|--------------------------------|--|------------------------------|----------------|
| Date Lodged     Status     Petition and No.     Supporting Evidence       28/03/2012     M     0 | Additional SA SEA                       |  | Rep format:<br>Letter        | , ,                            | our comments to be consider at a hearing session of Pu | •                            | •              |
| •  | •                                       | e Plan is unsound and<br>P1 - Unanswered | does not not meet o          | ` '                            | soundness, please indicate                             | e which test(s) th           | nat it fails.  |
|  | Consistency Tests -                     | C1 - Unanswered                          | C2 - Unanswe                 | ered C3 - Unans                | wered C4 - Unanswe                                     | ered                         |                |
|  | Coherence and Effective                 | veness Tests - CE1 -                     | - Unanswered C               | E2 - Unanswered                | CE3 - Unanswered C                                     | CE4 - Unanswere              | ;d             |
| , , ,  | Policy Number:<br>MG2(19). MG2(20)      | <u>Paragraph</u>                         |                              | roposal Map:                   | Constr   | aints Map                    | Appendices:    |
| 3b - Do you wish to see any changes made to the Deposit Plan                                     | as a result of your repre               | esentation? Unansw                       | vered (If "N                 | No" or "Unanswered             | " - go to 3d)  |                              |                |
| 3c - What changes would like to see made to the Deposit Plan?                                    | New Policy: Unanswered Notes:           |  | New Paragraph:<br>Unanswered | Amended Paragrag<br>Unanswered | <u>h: New Or Amended Site:</u><br>Unanswered           | Other (see No:<br>Unanswered | tes):          |
| 3d - If your representation relates to a new, deleted or amende                                  | d site, did you submit th<br>Site Name: | ne site as a Candidate                   | Site? Unanswered             | d (If "Yes", plea              | se give the Candidate Site Site Reference:             | Name and refer               | ence if known) |
| On Diagram and automorphisms and affine highers  |   |  |                              |                                |  |                              |                |

3e - Please set out your representation below:

As a resident of Dinas Powys I wish to express my concerns re. the implications of the effect that the proposed additional housing would have on the local highways network.

In Dinas Powys it is proposed that a minimum of 400 addition houses will be built on the St Cyres annexe and Caerleon Road, Both sites are on the Murch side of the community which is served by only two access points to the main road [A4055]. Both these junctions, namely the Infants School traffic lights at Murch Bridge and Cross Common Road at its junction with the A4055 are either at capacity or structurally suspect.

The 400 houses would generate between 600 to 800 additional cars in both directions, particularly at peak times,. The additional traffic would have a profound and adverse impact on the community as the existing roads are under great pressure now.

Further, I am concerned that there have not been any proposed extra community facilities of substance. A local church is in desperate need of a permanent base, the local sporting facilities are not adequate for the present demand and medical services are restricted due to the limitations of space at the Dinas Powys Surgery premises on Cardiff Road.

There appears to be no serious consideration having been given to other views as to the future possible use of St Cyres Annexe, Murch Road. It is worth noting that the school buildings are in good condition although in need of a little investment. To simply seek to tear down the school without any reference to the community needs would be a shameful waste. I also have concerns regarding the capacity of the local schools to accommodate the extra pupils due to the additional houses.

Then there is the wider consideration of the Plan. Up to 10,000 additional houses are planned, many in the south east area of the Vale, e.g. 2,000 units already having been approved at the Waterfront, Barry.

Much of this traffic will be funnelled through Dinas Powys and join the ever lengthening queues leading to and from the Merrie Harrier. The proposals in Sully, Penarth, Lavernock and the land adjacent St Josephs' School, Sully Road will only add to the existing congestion at this junction.

Already the air pollution levels are excessive. The Nitrogen Dioxide [N02] levels are recorded as being 43.8 units with the maximum recommended level being 40 units along Cardiff Road, Eastbrook. An increase in vehicles, particularly standing traffic, would exacerbate the situation. The level of other emissions such as CO (carbon monoxide) and Particulates [PM105] are not available but need clarifying

The Deposit plan does not indicate what measures will be taken to encourage the availability and use of public transport. I understand that there is a serious lack of rolling stock in Wales and providing extra trains will be a major challenge. Additional buses would simply be caught up in the traffic chaos the extra housing would cause.

(ordered by Representation ID No.)

Representor ID and details: 3956/DP1 Anne Fowler

As a resident of the above address (supplied) for over 50 years, it is not difficult to imagine how extra houses will generate an impossible traffic situation - a situation which at the present time is hardly sustainablke. All roads to the traffic lights will become like the M25!

- 3f Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
- 4b If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -



(ordered by Representation ID No.)

| Representor ID and details: 3957/DP1 Nicola Rhodes   |   |                           |                              |                               |   |                                |                  |
|--|---|---------------------------|------------------------------|-------------------------------|---|--------------------------------|------------------|
| Date Lodged     Status     Petition and No.     Supporting Evidence       29/03/2012     M     0 | Additional SA SEA                               |                           | Rep format:<br>Letter        |                               | your comments to be cons<br>k at a hearing session of F |                                |                  |
| 2a - Do you consider the LDP is Sound? Unanswered  | Procedural Tests -                              | P1 - Unanswered           | P2 - Unansv                  | vered                         | of soundness, please indic                              |                                | that it fails.   |
|  | Coherence and Effect                            | ctiveness Tests - CE1 - C | Unanswered                   | CE2 - Unanswered              | CE3 - Unanswered  | CE4 - Unanswe                  | red              |
| 3a - Which part of the Deposit Plan are you commenting on?                                       | Policy Number:<br>MG2(19). MG2(20).<br>MG10(1). | Paragraph  <br>MG2(25)    |                              | Proposal Map:                 | <u>Cons</u>   | straints Map                   | Appendices:      |
| 3b - Do you wish to see any changes made to the Deposit Plan                                     | as a result of your re                          | presentation? Unanswe     | ered (If                     | "No" or "Unanswered           | d" - go to 3d)  |                                |                  |
| 3c - What changes would like to see made to the Deposit Plan                                     | ? New Policy:<br>Unanswered<br>Notes:           |                           | New Paragraph:<br>Jnanswered | Amended Paragra<br>Unanswered | nph: New Or Amended Si<br>Unanswered                    | te: Other (see N<br>Unanswered | <del></del>      |
| 3d - If your representation relates to a new, deleted or amende                                  | ed site, did you submit<br>Site Name:           | the site as a Candidate S | Site? Unanswere              | ed (If "Yes", ple             | ease give the Candidate Si<br>Site Reference            |                                | erence if known) |

3e - Please set out your representation below:

I hereby state my objections to the development of the Dinas Powys St Cyres school site as a housing development, the building of new homes on Sully Road and Caerleon Road and the development of a new school complex on St Cyres, Penarth site. There are significant, detrimental implications of this plan, mainly on the local highways network, environment and our local community.

It is a predictable certainty that should the new school development at St Cyres, Penarth go ahead along with new housing developments on the current St Cyres, Dinas Powys site, Caerleon Road and Sully Road that there will be a significant increase in the already heavy traffic on all roads, ultimately meeting at the Merrie Harrier junction. Traffic is currently at gridlock point during peak times of 7.30 and 9.30 am and 3.30 and 6.00 pm. Slow-moving, or more likely, stationary traffic will only increase the amount of pollution along this main route and increase the levels of stress and anguish for commuters and residents. This will impede on commuters going in and out of the Vale of Glamorgan.

Of particular importance is the amount of air-borne pollution at Dinas Powys Infant school, on the main Cardiff Road, where out youngest and most vulnerable residents play. Increased traffic will lead to tailbacks along the length of Cardiff and Barry Road, in to Pen-y-turnpike Road and around the surrounding areas at Wenvoe into Culverhouse Cross. The already agreed development at Barry Waterfront of 2000 new houses will only add to this severe traffic congestion as inevitably commuters will be travelling in to Cardiff or accessing the M4.

The roads in Dinas Powys cannot cope with the current level of traffic, let alone the inevitable increase with further developments. Murch Crescent and Windyridge are far too narrow to allow for the access of a new development on the current St Cyres site. Ultimately the whole of the highways infra-structure in Dinas Powys is entirely insufficient and incapable of supporting any more traffic problem in Dinas Powys, along the A4055. Adding more housing, and thus, traffic will not alleviate this problem but exacerbate it.

Another concern is whether Dinas Powys needs any more housing. Many residents have had houses for sale for a considerable amount of time with no luck selling. With the building of the Penarth Learning Community certain school places are guaranteed, but with a growing population and potentially over 400 new houses we have to consider where these children will be schooled and if there are sufficient places available at the two current primary schools and new secondary school complex.

The third implication is environmental. There are significant numbers of bird, mammal and insect life that thrive in the immediate countryside around Dinas Powys. A significant number of riders, walkers and cyclists use the bridleways and access routes along Sully Road through to Cosmeston Country Park and Lavernock Point. New housing developments will inevitably lead to the destruction of habitats, including hedgerows. We need to encourage, not discourage more visitors and tourists to our locality so building at all three aforementioned sites will cause detrimental, possibly irreversible damage to the environment and encouragement of tourists. Objective 3 (pg 20) proposes that residents need to be encouraged to use more sustainable levels of transport e.g.) cycling. This is more likely to happen in an environment that is attractive and easily accessible. Objective 4 (pg.21) promotes the protection and enhancement of the natural environment thus, all rural routes need to be attractive and encouraging to all!

I am aware of the need, under WAG guidelines, that a certain percentage of new housing has to be provided by all Welsh authorities. However, I feel that this Local Development Plan has not thought about the

(ordered by Representation ID No.)

Representor ID and details: 3957/DP1 Nicola Rhodes

severe implications of development at the sites that I have highlighted. I would urge the council to consider the following:

- The development of the current St Cyres. Dinas Powys site in to a new Medical Health Care centre, fully equipped to provide high level care for a growing village. This would serve two purposes; decrease traffic on the main Cardiff Road, Perclose and Orchard Crescent, provide ample parking for our residents and provide a modern, desperately needed centre for the NHS to deliver care for our residents. This could, for example, provide minor operations, out-reach care and other services currently unavailable. The current health centre on Cardiff Road is rundown, dated and in desperate need of modernisation. I refer to Objective 5 in the LDP that states; 'To maintain and promote community facilities and services in the Vale of Glamorgan' (4.9 pg 21). This revised proposal will certainly satisfy this objective.
- Build OR refurbish the current St Cyres school, Dinas Powys site to provide a community hall and local base for our community. The local Baptist church currently has no permanent home and a new community building could fulfill this role as well as provide other services such as child care, courses, Brownie, Cubs and Guiding clubs etc. 1 again refer to Objective 5 (4.9 pg 21) and suggest this will meet this objective.

The proposed housing development would have to be relocated elsewhere, BUT, the points made in my objection are clear and supported by the vast majority of residents in Dinas Powys. It is also important to refer to the LDP statements themselves as it seems the LDP proposal reneges on many of its own objectives and mission statement.

The Vale of Glamorgan council needs to re-assess its proposals and consider the needs of its residents. After all it states that: 'Our vision for the Vale of Glamorgan is a place that is safe, clean and attractive. where individuals and communities have sustainable opportunities to improve their health, learning and skills, 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 sustainability of the area. I strongly feel that the Local Development Plan does not meet this mission statement and urge the Council to reconsider the plan forthwith.

3f - Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)

(ordered by Representation ID No.)

| Representor ID and details: 3958/DP1 Graham Butler                     |   |                               |                              |                                |  |  |       |
|--|---|-------------------------------|------------------------------|--------------------------------|--|--|-------|
| Date Lodged Status Petition and No. Supporting Evidence 28/03/2012 M 0 | e Additional SA SEA                           |                               | Rep format:<br>Letter        | , ,                            | our comments to be consie<br>at a hearing session of Pul | ered by 'written representations' oblic examination? | or do |
| 2a - Do you consider the LDP is Sound? Unanswered                      | 2b - If you think that the Procedural Tests - |                               |                              | ` '                            | soundness, please indicate                               | which test(s) that it fails.                         |       |
|  | Consistency Tests -                           | C1 - Unanswered               | C2 - Unansv                  | wered C3 - Unans               | swered C4 - Unanswe                                      | red  |       |
|  | Coherence and Effect                          | tiveness Tests - CE           | 1 - Unanswered               | CE2 - Unanswered               | CE3 - Unanswered C                                       | E4 - Unanswered                                      |       |
| 3a - Which part of the Deposit Plan are you commenting on?             | Policy Number:<br>MG2(19). MG2(20).           | <del></del>                   | <u> </u>                     | Proposal Map:                  | Constra  | aints Map Appendices:                                |       |
| 3b - Do you wish to see any changes made to the Deposit Pla            | an as a result of your rep                    | oresentation? Unans           | swered (If                   | "No" or "Unanswered            | " - go to 3d)  |  |       |
| 3c - What changes would like to see made to the Deposit Pla            | Unanswered                                    | Amended Policy:<br>Unanswered | New Paragraph:<br>Unanswered | Amended Paragrap<br>Unanswered | oh: New Or Amended Site:<br>Unanswered                   | Other (see Notes):<br>Unanswered                     |       |
|  | Notes:  |                               |                              |                                |  |  |       |
| 3d - If your representation relates to a new, deleted or amen          | ded site, did you submit t<br>Site Name:      | the site as a Candidat        | e Site? Unanswere            | ed (If "Yes", plea             | ase give the Candidate Site<br>Site Reference:           | Name and reference if known)                         |       |
|  |   |                               |                              |                                |  |  |       |

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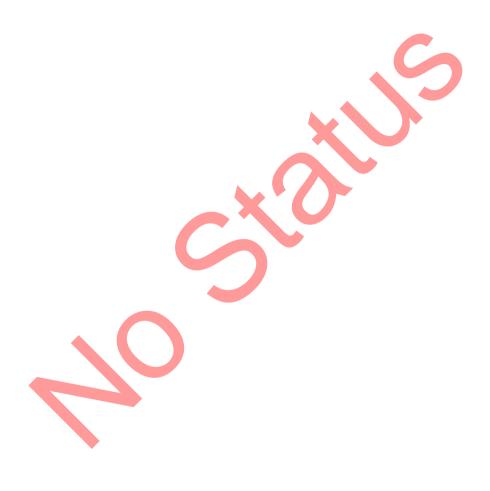
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(ordered by Representation ID No.)

Representor ID and details: 3958/DP1 Graham Butler

3f - Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)



(ordered by Representation ID No.)

| Representor ID and details: 3959/DP1 Mr D A Davies   |  |   |                              |                                |   |  |
|--|--|---|------------------------------|--------------------------------|---|--|
| Date Lodged     Status     Petition and No.     Supporting Eviden       28/03/2012     M     0 | ce Additional SA SEA                   |   | Rep format:<br>Letter        | , ,                            | your comments to be consider at a hearing session of Pu | ered by 'written representations' or do ublic examination? |
| 2a - Do you consider the LDP is Sound? Unanswered  | •                                      | he Plan is unsound and<br>P1 - Unanswered |                              | ` '                            | f soundness, please indicat                             | e which test(s) that it fails.                             |
|  | Consistency Tests -                    | C1 - Unanswered                           | C2 - Unans                   | wered C3 - Unans               | swered C4 - Unanswe                                     | ered   |
|  | Coherence and Effect                   | tiveness Tests - CE1                      | - Unanswered                 | CE2 - Unanswered               | CE3 - Unanswered C                                      | CE4 - Unanswered   |
| 3a - Which part of the Deposit Plan are you commenting on?                                     | Policy Number:<br>MG2(19). MG2(20).    | <del></del> -                             | oh Number:                   | Proposal Map:                  | Constr  | raints Map Appendices:                                     |
| 3b - Do you wish to see any changes made to the Deposit Pl                                     | an as a result of your rep             | presentation? Unans                       | wered (If                    | "No" or "Unanswered            | " - go to 3d)   |  |
| 3c - What changes would like to see made to the Deposit Pla                                    | n? <u>New Policy:</u><br>Unanswered    | Amended Policy:<br>Unanswered             | New Paragraph:<br>Unanswered | Amended Paragram<br>Unanswered | ph: New Or Amended Site Unanswered                      | : Other (see Notes): Unanswered                            |
|  | Notes:                                 |   |                              |                                |   |  |
| 3d - If your representation relates to a new, deleted or amen                                  | ded site, did you submit<br>Site Name: | the site as a Candidate                   | e Site? Unanswer             | ed (If "Yes", plea             | ase give the Candidate Site<br>Site Reference:          | Name and reference if known)                               |
|  |  |   |                              |                                |   |  |

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Then there is the wider consideration of the Plan. Up to 10,000 additional houses are planned, many in the south east area of the Vale, e.g. 2,000 units already having been approved at the Waterfront, Barry.

Much of this traffic will be funnelled through Dinas Powys and join the ever lengthening queues leading to and from the Merrie Harrier. The proposals in Sully, Penarth, Lavernock and the land adjacent St Josephs' School. Sully Road will only add to the existing congestion at this junction.

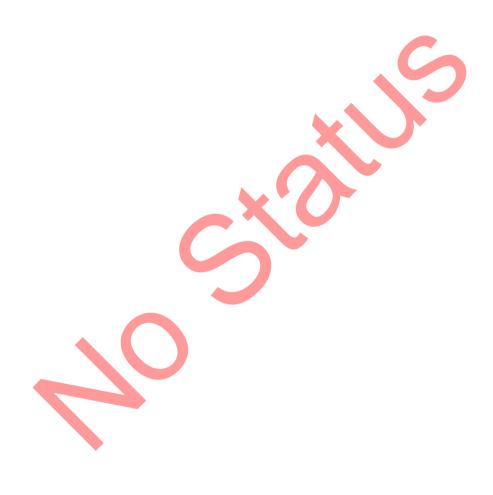
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(ordered by Representation ID No.)

Representor ID and details: 3959/DP1 Mr D A Davies

3f - Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)



| Representor ID and details: 3960/DP1  | Mrs Audrey Wilkinson   |  |                              |                                 |                     |  |                                   |
|---|--|--|------------------------------|---------------------------------|---------------------|--|-----------------------------------|
| Date Lodged     Status     Petition and No.     Sure Policy       29/03/2012     M     □     0  | pporting Evidence Additional SA SE   | <u>A</u>   | Rep format:<br>Comment form  |                                 |                     | consiered by 'written of Public examination  | representations' or do n? Written |
| 2a - Do you consider the LDP is Sound? Un   | Procedural Tests -   | at the Plan is unsound and d<br>P1 - Unanswered<br>- C1 - Unanswered | P2 - Unanswe                 | ered                            |                     | ` `  | that it fails.                    |
|   | Coherence and Ef   | ectiveness Tests - CE1 - l   | Jnanswered Cl                | E2 - Yes                        | CE3 - Unanswered    | CE4 - Unanswer                               | ed                                |
| 3a - Which part of the Deposit Plan are you o   | commenting on? Policy Number:  | Paragraph I  |                              | roposal Map:                    | <u>C</u>            | Constraints Map                              | Appendices:                       |
|   |  |  |                              | MG2(13)                         |                     |  |                                   |
| 3b - Do you wish to see any changes made to   | o the Deposit Plan as a result of your   | representation? Yes  | (If "N                       | lo" or "Unanswered" -           | go to 3d)           |  |                                   |
| 3c - What changes would like to see made to   |  | Amended Policy: N  | lew Paragraph:<br>Jnanswered | Amended Paragraph<br>Unanswered |                     |  |                                   |
|   | Notes:   |  |                              |                                 |                     |  |                                   |
| 3d - If your representation relates to a new,   |  | nit the site as a Candidate S<br>to west of St Athan Road Lla        | . v = =                      | ` '                             | •                   | e Site Name and refe<br>ence: 2446/CS1, 2446 | ,                                 |
| 3e - Please set out your representation below   | w:   |  |                              |                                 |                     |  |                                   |
| Proposed Development East and West  | ,  |  |                              |                                 |                     |  |                                   |
| I strongly object to the above developm Cowbridge was a lovely historic market market site and possibly on the school People living in all the new houses will I A big strain will also be put on our Heal There will also be less parking spaces f | town but over the years it has been s<br>playing field. This, together with the c<br>have at least one car per house.<br>th Centre and schools, especially if ne | urrounded by sprawling hous<br>oming of Waitrose will greatly        | y add to the traffic o       | congestion in the High          |                     | on the Town Mill Roa                         | ad old school site, the           |
| 3f - Please outline the changes you wish to s<br>Have candidate site removed and include  | ·  | `  | ns.                          |                                 |                     |  |                                   |
| 4h - If you wish to speak please confirm wh   | ich part of your representation you wi   | th to speak to the inspector :                                       | ahout and why they           | consider it he necess           | ary to speak at the | hearing -                                    |                                   |

(ordered by Representation ID No.)

| Representor ID and details: 3961/DP1 M & G Donegan                     |  |   |                                    |  |  |
|--|--|---|------------------------------------|--|--|
| Date Lodged Status Petition and No. Supporting Evidence 28/03/2012 M 0 | Additional SA SEA                              | Rep format:<br>Letter   |                                    | ur comments to be consiere<br>at a hearing session of Publ | ed by 'written representations' or do lic examination? |
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The Deposit plan does not indicate what measures will be taken to encourage the availability and use of public transport. I understand that there is a serious lack of rolling stock in Wales and providing extra trains will be a major challenge. Additional buses would simply be caught up in the traffic chaos the extra housing would cause.

(ordered by Representation ID No.)

Representor ID and details: 3961/DP1 M & G Donegan

Dear Sir/Madam

I agree with all the statements in the letter enclosed, but would like to add some comments.

It would be a crime to consider all these buildings without a new road in place beforehand. You are prepared to knock a school down and then if all the houses are built, have to build another to accommodate all the extra children they will bring.

What have you got against Dinas Powys? The traffic is already dreadful. Please consider people's quality of life. We have lived in Dinas for 43 years and it is losing its village character. I am not in the best of health but I would be prepared to demonstrate against these plans.

3f - Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)



| Representor I             | D and d     | etails:    | 3962/D          | P1 Mrs A Jenkins             |  |   |                                  |                                |                                  |  |                              |
|---------------------------|-------------|------------|-----------------|------------------------------|--|---|----------------------------------|--------------------------------|----------------------------------|--|------------------------------|
| Date Lodged<br>29/03/2012 | Status<br>M | Petitio    | on and No.<br>0 | Supporting Evidence          | Additional SA SEA                                  |   | Rep format:<br>Letter            |                                |                                  | e consiered by 'writter<br>on of Public examination  | n representations' or do on? |
| 2a - Do you co            | nsider th   | ne LDP     | is Sound?       |                              | 2b - If you think that the Procedural Tests -      | ne Plan is unsound and o<br>P1 - Unanswered | does not not meet<br>P2 - Unansw | ` '                            | soundness, please                | e indicate which test(s)   | ) that it fails.             |
|                           |             |            |                 |                              | Consistency Tests -                                | C1 - Unanswered                             | C2 - Unansv                      | vered C3 - Unans               | swered C4 - U                    | Inanswered   |                              |
|                           |             |            |                 |                              | Coherence and Effect                               | iveness Tests - CE1 -                       | Unanswered                       | CE2 - Unanswered               | CE3 - Unanswere                  | ed CE4 - Unanswe   | ered                         |
| 3a - Which par            | rt of the I | Deposit    | Plan are y      | ou commenting on?            | Policy Number:                                     | <u>Paragraph</u>                            | Number:                          | Proposal Map:                  |                                  | Constraints Map  | Appendices:                  |
|                           |             |            |                 |                              | MG2(19)  |   |                                  |                                |                                  |  |                              |
| 3b - Do you wi            | sh to see   | e any ch   | nanges ma       | de to the Deposit Plan       | as a result of your rep                            | resentation? Unanswe                        | ered (If                         | "No" or "Unanswered            | " - go to 3d)                    |  |                              |
| 3c - What cha             | nges wo     | uld like 1 | to see mad      | le to the Deposit Plan?      | ? New Policy: Unanswered                           |   | New Paragraph:<br>Unanswered     | Amended Paragrap<br>Unanswered | oh: New Or Amend<br>Unanswered   | ded Site: Other (see Note of the Control of the Con | <del></del>                  |
|                           |             |            |                 |                              | Notes:   |   |                                  |                                |                                  |  |                              |
| 3d - If your re           | presenta    | ition rela | ates to a ne    |                              | ed site, did you submit t<br>Site Name:            | he site as a Candidate S                    | Site? Unanswere                  | ed (If "Yes", plea             | ase give the Candid<br>Site Refe | ate Site Name and ref  | ference if known)            |
| 3e - Please se            | et out yo   | ur repre   | sentation b     | elow:                        |  | Y   |                                  |                                |                                  |  |                              |
|                           |             |            |                 |                              | s Annexe site, I am extr<br>ol and the Nursery Sch |   | ought of so much r               | road traffic it would ge       | nerate, bearing in n             | nind the considerable  | numbers of children who      |
| The road                  | l traffic a | long the   | Cardiff roa     | ad is already horrendo       | us as every commuter                               | to Cardiff/Penarth and E                    | ary would confirm                |                                |                                  |  |                              |
| The play                  | grounds     | at the Ir  | nfants Sch      | ool at the crossroads r      | must be choking with pe                            | etrol/diesel fumes alread                   | y.                               |                                |                                  |  |                              |
| I just car                | not think   | that the   | e position o    | of this site is suitable for | or such an enourmouse                              | e project- please think ag                  | gain!                            |                                |                                  |  |                              |
| 3f - Please ou            | ıtline the  | change     | s you wish      | to see made to the D         | eposit Plan to make it s                           | sound (if relevant)                         |                                  |                                |                                  |  |                              |
| 4h - If you wis           | sh to sne   | ak nlea    | se confirm      | which part of your ren       | presentation you wish to                           | speak to the inspector                      | about and why the                | ev consider it be nece         | ssary to speak at th             | e hearing -  |                              |

(ordered by Representation ID No.)

| Representor ID and details:              | 3963/DP1 Mr David Carter       |   |  |                              |                               |   |                                  |                  |
|--|--------------------------------|---|--|------------------------------|-------------------------------|---|----------------------------------|------------------|
| Date Lodged Status Petition 29/03/2012 M | and No. Supporting Evidence    | Additional SA SEA                               |  | Rep format:<br>Letter        |                               | your comments to be co<br>k at a hearing session of |                                  |                  |
| 2a - Do you consider the LDP is          | Sound? Unanswered              | Procedural Tests -                              | he Plan is unsound and o<br>P1 - Unanswered<br>C1 - Unanswered | P2 - Unansv                  | vered                         |   |                                  | that it fails.   |
|  |                                | Coherence and Effect                            | tiveness Tests - CE1 -   | Unanswered                   | CE2 - Unanswered              | CE3 - Unanswered                                    | CE4 - Unanswe                    | red              |
| 3a - Which part of the Deposit P         | lan are you commenting on?     | Policy Number:<br>MG2(19). MG2(20).<br>MG10(1). | <u>Paragraph</u><br>MG2(25)                                    |                              | Proposal Map:                 | <u>Cor</u>  | nstraints Map                    | Appendices:      |
| 3b - Do you wish to see any cha          | nges made to the Deposit Plan  | as a result of your rep                         | oresentation? Unanswe  | ered (If                     | "No" or "Unanswered           | d" - go to 3d)                                      |                                  |                  |
| 3c - What changes would like to          | see made to the Deposit Plan?  | P New Policy:<br>Unanswered<br>Notes:           |  | New Paragraph:<br>Jnanswered | Amended Paragra<br>Unanswered | ph: New Or Amended S<br>Unanswered                  | Site: Other (see N<br>Unanswered |                  |
| 3d - If your representation relation     | es to a new, deleted or amende | ed site, did you submit<br>Site Name:           | the site as a Candidate S                                      | Site? Unanswere              | ed (If "Yes", plea            | ase give the Candidate Site Referenc                |                                  | erence if known) |

3e - Please set out your representation below:

I hereby state my objections to the development of the Dinas Powys St Cyres school site as a housing development, the building of new homes on Sully Road and Caerleon Road and the development of a new school complex on St Cyres, Penarth site. There are significant, detrimental implications of this plan, mainly on the local highways network, environment and our local community.

It is a predictable certainty that should the new school development at St Cyres, Penarth go ahead along with new housing developments on the current St Cyres, Dinas Powys site, Caerleon Road and Sully Road that there will be a significant increase in the already heavy traffic on all roads, ultimately meeting at the Merrie Harrier junction. Traffic is currently at gridlock point during peak times of 7.30 and 9.30 am and 3.30 and 6.00 pm. Slow-moving, or more likely, stationary traffic will only increase the amount of pollution along this main route and increase the levels of stress and anguish for commuters and residents. This will impede on commuters going in and out of the Vale of Glamorgan.

Of particular importance is the amount of air-borne pollution at Dinas Powys Infant school, on the main Cardiff Road, where out youngest and most vulnerable residents play. Increased traffic will lead to tailbacks along the length of Cardiff and Barry Road, in to Pen-y-turnpike Road and around the surrounding areas at Wenvoe into Culverhouse Cross. The already agreed development at Barry Waterfront of 2000 new houses will only add to this severe traffic congestion as inevitably commuters will be travelling in to Cardiff or accessing the M4.

The roads in Dinas Powys cannot cope with the current level of traffic, let alone the inevitable increase with further developments. Murch Crescent and Windyridge are far too narrow to allow for the access of a new development on the current St Cyres site. Ultimately the whole of the highways infra-structure in Dinas Powys is entirely insufficient and incapable of supporting any more traffic problem in Dinas Powys, along the A4055. Adding more housing, and thus, traffic will not alleviate this problem but exacerbate it.

Another concern is whether Dinas Powys needs any more housing. Many residents have had houses for sale for a considerable amount of time with no luck selling. With the building of the Penarth Learning Community certain school places are guaranteed, but with a growing population and potentially over 400 new houses we have to consider where these children will be schooled and if there are sufficient places available at the two current primary schools and new secondary school complex.

The third implication is environmental. There are significant numbers of bird, mammal and insect life that thrive in the immediate countryside around Dinas Powys. A significant number of riders, walkers and cyclists use the bridleways and access routes along Sully Road through to Cosmeston Country Park and Lavernock Point. New housing developments will inevitably lead to the destruction of habitats, including hedgerows. We need to encourage, not discourage more visitors and tourists to our locality so building at all three aforementioned sites will cause detrimental, possibly irreversible damage to the environment and encouragement of tourists. Objective 3 (pg 20) proposes that residents need to be encouraged to use more sustainable levels of transport e.g.) cycling. This is more likely to happen in an environment that is attractive and easily accessible. Objective 4 (pg.21) promotes the protection and enhancement of the natural environment thus, all rural routes need to be attractive and encouraging to all!

I am aware of the need, under WAG guidelines, that a certain percentage of new housing has to be provided by all Welsh authorities. However, I feel that this Local Development Plan has not thought about the

(ordered by Representation ID No.)

Representor ID and details: 3963/DP1 Mr David Carter

severe implications of development at the sites that I have highlighted. I would urge the council to consider the following:

- The development of the current St Cyres. Dinas Powys site in to a new Medical Health Care centre, fully equipped to provide high level care for a growing village. This would serve two purposes; decrease traffic on the main Cardiff Road, Perclose and Orchard Crescent, provide ample parking for our residents and provide a modern, desperately needed centre for the NHS to deliver care for our residents. This could, for example, provide minor operations, out-reach care and other services currently unavailable. The current health centre on Cardiff Road is rundown, dated and in desperate need of modernisation. I refer to Objective 5 in the LDP that states: 'To maintain and promote community facilities and services in the Vale of Glamorgan' (4.9 pg 21). This revised proposal will certainly satisfy this objective.
- Build OR refurbish the current St Cyres school, Dinas Powys site to provide a community hall and local base for our community. The local Baptist church currently has no permanent home and a new community building could fulfil this role as well as provide other services such as child care, courses. Brownie, Cubs and Guiding clubs etc. Lagain refer to Objective 5 (4.9 pg 21) and suggest this will meet this objective.

The proposed housing development would have to be relocated elsewhere, BUT, the points made in my objection are clear and supported by the vast majority of residents in Dinas Powys. It is also important to refer to the LDP statements themselves as it seems the LDP proposal reneges on many of its own objectives and mission statement.

The Vale of Glamorgan council needs to re-assess its proposals and consider the needs of its residents. After all it states that: 'Our vision for the Vale of Glamorgan is a place that is safe, clean and attractive. where individuals and communities have sustainable opportunities to improve their health, learning and skills, 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 sustainability of the area. I strongly feel that the Local Development Plan does not meet this mission statement and urge the Council to reconsider the plan forthwith.

3f - Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)

(ordered by Representation ID No.)

| Representor ID and details: 39   | 964/DP1 Avril Jones         |   |                               |                              |  |  |                             |                |
|--|-----------------------------|---|-------------------------------|------------------------------|--|--|-----------------------------|----------------|
| Date Lodged     Status     Petition and Petitio | d No. Supporting Evidence   | Additional SA SEA   |                               | Rep format:<br>Letter        | ,  | ur comments to be con<br>at a hearing session of | •                           | •              |
| 2a - Do you consider the LDP is So   |                             | 2b - If you think that the<br>Procedural Tests -<br>Consistency Tests - | P1 - Unanswered               | P2 - Unans                   | t one or more test(s) of s<br>wered<br>wered C3 - Unansw |  |                             | nat it fails.  |
|  |                             | Coherence and Effective   | veness Tests - CE1            | - Unanswered                 | CE2 - Unanswered   | CE3 - Unanswered                                 | CE4 - Unanswere             | ed             |
| 3a - Which part of the Deposit Plan  | ,                           | Policy Number:<br>MG2(19). MG2(20)                                      |                               | n Number:                    | Proposal Map:  | <u>Cor</u>                                       | nstraints Map               | Appendices:    |
| 3b - Do you wish to see any change   | es made to the Deposit Plan | as a result of your repre   | esentation? Unansv            | vered (If                    | "No" or "Unanswered" -                                   | go to 3d)  |                             |                |
| 3c - What changes would like to se   | e made to the Deposit Plan? | New Policy:<br>Unanswered<br>Notes:                                     | Amended Policy:<br>Unanswered | New Paragraph:<br>Unanswered | Amended Paragraph<br>Unanswered                          | New Or Amended S<br>Unanswered                   | Other (see No<br>Unanswered | <u>tes):</u>   |
| 3d - If your representation relates t  | *                           | d site, did you submit th<br>Site Name:                                 | ne site as a Candidate        | Site? Unanswer               | ed (If "Yes", please                                     | e give the Candidate S<br>Site Reference         |                             | ence if known) |
| 2a Diagga ant out your represents  | ation halous                |   |                               |                              |  |  |                             |                |

3e - Please set out your representation below:

As a resident of Dinas Powys I wish to express my concerns re. the implications of the effect that the proposed additional housing would have on the local highways network.

In Dinas Powys it is proposed that a minimum of 400 addition houses will be built on the St Cyres annexe and Caerleon Road, Both sites are on the Murch side of the community which is served by only two access points to the main road [A4055]. Both these junctions, namely the Infants School traffic lights at Murch Bridge and Cross Common Road at its junction with the A4055 are either at capacity or structurally suspect.

The 400 houses would generate between 600 to 800 additional cars in both directions, particularly at peak times,. The additional traffic would have a profound and adverse impact on the community as the existing roads are under great pressure now.

Further, I am concerned that there have not been any proposed extra community facilities of substance. A local church is in desperate need of a permanent base, the local sporting facilities are not adequate for the present demand and medical services are restricted due to the limitations of space at the Dinas Powys Surgery premises on Cardiff Road.

There appears to be no serious consideration having been given to other views as to the future possible use of St Cyres Annexe, Murch Road. It is worth noting that the school buildings are in good condition although in need of a little investment. To simply seek to tear down the school without any reference to the community needs would be a shameful waste. I also have concerns regarding the capacity of the local schools to accommodate the extra pupils due to the additional houses.

Then there is the wider consideration of the Plan. Up to 10,000 additional houses are planned, many in the south east area of the Vale, e.g. 2,000 units already having been approved at the Waterfront, Barry.

Much of this traffic will be funnelled through Dinas Powys and join the ever lengthening queues leading to and from the Merrie Harrier. The proposals in Sully, Penarth, Lavernock and the land adjacent St Josephs' School, Sully Road will only add to the existing congestion at this junction.

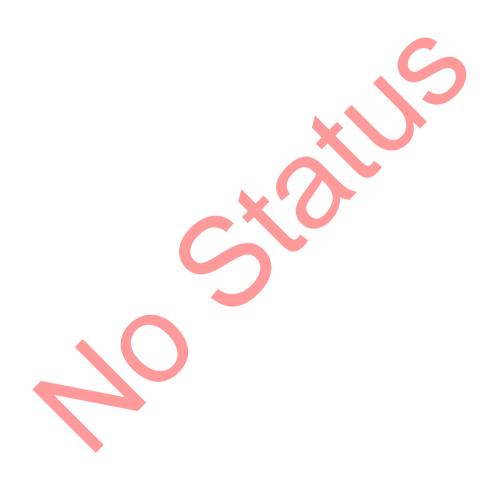
Already the air pollution levels are excessive. The Nitrogen Dioxide [N02] levels are recorded as being 43.8 units with the maximum recommended level being 40 units along Cardiff Road, Eastbrook. An increase in vehicles, particularly standing traffic, would exacerbate the situation. The level of other emissions such as CO (carbon monoxide) and Particulates [PM105] are not available but need clarifying

The Deposit plan does not indicate what measures will be taken to encourage the availability and use of public transport. I understand that there is a serious lack of rolling stock in Wales and providing extra trains will be a major challenge. Additional buses would simply be caught up in the traffic chaos the extra housing would cause.

(ordered by Representation ID No.)

Representor ID and details: 3964/DP1 Avril Jones

3f - Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)



| Representor ID and details: 3965/DP1 Mr John B Averill  |   |
|---|---|
| Date Lodged     Status     Petition and No.     Supporting Evidence       29/03/2012     M     0                        | Additional SA SEA Rep format: 4a - do you want your comments to be consiered by 'written representations' or do you want to speak at a hearing session of Public examination?   |
| 2a - Do you consider the LDP is Sound? Unanswered   | 2b - If you think that the Plan is unsound and does not not meet one or more test(s) of soundness, please indicate which test(s) that it fails.  Procedural Tests - P1 - Unanswered P2 - Unanswered C3 - Unanswered C4 - Unanswered  Consistency Tests - C1 - Unanswered C2 - Unanswered C3 - Unanswered C4 - Unanswered  Coherence and Effectiveness Tests - CE1 - Unanswered CE2 - Unanswered CE3 - Unanswered CE4 - Unanswered |
| 3a - Which part of the Deposit Plan are you commenting on?  | Policy Number:     Paragraph Number:     Proposal Map:     Constraints Map     Appendices:       MG2(19). MG2(20)   |
| 3b - Do you wish to see any changes made to the Deposit Plan  | as a result of your representation? Unanswered (If "No" or "Unanswered" - go to 3d)   |
| 3c - What changes would like to see made to the Deposit Plan?   | New Policy: Amended Policy: New Paragraph: Amended Paragraph: New Or Amended Site: Other (see Notes): Unanswered Unanswered Unanswered Unanswered Unanswered  |
|   | Notes:  |
| 3d - If your representation relates to a new, deleted or amende   | d site, did you submit the site as a Candidate Site? Unanswered (If "Yes", please give the Candidate Site Name and reference if known) Site Name:   |
| 3e - Please set out your representation below:  Vale of Glamorgan Deposit Local Development Plan 2011                   | - 2026  |
| In regard to the above plan my comments are as follows.   |   |
| As a resident who lives off Station Road, Dinas Powys I a already being used as a 'rat run' for vehicles trying to avoi | m already very concerned about the volume of traffic travelling through Dinas Powys, Station Road, Britway Road, Mill Road and Pen Y Turnpike are d the congestion on Cardiff Road.   |
| The addition of some 400 houses on the St Cyres and Ca  | erleon sites can only further increase traffic flow on Murch Road and Cardiff Road.   |
| Surely major highway infrastructure improvements, includ  | ing a By Pass for Dinas Powys, should be made before the addition of hundreds of new houses are considered.   |
| 3f - Please outline the changes you wish to see made to the D   | eposit Plan to make it sound (if relevant)  |
|   | oversentation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -  |

| Representor ID and details: 3966/DP1 Dr C Johns   |   |
|---|---|
| Date Lodged     Status     Petition and No.     Supporting Evidence       28/03/2012     M     0  | Additional SA SEA Rep format: 4a - do you want your comments to be consiered by 'written representations' or do you want to speak at a hearing session of Public examination?   |
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| · · · · · ·   | Policy Number:     Paragraph Number:     Proposal Map:     Constraints Map     Appendices:       MG2(19).     MG2(20).  |
| 3b - Do you wish to see any changes made to the Deposit Plan  |   |
| 3c - What changes would like to see made to the Deposit Plan?   | New Policy:     Amended Policy:     New Paragraph:     Amended Paragraph:     New Or Amended Site:     Other (see Notes):       Unanswered     Unanswered     Unanswered     Unanswered     Unanswered  |
| •   | d site, did you submit the site as a Candidate Site? Unanswered (If "Yes", please give the Candidate Site Name and reference if known) Site Name:   |
| In Dinas Powys it is proposed that a minimum of 400 addit directions, particularly at peak times. The additional traffic  To add to that there are already 2000 houses approved at drive through Dinas Powys, using both the main road and is Dinas Powys expected to take?  As it is, residents within the older part of the Village are already Pen-y-Turnpike. Theses roads are subjected to stream particularly standing traffic, would exacerbate the potential Further, I am concerned that there have not been any properties present demand and medical services are restricted duties. The Deposit plan does not indicate what measures will be trains will be a major challenge. Additional buses would sirtly in the present and that major highway infrastructure improvements. | Ins regarding the implications of the effect that the proposed additional housing would have on the local highways network.  It is no houses will be built on the St Cyres annexe and Caerleon Road. The 400 houses would generate between 600 to 800 additional cars in both would have a profound and adverse impact on the community as the existing roads are under great pressure now.  Barry Waterfront, to be built in the period from now until 2020. It is inevitable that many of the additional vehicles arising from that development will also through the village centre, down Mill Road and up Pen-y-turnpike. St.Andrews Road and Britway Road will also be affected. How much more traffic ready affected at present by the amount of traffic coming from the Barry direction that travels on the alternative route through Station Road, Mill Road as of cars, particularly at peak times. Michaelston-le-Pit would also be affected at its junction with the Pen-y-Turnpike Road. An increase in vehicles, polluting emissions from vehicles.  Prosed extra community facilities of substance. A local church is in desperate need of a permanent base, the local sporting facilities are not adequate for use to the limitations of space at the Dinas Powys Surgery premises on Cardiff Road.  Itaken to encourage the availability and use of public transport. I understand that there is a serious lack of rolling stock in Wales and providing extra mply be caught up in the traffic chaos the extra housing would cause. |
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| 4b - If you wish to speak, please confirm which part of your rep  | resentation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -  |

(ordered by Representation ID No.)

| Representor ID and details: 3967/DP1 M Thorne  |   |                               |                                  |                               |   |                                |                 |
|--|---|-------------------------------|----------------------------------|-------------------------------|---|--------------------------------|-----------------|
| Date Lodged     Status     Petition and No.     Supporting Evidence       28/03/2012     M     0 | Additional SA SEA                             |                               | Rep format:<br>Letter            | , ,                           | your comments to be considered at a hearing session of Po | •                              | •               |
| 2a - Do you consider the LDP is Sound? Unanswered  | 2b - If you think that the Procedural Tests - |                               | does not not meet<br>P2 - Unansv | ` '                           | f soundness, please indica                                | te which test(s) t             | hat it fails.   |
|  | Consistency Tests -                           | C1 - Unanswered               | C2 - Unansv                      | wered C3 - Unans              | swered C4 - Unansw  | ered                           |                 |
|  | Coherence and Effective                       | veness Tests - CE1            | - Unanswered                     | CE2 - Unanswered              | CE3 - Unanswered  | CE4 - Unanswer                 | ed              |
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|  |   |                               |                                  | ·                             |   |                                |                 |

3e - Please set out your representation below:

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Then there is the wider consideration of the Plan. Up to 10,000 additional houses are planned, many in the south east area of the Vale, e.g. 2,000 units already having been approved at the Waterfront, Barry.

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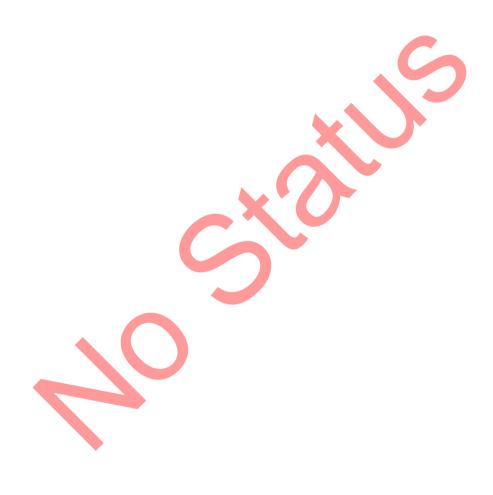
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(ordered by Representation ID No.)

Representor ID and details: 3967/DP1 M Thorne

3f - Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)



| Representor ID and details: 3968/DP1 M.Vassall  |  |   |                              |                                     |  |  |
|---|--|---|------------------------------|-------------------------------------|--|--|
| Date LodgedStatusPetition and No.Supporting Evidence29/03/2012M0  | Additional SA SEA                              |   | Rep format:<br>Comment form  |                                     | omments to be consiered by 'nearing session of Public exam | written representations' or do mination? Written |
| 2a - Do you consider the LDP is Sound? Unsound  | 2b - If you think that t<br>Procedural Tests - | he Plan is unsound and<br>P1 - Unanswered           | does not not meet o          | ` '                                 | dness, please indicate which                               | test(s) that it fails.                           |
|   | Consistency Tests -                            | C1 - Unanswered                                     | C2 - Unansw                  | ered C3 - Unanswered                | C4 - Unanswered  |  |
|   | Coherence and Effect                           | tiveness Tests - CE1                                | - Unanswered C               | CE2 - Yes CE3                       | - Unanswered CE4 - Un                                      | answered   |
| 3a - Which part of the Deposit Plan are you commenting on?  | Policy Number:                                 | Paragraph   | n Number: F                  | Proposal Map:                       | Constraints Ma   | <u>p Appendices:</u>                             |
|   | MG2(13)  |   |                              |                                     |  |  |
| 3b - Do you wish to see any changes made to the Deposit Plar  | as a result of your rep                        | oresentation? Yes                                   | (If "                        | No" or "Unanswered" - go            | to 3d)   |  |
| 3c - What changes would like to see made to the Deposit Plan  | ? New Policy:<br>Unanswered                    |   | New Paragraph:<br>Unanswered | Amended Paragraph: No Unanswered Ye |  | (see Notes):<br>swered                           |
|   | Notes:   |   |                              |                                     |  |  |
| 3d - If your representation relates to a new, deleted or amende   | •  | the site as a Candidate<br>west of St Athan Rd Llar |                              | ` ''                                | re the Candidate Site Name a<br>Site Reference: 2446/CS    | ,  |
| 3e - Please set out your representation below:  |  |   |                              |                                     |  |  |
| 3f - Please outline the changes you wish to see made to the D<br>Have candidate site removed and include as a green wed | •  |   | ons.                         |                                     |  |  |
| 4b - If you wish to speak, please confirm which part of your re   | presentation you wish                          | to speak to the inspector                           | r about and why the          | y consider it be necessary t        | o speak at the hearing -                                   |  |

| Representor ID and details: 3969/DP1 Mr & Mrs Vafidis  |   |   |  |  |  |  | _  |
|--|---|---|--|--|--|--|--|
| Date Lodged     Status     Petition and No.     Supporting Evidence       M     0  | Additional SA SEA   |   | Rep format:<br>Comment form  |  |  | pe consiered by 'written<br>on of Public examination | representations' or do on? Written   |
| 2a - Do you consider the LDP is Sound? Unsound   | 2b - If you think that the Procedural Tests -   | e Plan is unsound and<br>P1 - Yes   | d does not not mee<br>P2 - Yes   | t one or more test(s) o  | f soundness, pleas   | e indicate which test(s)                             | that it fails.   |
|  | Consistency Tests -   | C1 - Yes  | C2 - Yes   | C3 - Yes   | C4 - \   | res  |  |
|  | Coherence and Effecti   | veness Tests - CE1  | - Yes  | CE2 - Yes  | CE3 - Unanswer   | ed CE4 - Unanswe                                     | ered   |
| 3a - Which part of the Deposit Plan are you commenting on?   | Policy Number:  | Paragrap  | h Number:  | Proposal Map:  |  | Constraints Map                                      | Appendices:  |
|  | MG2(30)   |   |  |  |  |  |  |
| 3b - Do you wish to see any changes made to the Deposit Plar   |   | resentation? Yes  |  | "No" or "Unanswered  | d" - go to 3d)   |  |  |
| 3c - What changes would like to see made to the Deposit Plan   |   | Amended Policy:<br>Yes  | New Paragraph:<br>Unanswered   | Amended Paragra<br>Unanswered  | ph: New Or Amen<br>Unanswered  | ded Site: Other (see N                               | <del></del>  |
|  | Notes:  |   |  |  |  |  |  |
| 3d - If your representation relates to a new, deleted or amende  | ed site, did you submit t<br>Site Name:   | he site as a Candidate  | e Site? Unanswe  | red (If "Yes", ple   | ase give the Candid  | date Site Name and reference:                        | erence if known)   |
| <ul> <li>3e - Please set out your representation below: P1: No consultation with local community or school</li> <li>P2: Fails to meet sustainability objectives, Lies next to ha never discussed with the Community Council) Increased from walking to school and community hall the public transcription.</li> <li>C1/2: contravenes requirements of Planning Policy Wales Inadequate infrastructure, Highway safety issues, opens of this basis).</li> <li>C3: again this is an unsustainable site, contravening paraction.</li> <li>C4: Relevant Community Strategy: Again no accessible swithin the adjacent area, destruction of the natural environ CE1: Reality of the site contravenes the stated aims and CE2: Wrong classification of Fferm Goch as a "Minor Rula natural this is opposed because it is too large, it is unaccommodate the increased demand, it will lead to destruction.</li> </ul> | pressure on schools an apport is too bad and all so, this development is uponto a very busy road was 1.4 Wales Spatial Planervices including health nament.  key elements of the LD ral Settlement.  Insustainable because of the local environment in the local environment. | d open play space. W journeys to other services to other services of lack of local services onment (rare plant) | as previously designed as previously designed as a fair way aware so nearby. Use of Life of scale to existing a travelling to nearby | nated as a habitat ma<br>by will be undertaken be<br>ve-work units would me<br>communities leading to<br>y services by car. Lack | nagement area and y private car.  lean more journeys to over development | by car. Very limited put tof the site (previous a    | tch, a rare plant. Apart blic transport links. application refused on a learning opportunities |
| 3f - Please outline the changes you wish to see made to the D<br>Revert to extant planning permission for 12 dwellings   | eposit Pian to make it s  | sound (if relevant)   |  |  |  |  |  |
| 4b - If you wish to speak, please confirm which part of your rep   | oresentation you wish to  | speak to the inspect  | or about and why th  | ney consider it be nece  | essary to speak at the   | ne hearing -   |  |

| Representor ID and details: 3969/DP2 Mr & Mrs Vafidis   |  |   | <del></del>   |
|---|--|---|---|
| Date Lodged     Status     Petition and No.     Supporting Evidence       29/03/2012     M     0  |  | Comment form Vou want to speak a          | our comments to be consiered by 'written representations' or do at a hearing session of Public examination? Written |
| 2a - Do you consider the LDP is Sound? Unsound  |  |   | soundness, please indicate which test(s) that it fails.   |
|   | Consistency Tests - C1 - Yes   | C2 - Yes C3 - Yes                         | C4 - Yes  |
|   | Coherence and Effectiveness Tests - CE1  | - Yes CE2 - Yes                           | CE3 - Yes CE4 - Yes   |
| 3a - Which part of the Deposit Plan are you commenting on?  |  | n Number: Proposal Map:                   | Constraints Map Appendices:   |
|   |  |   |   |
| 3b - Do you wish to see any changes made to the Deposit Plan  |  | (If "No" or "Unanswered"                  | - go to 3d)   |
| 3c - What changes would like to see made to the Deposit Plan?   |  |   | n: New Or Amended Site: Other (see Notes):  |
|   |  | Unanswered Unanswered                     | Yes Unanswered  |
|   | Notes:   |   |   |
| 3d - If your representation relates to a new, deleted or amende   | ed site, did you submit the site as a Candidate<br>Site Name: Land east of Llangan   | Site? Unanswered (If "Yes", pleas         | se give the Candidate Site Name and reference if known) Site Reference: MG 9 / ID 22                                |
| 3e - Please set out your representation below:  |  |   |   |
| P1: No consultation with for example emergency services   | or school. Other consultees not consulted  |   |   |
| P2: Sustainability appraisal flawed and does not take into land. Note the Previous High Court Judicial Review regard  |  |   | s is an unsustainable site on open rural/agricultural green field   |
| C1: The lad use plan does not relate to any strategy.   |  |   |   |
| C2: Does not have regard to national policy. WG 30/2007 A) the land is rural and unsustainable in that there are no B) Site would not comply with rural exception policy contractors. Business would be operated from the site (non complictor) Scale of development, it would almost double the exist Pembroke decision) and refusal of Bonvilston application E) Too small for the proposed development in contraventing T) Does not meet the requirements of Travelling to a better G) Does not meet any of the requirements of the Planning | services in either Llangan or Fferm Goch<br>adicting TAN 2<br>ance with TAN 2)<br>ing community (see<br>on of Good Practice Guide. Access is poor for<br>er future | r both mobile homes and emergency vehic   | les and there are poor public transport links.  |
| C3: Similarly in the lack of facilities available it contravene   | es the Wales Spatial Plan  |   |   |
| C4: No regard to the relevant Community Strategy.   |  |   |   |
| CE1: Again the lack of sustainability contradicts the author  | rity's strategy. Certainly this development con  | tradicts many of the recommendations of t | he Fordham Report   |
| CE3: No mention of how this will be managed or what mo  | nitoring of G&T needs will be instituted.  |   |   |
| CE4: no flexibility to indentify suitable sites in the future   |  |   |   |
| 3f - Please outline the changes you wish to see made to the D   | eposit Plan to make it sound (if relevant)   |   | Page 1097 of 3187   |

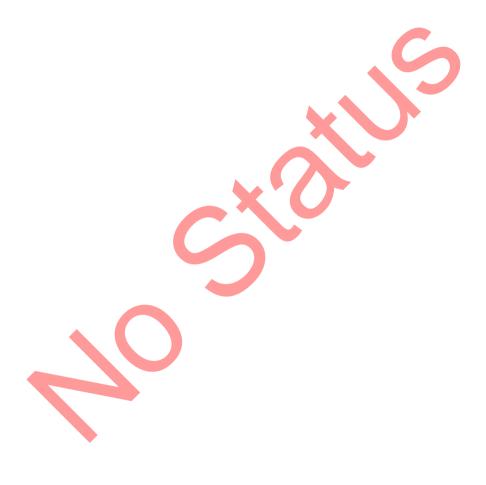
(ordered by Representation ID No.)

Representor ID and details: 3969/DP2 Mr & Mrs Vafidis

It should be removed as a preferred site and a robust and transparent policy to identify alternative sites be made public

This development discriminates against the G&T community by providing them with a sole unsuitable site which has not been assessed on a similar basis as Affordable Housing

4b - If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing - I wish to be represented by Llangan Action



(ordered by Representation ID No.)

| Representor ID and details: 3970/DP1 Anthony M Ernes             | t, 6 Kymin Terrace                 |                          |                                     |                         |   |   |
|--|------------------------------------|--------------------------|-------------------------------------|-------------------------|---|---|
| Date LodgedStatusPetition and No.Supporting Evidence28/03/2012M0 | Additional SA SEA                  |                          | Rep format:<br>Email                |                         | comments to be consiered hearing session of Publication | ed by 'written representations' or do ic examination? |
| 2a - Do you consider the LDP is Sound? Unanswered                | ,                                  |                          | does not not meet o<br>P2 - Unanswe | ` '                     | undness, please indicate                                | which test(s) that it fails.                          |
|  | Consistency Tests -                | C1 - Unanswered          | C2 - Unanswe                        | ered C3 - Unanswer      | ed C4 - Unanswere                                       | ed  |
|  | Coherence and Effective            | veness Tests - CE1 -     | Unanswered C                        | E2 - Unanswered CI      | E3 - Unanswered CE                                      | 4 - Unanswered  |
| 3a - Which part of the Deposit Plan are you commenting on?       | Policy Number:<br>MG2(16). MG2(25) | <u>Paragraph</u>         |                                     | roposal Map:            | <u>Constrain</u>  | nts Map Appendices:                                   |
| 3b - Do you wish to see any changes made to the Deposit Plan     | as a result of your repre          | esentation? Unansw       | ered (If "I                         | No" or "Unanswered" - g | o to 3d)  |   |
| 3c - What changes would like to see made to the Deposit Plan?    | Notes:                             |                          | New Paragraph:<br>Unanswered        |                         | New Or Amended Site:<br>Unanswered                      | Other (see Notes):<br>Unanswered                      |
| 3d - If your representation relates to a new, deleted or amende  | ed site, did you submit the        | ne site as a Candidate S | Site? Unanswered                    | d (If "Yes", please (   | give the Candidate Site N<br>Site Reference:            | lame and reference if known)                          |

3e - Please set out your representation below:

Re DRAFT LOCAL DEVELOPMENT PLAN - SULLY WARD

We have given very careful consideration to the Vale of Glamorgan Draft Local Development Plan as far as the effect any proposals will have on Sully and Lavernock. We make the following observations:-

The Swanbridge Road site in Sully consisting of 650 housing units, whilst superficially attractive, would be grossly overdeveloped in an area of otherwise high scenic value. Currently, the open fields provide an attractive and natural boundary preventing the coalescence of developed and undeveloped land. The density proposed will be such that the local highway would be under considerable strain, the adjacent roadway being a typical country road of ill-defined width in several places.

Additionally, we consider that the site is not sustainable in terms of the core tests which require the local provision of such facilities as shops, leisure facilities, public transport, community provision, etc., and in our view does not meet an adequate level of sustainability as required by the plan.

Access from the proposed site to the main through route (South Road) is via a busy cross roads, already in 2012 the subject of a number of accidents, and additionally overburdened by the amount of traffic currently using it.

The Lavernock site, currently in the ownership of the Welsh Government, formerly the WDA is, in our view, blighted as the likely landfall for the proposed Severn Barrage which is currently under fresh examination. Should that scheme proceed, many hectares of open unrestricted space will be required for the road and rail network, with connecting links to the north of the Vale of Glamorgan. There is no other publicly owned land in the area adjacent to Lavernock Point identified for the landfall of this major Government scheme. Whilst this may not yet be a "worked up" proposal, nevertheless it would be foolish to ignore the huge potential of power generation at/adjacent to the Lavernock allocation, and for this reason, yet again, we record our objections.

Apart from the already overloaded B4267 (Lavernock Road), the only other access to the proposed development site is yet again a narrow country lane providing no adequate access for the projected amount of traffic. It is a reasonable assumption in 2012 that every household, especially in this poorly served public transport area, would have no less than 2 cars.

The underlying ground conditions at Lavernock are those of a former unregulated Council waste site, which, it is widely acknowledged, was the site for tipping of toxic chemical waste in 1950/60s prior to strict environmental controls being placed on waste deposits in landfill sites.

Once again, the density of 450 housing units is considered excessive and it is felt that this density would fail to provide adequate amenity space for the number of units that would be provided. In a new housing development we find this unacceptable. Furthermore, we do not consider that the relevant core tests are achieved for this Candidate Site, despite the poor evidence provided to support the site.

(ordered by Representation ID No.)

Representor ID and details: 3970/DP1 Anthony M Ernest, 6 Kymin Terrace

In the instance of both proposed development sites, the only two Primary schools are already at capacity levels, with no potential for expansion. In addition we understand that the feeder Secondary School for the area, is already running at over 100% of agreed capacity.

We have also considered the issue of travel to work by motorists from both these potential sites, if these developments were to proceed and in view of the fact that most motorists will be travelling to Cardiff for work purposes, the only roads available through Penarth and Dinas Powys are already at 110% capacity. We strongly recommend that a vehicular traffic study be undertaken at Lavernock and Sully prior to any decision being made on the draft proposals. The Vale Council is unable to offer any proposals to improve the Highway Network serving the immediate area or the through routes, and we understand that Welsh Government plans do not include any proposals to improve the Vale's network in the next decade or beyond.

We are advised that both Candidate Sites are considered rich in fauna and wildlife, and ecologically important on the fringes of densely populated areas. Lavernock Point is a known southerly migration point for numerous species of birdlife, and several SSSI's are to be found within the immediate vicinity, whilst the adjacent Severn Estuary coastline is now considered an important wildlife resource.

The Council is currently considering the extension of the National Cycle network through the proposed site at Lavernock, and the NCN is likely to be additionally serviced by several additional routes in from the main road and coastline.

The Wales Coastal Path project, opening in May 2012, and sponsored by the Welsh Government and the Vale of Glamorgan Council, is seen as a major leisure and economic driver along the coast of Wales, and development at this site would inevitably impact on the sustainability of this important section of the path.

We would also remind you that the area contains important WWII historical features, such as underground bunkers, that research suggests were where the first propelled rockets were sited, and are thus of considerable historic importance. Marconi undertook his early experiments at Lavernock, and the site is considered important in the History of Broadcasting for that very reason.

In Summary, we consider the proposed Candidate Sites at both Swanbridge Road and Lavernock to be flawed in their likely sustainability performance, unable to meet the core tests required for acceptance in the Plan, and imposing a vast number of new houses into an area already at capacity in terms of traffic, density, education, local facilities, accessibility and other necessary local services.

We urge REJECTION of these sites accordingly.

- 3f Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
- 4b If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -

(ordered by Representation ID No.)

| Representor ID and details: 3971/DP1 Sarah Sharpe, 17            | A Smithies Avenue                       |   |                                  |                                |  |                                |                  |
|--|---|---|----------------------------------|--------------------------------|--|--------------------------------|------------------|
| Date LodgedStatusPetition and No.Supporting Evidence28/03/2012M0 | Additional SA SEA                       |   | Rep format:<br>Email             |                                | our comments to be cons<br>at a hearing session of F |                                |                  |
| 2a - Do you consider the LDP is Sound? Unanswered                | •                                       | ne Plan is unsound and<br>P1 - Unanswered | does not not meet<br>P2 - Unansv | ` '                            | soundness, please indica                             | ate which test(s)              | that it fails.   |
|  | Consistency Tests -                     | C1 - Unanswered                           | C2 - Unansv                      | wered C3 - Unansv              | wered C4 - Unansv                                    | vered                          |                  |
|  | Coherence and Effecti                   | iveness Tests - CE1                       | - Unanswered                     | CE2 - Unanswered               | CE3 - Unanswered                                     | CE4 - Unanswei                 | red              |
| 3a - Which part of the Deposit Plan are you commenting on?       | Policy Number:<br>MG2(16). MG2(25)      | Paragraph                                 |                                  | Proposal Map:                  | <u>Cons</u>  | straints Map                   | Appendices:      |
| 3b - Do you wish to see any changes made to the Deposit Plan     | as a result of your rep                 | resentation? Unansw                       | vered (If                        | "No" or "Unanswered"           | - go to 3d)  |                                |                  |
| 3c - What changes would like to see made to the Deposit Plan?    | Unanswered                              | Amended Policy:<br>Unanswered             | New Paragraph:<br>Unanswered     | Amended Paragrap<br>Unanswered | h: New Or Amended Sit<br>Unanswered                  | te: Other (see N<br>Unanswered | otes):           |
|  | Notes:                                  |   |                                  |                                |  |                                |                  |
| 3d - If your representation relates to a new, deleted or amende  | ed site, did you submit t<br>Site Name: | the site as a Candidate                   | Site? Unanswere                  | ed (If "Yes", pleas            | se give the Candidate Si<br>Site Reference           |                                | erence if known) |
|  |   |   |                                  |                                |  |                                |                  |

3e - Please set out your representation below:

Re DRAFT LOCAL DEVELOPMENT PLAN - SULLY WARD

We have given very careful consideration to the Vale of Glamorgan Draft Local Development Plan as far as the effect any proposals will have on Sully and Lavernock. We make the following observations:-

The Swanbridge Road site in Sully consisting of 650 housing units, whilst superficially attractive, would be grossly overdeveloped in an area of otherwise high scenic value. Currently, the open fields provide an attractive and natural boundary

preventing the coalescence of developed and undeveloped land. The density proposed will be such that the local highway would be under considerable strain, the adjacent roadway being a typical country road of ill-defined width in several places.

Additionally, we consider that the site is not sustainable in terms of the core tests which require the local provision of such facilities as shops, leisure facilities, public transport, community provision, etc., and in our view does not meet an adequate level of sustainability as required by the plan.

Access from the proposed site to the main through route (South Road) is via a busy cross roads, already in 2012 the subject of a number of accidents, and additionally overburdened by the amount of traffic currently using it.

The Lavernock site, currently in the ownership of the Welsh Government, formerly the WDA is, in our view, blighted as the likely landfall for the proposed Severn Barrage which is currently under fresh examination. Should that scheme proceed, many hectares of open unrestricted space will be required for the road and rail network, with connecting links to the north of the Vale of Glamorgan. There is no other publicly owned land in the area adjacent to Lavernock Point identified for the landfall of this major Government scheme. Whilst this may not yet be a "worked up" proposal, nevertheless it would be foolish to ignore the huge potential of power generation at/adjacent to the Lavernock allocation, and for this reason, yet again, we record our objections.

Apart from the already overloaded B4267 (Lavernock Road), the only other access to the proposed development site is yet again a narrow country lane providing no adequate access for the projected amount of traffic. It is a reasonable assumption in

2012 that every household, especially in this poorly served public transport area, would have no less than 2 cars.

The underlying ground conditions at Lavernock are those of a former unregulated Council waste site, which, it is widely acknowledged, was the site for tipping of toxic chemical waste in 1950/60s prior to strict environmental controls being placed on

(ordered by Representation ID No.)

Representor ID and details: 3971/DP1 Sarah Sharpe, 17A Smithies Avenue

waste deposits in landfill sites.

Once again, the density of 450 housing units is considered excessive and it is felt that this density would fail to provide adequate amenity space for the number of units that would be provided. In a new housing development we find this unacceptable. Furthermore, we do not consider that the relevant core tests are achieved for this Candidate Site, despite the poor evidence provided to support the site.

In the instance of both proposed development sites, the only two Primary schools are already at capacity levels, with no potential for expansion. In addition we understand that the feeder Secondary School for the area, is already running at over 100% of agreed capacity.

We have also considered the issue of travel to work by motorists from both these potential sites, if these developments were to proceed and in view of the fact that most motorists will be travelling to Cardiff for work purposes, the only roads available through Penarth and Dinas Powys are already at over 110% capacity. We strongly recommend that a vehicular traffic study be undertaken at Lavernock and Sully prior to any decision being made on the draft proposals. The Vale Council is unable to offer any proposals to improve the Highway Network serving the immediate area or the through routes, and we understand that Welsh Government plans do not include any proposals to improve the Vale's network in the next decade or beyond.

We are advised that both Candidate Sites are considered rich in fauna and wildlife, and ecologically important on the fringes of densely populated areas. Lavernock Point is a known southerly migration point for numerous species of birdlife, and

several SSSI's are to be found within the immediate vicinity, whilst the adjacent Severn Estuary coastline is now considered an important wildlife resource.

The Council is currently considering the extension of the National Cycle network through the proposed site at Lavernock, and the NCN is likely to be additionally serviced by several additional routes in from the main road and coastline.

The Wales Coastal Path project, opening in May 2012, and sponsored by the Welsh Government and the Vale of Glamorgan Council, is seen as a major leisure and economic driver along the coast of Wales, and development at this site would inevitably impact on the sustainability of this important section of the path.

We would also remind you that the area contains important WWII historical features, such as underground bunkers, that research suggests were where the first propelled rockets were sited, and are thus of considerable historic importance.

Marconi undertook his early experiments at Lavernock, and the site is considered important in the History of Broadcasting for that very reason.

In Summary, we consider the proposed Candidate Sites at both Swanbridge Road and Lavernock to be flawed in their likely sustainability performance, unable to meet the core tests required for acceptance in the Plan, and imposing a vast number

of new houses into an area already at capacity in terms of traffic, density, education, local facilities, accessibility and other necessary local services.

We urge REJECTION of these sites accordingly.

Anthony Ernest (County Councillor) Sarah Sharpe (County Councillor) Sully Ward- Vale of Glamorgan Council. 28th March, 2012.

3f - Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)

4b - If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -

(ordered by Representation ID No.)

| Representor ID and details: 3972/DP1 David Melding, W  | elsh Assembly Member                          |                       |                                       |                         |   |  |
|--|---|-----------------------|---------------------------------------|-------------------------|---|--|
| Date Lodged     Status     Petition and No.     Supporting Evidence       28/03/2012     M     0 | Additional SA SEA                             |                       | Rep format:<br>Email                  | , ,                     | comments to be consie<br>a hearing session of Pul | ered by 'written representations' or do ublic examination? |
| 2a - Do you consider the LDP is Sound? Unanswered  | 2b - If you think that the Procedural Tests - |                       | does not not meet on<br>P2 - Unanswer | ` '                     | undness, please indicate                          | e which test(s) that it fails.                             |
|  | Consistency Tests -                           | C1 - Unanswered       | C2 - Unanswer                         | red C3 - Unanswei       | red C4 - Unanswe                                  | ered   |
|  | Coherence and Effective                       | eness Tests - CE1 -   | Unanswered CE                         | 2 - Unanswered C        | E3 - Unanswered C                                 | CE4 - Unanswered   |
| 3a - Which part of the Deposit Plan are you commenting on?                                       | Policy Number:<br>MG2(16). MG2(25)            | <u>Paragraph</u>      |                                       | oposal Map:             | Constra   | raints Map Appendices:                                     |
| 3b - Do you wish to see any changes made to the Deposit Plan                                     | as a result of your repre                     | esentation? Unansw    | ered (If "N                           | lo" or "Unanswered" - g | go to 3d)   |  |
| 3c - What changes would like to see made to the Deposit Plan?                                    | New Policy: Unanswered Notes:                 |                       |                                       |                         | New Or Amended Site:<br>Unanswered                | : Other (see Notes):<br>Unanswered                         |
| 3d - If your representation relates to a new, deleted or amende                                  | ed site, did you submit th<br>Site Name:      | e site as a Candidate | Site? Unanswered                      | (If "Yes", please       | give the Candidate Site<br>Site Reference:        | Name and reference if known)                               |

3e - Please set out your representation below:

RE: Draft Local Development Plan - Sully and Lavernock

I have received many written and oral representations against the draft Local Development Plan's proposals for Sully and Lavernock. I have also had the opportunity to discuss the matter with local Members, Cllrs Sarah Sharpe and Anthony Ernest. My own views concur with those of Cllrs Sharpe and Ernest as outlined in their letter of 28th March. However, as a Penarth resident I would add that there is considerable local concern about these plans and their likely effect on traffic levels along Redlands Road and on demand for local services, particularly schools.

(Letter attachment from Cllrs Sharpe and Ernest below)

Re DRAFT LOCAL DEVELOPMENT PLAN - SULLY WARD

We have given very careful consideration to the Vale of Glamorgan Draft Local Development Plan as far as the effect any proposals will have on Sully and Lavernock. We make the following observations:-

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Additionally, we consider that the site is not sustainable in terms of the core tests which require the local provision of such facilities as shops, leisure facilities, public transport, community provision, etc., and in our view does not meet an adequate level of sustainability as required by the plan.

Access from the proposed site to the main through route (South Road) is via a busy cross roads, already in 2012 the subject of a number of accidents, and additionally overburdened by the amount of traffic currently using it.

The Lavernock site, currently in the ownership of the Welsh Government, formerly the WDA is, in our view, blighted as the likely landfall for the proposed Severn Barrage which is currently under fresh examination. Should that scheme proceed, many hectares of open unrestricted space will be required for the road and rail network, with connecting links to the north of the Vale of Glamorgan. There is no other publicly owned land in the area adjacent to Lavernock Point identified for the landfall of this major Government scheme. Whilst this may not yet be a "worked up" proposal, nevertheless it would be foolish to ignore the huge potential of power generation at/adjacent to the Lavernock allocation, and for this reason, yet again, we record our objections.

Apart from the already overloaded B4267 (Lavernock Road), the only other access to the proposed development site is yet again a narrow country lane providing no adequate access for the projected amount of

(ordered by Representation ID No.)

Representor ID and details: 3972/DP1 David Melding, Welsh Assembly Member

traffic. It is a reasonable assumption in 2012 that every household, especially in this poorly served public transport area, would have no less than 2 cars.

The underlying ground conditions at Lavernock are those of a former unregulated Council waste site, which, it is widely acknowledged, was the site for tipping of toxic chemical waste in 1950/60s prior to strict environmental controls being placed on waste deposits in landfill sites.

Once again, the density of 450 housing units is considered excessive and it is felt that this density would fail to provide adequate amenity space for the number of units that would be provided. In a new housing development we find this unacceptable. Furthermore, we do not consider that the relevant core tests are achieved for this Candidate Site, despite the poor evidence provided to support the site.

In the instance of both proposed development sites, the only two Primary schools are already at capacity levels, with no potential for expansion. In addition we understand that the feeder Secondary School for the area, is already running at over 100% of agreed capacity.

We have also considered the issue of travel to work by motorists from both these potential sites, if these developments were to proceed and in view of the fact that most motorists will be travelling to Cardiff for work purposes, the only roads available through Penarth and Dinas Powys are already at 110% capacity. We strongly recommend that a vehicular traffic study be undertaken at Lavernock and Sully prior to any decision being made on the draft proposals. The Vale Council is unable to offer any proposals to improve the Highway Network serving the immediate area or the through routes, and we understand that Welsh Government plans do not include any proposals to improve the Vale's network in the next decade or beyond.

We are advised that both Candidate Sites are considered rich in fauna and wildlife, and ecologically important on the fringes of densely populated areas. Lavernock Point is a known southerly migration point for numerous species of birdlife, and several SSSI's are to be found within the immediate vicinity, whilst the adjacent Severn Estuary coastline is now considered an important wildlife resource.

The Council is currently considering the extension of the National Cycle network through the proposed site at Lavernock, and the NCN is likely to be additionally serviced by several additional routes in from the main road and coastline.

The Wales Coastal Path project, opening in May 2012, and sponsored by the Welsh Government and the Vale of Glamorgan Council, is seen as a major leisure and economic driver along the coast of Wales, and development at this site would inevitably impact on the sustainability of this important section of the path.

We would also remind you that the area contains important WWII historical features, such as underground bunkers, that research suggests were where the first propelled rockets were sited, and are thus of considerable historic importance. Marconi undertook his early experiments at Lavernock, and the site is considered important in the History of Broadcasting for that very reason.

In Summary, we consider the proposed Candidate Sites at both Swanbridge Road and Lavernock to be flawed in their likely sustainability performance, unable to meet the core tests required for acceptance in the Plan, and imposing a vast number of new houses into an area already at capacity in terms of traffic, density, education, local facilities, accessibility and other necessary local services.

We urge REJECTION of these sites accordingly.

- 3f Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
- 4b If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -

(ordered by Representation ID No.)

| Representor ID and details: 3973/DP1 A Dymond  |  |                               |                              |                               |  |                    |                  |
|--|--|-------------------------------|------------------------------|-------------------------------|--|--------------------|------------------|
| Date Lodged     Status     Petition and No.     Supporting Eviden       02/04/2012     M     0 | ce Additional SA SEA                   |                               | Rep format:<br>Letter        |                               | your comments to be co<br>k at a hearing session o | ,                  | •                |
| 2a - Do you consider the LDP is Sound? Unanswered  | Procedural Tests -                     | P1 - Unanswered               | P2 - Unans                   | wered                         | of soundness, please ind                           |                    | that it fails.   |
|  | Coherence and Effec                    | tiveness Tests - CE1          | - Unanswered                 | CE2 - Unanswered              | CE3 - Unanswered                                   | CE4 - Unanswe      | ered             |
| 3a - Which part of the Deposit Plan are you commenting on?                                     | Policy Number:<br>MG2(19). MG2(20).    | <del></del>                   | h Number:                    | Proposal Map:                 | <u>Co</u>  | nstraints Map      | Appendices:      |
| 3b - Do you wish to see any changes made to the Deposit Pl                                     | an as a result of your rep             | oresentation? Unansv          | vered (If                    | "No" or "Unanswered           | d" - go to 3d)                                     |                    |                  |
| 3c - What changes would like to see made to the Deposit Pla                                    | n? New Policy: Unanswered Notes:       | Amended Policy:<br>Unanswered | New Paragraph:<br>Unanswered | Amended Paragra<br>Unanswered | nph: New Or Amended Unanswered                     | Site: Other (see N | <del></del>      |
| 3d - If your representation relates to a new, deleted or amen                                  | ded site, did you submit<br>Site Name: | the site as a Candidate       | Site? Unanswer               | ed (If "Yes", ple             | ease give the Candidate<br>Site Referenc           |                    | erence if known) |
| 20 Diagon and out your representation below  |  |                               |                              |                               |  |                    |                  |

3e - Please set out your representation below:

Re: Vale of Glamorgan Deposit Local Development Plan 2011 - 2026

I refer to the above plan and my comments are as follows:

As a resident of Dinas Powys I wish to express my concerns re the implications of the effect that the proposed additional housing would have on our local communities.

Page 134, paragraph MG2 (19) (20) - Land adjoining St Cyres School Murch Crescent/Caerleon Road.

In Dinas Powys it is proposed that 340/60 additional homes will be built on the above proposed sites. Both sites are on the Murch side of the community which is served by only two access points to the main road (A4055). Both these junctions namely the Infant's School traffic lights at Murch Bridge and Cross Common road at its junction with the A4055 are either at capacity or structurally suspect. The 400 houses will generate between 600 - 800 additional cars in both directions, particularly at peak times.

Page 45, paragraph 5.63 - SEWTA report.

The additional traffic would have a profound and adverse impact on the A4055 as it is already highlighted as a key problem (SEWTA REPORT). Contributing to the congestion will be the 2000 houses on Barry Waterfront which have already been approved and resulting traffic heading to Cardiff will be funneled through the A4055.

The land development proposals in Sully, Penarth, Llandough, Lavernock and the land adjacent to St Joseph's school Sully Road, together with the new St Cyres School access will only add to the existing congestion at the Merrier Harrier Junction.

#### **Environmental** impact

Already the air pollution levels are excessive. The Nitrogen Dioxide (N02) levels are recorded as being 43.8 units on the A4055 where a maximum recommended level should be 40 units as EU law/Welsh Assembly/DEFRA targets by no later than January 2015. An increase in vehicles particularly standing traffic would exacerbate the situation, which could have a serious heath implication to the 3 - 7 year old pupils at Dinas Powys Infants School located on the A4055.

Page 99 - Bus and Rail paragraph 7.81 - 7.87

I note in the report that an assessment has been taken and assumptions made that public transport improvements would assist in alleviating some of the impact of the Barry Waterfront Development. There is simply not enough rolling stock within the rail network, park and ride facilities, or stations in all areas of the Vale to enable extensive use of public transport to become a reality in addressing traffic congestion in the Vale. In addition bus routes would also be affected by traffic congestion in all major routes.

(ordered by Representation ID No.)

Representor ID and details: 3973/DP1 A Dymond

Page 56, Policy MD4 Community infrastructure and planning obligations

There appears to be no serious consideration having been given to other views as to the future possible use of St Cyres annexe Dinas Powys. A local church is in desperate need for a permanent base, the local sporting facilities are not adequate for current demand, and specifically Dinas Powys Football club spend annually in excess of £2,000 to out of the area indoor training facilities. Use of these fields could release the land currently used by the football club located at Sunny Croft Lane for a larger health centre to cope with the current population.

There is also concern regarding the local schools being able to accommodate any additional pupils that the proposed schemes will generate over the next fifteen years, as currently most local schools are at capacity.

It is essential that the local authorities listen to the communities to address local concerns and that major highway infra structure improvements are made BEFORE hundreds of additional housing could even be considered within the Vale.

- 3f Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
- 4b If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -



| Representor ID and details: 3973/DP2 A Dymond  |  |   |  |
|--|--|---|--|
| Date Lodged     Status     Petition and No.     Supporting Evidence       15/03/2012     M     □     0     □   | Additional SA SEA  | Rep format: 4a - do you want your commen<br>Letter you want to speak at a hearing                       | ts to be consiered by 'written representations' or do session of Public examination?                 |
| 2a - Do you consider the LDP is Sound? Unanswered  | 2b - If you think that the Plan is unsound and of Procedural Tests - P1 - Unanswered  Consistency Tests - C1 - Unanswered  Coherence and Effectiveness Tests - CE1 - |   | please indicate which test(s) that it fails.  C4 - Unanswered  Iswered CE4 - Unanswered              |
| 3a - Which part of the Deposit Plan are you commenting on?   | Policy Number: Paragraph MG2   |   | Constraints Map Appendices:  |
| 3b - Do you wish to see any changes made to the Deposit Plan   | as a result of your representation? Unanswe  | ered (If "No" or "Unanswered" - go to 3d)   |  |
| 3c - What changes would like to see made to the Deposit Plan?  |  | New Paragraph: Amended Paragraph: New Or Amended Paragraph: Unanswered Unanswered Unanswered            | Amended Site: Other (see Notes): ered Unanswered   |
|  | Notes:   |   |  |
| 3d - If your representation relates to a new, deleted or amende  | ed site, did you submit the site as a Candidate Site Name:   |   | Candidate Site Name and reference if known)<br>e Reference:  |
| 3e - Please set out your representation below: I would like my comments of disgust noted. I am absolutely shocked at the LDP that has been made page 1.  | public. To learn of the amount of housing that th  | ne council intends to create over the future years is u   | nbelievable.   |
| I live just off Castle Drive where a Tesco store has been of all the extra cars (estimated at around 400) that could be councillors be negotiating this traffic? I would also like to people are not even taken into consideration.  | be travelling down Murch Road and Castle Drive   | e and the gridlock it will cause, I cannot understand w   | hy this is being allowed to continue. Will any of your   |
| This now brings me to the crossing that is needed on Sull an independent company on your behalf. I took a walk wit road at about 50 – 60 mph and that was on a Sunday after Ash path to school is bad enough, without them having to | th my children down the Ash Path this weekend ernoon. Weekday mornings and afternoons are  | and we were talking, not particularly concentrating a much busier down that road and people do speed on | nd we approached Sully Road. A car came down that country lanes. Having to send my children down the |
| My last point is that I cannot understand why a request fo overload them, making them difficult places to live in. I loo   | r a pu <mark>blic</mark> meeting in Dinas Powys has been rej<br>ok forwar <mark>d to</mark> receiving your comments.   | ected!! Why is the council trying to spoil our towns ar   | nd villages and take away their individuality and  |
| 3f - Please outline the changes you wish to see made to the D  | eposit Plan to make it sound (if relevant)   |   |  |
| 4b - If you wish to speak, please confirm which part of your rep   | presentation you wish to speak to the inspector  | about and why they consider it be necessary to spea   | k at the hearing -   |

| Representor ID and details: 3974/DP1 Carole Rakodi   |   |
|--|---|
| Date Lodged     Status     Petition and No.     Supporting Evidence       29/03/2012     M     0 | Additional SA SEA Rep format: 4a - do you want your comments to be consiered by 'written representations' or do Letter you want to speak at a hearing session of Public examination?  |
| 2a - Do you consider the LDP is Sound? Unanswered  | 2b - If you think that the Plan is unsound and does not not meet one or more test(s) of soundness, please indicate which test(s) that it fails.  Procedural Tests - P1 - Unanswered P2 - Unanswered   |
|  | Consistency Tests - C1 - Unanswered C2 - Unanswered C3 - Unanswered C4 - Unanswered   |
|  | Coherence and Effectiveness Tests - CE1 - Unanswered CE2 - Unanswered CE3 - Unanswered CE4 - Unanswered   |
| 3a - Which part of the Deposit Plan are you commenting on?                                       | Policy Number: Proposal Map: Constraints Map Appendices:  |
|  | MG2(19). MG2(20)  |
| 3b - Do you wish to see any changes made to the Deposit Plan                                     | as a result of your representation? Unanswered (If "No" or "Unanswered" - go to 3d)   |
| 3c - What changes would like to see made to the Deposit Plan?                                    | New Policy:     Amended Policy:     New Paragraph:     Amended Paragraph:     New Or Amended Site:     Other (see Notes):       Unanswered     Unanswered     Unanswered     Unanswered     Unanswered  |
|  | Notes:  |
| 3d - If your representation relates to a new, deleted or amende                                  | d site, did you submit the site as a Candidate Site? Unanswered (If "Yes", please give the Candidate Site Name and reference if known) Site Name: Site Reference:   |
| 3e - Please set out your representation below:   |   |
| Vale of Glamorgan Deposit Local Development Plan 2011  | -2026: comments on housing proposals in Dinas Powys   |
|  | s (the old St Cyres lower school and Caerleon) road should be used for housing. While I appreciate that there is a need for additional housing land, through and the need for community facilities (such as new schools, health centre) in addition to housing does not appear to have been fully considered.   |
| existing peak hour congestion at the two access points to  | as already increased as a result of the opening of a Tesco store. The proposed housing will dramatically increase the volume of traffic, worsening the the A4055, increasing the demand for public transport (buses that will also get caught up in the peak hour congestion at those junctions, and trains that ighway improvements may be sufficient to provide access to the proposed housing sites, the plan does not consider the wider impacts of the additional transport. |
| improvements near the Merrie Harrier have improved mat   | arry has led to an increased volume of traffic using the A4055, with queues and delays throughout the day and not just during peak hours. Although the ers somewhat, they have not made sufficient impact on the existing levels of congestion, let alone being able to cope with additional traffic in future. In diverse effects (noise and pollution) for the houses and facilities (including the primary school) along the road through Dinas Powys and increased traffic    |
| The proposals for housing appear to be over-development deficiencies that they will exacerbate.  | , especially given the lack of consideration for other community needs and the absence of proposals for addressing the road and public transport  |
| 3f - Please outline the changes you wish to see made to the De                                   | eposit Plan to make it sound (if relevant)  |
| 4b - If you wish to speak, please confirm which part of your rep                                 | resentation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -  |

(ordered by Representation ID No.)

| Representor ID and details: 3975/DP1 Mr Derek            | Waite & Ms Sarah Carter                           |   |                              |                                |   |                                  |                  |
|--|---|---|------------------------------|--------------------------------|---|----------------------------------|------------------|
| Date Lodged Status Petition and No. Supporting I         | Evidence Additional SA SEA                        |   | Rep format:<br>Letter        | , ,                            | our comments to be co<br>at a hearing session o | ,                                | •                |
| 2a - Do you consider the LDP is Sound? Unanswered        | Procedural Tests -                                | the Plan is unsound and<br>P1 - Unanswered<br>C1 - Unanswered | P2 - Unanswe                 | ered                           | soundness, please ind                           |                                  | that it fails.   |
|  | Coherence and Effect                              | ctiveness Tests - CE1   | - Unanswered C               | E2 - Unanswered                | CE3 - Unanswered                                | CE4 - Unanswe                    | red              |
| 3a - Which part of the Deposit Plan are you commenting   | ng on? <u>Policy Number:</u><br>MG2(19). MG2(20). |   |                              | roposal Map:                   | _   | onstraints Map                   | Appendices:      |
| 3b - Do you wish to see any changes made to the Dep      | osit Plan as a result of your re                  | presentation? Unans   | wered (If "I                 | No" or "Unanswered             | - go to 3d)                                     |                                  |                  |
| 3c - What changes would like to see made to the Depo     | osit Plan? New Policy: Unanswered Notes:          | Amended Policy:<br>Unanswered                                 | New Paragraph:<br>Unanswered | Amended Paragrap<br>Unanswered | h: New Or Amended<br>Unanswered                 | Site: Other (see N<br>Unanswered | <del></del>      |
| 3d - If your representation relates to a new, deleted or | amended site, did you submit<br>Site Name:        | the site as a Candidate                                       | Site? Unanswered             | d (If "Yes", plea              | se give the Candidate<br>Site Referend          |                                  | erence if known) |
| 2a Diagon ant out your representation halous             |   |   |                              |                                |   |                                  |                  |

3e - Please set out your representation below:

As a resident of Dinas Powys I wish to express my concerns re. the implications of the effect that the proposed additional housing would have on the local highways network.

In Dinas Powys it is proposed that a minimum of 400 addition houses will be built on the St Cyres annexe and Caerleon Road, Both sites are on the Murch side of the community which is served by only two access points to the main road [A4055]. Both these junctions, namely the Infants School traffic lights at Murch Bridge and Cross Common Road at its junction with the A4055 are either at capacity or structurally suspect.

The 400 houses would generate between 600 to 800 additional cars in both directions, particularly at peak times,. The additional traffic would have a profound and adverse impact on the community as the existing roads are under great pressure now.

Further, I am concerned that there have not been any proposed extra community facilities of substance. A local church is in desperate need of a permanent base, the local sporting facilities are not adequate for the present demand and medical services are restricted due to the limitations of space at the Dinas Powys Surgery premises on Cardiff Road.

There appears to be no serious consideration having been given to other views as to the future possible use of St Cyres Annexe, Murch Road. It is worth noting that the school buildings are in good condition although in need of a little investment. To simply seek to tear down the school without any reference to the community needs would be a shameful waste. I also have concerns regarding the capacity of the local schools to accommodate the extra pupils due to the additional houses.

to cross to the community needs would be a shameful waste. Table have concerns regarding the dapacity of the local schools to accommodate the extra pupils due to the additional houses.

Then there is the wider consideration of the Plan. Up to 10,000 additional houses are planned, many in the south east area of the Vale, e.g. 2,000 units already having been approved at the Waterfront, Barry.

Much of this traffic will be funnelled through Dinas Powys and join the ever lengthening queues leading to and from the Merrie Harrier. The proposals in Sully, Penarth, Lavernock and the land adjacent St Josephs' School, Sully Road will only add to the existing congestion at this junction.

Already the air pollution levels are excessive. The Nitrogen Dioxide [N02] levels are recorded as being 43.8 units with the maximum recommended level being 40 units along Cardiff Road, Eastbrook. An increase in vehicles, particularly standing traffic, would exacerbate the situation. The level of other emissions such as CO (carbon monoxide) and Particulates [PM105] are not available but need clarifying

The Deposit plan does not indicate what measures will be taken to encourage the availability and use of public transport. I understand that there is a serious lack of rolling stock in Wales and providing extra trains will be a major challenge. Additional buses would simply be caught up in the traffic chaos the extra housing would cause.

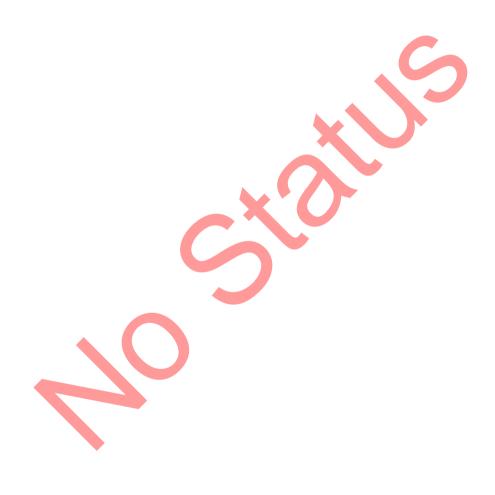
It is essential that major highway infrastructure improvements are made BEFORE hundreds of additional housing could even be considered.

(ordered by Representation ID No.)

Representor ID and details: 3975/DP1 Mr Derek Waite & Ms Sarah Carter

3f - Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)

4b - If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -



| Representor ID and details: 3976/DP1 Mrs M Whitworth   | & Mr & Mrs P Gershenson  |
|--|--|
| Date Lodged Status Petition and No. Supporting Evidence 29/03/2012 M 0   | Additional SA SEA Rep format: 4a - do you want your comments to be consiered by 'written representations' or do you want to speak at a hearing session of Public examination?  |
| 2a - Do you consider the LDP is Sound? Unanswered  | 2b - If you think that the Plan is unsound and does not not meet one or more test(s) of soundness, please indicate which test(s) that it fails.  Procedural Tests - P1 - Unanswered P2 - Unanswered  Consistency Tests - C1 - Unanswered C2 - Unanswered C3 - Unanswered C4 - Unanswered  Coherence and Effectiveness Tests - CE1 - Unanswered CE2 - Unanswered CE3 - Unanswered CE4 - Unanswered  |
| 3a - Which part of the Deposit Plan are you commenting on?   | Policy Number:     Paragraph Number:     Proposal Map:     Constraints Map     Appendices:       MG2(7). MG2(4). MG12  |
| 3b - Do you wish to see any changes made to the Deposit Plan   |  |
| 3c - What changes would like to see made to the Deposit Plan?  |  |
|  | Notes:   |
| 3d - If your representation relates to a new, deleted or amende  | ord site, did you submit the site as a Candidate Site? Unanswered (If "Yes", please give the Candidate Site Name and reference if known)  Site Name:  Site Reference:  |
| proposed employment use of green field land north of We The reasons for my concerns are as follows: -  The Green Wedge - these proposed developments involved place to prevent settlements merging into each other. Bathousing is needed but I would question the number of how Infrastructure  I do not think the existing roads will cope with the proposed impact they would have on the local housing in the area. It is already impossible to cross Port Road and Pontypride The noise and pollution from traffic on Port Road is alread I do not think improvements to the Five Mile Lane would be | e green field sites when there are brown field sites available within the Vale. They encroach on what most residents of Barry would call a boundary purry has seen a huge amount of housing development over past years some of which have already encroached on green fields.  uses proposed.  ed housing developments. The plan provides for alterations to Weycock Cross roundabout. I do not know what these alterations would be and what d Road safely for most of the day.  dy excessive for all the houses in the vicinity.  compensate for the increased traffic. |
|  | ts proposed for Rhoose, St Athan and Llantwit Major which inevitably will impact on the Port Road.   |
| Wildlife   | d these proposed would offer time extent weedlende   |
| Loss of green field sites has a huge impact on wild lifeand I believe most residents of Barry, if asked, would say Bar boundaries of the town.   | rry is large enough but if housing is still required land in and around the dock area would be preferable to using green fields and extending the  |

(ordered by Representation ID No.)

Representor ID and details: 3976/DP1 Mrs M Whitworth & Mr & Mrs P Gershenson

The traffic through Barry is excessive. Large amounts of traffic from the Airport and settlements west of Barry already travel along the Port Road daily and is set to increase with additional housing planned for the Vale.

Major improvements to the roads are required to bypass Barry as the amount of traffic using Port Road is already too much.

Yours faithfully

Mr. & Mrs. P. Gershenson & Mrs. M. Whitworth

3f - Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)

4b - If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -

| Representor ID and details: 3977/DP1 Mr & Mrs Harriso  | n   |                                       |                              |                               |                                    |  |                  |
|--|---|---------------------------------------|------------------------------|-------------------------------|------------------------------------|--|------------------|
| Date LodgedStatusPetition and No.Supporting Evidence29/03/2012M0   | Additional SA SEA   |                                       | Rep format:<br>Letter        | ,                             | ,                                  | e consiered by 'written<br>n of Public examination   | •                |
| 2a - Do you consider the LDP is Sound? Unanswered  | 2b - If you think that th<br>Procedural Tests -<br>Consistency Tests -<br>Coherence and Effecti | P1 - Unanswered<br>C1 - Unanswered    | P2 - Unans<br>C2 - Unans     | ` '                           | swered C4 - Ui                     |  |                  |
| 3a - Which part of the Deposit Plan are you commenting on?   | Policy Number:<br>MG2(19)   | <u>Paragraph</u>                      | Number:                      | Proposal Map:                 | )                                  | Constraints Map  | Appendices:      |
| 3b - Do you wish to see any changes made to the Deposit Plan   | as a result of your repr  | resentation? Unansw                   | vered (I                     | f "No" or "Unanswered         | l" - go to 3d)                     |  |                  |
| 3c - What changes would like to see made to the Deposit Plan   | ? New Policy:<br>Unanswered   |                                       | New Paragraph:<br>Unanswered | Amended Paragra<br>Unanswered | ph: New Or Amend Unanswered        | ed Site: Other (see Note of the Note of th | otes):           |
|  | Notes:  |                                       |                              |                               |                                    |  |                  |
| 3d - If your representation relates to a new, deleted or amende  | ed site, did you submit t<br>Site Name:   | he site as a Candidate                | Site? Unanswe                | red (If "Yes", plea           | ase give the Candida<br>Site Refer | ate Site Name and reference:   | erence if known) |
| 3e - Please set out your representation below:   |   |                                       |                              |                               |                                    |  |                  |
| Our objection to the St Cyres School Site at Dinas Powis which would not be able to cope with, plus that traffic wou be built in that area. There are lots of other things that co | lld not be able to get ou   | t on to the main Cardiff              | Rd which would r             | result in such a back lo      |                                    |  |                  |
| 1) The Doctors surgery would never cope for a start,   |   |                                       |                              |                               |                                    |  |                  |
| 2) No thought at all has been given to the residents of Mu   | rch Cres and Murch Rd   | d. These roads would be               | ecome main roads             | s and as I said would no      | ot be able to cope.                |  |                  |
| 3) The air pollution levels are already excessive; any furth   | er traffic would have a   | serious <mark>he</mark> alth impact o | on the school child          | lren.                         |                                    |  |                  |
| We will fight this any way we can.   |   |                                       |                              |                               |                                    |  |                  |
| 3f - Please outline the changes you wish to see made to the D  | eposit Plan to make it s  | ound (if relevant)                    |                              |                               |                                    |  |                  |
| 4b - If you wish to speak, please confirm which part of your re  | presentation you wish to  | speak to the inspecto                 | r about and why th           | ney consider it be nece       | ssary to speak at the              | e hearing -  |                  |

(ordered by Representation ID No.)

| Representor II   | D and d     | etails:    | 3978/DI         | P1 Rhian Sexton        |   |                |             |                              |           |                  |                                     |                             |                            |                                   |
|------------------|-------------|------------|-----------------|------------------------|---|----------------|-------------|------------------------------|-----------|------------------|-------------------------------------|-----------------------------|----------------------------|-----------------------------------|
| Date Lodged      | Status<br>M | Petitio    | on and No.<br>0 | Supporting Evidence    | Additional SA SEA                             |                |             | Rep format:<br>Comment form  |           |                  | our comments to<br>at a hearing ses |                             | •                          | representations' or do n? Written |
| 2a - Do you coi  | nsider th   | ne LDP i   | s Sound?        |                        | 2b - If you think that the Procedural Tests - |                | ound and do | es not not mee<br>P2 - Unans |           | more test(s) of  | soundness, plea                     | se indicate                 | which test(s)              | that it fails.                    |
|                  |             |            |                 |                        | Consistency Tests -                           | C1 - Unans     | swered      | C2 - Unans                   | swered    | C3 - Unans       | wered C4 -                          | Yes                         |                            |                                   |
|                  |             |            |                 |                        | Coherence and Effect                          | tiveness Tests | - CE1 - U   | nanswered                    | CE2 - L   | Jnanswered       | CE3 - Unanswe                       | ered Cl                     | E4 - Unanswei              | red                               |
| 3a - Which part  | t of the I  | Deposit    | Plan are yo     | ou commenting on?      | Policy Number:                                | <u> </u>       | Paragraph N | umber:                       | Propos    | al Map:          |                                     | Constra                     | aints Map                  | Appendices:                       |
|                  |             |            |                 |                        |   |                |             |                              | N         | MG2(29)          |                                     |                             |                            |                                   |
| 3b - Do you wis  | sh to see   | e any ch   | anges mad       | de to the Deposit Plan | as a result of your rep                       | oresentation?  | Yes         | (                            | If "No" o | r "Unanswered"   | - go to 3d)                         |                             |                            |                                   |
| 3c - What chan   | nges wo     | uld like t | o see mad       | e to the Deposit Plan? | New Policy:<br>Unanswered                     | Amended Po     |             | ew Paragraph:<br>nanswered   |           | ended Paragrap   | h: New Or Ame<br>Yes                | nded Site:                  | Other (see N<br>Unanswered | lotes):                           |
|                  |             |            |                 |                        | Notes:  |                |             |                              |           | •                |                                     |                             |                            |                                   |
| 3d - If your rep | presenta    | ition rela | ites to a ne    | ew, deleted or amende  | d site, did you submit<br>Site Name: ITV Wale |                |             | te? Yes                      |           | (If "Yes", pleas | se give the Cand<br>Site Re         | lidate Site I<br>ference: M |                            | erence if known)                  |
|                  |             |            |                 |                        |   |                |             |                              | 7         |                  |                                     |                             |                            |                                   |

3e - Please set out your representation below:

Re: Local Development Plan - ITV, Culverhouse Cross Development - MG2/29

As a member of a small rural community, I am writing to comment on the planning proposals for the above proposed site that will have a profound effect on my life and the lives of my children.

The Vale of Glamorgan Community Strategy promises that the Vale will be a place "that is safe, clean and attractive, where individuals and communities have sustainable opportunities to improve their health, learning and skills, prosperity and wellbeing, 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 sustainability of the area."

My first concern about the proposed LDP is the poor process of consultation with local communities. In this area the consultation process was poorly advertised and only the absolute minimum period given to allow community involvement. We have not been given the incentive to make an effective contribution to the process. I understand that some VOG councillors also found the process did not give them opportunities to add or change proposals. Only by organising our own local meeting have we been able, as a small community, to express our individual concerns with regard to the proposed ITV development.

Wenvoe has been identified as a primary settlement that has community facilities. These consist of one shop, three pubs, a church and two community halls. Twyn-yr -Odyn is an even smaller rural hamlet. These facilities are surely inadequate to serve an additional 220 households in the first instance (proposed development of the HTV site) and a further 150 houses if the proposed development in Wenvoe goes ahead. The size of the community will grow as to change Wenvoe entirely and make it, in effect, a commuter village lacking community adherence.

In addition, the problems that I see with regard to the ITV development are:

- Traffic congestion There is already traffic congestion at Culverhouse Cross roundabout, on the A48 from St Nicholas and along Port Road both to and from Barry particularly at peak times. An additional 220 houses on the HTV site would add considerably to the congestion not only at peak times. The Local Development Plan talks of sustainable transport solutions, but realistically each proposed new house would have at least one vehicle, if not more realistically two vehicles:
- Access and capacity for traffic on to the A48 and Port Road this will inevitably become a bottle neck on both roads, adding to the current traffic congestion;
- Safety and sustainability St Lythans Road on which the rural hamlets of Twyn-yr-Odyn, St Lythans and Duffryn are situated is a rural lane and not designed to take any volume of traffic. This is already increasingly becoming a 'rat-run', being used by commuters attempting to avoid the congestion down the A48. With a large housing development and further congestion at Culverhouse Cross roundabout and the redevelopment of Five Mile Lane, this can only increase:
- Pollution The proposed development would inevitable create more noise, air and light pollution in what is essentially a rural area, as indicated by the proposed 'green wedge' in the Twyn-yr-Odyn area;
- Loss of employment opportunities the removal of the HTV studio complex will result in the loss of current employment opportunities and the inability to create future jobs in this area.

(ordered by Representation ID No.)

Representor ID and details: 3978/DP1 Rhian Sexton

In conclusion, I would request that the VOG Council should, if the current site proposals proceed:

- Ensure closer consultation with the small communities on which this site development will impact before the development proposals are prepared and submitted, as well as after any submission;
- Take special care with access and egress from the site so that impacts are kept to a minimum;
- Ensure that St Lythan's Road is suitably 'pinch-pointed' or given road-humps to make the road less attractive to speeding commuter traffic:
- Ensure that light, noise and air pollution are considered in the development plans and minimised;
- Ensure that sufficient community facilities and play-areas are available on the development and that enough health and education facilities are available to residents and their families the current proposals seem to want to achieve a maximum density of housing which is unlikely to create a sustainable and healthy community.
- 3f Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)

4b - If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -

<u>`</u>

| Representor ID and details: 3979/DP1 C.A.Carey   |   |   | <del>.</del>   |
|--|---|---|--|
| Date Lodged     Status     Petition and No.     Supporting Evidence       29/03/2012     M     0   | Additional SA SEA   |   | r comments to be consiered by 'written representations' or do a hearing session of Public examination?   |
|  | Procedural Tests - P1 - Unanswered  Consistency Tests - C1 - Unanswered  Coherence and Effectiveness Tests - CE1 - Unanswered   | P2 - Unanswered C2 - Unanswered C3 - Unanswe Jnanswered CE2 - Unanswered C  | E3 - Unanswered CE4 - Unanswered   |
| 3a - Which part of the Deposit Plan are you commenting on?   | Policy Number: Paragraph N<br>MG2(19). MG2(20)  | Number: Proposal Map:   | Constraints Map Appendices:  |
| 3b - Do you wish to see any changes made to the Deposit Plan   | as a result of your representation? Unanswe   | red (If "No" or "Unanswered" -  | go to 3d)  |
| 3c - What changes would like to see made to the Deposit Plan?  |   | ew Paragraph:  Inanswered  Amended Paragraph:  Unanswered   | New Or Amended Site: Other (see Notes): Unanswered Unanswered  |
| 3d - If your representation relates to a new, deleted or amende  | d site, did you submit the site as a Candidate Si<br>Site Name:   | ite? Unanswered (If "Yes", please   | give the Candidate Site Name and reference if known) Site Reference:   |
| currently structurally suspect and is not traffic light control  The amount of addition vehicles that would be generated l are under extreme pressure and some of which are not in | ents below: d I wish to express my concerns regarding the e St Cyres grounds.  has two access points. One of which is by the Ir ed.  by this proposal could be in excess of 400 in bot good repair.  rrent community needs, does seems to be shar additional 10,000 houses in the south east area | nfants School which is controlled by traffic<br>th directions and this would have a profour<br>meful. Has there been any consideration a<br>most of the generated traffic will be funne | lights and the other at the cross common junction which is and and adverse impact on the community. Currently our roads is to the schooling facilities for the additional children that the elled through Dinas Powys. Has any thought gone into the |
| 3f - Please outline the changes you wish to see made to the De   |   |   |  |
|  |   | about and why they consider it be necessa   | ry to speak at the hearing -   |
|  | • • •   | • •   | · · · · · · · · · · · · · · · · · · ·  |

| Representor ID and details: 3980/DP1 Mr John Llewellyn  | า  |  |   |                   |
|---|--|--|---|-------------------|
| Date Lodged     Status     Petition and No.     Supporting Evidence       29/03/2012     M     □     0     □  | Additional SA SEA  |  | our comments to be consiered by 'written represer at a hearing session of Public examination? Writ          |                   |
| 2a - Do you consider the LDP is Sound? Unsound  | 2b - If you think that the Plan is unsound and of Procedural Tests - P1 - Unanswered Consistency Tests - C1 - Unanswered Coherence and Effectiveness Tests - CE1 - | P2 - Unanswered C2 - Unanswered C3 - Unans               | soundness, please indicate which test(s) that it far<br>wered C4 - Unanswered<br>CE3 - Yes CE4 - Unanswered | ils.              |
| 3a - Which part of the Deposit Plan are you commenting on?  | Policy Number: Paragraph MG2(11). MG12(11). MG15   | Number: Proposal Map: MG2(11)                            | Constraints Map Appe  | ndices:           |
| 3b - Do you wish to see any changes made to the Deposit Plan  | as a result of your representation? Yes  | (If "No" or "Unanswered                                  | - go to 3d)   |                   |
| 3c - What changes would like to see made to the Deposit Plan  |  | New Paragraph: Amended Paragrap<br>Unanswered Unanswered | h: New Or Amended Site: Other (see Notes): Yes Unanswered   |                   |
| 3d - If your representation relates to a new, deleted or amende   | ed site, did you submit the site as a Candidate S<br>Site Name: Cowbridge Cattle Market Land w   |  | se give the Candidate Site Name and reference if<br>Site Reference: 178/CS1 2440/CS2                        | known)            |
| 3e - Please set out your representation below:<br>Policy MG2 (11) states that Cowbridge Cattle Market has   | been allocated for residential development. This   | is is unsound and objected to on the gro                 | unds that-  |                   |
| The Cowbridge Cattle Market, which sells on average 500   | head of sheep per week, is trading successful  | ly and supporting the farming communit                   | of the Vale of Glamorgan and should not be close  | ed.               |
| On non market days the site is used for car and coach paramade within the LDP for the lost car and coach parking smarket town.  |  |  |   |                   |
| Policies MG12 (11) and MG15 refer to a proposed site fo policy is objected to as being unsound.   | r the replacement cattle market. This is a green   | field site and proposals are made within                 | the LDP for its purchase and development as a m   | arket. The        |
| 3f - Please outline the changes you wish to see made to the D Delete Policies MG2 (11), MG12(11) and MG15.  An additional policy should be included upholding the con on the site to support the attractiveness of Cowbridge as | tinuation of the Cowbridge Cattle Market in sup  |  | ale of Glamorgan and the provision of improved pa   | arking facilities |
| 4b - If you wish to speak, please confirm which part of your re   | presentation you wish to speak to the inspector  | about and why they consider it be neces                  | ssary to speak at the hearing -   |                   |

# Vale of Glamorgan Council - Local Development Plan DEPOSIT PLAN (February 2012) - REPRESENTATION DETAILS: (ordered by Representation ID No.)

| Representor ID and details: 3981/DP1 Mr & Mrs Bound  |  |
|--|--|
| Date Lodged     Status     Petition and No.     Supporting Evidence       12/03/1939     M     0   | Additional SA SEA Rep format: 4a - do you want your comments to be consiered by 'written representations' or do you want to speak at a hearing session of Public examination?  |
| 2a - Do you consider the LDP is Sound? Unanswered  | 2b - If you think that the Plan is unsound and does not not meet one or more test(s) of soundness, please indicate which test(s) that it fails.  Procedural Tests - P1 - Unanswered P2 - Unanswered  Consistency Tests - C1 - Unanswered C2 - Unanswered C3 - Unanswered C4 - Unanswered  Coherence and Effectiveness Tests - CE1 - Unanswered CE2 - Unanswered CE3 - Unanswered CE4 - Unanswered  |
|  | Policy Number:     Paragraph Number:     Proposal Map:     Constraints Map     Appendices:       MG2(19).     MG2(20).   |
| 3b - Do you wish to see any changes made to the Deposit Plan   | as a result of your representation? Unanswered (If "No" or "Unanswered" - go to 3d)  |
| 3c - What changes would like to see made to the Deposit Plan?  |  |
| 3d - If your representation relates to a new, deleted or amende  | d site, did you submit the site as a Candidate Site? Unanswered (If "Yes", please give the Candidate Site Name and reference if known) Site Name:  |
| In Dinas Powys it is proposed that a minimum of 400 addidirections, particularly at peak times. The additional traffic To add to that there are already 2000 houses approved at drive through Dinas Powys, using both the main road and is Dinas Powys expected to take?  As it is, residents within the older part of the Village are all and Pen-y-Turnpike. Theses roads are subjected to streat particularly standing traffic, would exacerbate the potential Further, I am concerned that there have not been any prothe present demand and medical services are restricted of The Deposit plan does not indicate what measures will be trains will be a major challenge. Additional buses would si | Ins regarding the implications of the effect that the proposed additional housing would have on the local highways network.  Ition houses will be built on the St Cyres annexe and Caerleon Road. The 400 houses would generate between 600 to 800 additional cars in both would have a profound and adverse impact on the community as the existing roads are under great pressure now.  Barry Waterfront, to be built in the period from now until 2020. It is inevitable that many of the additional vehicles arising from that development will also through the village centre, down Mill Road and up Pen-y-turnpike. St.Andrews Road and Britway Road will also be affected. How much more traffic ready affected at present by the amount of traffic coming from the Barry direction that travels on the alternative route through Station Road, Mill Road and so of cars, particularly at peak times. Michaelston-le-Pit would also be affected at its junction with the Pen-y-Turnpike Road. An increase in vehicles, |
| 3f - Please outline the changes you wish to see made to the D  | eposit Plan to make it sound (if relevant)   |
|  | resentation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -   |

(ordered by Representation ID No.)

| Representor I   | ID and d    | letails:   | 3982/DI         | P1 Richard Seel         |  |                |            |                             |            |                            |                                   |              |                            |                                   |
|-----------------|-------------|------------|-----------------|-------------------------|--|----------------|------------|-----------------------------|------------|----------------------------|-----------------------------------|--------------|----------------------------|-----------------------------------|
| Date Lodged     | Status<br>M | Petitio    | on and No.<br>0 | Supporting Evidence     | Additional SA SEA  |                |            | Rep format:<br>Comment form |            |                            | our comments to at a hearing sess |              | •                          | representations' or do n? Written |
| 2a - Do you co  | nsider tl   | ne LDP     | s Sound?        |                         | 2b - If you think that the Plan is unsound and does not not meet one or more test(s) of soundness, please indicate which test(s) that it fails.  Procedural Tests - P1 - Yes P2 - Unanswered |                |            |                             |            |                            |                                   |              |                            |                                   |
|                 |             |            |                 |                         | Consistency Tests -  | C1 - Unans     | swered     | C2 - Unans                  | swered     | C3 - Unansv                | wered C4 -                        | Yes          |                            |                                   |
|                 |             |            |                 |                         | Coherence and Effec  | tiveness Tests | - CE1 - U  | nanswered                   | CE2 - U    | Jnanswered                 | CE3 - Unanswe                     | red CE       | ∃4 - Unanswer              | red                               |
| 3a - Which par  | rt of the   | Deposit    | Plan are yo     | ou commenting on?       | Policy Number:   | <u> </u>       | aragraph N | umber:                      | Proposa    | al Map:                    |                                   | Constra      | ints Map                   | Appendices:                       |
|                 |             |            |                 |                         |  |                |            |                             | N          | /IG2(29)                   |                                   |              |                            |                                   |
| 3b - Do you wi  | sh to se    | e any ch   | anges mad       | de to the Deposit Plan  | as a result of your rep  | resentation?   | Yes        | (                           | (If "No" o | r "Unanswered"             | - go to 3d)                       |              |                            |                                   |
| 3c - What char  | nges wo     | uld like t | o see mad       | le to the Deposit Plan? | New Policy:<br>Unanswered  | Amended Po     |            | ew Paragraph:<br>nanswered  |            | ended Paragrapl<br>nswered | h: New Or Amer<br>Yes             | nded Site:   | Other (see N<br>Unanswered | otes):                            |
|                 |             |            |                 |                         | Notes:   |                |            |                             |            |                            |                                   |              |                            |                                   |
| 3d - If your re | presenta    | ation rela | ates to a ne    | ew, deleted or amende   | d site, did you submit<br>Site Name: ITV Wale  |                |            | te? Yes                     | <b>)</b>   | (If "Yes", pleas           | se give the Cand<br>Site Re       | idate Site N |                            | erence if known)                  |
|                 |             |            |                 |                         |  |                |            |                             | 7          |                            |                                   |              |                            |                                   |

3e - Please set out your representation below:

Re: Local Development Plan - ITV, Culverhouse Cross Development - MG2/29

As a member of a small rural community, I am writing to comment on the planning proposals for the above proposed site that will have a profound effect on my life and the lives of my children.

The Vale of Glamorgan Community Strategy promises that the Vale will be a place "that is safe, clean and attractive, where individuals and communities have sustainable opportunities to improve their health, learning and skills, prosperity and wellbeing, 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 sustainability of the area."

My first concern about the proposed LDP is the poor process of consultation with local communities. In this area the consultation process was poorly advertised and only the absolute minimum period given to allow community involvement. We have not been given the incentive to make an effective contribution to the process. I understand that some VOG councillors also found the process did not give them opportunities to add or change proposals. Only by organising our own local meeting have we been able, as a small community, to express our individual concerns with regard to the proposed ITV development.

Wenvoe has been identified as a primary settlement that has community facilities. These consist of one shop, three pubs, a church and two community halls. Twyn-yr -Odyn is an even smaller rural hamlet. These facilities are surely inadequate to serve an additional 220 households in the first instance (proposed development of the HTV site) and a further 150 houses if the proposed development in Wenvoe goes ahead. The size of the community will grow as to change Wenvoe entirely and make it, in effect, a commuter village lacking community adherence.

In addition, the problems that I see with regard to the ITV development are:

- Traffic congestion There is already traffic congestion at Culverhouse Cross roundabout, on the A48 from St Nicholas and along Port Road both to and from Barry particularly at peak times. An additional 220 houses on the HTV site would add considerably to the congestion not only at peak times. The Local Development Plan talks of sustainable transport solutions, but realistically each proposed new house would have at least one vehicle, if not more realistically two vehicles:
- Access and capacity for traffic on to the A48 and Port Road this will inevitably become a bottle neck on both roads, adding to the current traffic congestion;
- Safety and sustainability St Lythans Road on which the rural hamlets of Twyn-yr-Odyn, St Lythans and Duffryn are situated is a rural lane and not designed to take any volume of traffic. This is already increasingly becoming a 'rat-run', being used by commuters attempting to avoid the congestion down the A48. With a large housing development and further congestion at Culverhouse Cross roundabout and the redevelopment of Five Mile Lane, this can only increase:
- Pollution The proposed development would inevitable create more noise, air and light pollution in what is essentially a rural area, as indicated by the proposed 'green wedge' in the Twyn-yr-Odyn area;
- Loss of employment opportunities the removal of the HTV studio complex will result in the loss of current employment opportunities and the inability to create future jobs in this area.

In conclusion, I would request that the VOG Council should, if the current site proposals proceed:

Representation ID No.)

Representor ID and details: 3982/DP1 Richard Seel

- Ensure closer consultation with the small communities on which this site development will impact before the development proposals are prepared and submitted, as well as after any submission;
- Take special care with access and egress from the site so that impacts are kept to a minimum;
- Ensure that St Lythan's Road is suitably 'pinch-pointed' or given road-humps to make the road less attractive to speeding commuter traffic;
- Ensure that light, noise and air pollution are considered in the development plans and minimised;
- Ensure that sufficient community facilities and play-areas are available on the development and that enough health and education facilities are available to residents and their families the current proposals seem to want to achieve a maximum density of housing which is unlikely to create a sustainable and healthy community.

And efforts should be made to pursue existing breaches of planning permissions such as the unauthorised use of Greenwood Quarry as a bus depot with up to 12 buses leaving and entering the yard between the hours of 6am and as late as 1am. Damage to the road surface has also occurred due to the road not being designed for this weight of traffic.

- 3f Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
- 4b If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -



| Representor ID and details: 3983/DP1 Mr Peter H  | awkins  |   |                                       |  |  |                    |
|--|---|---|---------------------------------------|--|--|--------------------|
| Date Lodged     Status     Petition and No.     Supporting Ev       29/03/2012     M     □     0     □       | idence Additional SA SEA                        |   |                                       |  | nments to be consiered by 'writt<br>earing session of Public examina |                    |
| 2a - Do you consider the LDP is Sound? Unsound   | 2b - If you think that th<br>Procedural Tests - |   | not not meet one o<br>P2 - Unanswered | ` '                                    | ness, please indicate which test(                                    | (s) that it fails. |
|  | Consistency Tests -                             | C1 - Unanswered   | C2 - Unanswered                       | C3 - Unanswered                        | C4 - Unanswered  |                    |
|  | Coherence and Effecti                           | veness Tests - CE1 - Una                                      | nswered CE2 -                         | · Yes CE3 -                            | Unanswered CE4 - Unansv  | wered              |
| 3a - Which part of the Deposit Plan are you commenting   | on? Policy Number:                              | Paragraph Num   | nber: Propo                           | osal Map:                              | Constraints Map  | Appendices:        |
|  |   |   |                                       | . MG2(13)                              |  |                    |
| 3b - Do you wish to see any changes made to the Depos  | sit Plan as a result of your repr               | resentation? Yes  | (If "No"                              | or "Unanswered" - go to                | 3d)  |                    |
| 3c - What changes would like to see made to the Depos  | t Plan? New Policy: Unanswered                  |   |                                       | mended Paragraph: New<br>manswered Yes | w Or Amended Site: Other (see<br>S Unanswer                          |                    |
|  | Notes:  |   |                                       |  |  |                    |
| 3d - If your representation relates to a new, deleted or a   | • •   | he site as a Candidate Site?<br>rest of St Athan Road Llanble |                                       | ` ''                                   | the Candidate Site Name and r<br>Site Reference: 2446/CS1, 2         | ,                  |
| 3e - Please set out your representation below:<br>Local Development Plan (2011-2026) Representation          | on form- MG2(13)                                |   |                                       |  |  |                    |
| No building or development should take place on the duty and responsibility not to use up 'green belt' lar   |   |   |                                       |  |  |                    |
| 3f - Please outline the changes you wish to see made to<br>Have candidate site removed and include as a gree | ·   | ,   |                                       |  |  |                    |
| 4b - If you wish to speak, please confirm which part of v  | our representation you wish to                  | speak to the inspector about                                  | ut and why they cor                   | nsider it be necessary to              | speak at the hearing -   |                    |

(ordered by Representation ID No.)

| Representor I    | D and d     | etails:    | 3984/DI         | P1 Emily Seel          |   |                    |           |                               |                            |  |                      |                           |                |
|------------------|-------------|------------|-----------------|------------------------|---|--------------------|-----------|-------------------------------|----------------------------|--|----------------------|---------------------------|----------------|
| Date Lodged      | Status<br>M | Petitio    | on and No.<br>0 | Supporting Evidence    | Additional SA SEA                             |                    |           | Rep format:<br>Comment for    | ·                          | ant your comments to<br>beak at a hearing sess |                      | •                         | •              |
| 2a - Do you co   | nsider th   | ne LDP     | is Sound?       |                        | 2b - If you think that the Procedural Tests - |                    |           | does not not med<br>P2 - Unan | •                          | s) of soundness, pleas                         | se indicate          | which test(s) th          | at it fails.   |
|                  |             |            |                 |                        | Consistency Tests -                           | C1 - Un            | nanswered | C2 - Unan                     | swered C3 - Ur             | nanswered C4 -                                 | Yes                  |                           |                |
|                  |             |            |                 |                        | Coherence and Effect                          | tiveness Te        | sts - CE1 | - Unanswered                  | CE2 - Unanswered           | CE3 - Unanswe                                  | red CE               | E4 - Unanswere            | d              |
| 3a - Which par   | rt of the I | Deposit    | Plan are ye     | ou commenting on?      | Policy Number:                                |                    | Paragraph | n Number:                     | Proposal Map:              |  | Constra              | ints Map                  | Appendices:    |
|                  |             |            |                 |                        |   |                    |           |                               | MG2(29)                    |  |                      |                           |                |
| 3b - Do you wi   | sh to see   | e any ch   | nanges mad      | de to the Deposit Plan | as a result of your rep                       | resentation        | ı? Yes    | (                             | If "No" or "Unanswe        | ered" - go to 3d)                              |                      |                           |                |
| 3c - What char   | nges wo     | uld like   | to see mad      | e to the Deposit Plan? | New Policy:<br>Unanswered                     | Amended<br>Unanswe |           | New Paragraph:<br>Unanswered  | Amended Para<br>Unanswered | graph: New Or Amer<br>Yes                      | nded Site:           | Other (see Not Unanswered | <u>:es):</u>   |
|                  |             |            |                 |                        | Notes:  |                    |           |                               |                            |  |                      |                           |                |
| 3d - If your rep | presenta    | ition rela | ates to a ne    | ew, deleted or amende  | d site, did you submit<br>Site Name: ITV Wale |                    | _         | Site? Yes                     | (If "Yes",                 | please give the Cand<br>Site Ref               | date Site Nerence: M |                           | ence if known) |

3e - Please set out your representation below:

Re: Local Development Plan - ITV, Culverhouse Cross Development - MG2/29

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Wenvoe has been identified as a primary settlement that has community facilities. These consist of one shop, three pubs, a church and two community halls. Twyn-yr -Odyn is an even smaller rural hamlet. These facilities are surely inadequate to serve an additional 220 households in the first instance (proposed development of the HTV site) and a further 150 houses if the proposed development in Wenvoe goes ahead. The size of the community will grow as to change Wenvoe entirely and make it, in effect, a commuter village lacking community adherence.

In addition, the problems that I see with regard to the ITV development are:

- Traffic congestion There is already traffic congestion at Culverhouse Cross roundabout, on the A48 from St Nicholas and along Port Road both to and from Barry particularly at peak times. An additional 220 houses on the HTV site would add considerably to the congestion not only at peak times. The Local Development Plan talks of sustainable transport solutions, but realistically each proposed new house would have at least one vehicle, if not more realistically two vehicles:
- Access and capacity for traffic on to the A48 and Port Road this will inevitably become a bottle neck on both roads, adding to the current traffic congestion;
- Safety and sustainability St Lythans Road on which the rural hamlets of Twyn-yr-Odyn, St Lythans and Duffryn are situated is a rural lane and not designed to take any volume of traffic. This is already increasingly becoming a 'rat-run', being used by commuters attempting to avoid the congestion down the A48. With a large housing development and further congestion at Culverhouse Cross roundabout and the redevelopment of Five Mile Lane, this can only increase:
- Pollution The proposed development would inevitable create more noise, air and light pollution in what is essentially a rural area, as indicated by the proposed 'green wedge' in the Twyn-yr-Odyn area;
- Loss of employment opportunities the removal of the HTV studio complex will result in the loss of current employment opportunities and the inability to create future jobs in this area.

In conclusion, I would request that the VOG Council should, if the current site proposals proceed:

(ordered by Representation ID No.)

Representor ID and details: 3984/DP1 Emily Seel

- Ensure closer consultation with the small communities on which this site development will impact before the development proposals are prepared and submitted, as well as after any submission;
- Take special care with access and egress from the site so that impacts are kept to a minimum;
- Ensure that St Lythan's Road is suitably 'pinch-pointed' or given road-humps to make the road less attractive to speeding commuter traffic;
- Ensure that light, noise and air pollution are considered in the development plans and minimised:
- Ensure that sufficient community facilities and play-areas are available on the development and that enough health and education facilities are available to residents and their families the current proposals seem to want to achieve a maximum density of housing which is unlikely to create a sustainable and healthy community.

In addition, the area between Wenvoe and Culverhouse Cross provides a vital 'green wedge' between Wenvoe and Ely. The area contains some outstanding footpaths and ancient monuments which need to be preserved. The filled in quarries give off 'natural gas' and the site is directly in the 'lee' of a massive TV transmitter - the safety implications of these two factors need to be considered.

3f - Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant) Please revoke the plan to build a massive estate in the middle of the countryside.

4b - If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -



(ordered by Representation ID No.)

| Representor ID and details: 3985/DP1 Jan                                  | nes Morgan                              |  |               |                                 |  |                                 |                 |  |  |  |
|---|---|--|---------------|---------------------------------|--|---------------------------------|-----------------|--|--|--|
| Date Lodged     Status     Petition and No.     Suppo       M     □     0 | orting Evidence Additional SA SEA       | _  |               |                                 | our comments to be cons<br>at a hearing session of F | •                               | •               |  |  |  |
| 2a - Do you consider the LDP is Sound? Unsou                              | •                                       | 2b - If you think that the Plan is unsound and does not not meet one or more test(s) of soundness, please indicate which test(s) that it fails.  Procedural Tests - P1 - Yes P2 - Unanswered |               |                                 |  |                                 |                 |  |  |  |
|   | Consistency Tests -                     | C1 - Unanswered  | C2 - Unanswer | ed C3 - Unansv                  | vered C4 - Yes                                       |                                 |                 |  |  |  |
|   | Coherence and Effect                    | ctiveness Tests - CE1 - Una  | nswered CE    | 2 - Unanswered                  | CE3 - Unanswered                                     | CE4 - Unanswere                 | ed              |  |  |  |
| 3a - Which part of the Deposit Plan are you com                           | menting on? Policy Number:              | Paragraph Num  | ber: Pro      | pposal Map:                     | Cons   | straints Map                    | Appendices:     |  |  |  |
|   |   |  |               | MG2(29)                         |  |                                 |                 |  |  |  |
| 3b - Do you wish to see any changes made to the                           | e Deposit Plan as a result of your re   | presentation? Yes  | (If "No       | o" or "Unanswered"              | - go to 3d)  |                                 |                 |  |  |  |
| 3c - What changes would like to see made to the                           | Deposit Plan? New Policy:<br>Unanswered |  |               | Amended Paragraph<br>Unanswered | h: New Or Amended Sit                                | te: Other (see No<br>Unanswered | <u>tes):</u>    |  |  |  |
|   | Notes:                                  |  |               |                                 |  |                                 |                 |  |  |  |
| 3d - If your representation relates to a new, dele                        | · •                                     | the site as a Candidate Site?<br>es, Culverhouse Cross   | Yes           | (If "Yes", pleas                | se give the Candidate Sit<br>Site Reference:         |                                 | rence if known) |  |  |  |
|   |   |  |               |                                 |  |                                 |                 |  |  |  |

3e - Please set out your representation below:

Re: Local Development Plan - ITV, Culverhouse Cross Development - MG2/29

As a member of a small rural community, I am writing to comment on the planning proposals for the above proposed site that will have a profound effect on my life and the lives of my children.

The Vale of Glamorgan Community Strategy promises that the Vale will be a place "that is safe, clean and attractive, where individuals and communities have sustainable opportunities to improve their health, learning and skills, prosperity and wellbeing, 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 sustainability of the area."

My first concern about the proposed LDP is the poor process of consultation with local communities. In this area the consultation process was poorly advertised and only the absolute minimum period given to allow community involvement. We have not been given the incentive to make an effective contribution to the process. I understand that some VOG councillors also found the process did not give them opportunities to add or change proposals. Only by organising our own local meeting have we been able, as a small community, to express our individual concerns with regard to the proposed ITV development.

Wenvoe has been identified as a primary settlement that has community facilities. These consist of one shop, three pubs, a church and two community halls. Twyn-yr -Odyn is an even smaller rural hamlet. These facilities are surely inadequate to serve an additional 220 households in the first instance (proposed development of the HTV site) and a further 150 houses if the proposed development in Wenvoe goes ahead. The size of the community will grow as to change Wenvoe entirely and make it, in effect, a commuter village lacking community adherence.

In addition, the problems that I see with regard to the ITV development are:

- Traffic congestion There is already traffic congestion at Culverhouse Cross roundabout, on the A48 from St Nicholas and along Port Road both to and from Barry particularly at peak times. An additional 220 houses on the HTV site would add considerably to the congestion not only at peak times. The Local Development Plan talks of sustainable transport solutions, but realistically each proposed new house would have at least one vehicle, if not more realistically two vehicles:
- Access and capacity for traffic on to the A48 and Port Road this will inevitably become a bottle neck on both roads, adding to the current traffic congestion;
- Safety and sustainability St Lythans Road on which the rural hamlets of Twyn-yr-Odyn, St Lythans and Duffryn are situated is a rural lane and not designed to take any volume of traffic. This is already increasingly becoming a 'rat-run', being used by commuters attempting to avoid the congestion down the A48. With a large housing development and further congestion at Culverhouse Cross roundabout and the redevelopment of Five Mile Lane, this can only increase:
- Pollution The proposed development would inevitable create more noise, air and light pollution in what is essentially a rural area, as indicated by the proposed 'green wedge' in the Twyn-yr-Odyn area;
- Loss of employment opportunities the removal of the HTV studio complex will result in the loss of current employment opportunities and the inability to create future jobs in this area.

In conclusion, I would request that the VOG Council should, if the current site proposals proceed:

Representation ID No.)

Representor ID and details: 3985/DP1 James Morgan

- Ensure closer consultation with the small communities on which this site development will impact before the development proposals are prepared and submitted, as well as after any submission;
- Take special care with access and egress from the site so that impacts are kept to a minimum;
- Ensure that St Lythan's Road is suitably 'pinch-pointed' or given road-humps to make the road less attractive to speeding commuter traffic;
- Ensure that light, noise and air pollution are considered in the development plans and minimised;
- Ensure that sufficient community facilities and play-areas are available on the development and that enough health and education facilities are available to residents and their families the current proposals seem to want to achieve a maximum density of housing which is unlikely to create a sustainable and healthy community.
- 3f Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
- 4b If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -

| Representor ID and details: 3986/DP1 Alice Howells   |   |   |  |                                      |                                  |                                   |                                       |
|--|---|---|--|--------------------------------------|----------------------------------|-----------------------------------|---------------------------------------|
| Date Lodged     Status     Petition and No.     Supporting Evidence       29/03/2012     M     0   | Additional SA SEA   |   | Rep format:<br>Comment forr                  | 4a - do you want<br>you want to spea |                                  |                                   | n representations' or do ion? Written |
| 2a - Do you consider the LDP is Sound? Unanswered  | 2b - If you think that th<br>Procedural Tests -<br>Consistency Tests -<br>Coherence and Effecti   | P1 - Unanswered<br>C1 - Unanswered  | P2 - Unans                                   | ` '                                  |                                  | Jnanswered                        | ,<br>                                 |
| 3a - Which part of the Deposit Plan are you commenting on?   | Policy Number:  | <u>Paragrap</u>   | h Number:                                    | Proposal Map:                        | <b>7</b>                         | Constraints Map                   | Appendices:                           |
| 3b - Do you wish to see any changes made to the Deposit Plan   | as a result of your repr  | esentation? Unans   | wered (I                                     | If "No" or "Unanswered               | d" - go to 3d)                   |                                   |                                       |
| 3c - What changes would like to see made to the Deposit Plan?  | New Policy:<br>Unanswered<br>Notes:   | Amended Policy:<br>Unanswered   | New Paragraph:<br>Unanswered                 | Amended Paragra<br>Unanswered        | ph: New Or Amen<br>Unanswered    | ded Site: Other (see<br>Unanswere | <del></del>                           |
| 3d - If your representation relates to a new, deleted or amende  | ed site, did you submit tl<br>Site Name:  | he site as a Candidate  | Site? Unanswe                                | ered (If "Yes", ple                  | ase give the Candid<br>Site Refe | date Site Name and re<br>erence:  | ference if known)                     |
| 3e - Please set out your representation below: I object to the building of 60 dwellings on land to rear of S  1. Local highway improvements will be required to ease lot 2. The increase in traffic to and from the proposed site words. If access is provided by the playing fields to the south the 4. Water mains protection measures will be required; 5. Upgrade to public sewers will be required; 6. Measures will be required to prevent surface water floo 7. Drainage will have to be improved; 8. Protection of Colwinston's conservation area would have 9. Archaeological features would have to be protected in the 10. The enormity of the plan to build 60 residences in the | ocal parking and congest<br>ould be enormous;<br>hen alternative playing<br>ding, due to history of known<br>we to be considered;<br>the village: | stion problems surrour<br>field provision will be r<br>ocalised surface water | iding the school in<br>equired;<br>flooding; | early morning/late afte              | ernoon given the site            | e's close relationship t          | o the primary school;                 |
| 3f - Please outline the changes you wish to see made to the D<br>Please remove the village of Colwinston from your MONS  |   | ,   | of houses here.                              |                                      |                                  |                                   |                                       |
| 4b - If you wish to speak, please confirm which part of your rep   | presentation you wish to  | speak to the inspecto   | or about and why t                           | hey consider it be nece              | essary to speak at th            | ne hearing -                      |                                       |

(ordered by Representation ID No.)

| Representor ID and details:              | 3987/DP1 Mrs E.P.Anderson      |   |                       |                              |                                  |   |                              |                |
|--|--------------------------------|---|-----------------------|------------------------------|----------------------------------|---|------------------------------|----------------|
| Date Lodged Status Petition 29/03/2012 M | and No. Supporting Evidence 0  | Additional SA SEA   |                       | Rep format:<br>Letter        | ,                                | r comments to be consie<br>a hearing session of Pub | •                            | •              |
| 2a - Do you consider the LDP is          |                                | 2b - If you think that the<br>Procedural Tests -<br>Consistency Tests - | P1 - Unanswered       | P2 - Unanswe                 | ` '                              | undness, please indicate                            |                              | nat it fails.  |
|  |                                | Coherence and Effective   | veness Tests - CE1 -  | Unanswered Cl                | E2 - Unanswered C                | E3 - Unanswered C                                   | E4 - Unanswere               | d              |
| 3a - Which part of the Deposit P         | ,                              | Policy Number:<br>MG2(19). MG2(20)                                      | Paragraph             |                              | roposal Map:                     | Constra   | aints Map                    | Appendices:    |
| 3b - Do you wish to see any cha          | inges made to the Deposit Plan | as a result of your repre   | esentation? Unansw    | ered (If "N                  | lo" or "Unanswered" - g          | go to 3d)   |                              |                |
| 3c - What changes would like to          | see made to the Deposit Plan?  | New Policy:<br>Unanswered<br>Notes:                                     |                       | New Paragraph:<br>Unanswered | Amended Paragraph:<br>Unanswered | New Or Amended Site:<br>Unanswered                  | Other (see Not<br>Unanswered | tes):          |
| 3d - If your representation relate       | ·                              | d site, did you submit th   | e site as a Candidate | Site? Unanswered             | (If "Yes", please                | give the Candidate Site<br>Site Reference:          | Name and refer               | ence if known) |

3e - Please set out your representation below:

As a resident of Dinas Powys I wish to express my concerns re, the implications of the effect that the proposed additional housing would have on the local highways network.

In Dinas Powys it is proposed that a minimum of 400 addition houses will be built on the St Cyres annexe and Caerleon Road, Both sites are on the Murch side of the community which is served by only two access points to the main road [A4055]. Both these junctions, namely the Infants School traffic lights at Murch Bridge and Cross Common Road at its junction with the A4055 are either at capacity or structurally suspect.

The 400 houses would generate between 600 to 800 additional cars in both directions, particularly at peak times. The additional traffic would have a profound and adverse impact on the community as the existing roads are under great pressure now.

Further, I am concerned that there have not been any proposed extra community facilities of substance. A local church is in desperate need of a permanent base, the local sporting facilities are not adequate for the present demand and medical services are restricted due to the limitations of space at the Dinas Powys Surgery premises on Cardiff Road.

There appears to be no serious consideration having been given to other views as to the future possible use of St Cyres Annexe, Murch Road. It is worth noting that the school buildings are in good condition although in need of a little investment. To simply seek to tear down the school without any

reference to the community needs would be a shameful waste. I also have concerns regarding the capacity of the local schools to accommodate the extra pupils due to the additional houses.

Then there is the wider consideration of the Plan. Up to 10,000 additional houses are planned, many in the south east area of the Vale, e.g. 2,000 units already having been approved at the Waterfront, Barry.

Much of this traffic will be funnelled through Dinas Powys and join the ever lengthening queues leading to and from the Merrie Harrier. The proposals in Sully, Penarth, Lavernock and the land adjacent St Josephs' School, Sully Road will only add to the existing congestion at this junction.

Already the air pollution levels are excessive. The Nitrogen Dioxide [N02] levels are recorded as being 43.8 units with the maximum recommended level being 40 units along Cardiff Road, Eastbrook. An increase in vehicles, particularly standing traffic, would exacerbate the situation. The level of other emissions such as CO (carbon monoxide) and Particulates [PM105] are not available but need clarifying

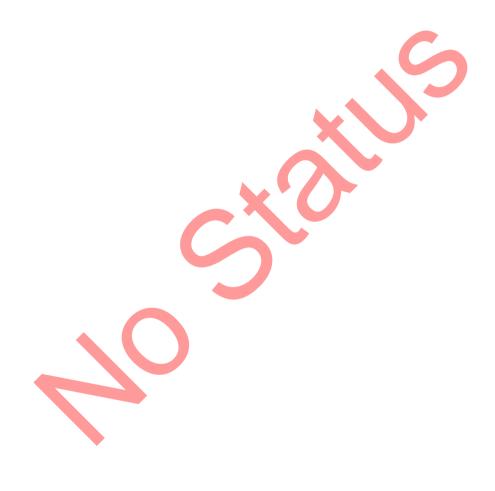
The Deposit plan does not indicate what measures will be taken to encourage the availability and use of public transport. I understand that there is a serious lack of rolling stock in Wales and providing extra trains will be a major challenge. Additional buses would simply be caught up in the traffic chaos the extra housing would cause.

(ordered by Representation ID No.)

Representor ID and details: 3987/DP1 Mrs E.P.Anderson

It is essential that major highway infrastructure improvements are made BEFORE hundreds of additional housing could even be considered.

- 3f Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
- 4b If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -



(ordered by Representation ID No.)

| Representor ID and details: 3988/DP1 Mr & Mrs Lewis                    |   |                                       |                              |                                |  |                                  |                  |
|--|---|---------------------------------------|------------------------------|--------------------------------|--|----------------------------------|------------------|
| Date Lodged Status Petition and No. Supporting Evidence 29/03/2012 M 0 | e Additional SA SEA                           |                                       | Rep format:<br>Letter        | , ,                            | our comments to be consie<br>at a hearing session of Pul |                                  | entations' or do |
| 2a - Do you consider the LDP is Sound? Unanswered                      | 2b - If you think that the Procedural Tests - |                                       |                              | ` '                            | soundness, please indicate                               | which test(s) that it f          | iails.           |
|  | Consistency Tests -                           | C1 - Unanswered                       | C2 - Unansv                  | wered C3 - Unans               | swered C4 - Unanswe                                      | red                              |                  |
|  | Coherence and Effect                          | tiveness Tests - CE                   | I - Unanswered               | CE2 - Unanswered               | CE3 - Unanswered C                                       | E4 - Unanswered                  |                  |
| 3a - Which part of the Deposit Plan are you commenting on?             | Policy Number:<br>MG2(20). MG2(19).           | · · · · · · · · · · · · · · · · · · · |                              | Proposal Map:                  | Constra  | aints Map App                    | <u>pendices:</u> |
| 3b - Do you wish to see any changes made to the Deposit Pla            | n as a result of your rep                     | oresentation? Unans                   | swered (If                   | "No" or "Unanswered            | " - go to 3d)  |                                  |                  |
| 3c - What changes would like to see made to the Deposit Pla            | Unanswered                                    | Amended Policy:<br>Unanswered         | New Paragraph:<br>Unanswered | Amended Paragrap<br>Unanswered | oh: New Or Amended Site: Unanswered                      | Other (see Notes):<br>Unanswered |                  |
|  | Notes:  |                                       |                              |                                |  |                                  |                  |
| 3d - If your representation relates to a new, deleted or amend         | led site, did you submit<br>Site Name:        | the site as a Candidat                | e Site? Unanswere            | ed (If "Yes", plea             | ase give the Candidate Site Site Reference:              | Name and reference               | if known)        |
|  |   |                                       |                              |                                |  |                                  |                  |

3e - Please set out your representation below:

As a resident of Dinas Powys I wish to express my concerns re. the implications of the effect that the proposed additional housing would have on the local highways network.

In Dinas Powys it is proposed that a minimum of 400 addition houses will be built on the St Cyres annexe and Caerleon Road, Both sites are on the Murch side of the community which is served by only two access points to the main road [A4055]. Both these junctions, namely the Infants School traffic lights at Murch Bridge and Cross Common Road at its junction with the A4055 are either at capacity or structurally suspect.

The 400 houses would generate between 600 to 800 additional cars in both directions, particularly at peak times. The additional traffic would have a profound and adverse impact on the community as the existing roads are under great pressure now.

Further, I am concerned that there have not been any proposed extra community facilities of substance. A local church is in desperate need of a permanent base, the local sporting facilities are not adequate for the present demand and medical services are restricted due to the limitations of space at the Dinas Powys Surgery premises on Cardiff Road.

There appears to be no serious consideration having been given to other views as to the future possible use of St Cyres Annexe, Murch Road. It is worth noting that the school buildings are in good condition although in need of a little investment. To simply seek to tear down the school without any reference to the community needs would be a shameful waste. I also have concerns regarding the capacity of the local schools to accommodate the extra pupils due to the additional houses.

Then there is the wider consideration of the Plan. Up to 10,000 additional houses are planned, many in the south east area of the Vale, e.g. 2,000 units already having been approved at the Waterfront, Barry.

Much of this traffic will be funnelled through Dinas Powys and join the ever lengthening queues leading to and from the Merrie Harrier. The proposals in Sully, Penarth, Lavernock and the land adjacent St Josephs' School, Sully Road will only add to the existing congestion at this junction.

Already the air pollution levels are excessive. The Nitrogen Dioxide [N02] levels are recorded as being 43.8 units with the maximum recommended level being 40 units along Cardiff Road, Eastbrook. An increase in vehicles, particularly standing traffic, would exacerbate the situation. The level of other emissions such as CO (carbon monoxide) and Particulates [PM105] are not available but need clarifying

The Deposit plan does not indicate what measures will be taken to encourage the availability and use of public transport. I understand that there is a serious lack of rolling stock in Wales and providing extra trains will be a major challenge. Additional buses would simply be caught up in the traffic chaos the extra housing would cause.

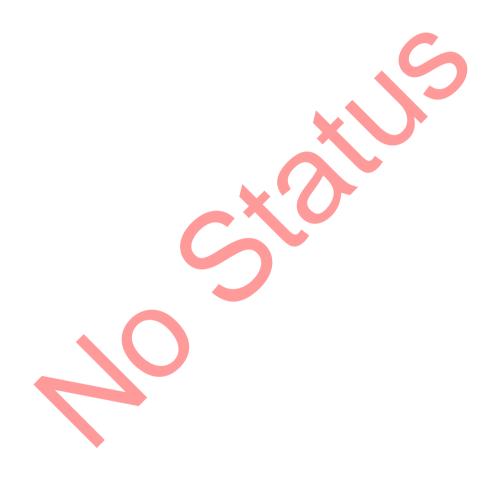
It is essential that major highway infrastructure improvements are made BEFORE hundreds of additional housing could even be considered.

(ordered by Representation ID No.)

Representor ID and details: 3988/DP1 Mr & Mrs Lewis

3f - Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)

4b - If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -



(ordered by Representation ID No.)

| Representor ID and details: 3989/DP1 Mr & Mrs Egert  | on  |                               |                              |                                  |   |  |
|--|---|-------------------------------|------------------------------|----------------------------------|---|--|
| Date Lodged     Status     Petition and No.     Supporting Eviden       29/03/2012     M     0 | ce Additional SA SEA                            |                               | Rep format:<br>Letter        |                                  | r comments to be consider a hearing session of Pu | ered by 'written representations' or do ublic examination? |
| 2a - Do you consider the LDP is Sound? Unanswered  | 2b - If you think that th<br>Procedural Tests - |                               | does not not meet            | ` '                              | oundness, please indicat                          | te which test(s) that it fails.                            |
|  | Consistency Tests -                             | C1 - Unanswered               | C2 - Unansw                  | vered C3 - Unanswe               | ered C4 - Unanswe                                 | ered   |
|  | Coherence and Effecti                           | iveness Tests - CE1           | - Unanswered (               | CE2 - Unanswered C               | CE3 - Unanswered (                                | CE4 - Unanswered   |
| 3a - Which part of the Deposit Plan are you commenting on?                                     | Policy Number:<br>MG2(19). MG2(20)              |                               |                              | Proposal Map:                    | Constr  | raints Map Appendices:                                     |
| 3b - Do you wish to see any changes made to the Deposit Pl                                     | an as a result of your rep                      | resentation? Unansv           | vered (If '                  | "No" or "Unanswered" -           | go to 3d)   |  |
| 3c - What changes would like to see made to the Deposit Pla                                    | nn? New Policy:<br>Unanswered<br>Notes:         | Amended Policy:<br>Unanswered | New Paragraph:<br>Unanswered | Amended Paragraph:<br>Unanswered | New Or Amended Site<br>Unanswered                 | <u>Other (see Notes):</u> Unanswered                       |
| 3d - If your representation relates to a new, deleted or amen                                  | ded site, did you submit t<br>Site Name:        | the site as a Candidate       | Site? Unanswere              | ed (If "Yes", please             | give the Candidate Site<br>Site Reference:        | e Name and reference if known)                             |

3e - Please set out your representation below:

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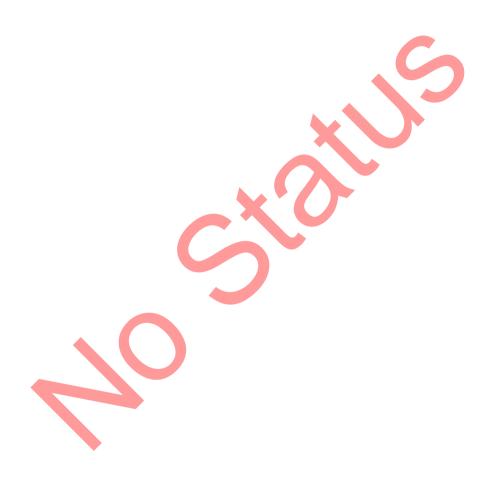
It is essential that major highway infrastructure improvements are made BEFORE hundreds of additional housing could even be considered.

(ordered by Representation ID No.)

Representor ID and details: 3989/DP1 Mr & Mrs Egerton

3f - Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)

4b - If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -



(ordered by Representation ID No.)

| Representor ID and details: 3990/DP1 Greg Ward   |   |                               |                              |                                       |   |                                  |                |
|--|---|-------------------------------|------------------------------|---------------------------------------|---|----------------------------------|----------------|
| Date Lodged     Status     Petition and No.     Supporting Evidence       27/03/2012     M     □     0     □ | Additional SA SEA                                 |                               | Rep format:<br>Comment form  | ,                                     | ur comments to be cons<br>at a hearing session of F | •                                | •              |
| 2a - Do you consider the LDP is Sound? Unsound   | Procedural Tests -                                | P1 - Yes                      | P2 - Unansw                  | rered                                 | soundness, please indica                            | ate which test(s) th             | at it fails.   |
|  | Consistency Tests - Coherence and Effecti         |                               |                              | rered C3 - Unansw<br>CE2 - Unanswered |   | CE4 - Unanswered                 | d              |
| 3a - Which part of the Deposit Plan are you commenting on?   | Policy Number:                                    | <u>Paragraph</u>              |                              | Proposal Map:                         | Cons  | traints Map                      | Appendices:    |
|  | · · · ·   |                               |                              | MG2(29)                               |   |                                  |                |
| 3b - Do you wish to see any changes made to the Deposit Plan   | n as a result of your repr                        | resentation? Yes              | (If "                        | No" or "Unanswered"                   | - go to 3d)   |                                  |                |
| 3c - What changes would like to see made to the Deposit Plan   | ? New Policy:<br>Unanswered                       | Amended Policy:<br>Unanswered | New Paragraph:<br>Unanswered | Amended Paragraph<br>Unanswered       | New Or Amended Sit                                  | te: Other (see Not<br>Unanswered | <u>es):</u>    |
|  | Notes:  |                               |                              |                                       |   |                                  |                |
| 3d - If your representation relates to a new, deleted or amend   | ed site, did you submit tl<br>Site Name: ITV Wale |                               | Site? Yes                    | (If "Yes", pleas                      | e give the Candidate Si<br>Site Reference:          |                                  | ence if known) |

3e - Please set out your representation below:

Re: Local Development Plan - ITV, Culverhouse Cross Development - MG2/29

As a member of a small rural community, I am writing to comment on the planning proposals for the above proposed site that will have a profound effect on my life and the lives of my children.

The Vale of Glamorgan Community Strategy promises that the Vale will be a place "that is safe, clean and attractive, where individuals and communities have sustainable opportunities to improve their health, learning and skills, prosperity and wellbeing, 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 sustainability of the area."

My first concern about the proposed LDP is the poor process of consultation with local communities. In this area the consultation process was poorly advertised and only the absolute minimum period given to allow community involvement. We have not been given the incentive to make an effective contribution to the process. I understand that some VOG councillors also found the process did not give them opportunities to add or change proposals. Only by organising our own local meeting have we been able, as a small community, to express our individual concerns with regard to the proposed ITV development.

Wenvoe has been identified as a primary settlement that has community facilities. These consist of one shop, three pubs, a church and two community halls. Twyn-yr -Odyn is an even smaller rural hamlet. These facilities are surely inadequate to serve an additional 220 households in the first instance (proposed development of the HTV site) and a further 150 houses if the proposed development in Wenvoe goes ahead. The size of the community will grow as to change Wenvoe entirely and make it, in effect, a commuter village lacking community adherence.

In addition, the problems that I see with regard to the ITV development are:

- Traffic congestion There is already traffic congestion at Culverhouse Cross roundabout, on the A48 from St Nicholas and along Port Road both to and from Barry particularly at peak times. An additional 220 houses on the HTV site would add considerably to the congestion not only at peak times. The Local Development Plan talks of sustainable transport solutions, but realistically each proposed new house would have at least one vehicle. if not more realistically two vehicles:
- Access and capacity for traffic on to the A48 and Port Road this will inevitably become a bottle neck on both roads, adding to the current traffic congestion;
- Safety and sustainability St Lythans Road on which the rural hamlets of Twyn-yr-Odyn, St Lythans and Duffryn are situated is a rural lane and not designed to take any volume of traffic. This is already increasingly becoming a 'rat-run', being used by commuters attempting to avoid the congestion down the A48. With a large housing development and further congestion at Culverhouse Cross roundabout and the redevelopment of Five Mile Lane, this can only increase:
- Pollution The proposed development would inevitable create more noise, air and light pollution in what is essentially a rural area, as indicated by the proposed 'green wedge' in the Twyn-yr-Odyn area;
- Loss of employment opportunities the removal of the HTV studio complex will result in the loss of current employment opportunities and the inability to create future jobs in this area. In conclusion, I would request that the VOG Council should, if the current site proposals proceed:

Representation ID No.)

Representor ID and details: 3990/DP1 Greg Ward

- Ensure closer consultation with the small communities on which this site development will impact before the development proposals are prepared and submitted, as well as after any submission;
- Take special care with access and egress from the site so that impacts are kept to a minimum;
- Ensure that St Lythan's Road is suitably 'pinch-pointed' or given road-humps to make the road less attractive to speeding commuter traffic;
- Ensure that light, noise and air pollution are considered in the development plans and minimised;
- Ensure that sufficient community facilities and play-areas are available on the development and that enough health and education facilities are available to residents and their families the current proposals seem to want to achieve a maximum density of housing which is unlikely to create a sustainable and healthy community.
- 3f Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant) See attached letter
- 4b If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -

| Representor ID and details: 3990/DP2 Greg Ward  |   |   |                              |                               |                         |  |                                      |
|---|---|---|------------------------------|-------------------------------|-------------------------|--|--------------------------------------|
| Date Lodged     Status     Petition and No.     Supporting Evidence       02/04/2012     M     0  | Additional SA SEA                             |   |                              | you want to spea              | ak at a hearing sess    | ion of Public examination              | n representations' or do on? Written |
| 2a - Do you consider the LDP is Sound? Unsound  | 2b - If you think that the Procedural Tests - | ne Plan is unsound and<br>P1 - Unanswered |                              | one or more test(s)           |                         |  | ) that it fails.                     |
|   | Consistency Tests -                           | C1 - Yes                                  | C2 - Yes                     | C3 - Unai                     | nswered C4 - `          | Yes                                    |                                      |
|   | Coherence and Effect                          | iveness Tests - CE1                       |                              | CE2 - Yes                     | CE3 - Unanswer          | red CE4 - Unanswe                      | ered                                 |
| 3a - Which part of the Deposit Plan are you commenting on?  | Policy Number:                                | <u>Paragraph</u>                          |                              | Proposal Map:                 |                         | Constraints Map                        | Appendices:                          |
|   |   |   |                              | MG2(33)                       |                         |  |                                      |
| 3b - Do you wish to see any changes made to the Deposit Plan  | as a result of your rep                       | resentation? Yes                          | (If                          | "No" or "Unanswere            | ed" - go to 3d)         |  |                                      |
| 3c - What changes would like to see made to the Deposit Plan  | ? New Policy:<br>Unanswered                   | Amended Policy: Unanswered                | New Paragraph:<br>Unanswered | Amended Paragra<br>Unanswered | aph: New Or Amen<br>Yes | nded Site: Other (see N<br>Unanswered  | <del></del>                          |
|   | Notes:  |   |                              |                               |                         |  |                                      |
| 3d - If your representation relates to a new, deleted or amende   | Site Name: St. Nicho                          |   | Site? Tes                    | (ii fes, pie                  | •                       | date Site Name and reference: MG2 (33) |                                      |
| 3e - Please set out your representation below:  |   | ( ;; )) (10.0 (00)                        |                              |                               |                         | 0 1                                    |                                      |
| As a long term resident of St. Nicholas Village, I strongly   |   |   | ind would ask for it         | is deletion from the p        | lan on the following    | Grounds :-                             |                                      |
| <ol> <li>This is a green field site and surely should not be consi</li> <li>A development of this size would overwhelm the village</li> <li>It would devalue the village</li> </ol> |   |   |                              |                               |                         |  |                                      |
| 4. Major enhancement of infrastructure would be required  | to accommodate a de                           | velopment of this size in                 | n such a small villa         | ge.                           |                         |  |                                      |
| <ul><li>5. There is no net demand for affordable housing in St.Nic</li><li>6. In the absence of village services, residents of this new</li></ul>                                   |   |   | ontrary to council r         | policy.                       |                         |  |                                      |
| 7. Proposed development conflicts with council policy (MC   | 3 7) for residential deve                     | elopment within rural are                 | eas.                         | ·                             |                         |  |                                      |
| <ol><li>Problems and dangers of access to and from a new jur</li><li>New houses should be built on Brown field sites and no</li></ol>   |   | he effect on traffic flow,                | particularly peak p          | periods.                      |                         |  |                                      |
| <ol> <li>Effect of increased traffic from new development inclu</li> </ol>  | iding Cowbridge on the                        | A48 and in particular C                   | ulverhouse Cross.            |                               |                         |  |                                      |
| <ol> <li>Part of the site was not a candidate site but was adde</li> <li>Difficult to understand why St.Nicholas was not elimin</li> </ol>  |   | d criteria were properly                  | applied 245 other            | candidate site were i         | rejected at this stand  | 0                                      |                                      |
| 13. Difficult to understand the scores attributed to site at s  |   |   | applied. 240 other           | candidate site were i         | rejected at this stage  | <b>.</b> .                             |                                      |
| 3f - Please outline the changes you wish to see made to the D Delete MG2 (33).  | eposit Plan to make it                        | sound (if relevant)                       |                              |                               |                         |  |                                      |
| 4b - If you wish to speak, please confirm which part of your rep  | oresentation you wish t                       | o speak to the inspecto                   | r about and why th           | ey consider it be nec         | essary to speak at t    | the hearing -                          |                                      |

(ordered by Representation ID No.)

| Representor ID and details: 3991/DP1 Mr & Mrs Taylor   |   |                          |                                  |                                |  |   |
|--|---|--------------------------|----------------------------------|--------------------------------|--|---|
| Date Lodged     Status     Petition and No.     Supporting Evidence       29/03/2012     M     0 | Additional SA SEA                             |                          | Rep format:<br>Letter            | , ,                            | our comments to be constant at a hearing session of Pr | iered by 'written representations' or do ublic examination? |
| 2a - Do you consider the LDP is Sound? Unanswered  | 2b - If you think that the Procedural Tests - |                          | does not not meet<br>P2 - Unansw | ` '                            | soundness, please indica                               | te which test(s) that it fails.                             |
|  | Consistency Tests -                           | C1 - Unanswered          | C2 - Unansw                      | ered C3 - Unans                | swered C4 - Unansw                                     | ered  |
|  | Coherence and Effective                       | veness Tests - CE1 -     | Unanswered (                     | CE2 - Unanswered               | CE3 - Unanswered                                       | CE4 - Unanswered  |
| 3a - Which part of the Deposit Plan are you commenting on?                                       | Policy Number:<br>MG2(19). MG2(20)            | <u>Paragraph</u>         |                                  | Proposal Map:                  | <u>Const</u>   | raints Map Appendices:                                      |
| 3b - Do you wish to see any changes made to the Deposit Plar                                     | as a result of your repr                      | esentation? Unanswe      | ered (If '                       | 'No" or "Unanswered            | " - go to 3d)  |   |
| 3c - What changes would like to see made to the Deposit Plan                                     | ? New Policy:<br>Unanswered                   | <del></del>              | New Paragraph:<br>Unanswered     | Amended Paragram<br>Unanswered | oh: New Or Amended Site Unanswered                     | e: Other (see Notes): Unanswered                            |
|  | Notes:  |                          |                                  |                                |  |   |
| 3d - If your representation relates to a new, deleted or amende                                  | ed site, did you submit the Site Name:        | he site as a Candidate S | Site? Unanswere                  | d (If "Yes", plea              | ase give the Candidate Site<br>Site Reference:         | e Name and reference if known)                              |

3e - Please set out your representation below:

As a resident of Dinas Powys I wish to express my concerns re. the implications of the effect that the proposed additional housing would have on the local highways network.

In Dinas Powys it is proposed that a minimum of 400 addition houses will be built on the St Cyres annexe and Caerleon Road, Both sites are on the Murch side of the community which is served by only two access points to the main road [A4055]. Both these junctions, namely the Infants School traffic lights at Murch Bridge and Cross Common Road at its junction with the A4055 are either at capacity or structurally suspect.

The 400 houses would generate between 600 to 800 additional cars in both directions, particularly at peak times. The additional traffic would have a profound and adverse impact on the community as the existing roads are under great pressure now.

Further, I am concerned that there have not been any proposed extra community facilities of substance. A local church is in desperate need of a permanent base, the local sporting facilities are not adequate for the present demand and medical ser

vices are restricted due to the limitations of space at the Dinas Powys Surgery premises on Cardiff Road.

There appears to be no serious consideration having been given to other views as to the future possible use of St Cyres Annexe, Murch Road. It is worth noting that the school buildings are in good condition although in need of a little investment. To simply seek to tear down the school without any reference to the community needs would be a shameful waste. I also have concerns regarding the capacity of the local schools to accommodate the extra pupils due to the additional houses.

Then there is the wider consideration of the Plan. Up to 10,000 additional houses are planned, many in the south east area of the Vale, e.g., 2,000 units already having been approved at the Waterfront, Barry.

Much of this traffic will be funnelled through Dinas Powys and join the ever lengthening queues leading to and from the Merrie Harrier. The proposals in Sully, Penarth, Lavernock and the land adjacent St Josephs' School, Sully Road will only add to the existing congestion at this junction.

Already the air pollution levels are excessive. The Nitrogen Dioxide [N02] levels are recorded as being 43.8 units with the maximum recommended level being 40 units along Cardiff Road, Eastbrook. An increase in vehicles, particularly standing traffic, would exacerbate the situation. The level of other emissions such as CO (carbon monoxide) and Particulates [PM105] are not available but need clarifying

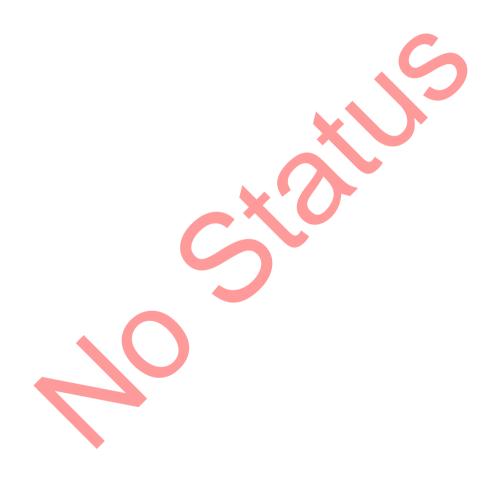
The Deposit plan does not indicate what measures will be taken to encourage the availability and use of public transport. I understand that there is a serious lack of rolling stock in Wales and providing extra trains will be a major challenge. Additional buses would simply be caught up in the traffic chaos the extra housing would cause.

(ordered by Representation ID No.)

Representor ID and details: 3991/DP1 Mr & Mrs Taylor

It is essential that major highway infrastructure improvements are made BEFORE hundreds of additional housing could even be considered.

- 3f Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
- 4b If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -



(ordered by Representation ID No.)

| Representor ID and details: 3992/DP1 Pamela P   | rotheroe   |                         |                              |                                  |  |                               |                 |
|---|--|-------------------------|------------------------------|----------------------------------|--|-------------------------------|-----------------|
| Date Lodged     Status     Petition and No.     Supporting E       29/03/2012     M     0 | vidence Additional SA SEA                        |                         | Rep format:<br>Letter        |                                  | ur comments to be consi<br>t a hearing session of Pu | •                             | ntations' or do |
| 2a - Do you consider the LDP is Sound? Unanswered   | 2b - If you think that the Procedural Tests -    |                         | does not not meet o          | ` '                              | oundness, please indica                              | te which test(s) that it fa   | ils.            |
|   | Consistency Tests -                              | C1 - Unanswered         | C2 - Unansw                  | ered C3 - Unansw                 | ered C4 - Unanswe                                    | ered                          |                 |
|   | Coherence and Effect                             | iveness Tests - CE1 -   | Unanswered C                 | CE2 - Unanswered (               | CE3 - Unanswered (                                   | CE4 - Unanswered              |                 |
| 3a - Which part of the Deposit Plan are you commentin                                     | g on? <u>Policy Number:</u><br>MG2(19). MG2(20). | Paragraph               |                              | Proposal Map:                    | Consti   | raints Map Appe               | endices:        |
| 3b - Do you wish to see any changes made to the Depo                                      | sit Plan as a result of your rep                 | resentation? Unansw     | ered (If "                   | No" or "Unanswered" -            | go to 3d)  |                               |                 |
| 3c - What changes would like to see made to the Depor                                     | sit Plan? New Policy: Unanswered Notes:          |                         | New Paragraph:<br>Unanswered | Amended Paragraph:<br>Unanswered | New Or Amended Site<br>Unanswered                    | Other (see Notes): Unanswered |                 |
| 3d - If your representation relates to a new, deleted or                                  | amended site, did you submit t<br>Site Name:     | the site as a Candidate | Site? Unanswere              | d (If "Yes", please              | e give the Candidate Site<br>Site Reference:         | e Name and reference it       | known)          |

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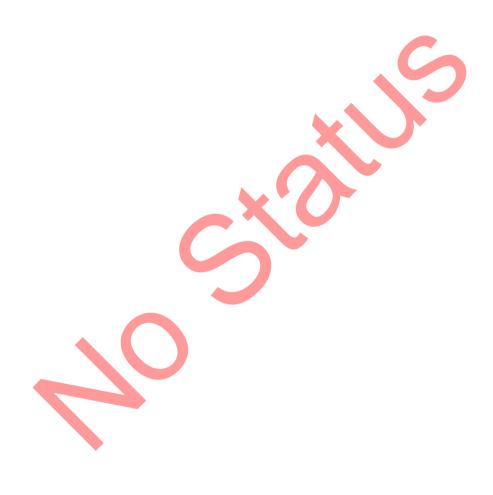
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(ordered by Representation ID No.)

Representor ID and details: 3992/DP1 Pamela Protheroe

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(ordered by Representation ID No.)

| Representor ID and details: 3993/DP1 Mr A Protheroe  |   |                          |                                  |                                |  |   |
|--|---|--------------------------|----------------------------------|--------------------------------|--|---|
| Date Lodged     Status     Petition and No.     Supporting Evidence       29/03/2012     M     0 | Additional SA SEA                             |                          | Rep format:<br>Letter            | , ,                            | our comments to be consi                       | ered by 'written representations' or deablic examination? |
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|  | Consistency Tests -                           | C1 - Unanswered          | C2 - Unansw                      | ered C3 - Unans                | swered C4 - Unanswe                            | ered  |
|  | Coherence and Effective                       | veness Tests - CE1 -     | Unanswered (                     | CE2 - Unanswered               | CE3 - Unanswered (                             | CE4 - Unanswered  |
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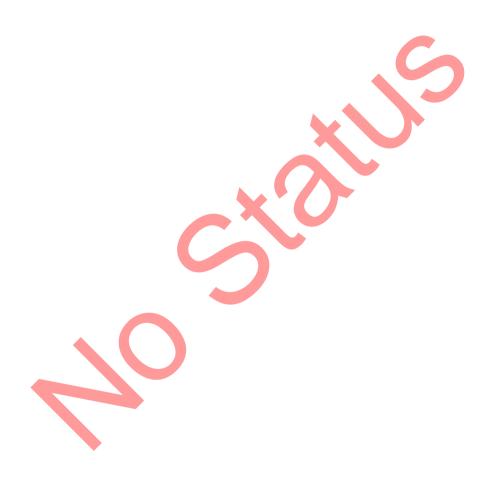
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(ordered by Representation ID No.)

Representor ID and details: 3993/DP1 Mr A Protheroe

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(ordered by Representation ID No.)

| Representor     | ID and d    | letails:   | 3994/DI         | P1 Hawys Evans         |   |                         |             |                             |             |                                       |                         |                            |  |                                      |
|-----------------|-------------|------------|-----------------|------------------------|---|-------------------------|-------------|-----------------------------|-------------|---------------------------------------|-------------------------|----------------------------|--|--------------------------------------|
| Date Lodged     | Status<br>M | Petitio    | on and No.<br>0 | Supporting Evidence    | Additional SA SEA                             |                         |             | Rep format:<br>Comment for  |             | a - do you want y<br>ou want to speak |                         |                            | •  | n representations' or do on? Written |
| 2a - Do you co  | onsider th  | ne LDP     | is Sound?       |                        | 2b - If you think that the Procedural Tests - |                         | ound and do | oes not not me<br>P2 - Unar |             | ` ,                                   | soundness, ple          | ease indicat               | te which test(s)   | ) that it fails.                     |
|                 |             |            |                 |                        | Consistency Tests -                           | C1 - Unan               | swered      | C2 - Unar                   | nswered     | C3 - Unans                            | wered C4                | - Yes                      |  |                                      |
|                 |             |            |                 |                        | Coherence and Effect                          | tiveness Tests          | - CE1-l     | Jnanswered                  | CE2         | Unanswered                            | CE3 - Unans             | wered C                    | CE4 - Unanswe  | ered                                 |
| 3a - Which pa   | rt of the   | Deposit    | Plan are yo     | ou commenting on?      | Policy Number:                                | <u> </u>                | Paragraph N | Number:                     | Propo       | osal Map:                             |                         | Constr                     | raints Map   | Appendices:                          |
|                 |             |            |                 |                        |   |                         |             |                             |             | . MG2(29)                             |                         |                            |  |                                      |
| 3b - Do you w   | ish to se   | e any cł   | nanges mad      | de to the Deposit Plan | as a result of your rep                       | oresentation?           | Yes         |                             | (If "No"    | or "Unanswered                        | " - go to 3d)           |                            |  |                                      |
| 3c - What cha   | inges wo    | uld like   | to see mad      | e to the Deposit Plan? | New Policy:<br>Unanswered                     | Amended P<br>Unanswered |             | ew Paragraph<br>Inanswered  | ·           | nended Paragrap<br>nanswered          | <u>New Or An</u><br>Yes | nended Site                | Other (see Note of the Contract of the Contrac |                                      |
|                 |             |            |                 |                        | Notes:  |                         |             |                             |             | <u> </u>                              |                         |                            |  |                                      |
| 3d - If your re | epresenta   | ation rela | ates to a ne    | ew, deleted or amende  | d site, did you submit<br>Site Name: ITV Wale |                         |             | ite? Yes                    | <b>&gt;</b> | (If "Yes", plea                       | Ü                       | ndidate Site<br>Reference: |  | ference if known)                    |
|                 |             |            |                 |                        |   |                         |             |                             |             |                                       |                         |                            |  |                                      |

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My first concern about the proposed LDP is the poor process of consultation with local communities. In this area the consultation process was poorly advertised and only the absolute minimum period given to allow community involvement. We have not been given the incentive to make an effective contribution to the process. I understand that some VOG councillors also found the process did not give them opportunities to add or change proposals. Only by organising our own local meeting have we been able, as a small community, to express our individual concerns with regard to the proposed ITV development.

Wenvoe has been identified as a primary settlement that has community facilities. These consist of one shop, three pubs, a church and two community halls. Twyn-yr -Odyn is an even smaller rural hamlet. These facilities are surely inadequate to serve an additional 220 households in the first instance (proposed development of the HTV site) and a further 150 houses if the proposed development in Wenvoe goes ahead. The size of the community will grow as to change Wenvoe entirely and make it, in effect, a commuter village lacking community adherence.

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- Ensure closer consultation with the small communities on which this site development will impact before the development proposals are prepared and submitted, as well as after any submission;

Representation ID No.)

Representor ID and details: 3994/DP1 Hawys Evans

- Take special care with access and egress from the site so that impacts are kept to a minimum;
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- 3f Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
- 4b If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -

(ordered by Representation ID No.)

| Representor ID and details: 3995/DP1 Y.S.Windsor   |   |                       |                              |                                  |  |  |
|--|---|-----------------------|------------------------------|----------------------------------|--|--|
| Date Lodged     Status     Petition and No.     Supporting Evidence       29/03/2012     M     0 | Additional SA SEA                         |                       | Rep format:<br>Letter        | , ,                              | ir comments to be consider a hearing session of Pu | ered by 'written representations' or do ublic examination? |
| 2a - Do you consider the LDP is Sound? Unanswered  | 2b - If you think that the F              |                       | loes not not meet o          | ` '                              | oundness, please indicat                           | e which test(s) that it fails.                             |
|  | Consistency Tests - C                     | C1 - Unanswered       | C2 - Unanswe                 | ered C3 - Unanswe                | ered C4 - Unanswe                                  | ered   |
|  | Coherence and Effective                   | ness Tests - CE1 - l  | Unanswered C                 | E2 - Unanswered (                | CE3 - Unanswered C                                 | CE4 - Unanswered   |
| 3a - Which part of the Deposit Plan are you commenting on?                                       | Policy Number:<br>MG2(19). MG2(20)        | Paragraph I           |                              | roposal Map:                     | Constr   | raints Map Appendices:                                     |
| 3b - Do you wish to see any changes made to the Deposit Plar                                     | as a result of your repres                | entation? Unanswe     | ered (If "I                  | No" or "Unanswered" -            | go to 3d)  |  |
| 3c - What changes would like to see made to the Deposit Plan                                     | <del></del>                               |                       | lew Paragraph:<br>Jnanswered | Amended Paragraph:<br>Unanswered | New Or Amended Site Unanswered                     | : Other (see Notes):<br>Unanswered                         |
|  | Notes:                                    |                       |                              |                                  |  |  |
| 3d - If your representation relates to a new, deleted or amende                                  | ed site, did you submit the<br>Site Name: | site as a Candidate S | ite? Unanswered              | d (If "Yes", please              | give the Candidate Site<br>Site Reference:         | Name and reference if known)                               |

3e - Please set out your representation below:

As a resident of Dinas Powys I wish to express my concerns re. the implications of the effect that the proposed additional housing would have on the local highways network.

In Dinas Powys it is proposed that a minimum of 400 addition houses will be built on the St Cyres annexe and Caerleon Road, Both sites are on the Murch side of the community which is served by only two access points to the main road [A4055]. Both these junctions, namely the Infants School traffic lights at Murch Bridge and Cross Common Road at its junction with the A4055 are either at capacity or structurally suspect.

The 400 houses would generate between 600 to 800 additional cars in both directions, particularly at peak times. The additional traffic would have a profound and adverse impact on the community as the existing roads are under great pressure now.

Further, I am concerned that there have not been any proposed extra community facilities of substance. A local church is in desperate need of a permanent base, the local sporting facilities are not adequate for the present demand and medical services are restricted due to the limitations of space at the Dinas Powys Surgery premises on Cardiff Road.

There appears to be no serious consideration having been given to other views as to the future possible use of St Cyres Annexe, Murch Road. It is worth noting that the school buildings are in good condition although in need of a little investment. To simply seek to tear down the school without any reference to the community needs would be a shameful waste. I also have concerns regarding the capacity of the local schools to accommodate the extra pupils due to the additional houses.

Then there is the wider consideration of the Plan. Up to 10,000 additional houses are planned, many in the south east area of the Vale, e.g. 2,000 units already having been approved at the Waterfront, Barry.

Much of this traffic will be funnelled through Dinas Powys and join the ever lengthening queues leading to and from the Merrie Harrier. The proposals in Sully, Penarth, Lavernock and the land adjacent St Josephs' School, Sully Road will only add to the existing congestion at this junction.

Already the air pollution levels are excessive. The Nitrogen Dioxide [N02] levels are recorded as being 43.8 units with the maximum recommended level being 40 units along Cardiff Road, Eastbrook. An increase in vehicles, particularly standing traffic, would exacerbate the situation. The level of other emissions such as CO (carbon monoxide) and Particulates [PM105] are not available but need clarifying

The Deposit plan does not indicate what measures will be taken to encourage the availability and use of public transport. I understand that there is a serious lack of rolling stock in Wales and providing extra trains will be a major challenge. Additional buses would simply be caught up in the traffic chaos the extra housing would cause.

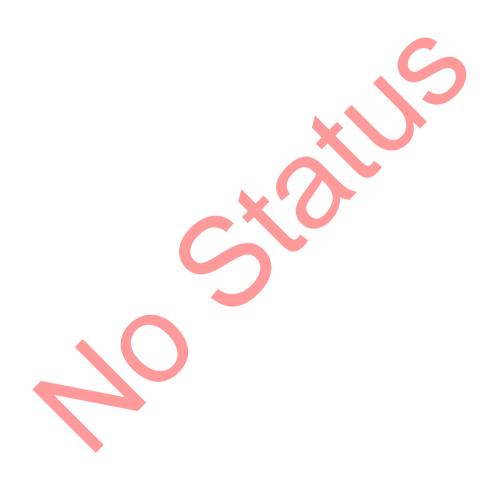
It is essential that major highway infrastructure improvements are made BEFORE hundreds of additional housing could even be considered.

(ordered by Representation ID No.)

Representor ID and details: 3995/DP1 Y.S.Windsor

3f - Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)

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(ordered by Representation ID No.)

| Representor ID and details: 3996/DP1 Janet Evans  |  |                            |                              |                             |  |                       |                |
|---|--|----------------------------|------------------------------|-----------------------------|--|-----------------------|----------------|
| Date Lodged       Status       Petition and No.       Supporting Evidence         M       □       0       □ | Additional SA SEA                                |                            | Rep format:<br>Comment form  | , ,                         | our comments to be con at a hearing session of F | •                     | •              |
| 2a - Do you consider the LDP is Sound? Unsound  | 2b - If you think that the Procedural Tests -    |                            | does not not meet o          | ` '                         | soundness, please indic                          | cate which test(s) th | nat it fails.  |
|   | Consistency Tests -                              | C1 - Unanswered            | C2 - Unanswe                 | ered C3 - Unans             | wered C4 - Yes                                   |                       |                |
|   | Coherence and Effect                             | tiveness Tests - CE1       | - Unanswered C               | E2 - Unanswered             | CE3 - Unanswered                                 | CE4 - Unanswere       | ;d             |
| 3a - Which part of the Deposit Plan are you commenting on?  | Policy Number:                                   | <u>Paragraph</u>           | n Number: P                  | roposal Map:                | Cons   | straints Map          | Appendices:    |
|   |  |                            |                              | MG2(29)                     |  |                       |                |
| 3b - Do you wish to see any changes made to the Deposit Plan  | n as a result of your rep                        | resentation? Yes           | 1" fl)                       | No" or "Unanswered"         | - go to 3d)                                      |                       |                |
| 3c - What changes would like to see made to the Deposit Plan  | ? New Policy:<br>Unanswered                      | Amended Policy: Unanswered | New Paragraph:<br>Unanswered | Amended Paragrap Unanswered | h: New Or Amended Si                             | ite: Other (see No    | tes):          |
|   | Notes:   | onaono.ou                  |                              |                             |  |                       |                |
| 3d - If your representation relates to a new, deleted or amende   | ed site, did you submit t<br>Site Name: ITV Wale |                            | Site? Unanswered             | d (If "Yes", plea           | se give the Candidate Si<br>Site Reference       |                       | ence if known) |
|   |  |                            |                              |                             |  |                       |                |

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Re: Local Development Plan - ITV, Culverhouse Cross Development - MG2/29

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- Loss of employment opportunities the removal of the HTV studio complex will result in the loss of current employment opportunities and the inability to create future jobs in this area.

In conclusion, I would request that the VOG Council should, if the current site proposals proceed:

Representation ID No.)

Representor ID and details: 3996/DP1 Janet Evans

- Ensure closer consultation with the small communities on which this site development will impact before the development proposals are prepared and submitted, as well as after any submission;
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|------------------------------------|--------------------------------|--|-------------------------------|------------------------------|---------------------------------------|--|-----------------------------------|----------------|
| Date Lodged Status Petition  M     | and No. Supporting Evidence    | Additional SA SEA  |                               | Rep format:<br>Comment form  | · · · · · · · · · · · · · · · · · · · | our comments to be co<br>at a hearing session of | ,                                 | •              |
| 2a - Do you consider the LDP is    | Sound? Unsound                 | 2b - If you think that th<br>Procedural Tests -<br>Consistency Tests - | P1 - Yes                      | P2 - Unans                   | ` '                                   | · ·  | icate which test(s) th            | nat it fails.  |
|                                    |                                | Coherence and Effecti  | veness Tests - CE1            | - Unanswered                 | CE2 - Unanswered                      | CE3 - Unanswered                                 | CE4 - Unanswere                   | d              |
| 3a - Which part of the Deposit P   | lan are you commenting on?     | Policy Number:   | Paragrap                      |                              | Proposal Map:                         | Co   | nstraints Map                     | Appendices:    |
|                                    |                                |  |                               |                              | MG2(29)                               |  |                                   |                |
| 3b - Do you wish to see any cha    | inges made to the Deposit Plan | as a result of your repr   | resentation? Yes              | (If                          | "No" or "Unanswered"                  | - go to 3d)                                      |                                   |                |
| 3c - What changes would like to    | see made to the Deposit Plan?  | New Policy: Unanswered   | Amended Policy:<br>Unanswered | New Paragraph:<br>Unanswered | Amended Paragrap Unanswered           | h: New Or Amended S<br>Yes                       | Site: Other (see No<br>Unanswered | tes):          |
|                                    |                                | Notes:   |                               |                              |                                       |  |                                   |                |
| 3d - If your representation relate | es to a new, deleted or amende | ed site, did you submit the<br>Site Name: ITV Wales                    |                               | Site? Yes                    | (If "Yes", plea                       | se give the Candidate Site Reference             |                                   | ence if known) |
| 0. Diameter and and an arrangement | and a Completion               |  |                               |                              | F                                     |  |                                   |                |

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(ordered by Representation ID No.)

| Representor ID and details: 3998/DP1 Mrs J Jones  |  |  |  |
|---|--|--|--|
| Date Lodged     Status     Petition and No.     Supporting Evidence       30/03/2012     M     □     0     □  | Additional SA SEA  | Rep format:4a - do you want your commentsLetteryou want to speak at a hearing se | to be consiered by 'written representations' or do ession of Public examination? |
| 2a - Do you consider the LDP is Sound? Unanswered   | 2b - If you think that the Plan is unsound and do Procedural Tests - P1 - Unanswered | pes not not meet one or more test(s) of soundness, ple<br>P2 - Unanswered        | ease indicate which test(s) that it fails.                                       |
|   | Consistency Tests - C1 - Unanswered  | C2 - Unanswered C3 - Unanswered C4   | - Unanswered   |
|   | Coherence and Effectiveness Tests - CE1 - U  | Inanswered CE2 - Unanswered CE3 - Unansw   | wered CE4 - Unanswered   |
| 3a - Which part of the Deposit Plan are you commenting on?  | Policy Number: Paragraph N   | lumber: Proposal Map:  | Constraints Map Appendices:  |
|   |  |  |  |
| 3b - Do you wish to see any changes made to the Deposit Plan  | as a result of your representation? Unanswer   | red (If "No" or "Unanswered" - go to 3d)   |  |
| 3c - What changes would like to see made to the Deposit Plan?   |  | ew Paragraph: Amended Paragraph: New Or Amended Paragraph: Unanswered Unanswered |  |
|   | Notes:   |  |  |
| 3d - If your representation relates to a new, deleted or amende   | d site, did you submit the site as a Candidate Sit<br>Site Name:                     |  | ndidate Site Name and reference if known) Reference:                             |
| 3e - Please set out your representation below:  Deposit Local Development Plan  This letter is to give my support for the Deposit LDP appropriate and therefore protected from being built on by housing de appreciate it if you would acknowledge receipt of my letter | velopers is particularly encouraging. I believe it is                                |  |  |
| 3f - Please outline the changes you wish to see made to the D   | eposit Plan to make it sound (if relevant)   | <u>F</u>   |  |
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(ordered by Representation ID No.)

| Representor     | ID and d    | letails:   | 3999/DI         | P1 Tudor Ellis         |   |                |             |                             |          |                                       |                     |                              |                 |                                    |
|-----------------|-------------|------------|-----------------|------------------------|---|----------------|-------------|-----------------------------|----------|---------------------------------------|---------------------|------------------------------|-----------------|------------------------------------|
| Date Lodged     | Status<br>M | Petitio    | on and No.<br>0 | Supporting Evidence    | Additional SA SEA                             |                |             | Rep format:<br>Comment for  |          | a - do you want y<br>ou want to speak |                     |                              | •               | representations' or do on? Written |
| 2a - Do you co  | onsider th  | ne LDP     | is Sound?       |                        | 2b - If you think that the Procedural Tests - |                | ound and do | oes not not me<br>P2 - Unar |          | ` '                                   | soundness, ple      | ase indicate                 | e which test(s) | that it fails.                     |
|                 |             |            |                 |                        | Consistency Tests -                           | C1 - Unan      | swered      | C2 - Unar                   | swered   | C3 - Unans                            | wered C4            | - Yes                        |                 |                                    |
|                 |             |            |                 |                        | Coherence and Effect                          | tiveness Tests | - CE1 - l   | Jnanswered                  | CE2 -    | Unanswered                            | CE3 - Unansv        | vered C                      | E4 - Unanswe    | red                                |
| 3a - Which pa   | rt of the   | Deposit    | Plan are yo     | ou commenting on?      | Policy Number:                                | <u> </u>       | Paragraph N | Number:                     | Propo    | osal Map:                             |                     | Constr                       | aints Map       | Appendices:                        |
|                 |             |            |                 |                        |   |                |             |                             |          | . MG2(29)                             |                     |                              |                 |                                    |
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|                 |             |            |                 |                        | Notes:  |                |             |                             |          | <b>S</b>                              |                     |                              |                 |                                    |
| 3d - If your re | epresenta   | ation rela | ates to a ne    | ew, deleted or amende  | d site, did you submit<br>Site Name: ITV Wale |                |             | ite? Yes                    | <b>)</b> | (If "Yes", plea                       | · ·                 | ndidate Site<br>deference: I |                 | erence if known)                   |
|                 |             |            |                 |                        |   |                |             |                             |          |                                       |                     |                              |                 |                                    |

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Representor ID and details: 3999/DP1 Tudor Ellis

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- Take special care with access and egress from the site so that impacts are kept to a minimum;
- Ensure that St Lythan's Road is suitably 'pinch-pointed' or given road-humps to make the road less attractive to speeding commuter traffic;
- Ensure that light, noise and air pollution are considered in the development plans and minimised;
- Ensure that sufficient community facilities and play-areas are available on the development and that enough health and education facilities are available to residents and their families the current proposals seem to want to achieve a maximum density of housing which is unlikely to create a sustainable and healthy community.
- 3f Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
- 4b If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -

(ordered by Representation ID No.)

| Representor               | ID and d                   | etails:             | 4000/D          | P1 Mr D.R.B.Jones                          |  |  |                                |                               |   |                               |   |
|---------------------------|----------------------------|---------------------|-----------------|--|--|--|--------------------------------|-------------------------------|---|-------------------------------|---|
| Date Lodged<br>30/03/2012 |                            | Petitio             | on and No.<br>0 | Supporting Evidence                        | Additional SA SEA                              |  | Rep format:<br>Letter          |                               | your comments to be<br>k at a hearing session |                               | n representations' or do on?                  |
| 2a - Do you co            | onsider th                 | ne LDP              | s Sound?        | Unanswered                                 | 2b - If you think that t<br>Procedural Tests - | he Plan is unsound and<br>P1 - Unanswered  | does not not mee<br>P2 - Unans | , ,                           | f soundness, please                           | indicate which test(s         | ) that it fails.                              |
|                           |                            |                     |                 |  | Consistency Tests -                            | C1 - Unanswered  | C2 - Unans                     | swered C3 - Unan              | swered C4 - Ur                                | nanswered                     |   |
|                           |                            |                     |                 |  | Coherence and Effec                            | tiveness Tests - CE1 -   | Unanswered                     | CE2 - Unanswered              | CE3 - Unanswered                              | d CE4 - Unansw                | ered  |
| 3a - Which pa             | rt of the I                | Deposit             | Plan are y      | ou commenting on?                          | Policy Number:                                 | Paragraph  | Number:                        | Proposal Map:                 |   | Constraints Map               | Appendices:                                   |
|                           |                            |                     |                 |  |  |  |                                |                               |   |                               |   |
| 3b - Do you w             | ish to see                 | e any ch            | anges ma        | de to the Deposit Plan                     | as a result of your rep                        | presentation? Unansw   | ered (If                       | f "No" or "Unanswered         | d" - go to 3d)                                |                               |   |
| 3c - What cha             | inges wo                   | uld like t          | o see mad       | le to the Deposit Plan?                    | New Policy:<br>Unanswered                      |  | New Paragraph:<br>Unanswered   | Amended Paragra<br>Unanswered | ph: New Or Amende<br>Unanswered               | ed Site: Other (see Unanswere | <del></del>                                   |
|                           |                            |                     |                 |  | Notes:   |  |                                |                               |   |                               |   |
| 3d - If your re           | presenta                   | ition rela          | ates to a ne    | ew, deleted or amende                      | ed site, did you submit<br>Site Name:          | the site as a Candidate  | Site? Unanswe                  | red (If "Yes", ple            | ase give the Candida<br>Site Refer            |                               | ference if known)                             |
| settleme                  | LDP  ng to give  ent bound | my sup<br>lary, and | port for the    | e Deposit LDP approve protected from being | built on by housing dev                        | anuary 20 <mark>12</mark> . I am partice<br>velopers. It is extremely<br>d acknowledge receipt o | important that the             |                               |   |                               | outside of the residential reational land and |
| 3f - Please ou            | utline the                 | change              | s you wish      | to see made to the D                       | eposit Plan to make it                         | sound (if relevant)  |                                |                               |   |                               |   |
| 4b - If you wis           | sh to spe                  | ak, plea            | se confirm      | which part of your ren                     | oresentation you wish t                        | to speak to the inspector  | about and why th               | nev consider it be nece       | ssary to speak at the                         | e hearing -                   |   |

(ordered by Representation ID No.)

| Representor ID and details: 4001/DP1 Mr Keith Atkinson   |   |   |  |  |                         |
|--|---|---|--|--|-------------------------|
| Date LodgedStatusPetition and No.Supporting Evidence29/03/2012M0   | Additional SA SEA   | Rep format:<br>Comment for  | 4a - do you want your commen<br>m you want to speak at a hearing                   | ts to be consiered by 'written represe<br>session of Public examination? Wr  | entations' or do itten  |
| 2a - Do you consider the LDP is Sound? Sound   | •   | is unsound and does not not me<br>Unanswered P2 - Unar                  | et one or more test(s) of soundness, aswered                                       | please indicate which test(s) that it fa                                     | ails.                   |
|  | Consistency Tests - C1 -                                  | Unanswered C2 - Unar  | nswered C3 - Unanswered C  | C4 - Unanswered  |                         |
|  | Coherence and Effectivenes                                | s Tests - CE1 - Unanswered  | CE2 - Unanswered CE3 - Unar  | nswered CE4 - Unanswered   |                         |
| 3a - Which part of the Deposit Plan are you commenting on?   | Policy Number:  | Paragraph Number:   | Proposal Map:  | Constraints Map Appe   | endices:                |
|  |   |   |  |  |                         |
| 3b - Do you wish to see any changes made to the Deposit Plan   | as a result of your representa                            | ation? No   | (If "No" or "Unanswered" - go to 3d)   |  |                         |
| 3c - What changes would like to see made to the Deposit Plan?  | · · · · · · · · · · · · · · · · · · ·                     | nded Policy: New Paragraph<br>nswered Unanswered                        | Amended Paragraph: New Or A<br>Unanswered Unanswer                                 | Amended Site: Other (see Notes): ered Unanswered                             |                         |
|  | Notes:  |   |  |  |                         |
| 3d - If your representation relates to a new, deleted or amende  | d site, did you submit the site<br>Site Name:             | as a Candidate Site? Unansw   | •  | Candidate Site Name and reference it<br>e Reference: 2407/CS1                | f known)                |
| 3e - Please set out your representation below:   |   |   |  |  |                         |
| Having examined the draft LDP document I wish to expressite is at present outside of the identified settlement bound housing developer. I am totally opposed to any application allocation to meet needs for residential development has existing classification of 2407/CS.1 would: | dary in which development winto change the existing class | Il not be permitted. I understand tification to a site for housing deve | hat Brynhill Golf Club which is part of<br>elopment and I urge you to maintain the | 2407/CS1 have offered this land for the current classification. In Policy MG | sale to a<br>32 Housing |
| Unacceptably impact on the character and appearance of   | the locality.   |   |  |  |                         |
| Result in a loss of open space.  |   |   |  |  |                         |
| Would exacerbate existing traffic congestion in the Port R   | oad (A4050) areas.  |   |  |  |                         |
| Would have an impact on the area through noise pollution   |   |   |  |  |                         |
| Bearing in mind that 3 schools are in close proximity to Po  | ort Road any increased housing                            | ng development will lead to safety                                      | concerns.  |  |                         |
| Any transport measures taken, if planning approval was g   | ranted, would not reduce con                              | gestion on Port Road.   |  |  |                         |
| 3f - Please outline the changes you wish to see made to the D  | eposit Plan to make it sound                              | (if relevant)   |  |  |                         |
| 4b - If you wish to speak, please confirm which part of your rep   | resentation you wish to spea                              | k to the inspector about and why  | they consider it be necessary to spea  | ık at the hearing -  |                         |

(ordered by Representation ID No.)

| Representor     | ID and d    | letails:   | 4002/DI         | P1 R David Hutton      |   |                         |             |                              |             |                                       |                     |                              |                            |                                    |
|-----------------|-------------|------------|-----------------|------------------------|---|-------------------------|-------------|------------------------------|-------------|---------------------------------------|---------------------|------------------------------|----------------------------|------------------------------------|
| Date Lodged     | Status<br>M | Petitio    | on and No.<br>0 | Supporting Evidence    | Additional SA SEA                             |                         |             | Rep format:<br>Comment for   |             | a - do you want y<br>ou want to speak |                     |                              | •                          | representations' or do on? Written |
| 2a - Do you co  | onsider th  | ne LDP     | is Sound?       |                        | 2b - If you think that the Procedural Tests - |                         | ound and do | oes not not me<br>P2 - Unar  |             | ` '                                   | soundness, ple      | ease indicate                | e which test(s)            | that it fails.                     |
|                 |             |            |                 |                        | Consistency Tests -                           | C1 - Unan               | swered      | C2 - Unar                    | nswered     | C3 - Unans                            | wered C4            | - Yes                        |                            |                                    |
|                 |             |            |                 |                        | Coherence and Effect                          | tiveness Tests          | - CE1-l     | Jnanswered                   | CE2         | Unanswered                            | CE3 - Unansv        | vered C                      | E4 - Unanswe               | red                                |
| 3a - Which pa   | rt of the   | Deposit    | Plan are yo     | ou commenting on?      | Policy Number:                                | <u> </u>                | Paragraph N | Number:                      | Propo       | osal Map:                             |                     | Constr                       | aints Map                  | Appendices:                        |
|                 |             |            |                 |                        |   |                         |             |                              |             | . MG2(29)                             |                     |                              |                            |                                    |
| 3b - Do you w   | ish to se   | e any cł   | nanges mad      | de to the Deposit Plan | as a result of your rep                       | oresentation?           | Yes         |                              | (If "No"    | or "Unanswered                        | " - go to 3d)       |                              |                            |                                    |
| 3c - What cha   | inges wo    | uld like   | to see mad      | e to the Deposit Plan? | New Policy:<br>Unanswered                     | Amended P<br>Unanswered |             | lew Paragraph:<br>Jnanswered |             | nended Paragrap                       | h: New Or Am<br>Yes | ended Site:                  | Other (see N<br>Unanswered | <del>/-</del>                      |
|                 |             |            |                 |                        | Notes:  |                         |             |                              |             | <b>S</b>                              |                     |                              |                            |                                    |
| 3d - If your re | epresenta   | ation rela | ates to a ne    | ew, deleted or amende  | d site, did you submit<br>Site Name: ITV Wale |                         |             | ite? Yes                     | <b>&gt;</b> | (If "Yes", plea                       | J                   | ndidate Site<br>teference: I |                            | erence if known)                   |
|                 |             |            |                 |                        |   |                         |             |                              |             |                                       |                     |                              |                            |                                    |

3e - Please set out your representation below:

Re: Local Development Plan - ITV, Culverhouse Cross Development - MG2/29

As a member of a small rural community, I am writing to comment on the planning proposals for the above proposed site that will have a profound effect on my life.

The Vale of Glamorgan Community Strategy promises that the Vale will be a place "that is safe, clean and attractive, where individuals and communities have sustainable opportunities to improve their health, learning and skills, prosperity and wellbeing, 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 sustainability of the area."

My first concern about the proposed LDP is the poor process of consultation with local communities. In this area the consultation process was poorly advertised and only the absolute minimum period given to allow community involvement. We have not been given the incentive to make an effective contribution to the process. I understand that some VOG councillors also found the process did not give them opportunities to add or change proposals. Only by organising our own local meeting have we been able, as a small community, to express our individual concerns with regard to the proposed ITV development.

Wenvoe has been identified as a primary settlement that has community facilities. These consist of one shop, three pubs, a church and two community halls. Twyn-yr -Odyn is an even smaller rural hamlet. These facilities are surely inadequate to serve an additional 220 households in the first instance (proposed development of the HTV site) and a further 150 houses if the proposed development in Wenvoe goes ahead. The size of the community will grow as to change Wenvoe entirely and make it, in effect, a commuter village lacking community adherence.

In addition, the problems that I see with regard to the ITV development are:

- Traffic congestion There is already traffic congestion at Culverhouse Cross roundabout, on the A48 from St Nicholas and along Port Road both to and from Barry particularly at peak times. An additional 220 houses on the HTV site would add considerably to the congestion not only at peak times. The Local Development Plan talks of sustainable transport solutions, but realistically each proposed new house would have at least one vehicle, if not more realistically two vehicles:
- Access and capacity for traffic on to the A48 and Port Road this will inevitably become a bottle neck on both roads, adding to the current traffic congestion;
- Safety and sustainability St Lythans Road on which the rural hamlets of Twyn-yr-Odyn, St Lythans and Duffryn are situated is a rural lane and not designed to take any volume of traffic. This is already increasingly becoming a 'rat-run', being used by commuters attempting to avoid the congestion down the A48. With a large housing development and further congestion at Culverhouse Cross roundabout and the redevelopment of Five Mile Lane, this can only increase:
- Pollution The proposed development would inevitable create more noise, air and light pollution in what is essentially a rural area, as indicated by the proposed 'green wedge' in the Twyn-yr-Odyn area;
- Loss of employment opportunities the removal of the HTV studio complex will result in the loss of current employment opportunities and the inability to create future jobs in this area.

In conclusion, I would request that the VOG Council should, if the current site proposals proceed:

(ordered by Representation ID No.)

Representor ID and details: 4002/DP1 R David Hutton

- Ensure closer consultation with the small communities on which this site development will impact before the development proposals are prepared and submitted, as well as after any submission;
- Take special care with access and egress from the site so that impacts are kept to a minimum;
- Ensure that St Lythan's Road is suitably 'pinch-pointed' to make the road less attractive to speeding commuter traffic;
- Ensure that light, noise and air pollution are considered in the development plans and minimised;
- Ensure that sufficient community facilities and play-areas are available on the development and that enough health and education facilities are available to residents and their families the current proposals seem to want to achieve a maximum density of housing which is unlikely to create a sustainable and healthy community.
- 3f Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
- 4b If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -



(ordered by Representation ID No.)

| Representor ID and details: 4003/DP1 Mr A.Thomas   |   |  |                                |   |                     |  |  |  |  |
|--|---|--|--------------------------------|---|---------------------|--|--|--|--|
| Date Lodged Status Petition and No. Supporting Evidence  | Additional SA SEA   | Rep format:                                    |                                | ant your comments to be consiered by 'written representations' or do leak at a hearing session of Public examination? Written |                     |  |  |  |  |
| 30/03/2012 M   |   | Comment form                                   | you want to speak at a ne      |   | wiillen             |  |  |  |  |
| 2a - Do you consider the LDP is Sound? Sound   | 2b - If you think that the Plan is unsound and does not not meet one or more test(s) of soundness, please indicate which test(s) that it fails.  Procedural Tests - P1 - Unanswered P2 - Unanswered |  |                                |   |                     |  |  |  |  |
|  | Consistency Tests - C1 -  | Unanswered C2 - Unansw                         | wered C3 - Unanswered          | C4 - Unanswered   |                     |  |  |  |  |
|  | Coherence and Effectivenes  | s Tests - CE1 - Unanswered                     | CE2 - Unanswered CE3 -         | - Unanswered CE4 - Unanswe  | red                 |  |  |  |  |
| 3a - Which part of the Deposit Plan are you commenting on?   | Policy Number:  | Paragraph Number:                              | Proposal Map:                  | Constraints Map   | Appendices:         |  |  |  |  |
|  |   |  |                                |   |                     |  |  |  |  |
| 3b - Do you wish to see any changes made to the Deposit Plan   | as a result of your representa  | ation? No (If                                  | "No" or "Unanswered" - go to   | o 3d)   |                     |  |  |  |  |
| 3c - What changes would like to see made to the Deposit Plan   |   | nded Policy: New Paragraph: nswered Unanswered |                                | Aph: New Or Amended Site: Other (see Notes): Unanswered Unanswered  |                     |  |  |  |  |
|  | Notes:  |  |                                |   |                     |  |  |  |  |
| 3d - If your representation relates to a new, deleted or amende  | ed site, did you submit the site<br>Site Name: Land at Port Ro  |  | (If "Yes", please give         | e the Candidate Site Name and refe<br>Site Reference: 2597/CS1  | erence if known)    |  |  |  |  |
| 3e - Please set out your representation below:  The land at Port Road East, Barry is shown in the Deposi wildlife in the area. | t LDP as as "Site of Importand  | ce for Nature Conservation". This la           | and should be preserved as a   | natural woodland as it is a natural   | habitat for all the |  |  |  |  |
| 3f - Please outline the changes you wish to see made to the D  | eposit Plan to make it sound  | (if relevant)                                  |                                |   |                     |  |  |  |  |
| 4b - If you wish to speak, please confirm which part of your rel   | presentation you wish to spea   | k to the inspector about and why the           | ev consider it be necessary to | speak at the hearing -  |                     |  |  |  |  |

(ordered by Representation ID No.)

| Representor ID and details: 4003/DP2 Mr A.Thomas  |   |   |                              |                                |  |                           |                                      |  |  |
|---|---|---|------------------------------|--------------------------------|--|---------------------------|--------------------------------------|--|--|
| Date LodgedStatusPetition and No.Supporting Evidence30/03/2012M0  | Additional SA SEA   |   | Rep format:<br>Comment form  |                                | our comments to be co<br>at a hearing session o                      | •                         | n representations' or do on? Written |  |  |
| 2a - Do you consider the LDP is Sound? Sound  | 2b - If you think that the Plan is unsound and does not not meet one or more test(s) of soundness, please indicate which test(s) that it fails.  Procedural Tests - P1 - Unanswered P2 - Unanswered |   |                              |                                |  |                           |                                      |  |  |
|   | Consistency Tests -   | Consistency Tests - C1 - Unanswered C2 - Unanswered C3 - Unanswered C4 - Unanswered |                              |                                |  |                           |                                      |  |  |
|   | Coherence and Effect  | iveness Tests - CE1 -   | Unanswered                   | CE2 - Unanswered               | CE3 - Unanswered   | answered CE4 - Unanswered |                                      |  |  |
| 3a - Which part of the Deposit Plan are you commenting on?  | Policy Number:  | <u>Paragraph</u>  | Number:                      | Proposal Map:                  | Co   | nstraints Map             | Appendices:                          |  |  |
|   |   |   |                              |                                |  |                           |                                      |  |  |
| 3b - Do you wish to see any changes made to the Deposit Plan  | as a result of your rep   | resentation? No   | (If                          | "No" or "Unanswered            | " - go to 3d)  |                           |                                      |  |  |
| 3c - What changes would like to see made to the Deposit Plan  |   |   | New Paragraph:<br>Unanswered | Amended Paragrap<br>Unanswered | graph: New Or Amended Site: Other (see Notes): Unanswered Unanswered |                           |                                      |  |  |
|   | Notes:  |   |                              |                                |  |                           |                                      |  |  |
| 3d - If your representation relates to a new, deleted or amended site, did you submit the site as a Candidate Site? Yes (If "Yes", please give the Candidate Site Name and reference if known)  Site Name: Brynhill Golf Club |   |   |                              |                                |  |                           |                                      |  |  |
| 3e - Please set out your representation below: I am very happy that the deposit LDP has kept Brynhill G   | olf Club outside of the i   | residential settlement bo   | oundary. The golf c          | lub land must be kept          | as green field recreation  | n land.                   |                                      |  |  |
| 3f - Please outline the changes you wish to see made to the D   | eposit Plan to make it  | sound (if relevant)   |                              |                                |  |                           |                                      |  |  |
| 4b - If you wish to speak, please confirm which part of your re   | oresentation you wish t   | o speak to the inspector  | about and why the            | ey consider it be neces        | ssary to speak at the he   | earing -                  |                                      |  |  |

(ordered by Representation ID No.)

| Representor ID and details                                   | 4004/DI          | P1 Lloyd Ellis         |   |                          |             |                                |                              |   |                                     |   |       |
|--|------------------|------------------------|---|--------------------------|-------------|--------------------------------|------------------------------|---|-------------------------------------|---|-------|
| Date Lodged Status Petil                                     | ion and No.<br>0 | Supporting Evidence    | Additional SA SEA                               |                          | -           | Rep format:<br>Comment form    | ·                            | t your comments to bak at a hearing sessi | •                                   | written representations' of mination? Written | or do |
| 2a - Do you consider the LDF                                 | is Sound?        |                        | 2b - If you think that th<br>Procedural Tests - |                          | und and doe | es not not meet<br>P2 - Unansv | ( )                          | of soundness, pleas                       | e indicate which                    | test(s) that it fails.                        |       |
|  |                  |                        | Consistency Tests -                             | C1 - Unans               | wered       | C2 - Unansv                    | wered C3 - Una               | nswered C4 - `                            | Yes                                 |   |       |
|  |                  |                        | Coherence and Effect                            | tiveness Tests -         | CE1 - Un    | answered                       | CE2 - Unanswered             | CE3 - Unanswer                            | ed CE4 - Un                         | answered                                      |       |
| 3a - Which part of the Deposit Plan are you commenting on?   |                  |                        | Policy Number:                                  | <u>P</u> :               | aragraph Nu | ımber:                         | Proposal Map:                | ,   | Constraints Ma                      | <u>Appendices:</u>                            |       |
|  |                  |                        |   |                          |             |                                | MG2(29)                      |   |                                     |   |       |
| 3b - Do you wish to see any                                  | changes mad      | de to the Deposit Plan | as a result of your rep                         | presentation?            | Yes         | (If                            | "No" or "Unanswere           | ed" - go to 3d)                           |                                     |   |       |
| 3c - What changes would like to see made to the Deposit Plan |                  |                        | New Policy:<br>Unanswered                       | Amended Po<br>Unanswered |             | w Paragraph:<br>answered       | Amended Paragr<br>Unanswered | raph: New Or Amen<br>Yes                  | ded Site: Other<br>Unans            | (see Notes):<br>swered                        |       |
|  |                  |                        | Notes:  |                          |             |                                |                              |   |                                     |   |       |
| 3d - If your representation re                               | elates to a ne   | •                      | d site, did you submit i<br>Site Name: ITV Wale |                          |             | e? Yes                         | (If "Yes", pl                | o .                                       | date Site Name a<br>erence: MG2(29) | and reference if known)                       |       |
|  |                  |                        |   |                          |             |                                |                              |   |                                     |   |       |

3e - Please set out your representation below:

Re: Local Development Plan - ITV, Culverhouse Cross Development - MG2/29

As a member of a small rural community, I am writing to comment on the planning proposals for the above proposed site that will have a profound effect on my life and the lives of my children.

The Vale of Glamorgan Community Strategy promises that the Vale will be a place "that is safe, clean and attractive, where individuals and communities have sustainable opportunities to improve their health, learning and skills, prosperity and wellbeing, 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 sustainability of the area."

My first concern about the proposed LDP is the poor process of consultation with local communities. In this area the consultation process was poorly advertised and only the absolute minimum period given to allow community involvement. We have not been given the incentive to make an effective contribution to the process. I understand that some VOG councillors also found the process did not give them opportunities to add or change proposals. Only by organising our own local meeting have we been able, as a small community, to express our individual concerns with regard to the proposed ITV development.

Wenvoe has been identified as a primary settlement that has community facilities. These consist of one shop, three pubs, a church and two community halls. Twyn-yr -Odyn is an even smaller rural hamlet. These facilities are surely inadequate to serve an additional 220 households in the first instance (proposed development of the HTV site) and a further 150 houses if the proposed development in Wenvoe goes ahead. The size of the community will grow as to change Wenvoe entirely and make it, in effect, a commuter village lacking community adherence.

In addition, the problems that I see with regard to the ITV development are:

- Traffic congestion There is already traffic congestion at Culverhouse Cross roundabout, on the A48 from St Nicholas and along Port Road both to and from Barry particularly at peak times. An additional 220 houses on the HTV site would add considerably to the congestion not only at peak times. The Local Development Plan talks of sustainable transport solutions, but realistically each proposed new house would have at least one vehicle, if not more realistically two vehicles:
- Access and capacity for traffic on to the A48 and Port Road this will inevitably become a bottle neck on both roads, adding to the current traffic congestion;
- Safety and sustainability St Lythans Road on which the rural hamlets of Twyn-yr-Odyn, St Lythans and Duffryn are situated is a rural lane and not designed to take any volume of traffic. This is already increasingly becoming a 'rat-run', being used by commuters attempting to avoid the congestion down the A48. With a large housing development and further congestion at Culverhouse Cross roundabout and the redevelopment of Five Mile Lane, this can only increase:
- Pollution The proposed development would inevitable create more noise, air and light pollution in what is essentially a rural area, as indicated by the proposed 'green wedge' in the Twyn-yr-Odyn area;
- Loss of employment opportunities the removal of the HTV studio complex will result in the loss of current employment opportunities and the inability to create future jobs in this area.

In conclusion, I would request that the VOG Council should, if the current site proposals proceed:

Representation ID No.)

Representor ID and details: 4004/DP1 Lloyd Ellis

- Ensure closer consultation with the small communities on which this site development will impact before the development proposals are prepared and submitted, as well as after any submission;
- Take special care with access and egress from the site so that impacts are kept to a minimum;
- Ensure that St Lythan's Road is suitably 'pinch-pointed' or given road-humps to make the road less attractive to speeding commuter traffic;
- Ensure that light, noise and air pollution are considered in the development plans and minimised;
- Ensure that sufficient community facilities and play-areas are available on the development and that enough health and education facilities are available to residents and their families the current proposals seem to want to achieve a maximum density of housing which is unlikely to create a sustainable and healthy community.
- 3f Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
- 4b If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -

(ordered by Representation ID No.)

| Representor ID and details: 4005/DP1 A.G.Thomas   |   |  |   |  |  |  |  |  |  |
|---|---|--|---|--|--|--|--|--|--|
| Date Lodged     Status     Petition and No.     Supporting Evidence       02/04/2012     M     □     0     □    | Additional SA SEA   |  | mments to be consiered by 'written representations' or do earing session of Public examination? Written |  |  |  |  |  |  |
| 2a - Do you consider the LDP is Sound? Unsound  | 2b - If you think that the Plan is unsound and does not not meet one or more test(s) of soundness, please indicate which test(s) that it fails.  Procedural Tests - P1 - Unanswered P2 - Unanswered |  |   |  |  |  |  |  |  |
|   | Consistency Tests - C1 - Unanswered   | C2 - Unanswered C3 - Unanswered                | C4 - Unanswered   |  |  |  |  |  |  |
|   | Coherence and Effectiveness Tests - CE1 - I   | Unanswered CE2 - Yes CE3                       | - Unanswered CE4 - Unanswered   |  |  |  |  |  |  |
| 3a - Which part of the Deposit Plan are you commenting on?  | Policy Number: Paragraph  | Number: Proposal Map:                          | Constraints Map Appendices:   |  |  |  |  |  |  |
|   | 125. 111  | 396  | Ancient and Semi Appendix 9 - Natural Woodland Supporting Documents                                     |  |  |  |  |  |  |
| 3b - Do you wish to see any changes made to the Deposit Plan  | n as a result of your representation? Yes   | (If "No" or "Unanswered" - go to               | o 3d)   |  |  |  |  |  |  |
| 3c - What changes would like to see made to the Deposit Plan  |   | Unanswered Ye                                  | w Or Amended Site: Other (see Notes): s Yes   |  |  |  |  |  |  |
| 3d - If your representation relates to a new, deleted or amende   | ed site, did you submit the site as a Candidate S<br>Site Name: Model Farm, Port Road, Rhoose   | ite? Yes (If "Yes", please give                | e the Candidate Site Name and reference if known) Site Reference: 2501                                  |  |  |  |  |  |  |
| 3e - Please set out your representation below: This is first class arable land of which there is very little le | eft in the Vale of Glamorgan. It should not be des  | stroyed.                                       |   |  |  |  |  |  |  |
| 3f - Please outline the changes you wish to see made to the D   | Deposit Plan to make it sound (if relevant)   | <b>/</b>                                       |   |  |  |  |  |  |  |
| 4b - If you wish to speak, please confirm which part of your re   | presentation you wish to speak to the inspector   | about and why they consider it be necessary to | o speak at the hearing -  |  |  |  |  |  |  |

(ordered by Representation ID No.)

| Representor ID and details: 4005/DP2 A.G.Th   | omas   |  |                              |   |                                      |                      |                        |
|---|--|--|------------------------------|---|--------------------------------------|----------------------|------------------------|
| Date Lodged     Status     Petition and No.     Supporting       30/03/2012     M     □     0 | Evidence Additional SA SEA                               |  | ep format:<br>omment form    | 4a - do you want you<br>you want to speak a |                                      | •                    | representations' or do |
| 2a - Do you consider the LDP is Sound? Unsound  | 2b - If you think that th<br>Procedural Tests -          | e Plan is unsound and does<br>P1 - Yes   | not not meet one<br>P2 - Yes | e or more test(s) of so                     | oundness, please in                  | dicate which test(s) | that it fails.         |
|   | Consistency Tests - Coherence and Effecti                | C1 - Unanswered veness Tests - CE1 - Una |                              | ed C3 - Unansw<br>2 - Yes                   | ered C4 - Una<br>CE3 - Unanswered    |                      | ed                     |
| 3a - Which part of the Deposit Plan are you commen  |  | Paragraph Num                            |                              | pposal Map:                                 |                                      | onstraints Map       | Appendices:            |
|   | 74   |  |                              |   |                                      |                      |                        |
| 3b - Do you wish to see any changes made to the De  | posit Plan as a result of your rep                       | esentation? Yes                          | (If "No                      | o" or "Unanswered" -                        | go to 3d)                            |                      |                        |
| 3c - What changes would like to see made to the De  | posit Plan? New Policy:                                  | Amended Policy: New                      | Paragraph:                   | Amended Paragraph                           | New Or Amended                       | Site: Other (see No  | otes):                 |
|   | Unanswered<br>Notes:                                     | Unanswered Unar                          | nswered                      | Unanswered                                  | Yes                                  | Unanswered           |                        |
| 3d - If your representation relates to a new, deleted   | or amended site, did you submit t<br>Site Name: Land Wes |  | Yes                          | (If "Yes", please                           | e give the Candidate<br>Site Referer | e Site Name and refe | rence if known)        |
| 3e - Please set out your representation below:<br>See attached Sheets.                        |  |  |                              |   |                                      |                      |                        |
| 3f - Please outline the changes you wish to see mad<br>Deletion of MG2 (25)                   | le to the Deposit Plan to make it s                      | ound (if relevant)                       |                              |   |                                      |                      |                        |
| 4b - If you wish to speak, please confirm which part  | of your representation you wish to                       | speak to the inspector about             | ut and why they              | consider it be necess                       | arv to speak at the I                | nearing -            |                        |

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| Representor  | ID and d    | etails:                   | 4006/DF                   | P1 Richard Soxton      |   |                            |                        |                                    |                                      |                    |   |   |
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| Date Lodged  | Status<br>M | Petition                  | n and No.<br>0            | Supporting Evidence    | Additional SA SEA                               |                            |                        | Rep format:<br>Comment form        | *                                    | •                  | be consiered by 'writte<br>sion of Public examina | en representations' or do tion? Written |
| 2a - Do you consider the LDP is Sound? Unsound               |             |                           |                           |                        | 2b - If you think that the Procedural Tests -   |                            | and doo                | es not not mee<br>P2 - Unans       | et one or more test(s) of the swered | of soundness, plea | se indicate which test(                           | s) that it fails.                       |
|  |             |                           |                           |                        | Consistency Tests -                             | C1 - Unansv                | wered                  | C2 - Unans                         | swered C3 - Unan                     | nswered C4 -       | Yes   |   |
|  |             |                           |                           |                        | Coherence and Effect                            | tiveness Tests -           | CE1 - U                | nanswered                          | CE2 - Unanswered                     | CE3 - Unanswe      | red CE4 - Unansv                                  | vered                                   |
| 3a - Which part of the Deposit Plan are you commenting on?   |             | ou commenting on?         | Policy Number:            | <u>Pa</u>              | aragraph Ni                                     | umber:                     | Proposal Map:          |                                    | Constraints Map                      | Appendices:        |   |   |
|  |             |                           |                           |                        |   |                            |                        |                                    | MG2(2 <mark>9)</mark>                |                    |   |   |
| 3b - Do you w  | ish to see  | e any cha                 | anges mad                 | de to the Deposit Plan | as a result of your rep                         | resentation?               | Yes                    | (I                                 | f "No" or "Unanswered                | d" - go to 3d)     |   |   |
| 3c - What changes would like to see made to the Deposit Plan |             | New Policy:<br>Unanswered | Amended Pol<br>Unanswered |                        | ew Paragraph:<br>nanswered                      | Amended Paragra Unanswered | Aph: New Or Ame<br>Yes | nded Site: Other (see<br>Unanswere |                                      |                    |   |   |
|  |             |                           |                           |                        | Notes:  |                            |                        |                                    |                                      |                    |   |   |
| 3d - If your re  | presenta    | ition relat               | es to a ne                | w, deleted or amende   | d site, did you submit i<br>Site Name: ITV Wale |                            |                        | e? Yes                             | (If "Yes", ple                       | · ·                | idate Site Name and r<br>ference: MG2(29)         | eference if known)                      |
|  |             |                           |                           |                        |   |                            |                        |                                    | <del>-</del>                         |                    |   |   |

3e - Please set out your representation below:

Re: Local Development Plan - ITV, Culverhouse Cross Development - MG2/29

As a member of a small rural community, I am writing to comment on the planning proposals for the above proposed site that will have a profound effect on my life and the lives of my children.

The Vale of Glamorgan Community Strategy promises that the Vale will be a place "that is safe, clean and attractive, where individuals and communities have sustainable opportunities to improve their health, learning and skills, prosperity and wellbeing, 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 sustainability of the area."

My first concern about the proposed LDP is the poor process of consultation with local communities. In this area the consultation process was poorly advertised and only the absolute minimum period given to allow community involvement. We have not been given the incentive to make an effective contribution to the process. I understand that some VOG councillors also found the process did not give them opportunities to add or change proposals. Only by organising our own local meeting have we been able, as a small community, to express our individual concerns with regard to the proposed ITV development.

Wenvoe has been identified as a primary settlement that has community facilities. These consist of one shop, three pubs, a church and two community halls. Twyn-yr -Odyn is an even smaller rural hamlet. These facilities are surely inadequate to serve an additional 220 households in the first instance (proposed development of the HTV site) and a further 150 houses if the proposed development in Wenvoe goes ahead. The size of the community will grow as to change Wenvoe entirely and make it, in effect, a commuter village lacking community adherence.

In addition, the problems that I see with regard to the ITV development are:

- Traffic congestion There is already traffic congestion at Culverhouse Cross roundabout, on the A48 from St Nicholas and along Port Road both to and from Barry particularly at peak times. An additional 220 houses on the HTV site would add considerably to the congestion not only at peak times. The Local Development Plan talks of sustainable transport solutions, but realistically each proposed new house would have at least one vehicle, if not more realistically two vehicles:
- Access and capacity for traffic on to the A48 and Port Road this will inevitably become a bottle neck on both roads, adding to the current traffic congestion;
- Safety and sustainability St Lythans Road on which the rural hamlets of Twyn-yr-Odyn, St Lythans and Duffryn are situated is a rural lane and not designed to take any volume of traffic. This is already increasingly becoming a 'rat-run', being used by commuters attempting to avoid the congestion down the A48. With a large housing development and further congestion at Culverhouse Cross roundabout and the redevelopment of Five Mile Lane, this can only increase:
- Pollution The proposed development would inevitable create more noise, air and light pollution in what is essentially a rural area, as indicated by the proposed 'green wedge' in the Twyn-yr-Odyn area;
- Loss of employment opportunities the removal of the HTV studio complex will result in the loss of current employment opportunities and the inability to create future jobs in this area.

In conclusion, I would request that the VOG Council should, if the current site proposals proceed:

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- Ensure closer consultation with the small communities on which this site development will impact before the development proposals are prepared and submitted, as well as after any submission;
- Take special care with access and egress from the site so that impacts are kept to a minimum;
- Ensure that St Lythan's Road is suitably 'pinch-pointed' or given road-humps to make the road less attractive to speeding commuter traffic;
- Ensure that light, noise and air pollution are considered in the development plans and minimised;
- Ensure that sufficient community facilities and play-areas are available on the development and that enough health and education facilities are available to residents and their families the current proposals seem to want to achieve a maximum density of housing which is unlikely to create a sustainable and healthy community.
- 3f Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
- 4b If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -

(ordered by Representation ID No.)

| Representor ID   | and de      | tails:            | 4007/DI                    | P1 Mr Dylan Davies     |   |                                    |              |                              |         |  |                                |        |   |              |
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| Date Lodged S: 30/03/2012                                  | Status<br>M | Petitio           | n and No.<br>0             | Supporting Evidence    | e Additional SA SEA                             |                                    |              | Rep format:<br>Comment for   |         | 4a - do you want your comments to be consiered by 'written represent you want to speak at a hearing session of Public examination? Writt |                                |        |   | •            |
| 2a - Do you cons   | sider the   | e LDP i           | s Sound?                   |                        | 2b - If you think that the Procedural Tests -   | P1 -                               | Yes          | P2 - Yes                     |         |  |                                |        | ate which test(s) th                    | at it fails. |
|  |             |                   |                            |                        | Consistency Tests -<br>Coherence and Effect     |                                    |              |                              |         |  |                                |        | CE4 - Unanswered                        | J            |
| 3a - Which part of the Deposit Plan are you commenting on? |             | Policy Number: 49 | <u>Paragraph N</u><br>5.11 |                        |   | umber: Proposal Map: Page 74 and p |              | age 145                      |         | straints Map<br>. February 2012  | Appendices: Other - Not Listed |        |   |              |
| 3b - Do you wish   | to see      | any ch            | anges mad                  | de to the Deposit Plan | as a result of your rep                         | resenta                            | ation? Yes   | (                            | If "No" | or "Unanswered   | " - go to 3d)                  |        |   |              |
| 3c - What chang  | jes wou     | ld like t         | o see mad                  | e to the Deposit Plan? | New Policy: Unanswered Notes:                   | Ame<br>Yes                         | nded Policy: | New Paragraph:<br>Unanswered |         | mended Paragragnamended Paragragnamended   | oh: New Or Amer<br>Yes         | ded Si | te: Other (see Note<br>Unanswered       | <u>es):</u>  |
| 3d - If your repre   | esentat     | ion rela          | tes to a ne                | ·                      | d site, did you submit t<br>Site Name: Garden E |                                    |              |                              |         | (If "Yes", plea  | J                              |        | te Name and refere<br>: MG2 (30) 2536/C | ,            |
| 3e - Please set  | out you     | r repre           | sentation b                | elow:                  |   |                                    |              |                              |         |  |                                |        |   |              |

Procedural Tests

#### Test P1

The local community have not been involved in the decision to allocate 40 houses on the site. Neither the school nor the Local Education Authority (LEA) were consulted. In addition, Llangan Community Council was not consulted during any previous stages in the draft LDP process.

#### Test P2

The Sustainability Appraisal of the Garden Emporium site is wrong in its assessment of the Garden Emporium site's ability to meet the Sustainability Appraisal's objectives for the following reasons:

- 1. The site is incorrectly rated '++' (strongly contributes) as regards objective 1"To provide the opportunity for people to meet their housing needs." Although this site falls within the Rural Vale, the Rural Vale is a very large area and there is no
- particular local specific need for this housing. As far as affordable housing is concerned, it is only proposed that the site provides the standard 35% affordable housing which means it is no different to/better than any other site. The '++'

rating should be reduced to '+' (contributes).

- 2. The site is incorrectly rated '+' (contributes) as regards objective 2 "To maintain, promote and enhance the range of local facilities". There is no suggestion that the proposed development will in any way enhance the local facilities. It will place
- increased pressure on the local facilities such as the primary school (which is full to capacity), the playground/open space at Fferm Goch and the community hall, which already serves a large number of houses and is of a limited capacity. There is no suggestion of on-site open space being provided on the Garden Emporium site. This is of particularly relevance given the high density of housing which 40 homes would involve. The current '+' rating should be changed to a '- '(strongly detracts) rating.
- 3. The site is incorrectly rated '++' (strongly contributes) as regards objective 8, "To use land effectively and efficiently". Although part of the site is brownfield, and has been previously developed as a garden centre, a large section at the rear of
- the site (approximately 30% of the entire site) has never been developed. This area was previously identified as a habitat management area in the current planning permission for 12 houses. The requirement for a habitat management area was in part due to the presence of a very rare species of plant on the site (Bithynian vetch). This rating should be reduced to a '+' (contributes) rating, to acknowledge the fact that while the development would reuse the developed part of the site, it would also use a currently undeveloped, greenfield, area.
- 4. The site is incorrectly rated '++' (strongly contributes) as regards objective 9 "To protect and enhance the built environment and natural environment". This is incorrect for the reasons given in point 3 above. If

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the site was developed for 40 houses there would insufficient land remaining for any habitat management or other effective biodiversity area as has been required by the extant planning permission. This will mean the loss of a very rare plant species which has only been found in two other locations in the whole of Wales. This rating should therefore be reduced altogether to a '--'(strongly detracts) rating.

- 5. The site is incorrectly rated '0' (neutral) as regards objective 11 "To protect, enhance and promote the quality and character of the Vale of Glamorgan's culture and heritage." This is incorrect for the same reasons as at points 3 and 4 above. The Council has resolved to protect the very rare plant species which has been added to its local biodiversity action plan. This resolution by the Council (which was made specifically in response to the survey which identified this plant on this site) indicates its recognition of the species' importance to the culture and heritage of the Vale of Glamorgan. This rating should therefore be reduced to a -'(strongly detracts) rating.
- 6. The site is incorrectly rated '+' (contributes) rating as regards objective 12 "To reduce the need to travel and enable the use of more sustainable modes of transport". This rating is incorrect as although it will be possible to travel by foot or bicycle to the primary school and the community hail, every other service and local amenity including employment can only be accessed by private car. The bus service to the site is poor and does not merit a rating on the Council's sustainable settlements score. This rating should therefore be reduced to a '--' (strongly detracts) rating.

Consistency Tests

Test C2

The proposed allocation of the Garden Emporium site for 40 houses fails to meet Planning Policy Wales (February 2011) ("PPW") in the following respects:

1. The Garden Emporium site is totally unsustainable. It is located in the Rural Vale, surrounded by open countryside. It is 7 miles from Cowbridge and 8 miles from Bridgend. Anyone living in this location will rely on private cars to get to and from

the site for work, shops, everything except the primary school, which, as stated below, is full. The nearest corner shop is in Pencoed to which there is no public transport; otherwise it is necessary to drive to Cowbridge or Bridgend or one of the large supermarkets on the edge of Bridgend.

The current planning permission for the site is for 12 houses, of which at least 30% (i.e. 4) are to be affordable. There is a condition forming part of the planning permission (condition 10) which requires each of the 8 private units to be livework

units and requires that the business floor space of the live/work unit shall be finished ready for occupation before the residential floor space is occupied. The reason given for this condition is "In order to ensure a satisfactory and sustainable

form of development which will support and enhance the local rural community and in order for the development to comply with policies ENV27, ENV29 and EMP2 of the UDP." Although the application originally proposed the live-work units and made much of them improving the sustainability of the site, at a later date, the applicant asked the Local Planning Authority (LPA) not to impose this condition. However, the LPA insisted it was required.

There is no suggestion that the 40 houses now proposed for the site would be live-work units. If this condition was imposed, this site would still be unsustainable as the residents would need to drive for everything except work. It also seems likely that they would need to make business-related journeys and of course, depending upon their business, additional car journeys could in fact be created by these businesses. This is contrary to PPW (paragraph 4.6.2) which states, "Development plans... should secure a sustainable settlement pattern which meets the needs of the economy, the environment and health, while

respecting local diversity and protecting the character and cultural identity of communities."

2. The Garden Emporium site is very poorly served by public transport. There is a very limited bus service to and from Fferm Goch (5 buses per day to Bridgend; 4 per day from Bridgend which go on to Cowbridge). There is no bus service to the

nearest train station at Pencoed which is 3 miles away, along roads with no pedestrian footway). This is contrary to PPW (paragraph 4.6.4), which states, 'Local planning authorities should assess the extent to which their development plan settlement strategies and new development are consistent with minimising the need to travel and increasing accessibility by modes other than the private car. ... Higher density development, including residential development, should be

encouraged near public transport nodes or near corridors well served by public transport (or with the potential to be so served).

In addition, paragraph 4.6.7 PPW stresses that, 'In rural areas the majority of new development should be located in those settlements which have relatively good accessibility by non-car modes.' This is emphasized again in paragraph 8.7.3

PPW which states, 'It is also expected that the proposed access to a development will reflect the likely travel patterns involved. It should ensure that people can reach the development, as far as practicable, by walking, cycling and public

transport, as well as by car.'

3. The existing local infrastructure will not be able to serve a further 40 houses at the Garden Emporium site. There is very little local infrastructure available at this site, but two issues are relevant — the local primary school (Llangan primary school) and highways safety issues:

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Llangan primary school.

The school is within walking distance of the site. However, this school is very small and is full. The LEA has confirmed that Llangan primary school's maximum capacity is 111 pupils, and that the number on the roll as of September 2011 was 108 pupils. The admission number of new pupils each year is no more than 15. Several year groups are combined i.e. two year groups are taught as a single class in one classroom. The LEA needs to comply with the requirement in its education plan to have no more than 30 children in each classroom. Although in some circumstances it might be appropriate to deal with this by seeking a s106 contribution from the developers to increase the capacity of the school, in this case the school has neither the space nor the land to expand to take on more pupils. Two classes are already being taught in terrapins located in the playground and the school only has a relatively small area of grass which has already been diminished as a result of building a new school hail and two classrooms a few years ago.

It is noted that in the planning officer's report for the current 12-house planning permission that the LEA thought that there was enough space in local primary schools (it did not specify any in particular) to accommodate the children from 12 houses. However 40 houses is obviously a very different matter. The LEA has a formula for calculating the number of primary school places generated by new houses. This formula calculates that the provision of 40 new houses would result in 15 primary age children needing places. There is no possibility that the school could provide sufficient number of places to accommodate the number of primary-age children from this development. These additional children would have to be driven to other schools some distance away.

Highway Safety Issues.

When the Council considered the current planning permission (for 12 houses), the highways department was concerned about there being more than one exit from the site. The existing planning permission includes a condition (condition 20) that the site shall be served by no more than two means of access onto Ruthin Road The primary access shall serve no more than 8 dwellings and the secondary access to serve no more than 4 dwellings. How many exits would be proposed for 40? This road is used heavily by traffic, particularly during peak times. Many drivers, including a significant number of large lorries, use it as a short cut from the A48 to the M4. It is also the main pedestrian/cycleway to Llangan primary school from Fferm Goch/Heol
Llidiard/St Mary Hill and is used on a daily basis by those residents for that purpose. Currently, only a few single houses have driveways onto this road. Having an additional 40 driveways will increase the traffic considerably which would increase the risk to existing drivers, pedestrians and cyclists.

The proposal is contrary to paragraph 4.6.8 of PPW which states, 'Development in the countryside should be located within and adjoining those settlements where it can be best accommodated in terms of infrastructure, access and habitat and landscape conservation.' It is also contrary to paragraph 9.2.9 of PPW which states that 'Local planning authorities should consider the following criteria in deciding which sites to allocate for housing in their development plans:

- the location of potential development sites and their accessibility to jobs, shops and services by modes other than the car, and the potential for improving such accessibility.
- the capacity of existing and potential infrastructure including public transport... and social infrastructure (such as schools...), to absorb further development and the cost of adding further infrastructure..."
- 4. The development of the Garden Emporium site cannot be described as infilling or a minor extension to Fferm Goch. It is located adjacent to Fferm Goch. The proposed 40 houses are more than Fferm Goch and Heol Llidiard combined (which amount to 33 houses). It is therefore totally out of scale for this area.

It also cannot be claimed to meet any "local neec!' for affordable housing. The Council's own background documents recognise that the need for affordable housing is greater in the larger settlements in the Vale, such as Barry. Section 3.9 of the draft LDP states that, 'The findings of the [Local Housing Market Assessment 2010] make clear that the area of greatest need is Barry followed by the coastal settlements of Rhoose, Llantwit Major and Penarth as well as the Rural and Eastern Vale." This statement is supported by the Council's 'Affordable Housing' background paper (November 2011), in which Table 2 in paragraph 3.7 specifies an identified need of 35 units of affordable housing per year in the Rural Vale. This is a very low number of units to be accommodated within a large area of land and there is no need for such a high concentration of units to be accommodated on the Garden Emporium site. In fact, the existing houses at Fferm Goch are sold at considerably less than the average house price in this area i.e. the Rural Vale. No.3 Fferm Goch was sold in June 2011 for £180,000 and No.8 has been on the market for £185,000. Notwithstanding these prices, these houses often remain on the market for some time, at least a year. Fferm Goch is private market housing which was originally Agricultural Settlement Houses (a form of Council housing) developed by the Welsh Land Society in 1939. Why do we need more houses at affordable prices in this location? There is no identified local need to be met.

A Council officer has confirmed that the main reason the Council are prepared to consider 40 houses on this site is the need for more affordable housing in the Vale. It is inappropriate for such a huge increase in the total number of houses being proposed on this site to satisfy the number of affordable homes across the entire Vale. Within the original planning permission of 12 houses, a 30% allocated to affordable housing would have resulted in a sensible allocation of 4 affordable houses. To invert this reasoning and specify a total of 40 houses in order to specifically raise the number of affordable housing (to a total 14) is not reasonable. This approach and the resultant number of houses will have a detrimental impact on the local community is a disproportionate sacrifice to make for an additional 10 affordable houses.

The proposal for 40 houses on this site is therefore contrary to paragraph 4.6.8 of PPW which states, "In filling or minor extensions to existing settlements may be acceptable, in particular where it meets a local need for affordable housing, but

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new building in the open countryside away from existing settlements or areas allocated for development in development plans must continue to be strictly controlled. All new development should respect the character of the surrounding area and should be of appropriate scale and design."

- 5. 40 houses on the Garden Emporium site would constitute a significant over development and the density should not be permitted in this location. The following points are relevant:
- a) it is acknowledged and accepted that the site has existing planning permission for 12 houses. There are already clear concerns regarding the impact on the local school and highways for the provision of these 12 houses.
- b) 40 houses will make the site crowded and out of keeping with the rural area Fferm Goch has a particular and special history.

It was built by the Welsh Land Society in 1939 to promote employment in rural areas and in this case to provide social housing and a community for farm workers at the large farm across the road. The houses at Fferm Goch form 3 sides of a square with a large grass pitch and play area in the middle. There is no suggestion that the proposal for the Garden Emporium site would be designed in a similar way. Fferm Goch should not be used to set a "precedent" for this locality, where other housing consists of isolated dwellings.

- c) The previous planning history of the site is relevant. The Council previously considered proposals for 42 and 24 houses on the site both were rejected on the grounds of over-development. This is contrary paragraph 9.2.12 of PPW which states that 'strong pressure for development may give rise to inappropriately high densities if not carefully controlled.' In paragraph 9.2.22 it states that "in order to safeguard the character and appearance of the countryside, to reduce the need to travel by car and to economise on the provision of services, new houses in the countryside away from existing settlements recognised in development plans or from other areas allocated for development must be strictly controlled. Many parts of the countryside have isolated groups of dwellings. Sensitive filling-in of small gaps or minor extensions to such groups, in particular for affordable housing to meet local need, may be acceptable but much depends on the character of the surroundings, the pattern of development in the area and the accessibility to main towns and villages.' In paragraph 9.3.4 PPW it states that 'in
- determining applications for new housing, local planning authorities should ensure that the proposed development does not damage an area's character and amenity.' The proposed development of this site with 40 houses would significantly damage the character of this area.
- 6. The provision of 40 houses on the Garden Emporium Site will result in the loss of a rare plant species Bithynian Vetch. Bithynian Vetch has been identified by the Council in its Local Biodiversity Action Plan. The existing planning permission for the Garden Emporium site includes:
- a) a condition (condition 9) that a significant proportion of the site (approx. 25-30% being the whole of the back strip of the site edged green on the approved plan) shall have no buildings located on it and all properties shall be located at least 10 metres from this boundary within the development site; and,
- b) another condition (condition 12) that this area shall be designated as a habitat management area to be supported a comprehensive habitat management plan. The plan is to pay particular regard to the areas where Bithynian vetch has been found and seek to maintain and conserve this species. These conditions were imposed in particular to preserve the species Bithynian vetch. It is apparent from the planning officer's report associated with the current planning permission that Bithynian vetch was found on the site during the course of an ecological survey being carried out, at the request of the Countryside Council for Wales. The report states that Bithynian vetch is a rare species, included as vulnerable on the UK vascular plant red data list and endangered on the Welsh list. The reports says that this species was previously unknown to occur in the Council and is known to occur on only 2 other sites in the whole of Wales.

As a result, the Council held a special meeting to decide to protect this plant by placing it on the Council's 2002 Local Biodiversity Action Plan.

There is no suggestion in the draft LDP that this large part of the site — which the planning officer's report recognises is open land rather than previously developed land - would not be open to development and it would seem difficult/impossible for a planning permission for 40 houses on this site to protect the same area as a "no-build" zone. The Proposals map includes this part of the site within the area proposed to be allocated for 40 houses. The fact that this open area of land at the back of the site would not be built on under the terms of the current planning permission was a material consideration for the planning officer in recommending approval of the planning application for 12 houses (see the planning officer's report, page 12).

The allocation of 40 houses is therefore contrary to PPW paragraph 5.2.8 which states, 'Local planning authorities must address biodiversity issues, insofar as they relate to land use planning in both development plans and development control decisions. Paragraph 5.2.2 of PPW recognises that, 'The Natural Environment and Rural Communities Act 2006 places a duty on every public authority, in exercising its functions, to have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity.' The extant planning permission allowed for the preservation of this rare plant by allocating a significant portion of the site to be a no-build zone — a habitat conservation area. This area will not be possible if 40 houses are built.

The proposed designation of Fferm Goch as a "Minor Rural Settlement" also fails to meet PPW because it is plainly not a sustainable settlement and has been incorrectly assessed by the Council. This incorrect designation (which is considered in detail in Test CE2 below) infringes the following paragraphs of PPW: 4.6.2, 4.6.4, 4.6.7, 4.6.8, 8.7.3, 9.2.9, 9.2.12, 9.2.22 and 9.3.4 (all as cited above). If it were identified as a Minor Rural Settlement, Fferm Goch would be at risk of future residential development being allowed in this location through policy MG7 of the draft LDP. Fferm Goch is not a location where new development

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should routinely be permitted since it would infringe all the sustainability principles for development in rural locations.

Test C3

The Wales Spatial Plan update 2008 states at paragraph 1.4 that, 'It is a principle of the Wales Spatial Plan that development should be sustainable. Sustainable development is about improving wellbeing and quality of life by integrating social, economic and environmental objectives in the context of more efficient use of natural resources.' The Garden Emporium Site is a totally unsustainable site for reasons given above (Test C2).

Test C4

The Community Strategy for the Vale 2011-21 sets out 10 priority outcomes. The allocation of the Garden Emporium for 40 houses fails to have regard to the following of these priorities:

- "2. The diverse needs of local people are met through the provision of customer focused, accessible services and information." This priority is not met because the Garden Emporium site is so far from shops, health services, local amenities and workplaces as well as having poor public transport."
- "3. Vale residents and organisations respect the local environment and work together to meet the challenge of climate change." This priority is not met because the Garden Emporium site will require all its residents to travel by car to access every local service save the primary school (which does not have sufficient space for the children of 40 families, so primary school pupils will have to travel by car to other schools)
- "4. Older people are valued and empowered to remain independent, healthy and active. They have equality of opportunity and receive high quality services to meet their diverse needs." This priority is not met as the public transport to this site is very poor both in terms of timetabling and route, which greatly inhibits their chance of remaining independent. Also, there are no local services available to them such as healthcare, library or other local amenities.
- "5. Children and Young people in the Vale are well informed and supported to access a broad range of quality services that enable them to take full advantage of the life opportunities available in their local communities and beyond." This priority is not met as the local primary school is unable to accommodate the projected increase in pupil numbers from 40 new homes. Children will need to travel to other primary schools. Public transport from this site is very poor. Children will need to travel by car to primary school and to all other activities and services including leisure activities.
- "6. People of all ages are able to access coordinated learning opportunities and have the necessary skills to reach their full potential, helping to remove barriers to employment." This priority is not met as there are no learning opportunities present near the site nor, more importantly, are there any employment opportunities near the site either.
- "7. The underlying causes of deprivation are tackled and the regeneration of the Vale continues, opportunities for individuals and businesses are developed and the quality of the built and natural environment is protected and enhanced." This priority is not met because the proposed allocation of 40 houses on the Garden Emporium will not protect and enhance the natural environment of the Vale: in order to develop 40 houses the entirety of the site will have to be developed, whereas the current planning permission requires the back third of the site to be allocated as a habitat management area. A key reason for this habitat management area was to preserve a very rare plant species growing on the site.
- "10. Health inequalities are reduced and residents are able to access the necessary services, information and advice to improve their wellbeing and quality of life." This priority is not met because there are no local health services near

the site. Such services can only be accessed by driving to one of the nearby towns.

Coherence and Effectiveness Tests

Test CE1

The Plan does not set out a coherent strategy from which its policies and allocations logically flow and, where cross boundary issues are relevant, it is not compatible with the development plans prepared by neighbouring authorities. The draft LDP Strategy to comprises four key elements (page 23). One of these elements is 'Other sustainable settlements to accommodate further housing and associated development'. This element of the draft LDP strategy is based on the designation of certain towns and villages within the Vale as "sustainable settlements". However, Fferm Goch is wrongly identified in the strategy as a "Minor Rural Settlement", for reasons set out under Test CE2 below.

The draft LDP at Section 5.10 (page 25) states that minor rural settlements are those 'considered to have sufficient population, services and facilities to assimilate growth without it having a detrimental impact on their existing character and local environment.' Also, at Section 5.16 of the draft LDP (page 27), 'The types of services and facilities typically found within the minor rural settlements include places of worship, community halls, small-scale retail uses and formal recreational facilities.

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A number of the smaller rural settlements also provide small-scale local employment opportunities, either within or in close proximity to the settlements.' Neither of these descriptions fit Fferm Goch — for reasons set out under Test CE2. The strategy base for the rest of the LDP policies is therefore wrong in this respect. The draft LDP Strategy is stated to follow on from the Vision and Objectives set out in the draft LDP. The Vision is stated to be for the Vale of Glamorgan to be "a place that is safe, clean and attractive, where individuals and communities have sustainable opportunities to improve their health, learning and skills, prosperity and wellbeing..." The proposed allocation of the Garden Emporium site will be contrary to this Vision, being unsustainable development in an area with very poor public transport where there are no employment prospects and all learning, health and other facilities can only be accessed using the car.

The allocation of this site will also be contrary to the following Objectives set out in the draft LDP:

• Objective 1. "To sustain and further the development of sustainable communities within the Vale of Glamorgan, providing opportunities for living, learning, working and socialising for all". The proposed Garden Emporium site is in a wholly unsustainable location, as is the adjacent Fferm Goch.

Objective 2. "To ensure that development within the Vale of Glamorgan makes a positive contribution towards reducing the impact of and mitigating the adverse effects of climate change." The effects of climate change will be increased if a further 40 houses are built in this location where people will have to use cars to meet their daily needs.

- Objective 3. "To reduce the need for Vale of Glamorgan residents to travel to meet their daily needs and enabling them greater access to sustainable forms of transport". Public transport at this site is very poor.
- "Objective 4. "To protect and enhance the Vale of Glamorgan's historic, built and natural environment". The proposed development of the Garden Emporium site represents over-development of this site, which is out of keeping with the rural area. It will also fail to preserve the back third of the site as a habitat conservation area, as proposed by the extant planning permission for 12 houses on the site.
- Objective 5. "To maintain, enhance and promote community facilities and services in the Vale of Glamorgan". The proposed development at the Garden Emporium site will place increased pressure on resources in particular Llangan primary school which is full.
- Objective 7. "To provide the opportunity for people in the Vale of Glamorgan to meet their housing needs." There is no need for this housing at this location.
- Objective 10. "To ensure that development within the Vale of Glamorgan uses land effectively and efficiently and to promote the sustainable use and management of natural resources." If 40 houses are allowed to be built at the Garden Emporium site then the rear part of the Garden Emporium site, which is greenfield and has not previously been built on, will be.

Test CE2

The strategy, policies and allocations are not realistic and appropriate having considered the relevant alternatives and/or are not founded on a robust and credible evidence base.

Fferm Goch has been wrongly classified by the Council as a "Minor Rural Settlement" for the following reasons:

- In the Council's 'Sustainable Settlements Appraisal Review' Background paper November 201 1(the SSAR'), Fferm Goch should have been classified as being one of the rural hamlets and isolated areas of the Vale of Glamorgan with an 'Anomaly Settlement' score. In paragraph 5.15 of the SSAR, the Council recognises that there are a number of settlements with relatively high scores which have been identified with anomaly scores because, for example, the settlement is located within walking distance of a one-off, high-scoring facility. Paragraph 5.15 says anomaly settlements have been identified by 'overriding' or 'limiting' factors such as:
- a general limited range of services and facilities within the settlement,
- a low population (generally below 100), and/or
- the settlement being in an otherwise isolated or sensitive location.

All of the above factors apply to Fferm Goch. Fferm Goch is a classic example of an anomaly settlement since it receives a full '3'score due to its proximity to a primary school. The employment score is wrong (see below), so its overall score should have been 6. It has a population of 98 (i.e. below 100). It is in an isolated location.

- It is the smallest of the "Minor Rural Settlements" with only 98 residents (Council say should have over 100).
- Unlike all the other "Minor Rural Settlements" it is not recognised locally as a village it has no place sign of its own, only a street sign.

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- It was not originally classified as a "Minor Rural Settlement" it seems to have been re-classified during the development plan process probably due to representations by the property developers who own the Garden Emporium(we note representations made by Winchester Properties on the draft preferred strategy in March 2009).
- The settlement scoring criteria for Fferm Goch is wrong in the SSAR Fferm Goch scores 3 for employment which is defined as meaning that there are employment opportunities on site. The only employment opportunity near Fferm Goch is Westwinds industrial estate. This is a very small estate with small units, many of which are used by sole traders who have no employees. In practice it has not employed any residents of Fferm Goch for several years. It cannot be right that this small industrial estate is classified as the same employment opportunity as those available in towns in the Vale, such as Barry, Penarth and Cowbridge. We believe Fferm Goch should score 0 for employment.
- Fferm Goch does not have any designation as a settlement in the current UDP. It is correctly classified along with other small hamlets as "open countryside". In the planning officer's report which considered the current planning permission it was
- concluded that the "development of the site for no more than 12 residential units, when taking into account the other material considerations would be sufficient to outweigh the local policy presumption against such development found in the

Unitary Development Plan, subject to conditions and a Section 106 Legal Agreement requiring contributions to mitigate the impacts of the development" (page 22).

The planning officer's report also noted, at page 12, that, "Categorising the site as brown field or previously developed land is a material consideration that does not, on its own, justify its suitability for residential development, however, the proposed amendments to the scheme concentrating development into the previously built up part of the site does have a bearing on the consequent policy position".

• If the list of other Minor Rural Settlements is considered, together with those which the Council decided were Anomaly Settlements or simply Hamlets/Rural Areas, Fferm Goch stands out as an odd allocation. It cannot be considered equal to any of the other Minor Rural Settlements, including nearby Graig Penllyn and Troes, which are both substantial villages. It is much more similar to The Herberts, which the Council considered to be an Anomaly Settlement in spite of it having a primary school like Fferm Goch, although The Herberts scores for having a bus service and being much nearer to Cowbridge, whereas Fferm Goch does not.

There are also villages which again are much more substantial than Fferm Goch which are not recognised as Minor Rural Settlements, including nearby Llangan and Welsh St Donats.

- The draft LDP at Section 5.19 (page 33) sets out the following 'common objectives' for the Minor Rural Settlements:
- "Favour proposals which seek to protect and enhance the viability, accessibility or community value of existing village facilities and transport services."
- "Provide for an appropriate level, range and choice of housing, including affordable rural housing to meet local need."
- "Encourage the diversification of the rural economy by favouring appropriate employment and tourism related developments."

The above objectives are supported by Policy MG7 which at section 7.34 (page 83) states, 'New development however must always be of an appropriate scale, form and design that is sympathetic to and respects the existing character of the village and the range of services and facilities that are available. This will generally comprise infilling or limited small scale extensions to the minor rural settlements, in particular where they meet the need for local affordable housing.' Considering these statements as a whole it is apparent that Fferm Goch does not fit the classification of Minor Rural Settlement.

If it were identified as a Minor Rural Settlement, Fferm Goch would be at risk of future residential development being allowed in this location through policy MG7 of the draft LDP. Fferm Goch is not a location where new development should routinely be permitted since it would infringe all the sustainability principles for development in rural locations. The only reason housing development has been permitted at the Garden Emporium site is because it is a brownfield site — this is an exceptional site in this location.

The allocation of 40 houses at the Garden Emporium site is inappropriate for the following reasons:

- A large part of the argument for allowing a huge increase in the number of houses proposed at the Garden Emporium site appears to be the classification of Fferm Goch as a minor rural settlement, which is incorrect for the reasons stated above.
- The number of houses to be allocated at the Garden Emporium should reflect the extant planning permission for 12 houses. The draft LDP, Section 7.11 (page 75) states that, 'The number of units proposed for each identified site [which includes

the Garden Emporium] is based on a density range between 25 and 30 units net per hectare or where they are available, planning application or pro-application details. Where site densities differ from these levels, this reflects local site

circumstances or sensitivities.' In this case there is an existing planning permission for 12 units which should therefore have been the starting point for this site and there are good reasons why a higher density of units should not be permitted and has been consistently refused by the Council on planning applications considered to date (unsustainable, lack of local infrastructure and employment, very poor public

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transport and preservation of a rare plant).

- Policy MG8 (page 84) states 'in Minor Rural Settlements, a net residential density of 25 net dwellings per hectare will be required.' It further states that 'lower density levels will be permitted where it can be demonstrated that:
- 1. Development at the prescribed densities would have an unacceptable impact on the character of the surrounding area;
- 2. Reduced densities are required... "to preserve a feature that would contribute to existing or future local amenity."

  In relation to point I the development of 40 houses would have an unacceptable impact on this area which with the exception of Fferm Goch consists of isolated and dispersed rural houses.

In relation to point 2, there is an identified rare plant on this site which would be preserved by the extant planning permission.

3f - Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)

The provision of 40 houses should not go forward. The site should be allocated 12 houses in line with the existing planning permission and the conditions contained in the planning permission should prevail.

4b - If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -

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|--|-------------------------------|---|----------------------|----------------------------------|--|-------------------------------|--|---|--|--|
| Date Lodged Status Petition 30/03/2012 M | and No. Supporting Evidence 0 | Additional SA SEA                             |                      | Rep format:<br>Comment for       | 4a - do you want your comments to be consiered by 'written representations' or do you want to speak at a hearing session of Public examination? Unanswered |                               |  |   |  |  |
| 2a - Do you consider the LDP is          |                               | Procedural Tests -                            | P1 - Yes<br>C1 - Yes |                                  | C3 - Yes   | c4 - CE3 - Yes                |  | that it fails.                                |  |  |
| 3a - Which part of the Deposit Pl        | ,                             | Policy Number:<br>MD12. MG9                   |                      | ragraph Number:<br>) - All       | Proposal Map: February 2012  | )                             | Constraints Map                                  | Appendices: Appendix 9 - Supporting Documents |  |  |
| 3b - Do you wish to see any char         | nges made to the Deposit Plan | as a result of your rep                       | oresentation? `      | Yes (                            | If "No" or "Unanswered   | " - go to 3d)                 |  |   |  |  |
| 3c - What changes would like to          | see made to the Deposit Plan? | New Policy:<br>Unanswered<br>Notes:           | Amended Poli<br>Yes  | cy: New Paragraph:<br>Unanswered | Amended Paragram Unanswered  | oh: <u>New Or Amer</u><br>Yes | nded Site: Other (see N<br>Unanswered            | <del></del>                                   |  |  |
| 3d - If your representation relate       |                               | d site, did you submit<br>Site Name: Land Eas |                      | ndidate Site? Yes                | (If "Yes", plea  | J                             | idate Site Name and ref<br>ference: MG9/ID22 App | ,   |  |  |
| 3e - Please set out vour represe         | entation below:               |   |                      |                                  |  |                               |  |   |  |  |

**Procedural Tests** 

Test P1

The Local Development Plan (LDP) has not been prepared in accordance with the Community Involvement Scheme for the following reasons:

- o The Emergency Services and the Local Primary School have both confirmed that they have not been consulted on the proposed site.
- o Registered consultees have not been informed of the consultation stages.
- o The Vale of Glamorgan Council has not consulted with its strategic partners in accordance with Welsh Government (WG) document "Travelling to a better future".
- o Good practice "WG Good Practice in Designing Gypsy and Traveller Sites" suggests that where Gypsy and Traveller sites are concerned, the local community should be engaged as early as possible. There has been minimal if any consultation.

#### Test P2

The sustainability appraisal is flawed and contradictory. The proposed site does not meet with national policy in respect of sustainability. The allocation of Llangan is not consistent with previous Planning Rejections by the Vale of Glamorgan (V0G) i.e. Bonvilston in September 2011 and similar determinations by the Planning Inspectorate i.e. Pembroke September 2011. The allocation of MG9 is not consistent with the proposed LDP policies.

Operation of MOS is not consistent with the proposed EDF po

Consistency Tests

#### Tact C

The land use plan (with regard to the Gypsy and Traveller site) does not relate to any strategy. The Housing Strategy is outdated and does not provide any structure for assessing Gypsy and Traveller needs or site location.

#### TEST C2

The Site allocation does not have regard to National Policy, for example:

o Welsh Government Circular (30/2007): The site is RURAL and is unsustainable as there are no local services (shops; transport; health etc). Both Llangan and Fferm Goch Score 0 points in the evidence based assessment "Sustainable Settlements Appraisal".

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The site would not comply with a Rural Exception Policy as it advocates that all pitches are accommodated on a Rural site including transient pitches which would not comply with TAN 2.

Business would be operated from the site in contradiction of Rural Exception guidance.

The site allocation does not take into account the scale of the resident community. Llangan has a population of less than 100 with 35 homes.

The proposal will therefore nearly double the size of the Hamlet. Recent application of the sustainability issue was applied by the Planning inspector in Pembroke where an appeal was refused solely on this basis.

The VoG has refused an application in Bonvilston on the basis of sustainability. As a comparison, the distance between the Llangan site and services is greater than those of the Bonvilston site and services.

Designing Gypsy and Traveller Sites Good Practice Guide:

- o The site measures 7400 m2 and could only accommodate 14 pitches without infrastructure. The guidance is 500m2 per pitch plus refuse area, office, play area and infrastructure. The site is too small and cannot therefore meet the needs identified in the LDP.
- o The site does not meet the minimum requirements for emergency vehicles which is a highway access width of 3.7m. The actual highway width of the site is 2.7m.
- o The site access is poor and unsafe and has an extended walk (in excess of 500m to the only bus stop) along an unlit road with no public footpath or street lighting.
- o The proposal of 21 units on the site would restrict the ability of emergency vehicles to manoeuvre around the site.
- o Reference is made to "new sites grants" that might be available. Cost should not be a material consideration for planning purposes.

The guidance requires that sites:

o are sustainable. The proposed site is not sustainable.

o are equivalent to standards that would be expected for social housing in the settled community. The proposed site does not meet the standards and would not have been considered appropriate for development for residential in either the current or proposed plans.

o have the effect of encouraging and developing good relations between Gypsy Travellers and the settled community. The scale of this proposal will result in tension with the local community due to additional pressure on local infrastructure.

o Travelling to a Better Future states or recommends that:

- local Authority's engage with their Housing Association Partners to bring sites forward. This has not been done by the VOG.
- 'Situating transit provision on residential sites is not an option preferred by the Gypsy and Traveller community as this can lead to tensions among different family groups and make site management and maintenance very difficult." In addition it states that such a situation would "create a sense of fear within the settled community". The current proposal is recommending that transient and permanent sites are colocated.
- o Planning Policy Wales:
- The land is greenfield land in accordance with the definition of brownfield land set out in Figure 4.1 of PPW.
- The proposed site will not reduce the need to travel due to the limited local service provision in close proximity to the site.
- The site has very limited access to public transport facilities.
- The site is not large enough to provide ancillary facilities required to support a sustainable development as set out in paragraph 3.30 in accordance with Designing Gypsy and Travellers Sites Good Practice Guide.
- The site is located within a Special Landscape Area and in close proximity to a Conservation Area.
- The site does not meet the identified needs of Gypsies and Travellers in the V0G (Fordham evidence);
- The site does not promote sustainable access to employment, shopping, education, health, community, leisure and sports facilities.
- The site does not maximise opportunities for community development and social welfare.
- The site location will not foster social inclusion due to its isolated nature.
- The location of the site will not contribute to improvements in health due to the isolation from services and facilities.

#### TEST C3

The proposal has no due regard to the Wales Spatial Plan. The key theme of the Wales Spatial Plan to achieve sustainable development by focusing new developments in areas which have good access to key

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services and facilities. As there are no services surrounding the site, the allocation of MG9 is not consistent with the objectives of the Wales Spatial Plan.

#### TEST C4

The proposal does not have regard to the relevant Community Strategy for the following reasons:

- o "The diverse needs of local people are met through the provision of customer focused, accessible services and information". This cannot be achieved by the allocation of a non-accessible rural allocation.
- o "Vale of Glamorgan residents and organisations respect the local environment and work together to meet the challenge of climate change". The allocation of MG9 places heavy emphasis on the use of the car to access the most basic facilities such as shops, health and education.
- o "Older people are valued and empowered to remain independent, healthy and active. They have equality of opportunity and receive high quality services to meet their diverse needs". All services are located many miles from the proposed site and are inaccessible to the older community. The poor public transport system is located 105Cm from the site and is in excess of the maximum distances as defined in the proposed LDP and "Manual for Streets".
- o "People of all ages are able to access coordinated learning opportunities and have the necessary skills to reach their full potential, helping to remove barriers to employment". There is no employment opportunity near to the site. The local primary school has confirmed that it is full and that its projections suggest that it doesn't have the capacity for such a large development. The school has a maximum capacity of 111 pupils each year and the number of pupils on the roll as at September 2011 was 108.
- o The local industrial unit has raised concerns in relation to the scale of the proposal.
- o The Guidance for Gypsy and Travellers recommends that sites are not larger than 14 units and do not consist of both permanent and transient units.

#### Coherence and Effectiveness Tests

#### Test CE1

The Plan does not set out a coherent strategy which its policies and allocation logically flow for the following reasons:

- o The strategy states that the LDP will seek to provide a policy framework which "Manages the housing supply effectively in order to provide a range of good quality, affordable homes in sustainable locations" and "reduces out commuting by providing opportunities for new housing, retail and employment development in accessible locations in the Vale of Glamorgan". The allocation of this rural site in open countryside does not meet this objective
- o The LDP states that the vision for the Vale of Glamorgan is a place that is 'safe, clean and attractive, where individuals and communities have sustainable opportunities to improve their health, learning and skills, prosperity and wellbeing" 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 sustainability of the area." The allocation of MG9 does not meet these objectives being in a rural location with inadequate facilities and transport links.

The Allocation of MG9 does not comply with the following objectives:

- o Objective 1. "To sustain and further the development of sustainable communities within the Vale of Glamorgan, providing opportunities for living, learning, working and socialising for all". The location of the site would clearly not meet this objective.
- o Objective 2. "To ensure that development within the Vale of Glamorgan makes a positive contribution towards reducing the impact of and mitigating the adverse effects of climate change". The site location is prohibitive.
- o Objective 3. "To reduce the need for Vale of Glamorgan residents to travel to meet their daily needs and enabling them greater access to sustainable forms of transport." The site location is prohibitive.
- o Objective 4. "To protect and enhance the VoG's historic, built, and natural environment". In a planning refusal on an adjacent site in May 2002, the VoG stated that 't is a proposal that would adversely affect the undeveloped rural character of the area."
- o Objective 5. "To maintain, enhance and promote community facilities and services in the V0G". The local primary school has not been consulted. The school does not have the capacity, nor is it projected to have the capacity for additional pupils.
- o Objective 7. "To provide the opportunity for people in the Vale of Glamorgan to meet their housing needs". Housing should be in sustainable locations. The site is not in a sustainable location. Furthermore, it brings into question POLICY MDI2 which is discriminatory in that Gypsy and Traveller sites should not be treated differently from other housing allocations. An inclusive policy would see Gypsy and Traveller sites being assessed on the same basis as affordable housing and considered for all candidate residential sites in the LDP.
- o Objective 10. "To ensure that development within the VoG uses land effectively and efficiently and to promote the sustainable use and management of natural resources". The proposed site is agricultural land in a Special Landscaped Area

#### TEST CE2

The strategy policies and allocations are not realistic and appropriate having considered relevant alternatives and are not founded on robust evidence for the following reasons:

- o The allocation of the site in Llangan is purely on the basis of site ownership by the VOG and does not meet the requirement of Policy MD1 2.
- o The Gypsy and Traveller site assessment conflicts with other evidence based background papers; specifically the Sustainable Settlement Appraisal (SSA). The SSA states 0 points for public transport but the Gypsy and Traveller site assessment states that this is good.
- o The Gypsy and Traveller site assessment states "good highway access", yet the access falls considerably short of the minimum requirement for vehicle access. The actual highway access is 2.5m against a minimum standard of 3.7m plus footpath of 1.2m.
- o The Gypsy and Traveller site assessment does not reflect the current legal obligations of the Council. All other site assessments highlight any legal issues. The site is referred to as an existing site and that it is tolerated. The site was subject to a Challenge at the High Court in London which found in favour of the local community to return the site back to agricultural use. The site is further subject to a legally binding

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undertaking by the VoG (signed by the Chief Executive) to use "best lawful endeavours" to remove the existing travellers and upon the site becoming vacant, to remove all illegally constructed buildings. Although the VoG has failed to comply with its duties as detailed in the legal undertaking to date, the legal obligation remains in place.

The description of the site in the draft LDP is therefore misleading and did not enable the Councillors to have a clear understanding of the legal issues in relation to this site prior to approving the draft plan for consultation.

- o Several private sites were put forward as candidate sites for Gypsy and Travellers but were dismissed as they were not in Council ownership. If such sites were rejected due to reasons of ownership, why was the public sector requested to put forward sites in the first place?
- o The site allocation does not reflect the identified need of the Gypsy and

Traveller community as highlighted in the Fordham report.

- o The Gypsy and Traveller site assessment suggests that Fferm Goch is the local settlement. However, Llangan is the recognised local settlement and it is only 150m from the proposed site.
- o The assessment makes no reference that the site is in a Special Landscape Area.
- o The assessment makes no reference that the site is adjacent to a Conservation Area. Within the Conservation Management Plan for this area there is a specific requirement to protect the view from the edge of the conservation area over the proposed site.
- o The allocation of Fferm Goch as a Minor Rural Settlement is questionable. The appraisal scored 9 points; 3 of which are for employment which puts this site on par with major settlements such as Barry. This scoring is on the basis of 4 light industrial buildings. A survey of these employers has confirmed that no new jobs have become available in the last 9 years and that the units employ less than 15 people with no intention to expand. Furthermore, one of the units has been empty and the development is not a popular industrial site.
- o Fferm Goch has a population of less than 100 (98) and has been classified as a Minor Rural site. This is incorrect. The guidance requires that all sites of a population below 100 should be classified as a Hamlet. Fferm Goch is a Hamlet and the presumption against development in such areas should therefore apply.
- o The V0G undertook a study (Fordham) in which one of the overriding messages was that the Gypsy and Traveller community want smaller sites located on the fringes of larger communities. The Fordham report confirmed that isolated and rural sites restrict access to Health, Education and welfare facilities and disadvantaged the Gypsy and Traveller community. The location of the proposed site does not meet any of these requirements.
- o An independent highway study surrounding the proposed site has concluded that:
- "The 1km long lane itself is of poor horizontal alignment, with poor forward visibility and unsuitable for regular vehicular traffic. If the site is developed the lane itself would need major upgrading, which would certainly change its appearance within this rural environment.

"The village school is approximately 1km from the village and 900 metres from the proposed site. It/s noted that the route does not offer any facilities for pedestrians, such that the only safe way for children to travel between the site and the school safely would be by vehicle. This route would also be potentially hazardous for cycle use for children, the elderly or infirm and could be potentially hazardous for all users other than by car"

"With regard to the appropriateness of the location for a travellers site development, in relation to transportation, it is difficult to refer to standard guidelines, as few relate to "rural highways", most highway design standards for residential development relate to urban areas. Hence, the advice contained within this report is based on best available information, acceptable highway standards for developments of similar size and transport needs of small communities. Welsh Government guidelines state sites should be situated in close proximity to transport links. The Llangan site would not appear to meet that criteria, being situated away from the main transport infrastructure, sites should also have ready access to schools, doctors and shops, against which requirements Llangan again appears to fail."

"With regards to the existing lane, it is generally considered that where there is direct access to dwellings, the previous standard for developments, Design Bulletin 32, offers guidance where it states that a desirable minimum carriageway width of 5. 5metres is appropriate, together with 2.0 metre wide footways on both sides. This will allow two way traffic at all times, and safe movement of pedestrians. However, as there is no direct access off the lane (apart from into the proposed development)"

"Thus the lane itself should be widened to this minimum standard, which will require the removal of the existing hedge line on one or both sides of the lane and probable acquisition of land from the adjoining fields. This will of course change the environmental character of the area substantially, but is considered essential to cater for increased vehicle and pedestrian traffic"

In summary, there is complete inconsistency with the allocation of MG9 against the proposed policies.

#### TEST CE3

The VoG make no reference as to how they are going to manage such a large site.

The 21 unit site in Rover Way Cardiff has 3 full time staff.

The current Housing Strategy expires in April 2012 and makes no relevant reference as to how the Travelling Community will be monitored in terms of growth or need.

There is no strategy that underpins the Gypsy and Traveller community or housing at all.

(ordered by Representation ID No.)

Representor ID and details: 4007/DP2 Mr Dylan Davies

TEST CE4

Policy MD12 (Gypsy and Travellers) is discriminatory. It offers no flexibility for the VoG to bring forward sites that are sustainable or suitable for Gypsy and Travellers through the policies derived within the plan.

MD12 should be redrafted to enable smaller, sustainable sites to be included within the Affordable Housing requirements and delivered through the RSL sector.

3f - Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)

The site MG9 should be removed from the plan and an alternative site that has been assessed according to a relative sustainability appraisal is put in its place.

4b - If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -

(ordered by Representation ID No.)

| Representor ID and details: 400        | 08/DP1 Derek Bladen       |   |                       |                                     |                                   |   |                               |               |
|--|---------------------------|---|-----------------------|-------------------------------------|-----------------------------------|---|-------------------------------|---------------|
| Date Lodged Status Petition and M □ 0  | No. Supporting Evidence   | Additional SA SEA                               |                       | Rep format:<br>Comment form         | ,                                 | r comments to be cons<br>a hearing session of P | , ,                           |               |
| 2a - Do you consider the LDP is Sou    |                           | 2b - If you think that th<br>Procedural Tests - |                       | does not not meet o<br>P2 - Unanswe | one or more test(s) of so<br>ered | oundness, please indica                         | ate which test(s) tha         | at it fails.  |
|  |                           | Consistency Tests -                             | C1 - Unanswered       | C2 - Unanswe                        | ered C3 - Unanswe                 | ered C4 - Yes                                   |                               |               |
|  |                           | Coherence and Effecti                           | iveness Tests - CE1 - | Unanswered C                        | E2 - Unanswered C                 | CE3 - Unanswered                                | CE4 - Unanswered              |               |
| 3a - Which part of the Deposit Plan a  | are you commenting on?    | Policy Number:                                  | Paragraph             | Number: P                           | roposal Map:                      | Const   | traints Map                   | Appendices:   |
|  |                           |   |                       | •                                   | MG2(29)                           |   |                               |               |
| 3b - Do you wish to see any changes    | made to the Deposit Plan  | as a result of your repr                        | resentation? Yes      | (If "I                              | No" or "Unanswered" -             | go to 3d)                                       |                               |               |
| 3c - What changes would like to see    | made to the Deposit Plan? | New Policy:<br>Unanswered                       |                       | New Paragraph:<br>Unanswered        | Amended Paragraph:<br>Unanswered  | New Or Amended Site                             | e: Other (see Note Unanswered | <u>es):</u>   |
|  |                           | Notes:  |                       |                                     |                                   |   |                               |               |
| 3d - If your representation relates to | ·                         | d site, did you submit t<br>Site Name: ITV Wale |                       | Site? Yes                           | (If "Yes", please                 | give the Candidate Site Site Reference:         |                               | nce if known) |

3e - Please set out your representation below:

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My first concern about the proposed LDP is the poor process of consultation with local communities. In this area the consultation process was poorly advertised and only the absolute minimum period given to allow community involvement. We have not been given the incentive to make an effective contribution to the process. I understand that some VOG councillors also found the process did not give them opportunities to add or change proposals. Only by organising our own local meeting have we been able, as a small community, to express our individual concerns with regard to the proposed ITV development.

Wenvoe has been identified as a primary settlement that has community facilities. These consist of one shop, three pubs, a church and two community halls. Twyn-yr -Odyn is an even smaller rural hamlet. These facilities are surely inadequate to serve an additional 220 households in the first instance (proposed development of the HTV site) and a further 150 houses if the proposed development in Wenvoe goes ahead. The size of the community will grow as to change Wenvoe entirely and make it, in effect, a commuter village lacking community adherence.

In addition, the problems that I see with regard to the ITV development are:

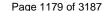
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(ordered by Representation ID No.)

Representor ID and details: 4008/DP1 Derek Bladen

• Ensure closer consultation with the small communities on which this site development will impact before the development proposals are prepared and submitted, as well as after any submission;

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(ordered by Representation ID No.)

| Representor     | ID and d    | letails:   | 4009/DI         | P1 Anna Ellis          |   |                         |             |                              |             |  |                      |                            |                            |                                    |
|-----------------|-------------|------------|-----------------|------------------------|---|-------------------------|-------------|------------------------------|-------------|--|----------------------|----------------------------|----------------------------|------------------------------------|
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| 2a - Do you co  | onsider th  | ne LDP     | is Sound?       |                        | 2b - If you think that the Procedural Tests - |                         | ound and d  | loes not not me<br>P2 - Unar |             | ` '                                    | soundness, ple       | ease indicat               | e which test(s)            | that it fails.                     |
|                 |             |            |                 |                        | Consistency Tests -                           | C1 - Unan               | swered      | C2 - Unar                    | nswered     | d C3 - Unans                           | swered C4            | - Yes                      |                            |                                    |
|                 |             |            |                 |                        | Coherence and Effect                          | tiveness Tests          | - CE1 - l   | Unanswered                   | CE2         | - Unanswered                           | CE3 - Unansv         | wered C                    | E4 - Unanswe               | red                                |
| 3a - Which pa   | rt of the   | Deposit    | Plan are yo     | ou commenting on?      | Policy Number:                                | <u> </u>                | Paragraph N | Number:                      | Prop        | osal Map:                              |                      | Constr                     | aints Map                  | Appendices:                        |
|                 |             |            |                 |                        |   |                         |             |                              |             | . MG2(29)                              |                      |                            |                            |                                    |
| 3b - Do you w   | ish to se   | e any cł   | nanges mad      | de to the Deposit Plan | as a result of your rep                       | oresentation?           | Yes         |                              | (If "No"    | or "Unanswered                         | " - go to 3d)        |                            |                            |                                    |
| 3c - What cha   | inges wo    | uld like   | to see mad      | e to the Deposit Plan? | New Policy:<br>Unanswered                     | Amended P<br>Unanswered |             | lew Paragraph<br>Jnanswered  |             | mended Paragrap<br>nanswered           | oh: New Or An<br>Yes | nended Site                | Other (see N<br>Unanswered | <del>/-</del>                      |
|                 |             |            |                 |                        | Notes:  |                         |             |                              |             | <b>S</b>                               |                      |                            |                            |                                    |
| 3d - If your re | epresenta   | ation rela | ates to a ne    | ew, deleted or amende  | d site, did you submit<br>Site Name: ITV Wale |                         |             | ite? Yes                     | <b>&gt;</b> | (If "Yes", plea                        | ū                    | ndidate Site<br>Reference: |                            | erence if known)                   |
|                 |             |            |                 |                        |   |                         |             |                              | 7           |  |                      |                            |                            |                                    |

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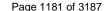
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(ordered by Representation ID No.)

Representor ID and details: 4009/DP1 Anna Ellis

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(ordered by Representation ID No.)

| Representor     | ID and d    | etails:    | 4010/DI         | P1 Nigel Gee            |   |                  |                     |                                |             |  |                       |                          |                            |                                   |
|-----------------|-------------|------------|-----------------|-------------------------|---|------------------|---------------------|--------------------------------|-------------|--|-----------------------|--------------------------|----------------------------|-----------------------------------|
| Date Lodged     | Status<br>M | Petitio    | on and No.<br>0 | Supporting Evidence     | Additional SA SEA                               |                  |                     | Rep format:<br>Comment for     |             | a - do you want yo<br>ou want to speak a |                       |                          | •                          | representations' or do n? Written |
| 2a - Do you co  | onsider th  | ne LDP     | is Sound?       |                         | 2b - If you think that the Procedural Tests -   |                  |                     | d does not not me<br>P2 - Unan |             | ` ,                                      | soundness, pleas      | se indicate              | which test(s)              | that it fails.                    |
|                 |             |            |                 |                         | Consistency Tests -                             | C1 - U           | Inanswered          | C2 - Unan                      | nswered     | C3 - Unansv                              | vered C4 -            | Yes                      |                            |                                   |
|                 |             |            |                 |                         | Coherence and Effect                            | iveness T        | ests - CE1          | - Unanswered                   | CE2 -       | Unanswered                               | CE3 - Unanswe         | red Cl                   | E4 - Unanswer              | red                               |
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|                 |             |            |                 |                         |   |                  |                     |                                |             | . MG2(29)                                |                       |                          |                            |                                   |
| 3b - Do you w   | ish to see  | e any ch   | nanges mad      | de to the Deposit Plan  | as a result of your rep                         | resentatio       | n? Yes              | (                              | (If "No"    | or "Unanswered"                          | - go to 3d)           |                          |                            |                                   |
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|                 |             |            |                 |                         | Notes:  |                  |                     |                                |             | <b>S</b>                                 |                       |                          |                            |                                   |
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|                 |             |            |                 |                         |   |                  |                     |                                | <del></del> |  |                       |                          |                            |                                   |

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Representor ID and details: 4010/DP1 Nigel Gee

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(ordered by Representation ID No.)

| Representor     | ID and c    | letails:   | 4011/DI         | P1 L C Jenkins          |   |                          |             |   |                     |               |                               |            |                             |                 |
|-----------------|-------------|------------|-----------------|-------------------------|---|--------------------------|-------------|---|---------------------|---------------|-------------------------------|------------|-----------------------------|-----------------|
| Date Lodged     | Status<br>M | Petitio    | on and No.<br>0 | Supporting Evidence     | nce Additional SA SEA                         |                          |             | Rep format: 4a - do you want your comments to be consiered by 'written representation you want to speak at a hearing session of Public examination? Written |                     |               |                               |            |                             | •               |
| 2a - Do you co  | onsider t   | he LDP     | is Sound?       |                         | 2b - If you think that the Procedural Tests - |                          | ound and do | es not not mee<br>P2 - Unans  |                     | test(s) of so | undness, please               | indicate v | vhich test(s) t             | that it fails.  |
|                 |             |            |                 |                         | Consistency Tests -                           | C1 - Unans               | swered      | C2 - Unans  | swered C3           | - Unanswe     | red C4 - Y                    | es         |                             |                 |
|                 |             |            |                 |                         | Coherence and Effect                          | tiveness Tests           | - CE1 - U   | nanswered   | CE2 - Unansv        | vered C       | E3 - Unanswere                | d CE       | 4 - Unanswer                | ed              |
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|                 |             |            |                 |                         |   |                          |             |   | MG2(2               | 9)            |                               |            |                             |                 |
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|                 |             |            |                 |                         | Notes:  |                          |             |   |                     |               |                               |            |                             |                 |
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|                 |             |            |                 |                         |   |                          |             |   | 7                   |               |                               |            |                             |                 |

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- Safety and sustainability St Lythans Road on which the rural hamlets of Twyn-yr-Odyn, St Lythans and Duffryn are situated is a rural lane and not designed to take any volume of traffic. This is already increasingly becoming a 'rat-run', being used by commuters attempting to avoid the congestion down the A48. With a large housing development and further congestion at Culverhouse Cross roundabout and the redevelopment of Five Mile Lane, this can only increase:
- Pollution The proposed development would inevitable create more noise, air and light pollution in what is essentially a rural area, as indicated by the proposed 'green wedge' in the Twyn-yr-Odyn area;
- Loss of employment opportunities the removal of the HTV studio complex will result in the loss of current employment opportunities and the inability to create future jobs in this area.

(ordered by Representation ID No.)

Representor ID and details: 4011/DP1 L C Jenkins

- Ensure closer consultation with the small communities on which this site development will impact before the development proposals are prepared and submitted, as well as after any submission;
- Take special care with access and egress from the site so that impacts are kept to a minimum;
- Ensure that St Lythan's Road is suitably 'pinch-pointed' or given road-humps to make the road less attractive to speeding commuter traffic;
- Ensure that light, noise and air pollution are considered in the development plans and minimised;
- Ensure that sufficient community facilities and play-areas are available on the development and that enough health and education facilities are available to residents and their families the current proposals seem to want to achieve a maximum density of housing which is unlikely to create a sustainable and healthy community.
- 3f Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
- 4b If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -

(ordered by Representation ID No.)

| Representor     | ID and d    | etails:    | 4012/DI         | P1 Robert Greensmit    | h   |                           |            |                              |                               |   |                          |                          |                                   |
|-----------------|-------------|------------|-----------------|------------------------|---|---------------------------|------------|------------------------------|-------------------------------|---|--------------------------|--------------------------|-----------------------------------|
| Date Lodged     | Status<br>M | Petitio    | on and No.<br>0 | Supporting Evidence    | Additional SA SEA                             |                           |            | Rep format:<br>Comment form  | ·                             | your comments to<br>ak at a hearing ses |                          |                          | representations' or do n? Written |
| 2a - Do you co  | onsider th  | ne LDP i   | s Sound?        |                        | 2b - If you think that the Procedural Tests - |                           | und and do | es not not mee<br>P2 - Unans |                               | of soundness, plea                      | ase indicate             | which test(s) tl         | hat it fails.                     |
|                 |             |            |                 |                        | Consistency Tests -                           | C1 - Unansv               | wered      | C2 - Unans                   | swered C3 - Unai              | nswered C4 -                            | Yes                      |                          |                                   |
|                 |             |            |                 |                        | Coherence and Effect                          | tiveness Tests -          | CE1 - U    | nanswered                    | CE2 - Unanswered              | CE3 - Unansw                            | ered CE                  | E4 - Unanswere           | ed                                |
| 3a - Which pa   | rt of the I | Deposit    | Plan are yo     | ou commenting on?      | Policy Number:                                | <u>Pa</u>                 | aragraph N | umber:                       | Proposal Map:                 |   | Constrai                 | ints Map                 | Appendices:                       |
|                 |             |            |                 |                        |   |                           |            |                              | MG2(29)                       |   |                          |                          |                                   |
| 3b - Do you w   | ish to see  | e any ch   | anges mad       | de to the Deposit Plan | as a result of your rep                       | resentation?              | Yes        | (11                          | f "No" or "Unanswere          | ed" - go to 3d)                         |                          |                          |                                   |
| 3c - What cha   | nges wo     | uld like t | o see mad       | e to the Deposit Plan? | New Policy:<br>Unanswered                     | Amended Pol<br>Unanswered |            | ew Paragraph:<br>nanswered   | Amended Paragra<br>Unanswered | aph: New Or Ame<br>Yes                  | ended Site:              | Other (see No Unanswered | otes):                            |
|                 |             |            |                 |                        | Notes:  |                           |            |                              |                               |   |                          |                          |                                   |
| 3d - If your re | presenta    | tion rela  | ites to a ne    | w, deleted or amende   | d site, did you submit<br>Site Name: ITV Wale |                           |            | e? Yes                       | (If "Yes", ple                | ease give the Can<br>Site Re            | didate Site Neference: M |                          | rence if known)                   |
|                 |             |            |                 |                        |   |                           |            |                              |                               |   |                          |                          |                                   |

3e - Please set out your representation below:

Re: Local Development Plan - ITV, Culverhouse Cross Development - MG2/29

As a member of a small rural community, I am writing to comment on the planning proposals for the above proposed site that will have a profound effect on my life.

The Vale of Glamorgan Community Strategy promises that the Vale will be a place "that is safe, clean and attractive, where individuals and communities have sustainable opportunities to improve their health, learning and skills, prosperity and wellbeing, 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 sustainability of the area."

My first concern about the proposed LDP is the poor process of consultation with local communities. In this area the consultation process was poorly advertised and only the absolute minimum period given to allow community involvement. We have not been given the incentive to make an effective contribution to the process. I understand that some VOG councillors also found the process did not give them opportunities to add or change proposals. Only by organising our own local meeting have we been able, as a small community, to express our individual concerns with regard to the proposed ITV development.

Wenvoe has been identified as a primary settlement that has community facilities. These consist of one shop, three pubs, a church and two community halls. Twyn-yr -Odyn is an even smaller rural hamlet. These facilities are surely inadequate to serve an additional 220 households in the first instance (proposed development of the HTV site) and a further 150 houses if the proposed development in Wenvoe goes ahead. The size of the community will grow as to change Wenvoe entirely and make it, in effect, a commuter village lacking community adherence.

In addition, the problems that I see with regard to the ITV development are:

- Traffic congestion There is already traffic congestion at Culverhouse Cross roundabout, on the A48 from St Nicholas and along Port Road both to and from Barry particularly at peak times. An additional 220 houses on the HTV site would add considerably to the congestion not only at peak times. The Local Development Plan talks of sustainable transport solutions, but realistically each proposed new house would have at least one vehicle, if not more realistically two vehicles:
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(ordered by Representation ID No.)

Representor ID and details: 4012/DP1 Robert Greensmith

- Ensure closer consultation with the small communities on which this site development will impact before the development proposals are prepared and submitted, as well as after any submission;
- Take special care with access and egress from the site so that impacts are kept to a minimum;
- Ensure that St Lythan's Road is suitably 'pinch-pointed' or given road-humps to make the road less attractive to speeding commuter traffic;
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- 4b If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -

(ordered by Representation ID No.)

| Representor ID and details: 4013/DP1 Mrs Nicola Matthi   | as  |                          |                                     |                                  |   |  |
|--|---|--------------------------|-------------------------------------|----------------------------------|---|--|
| Date Lodged     Status     Petition and No.     Supporting Evidence       29/03/2012     M     0 | Additional SA SEA                               |                          | Rep format:<br>Letter               | ,                                | r comments to be consider a hearing session of Pu | ered by 'written representations' or do ublic examination? |
| 2a - Do you consider the LDP is Sound? Unanswered  | 2b - If you think that th<br>Procedural Tests - |                          | does not not meet o<br>P2 - Unanswe | ` '                              | undness, please indicato                          | e which test(s) that it fails.                             |
|  | Consistency Tests -                             | C1 - Unanswered          | C2 - Unanswe                        | ered C3 - Unanswe                | red C4 - Unanswe                                  | ered   |
|  | Coherence and Effecti                           | veness Tests - CE1 -     | Unanswered C                        | E2 - Unanswered C                | E3 - Unanswered C                                 | CE4 - Unanswered   |
| 3a - Which part of the Deposit Plan are you commenting on?                                       | Policy Number:                                  | Paragraph                | Number: Pi                          | roposal Map:                     | Constr  | raints Map Appendices:                                     |
|  |   |                          |                                     |                                  |   |  |
| 3b - Do you wish to see any changes made to the Deposit Plar                                     | as a result of your repr                        | resentation? Unansw      | ered (If "N                         | No" or "Unanswered" - g          | go to 3d)   |  |
| 3c - What changes would like to see made to the Deposit Plan                                     | ? New Policy:<br>Unanswered                     |                          | New Paragraph:<br>Unanswered        | Amended Paragraph:<br>Unanswered | New Or Amended Site:<br>Unanswered                | Other (see Notes): Unanswered                              |
|  | Notes:  |                          |                                     |                                  |   |  |
| 3d - If your representation relates to a new, deleted or amende                                  | ed site, did you submit tl<br>Site Name:        | he site as a Candidate s | Site? Unanswered                    | (If "Yes", please                | give the Candidate Site<br>Site Reference:        | Name and reference if known)                               |

3e - Please set out your representation below:

Re: Candidate Number 2407/CSI

I am writing to state my support for the current Local Development Plan and in particular the decision to exclude Brynhill from the LDP.

I have lived in Barry for thirty two years and during that time have seen the loss of many green field sites and the destruction of habitat for wildlife and leisure areas for the local population. It is essential to future generations of Barry and the Vale of Glamorgan that the green field belt is preserved and that building is restricted to the area defined in the local Development Plan. My grounds for supporting the LDP and for excluding Brynhill from the LDP are as follows:

A development on Brynhill would have a negative impact on the designated special landscape area. Brynhill is a greenfield site which is unspoilt and provides for wonderful views over the Vale of Glamorgan which have been enjoyed by my family and I since we have lived on Highlight Park. It provides a special landscape that is unspoilt and extends across the Vale. It needs to be preserved for future generations.

There would be destruction of open space currently used for leisure purposes. The golf course as it currently stands is suitable for 18 holes because of its size. If the course was reduced in size I have been informed that it would need to be redesigned which would not make it fit for purpose. A smaller size would make it a poorer course that is not likely to be attractive to golfers who would likely move to other courses making the area further susceptible for non leisure use.

There would be an inferior road infrastructure. Port Road is a main access road to Barry, the Airport and the Vale of Glamorgan. The road at peak times is already over capacity and prone to congestion and at times grid lock. Brynhill is near to the Colcot Road junction which becomes particularly congested during times of peak traffic flow. An additional residential development with the probability of two and three car households would add to congestion and create additional road safety problems. Lakin Drive is another road which could be affected. It was designed for a relatively small estate and is not suitable for use as an additional route into either an estate or golf course. The pavement does not run either side of the road for the perimeter of the golf course which would add to pedestrian danger if there was increased traffic.

There are safety concerns. A new housing development at Brynhill would add many vehicles to the already congested road network. The proximity of Brynhill to Barry Hospital and to three schools, Barry Boys, Bryn Hafren and Colcot would increase traffic volumes and risk of accidents particularly during rush hour times. This is a particular worry as access from Brynhill is via Port Road which is used by motor vehicles and cyclists accessing the schools and hospital.

There would be a negative impact on ecological/environmental issues. Brynhill is a green field site with wonderful flora and fauna. Having lived adjacent to the golf course for over 20 years I have seen many wild animals including foxes, rabbits and hedgehogs using the area. There are many varieties of birds and the whole landscape provides an abundance of wildlife which gives great pleasure to locals. The destruction of this habitat would be a tragedy both for the wildlife and for local people who currently can see this habitat in all its glory.

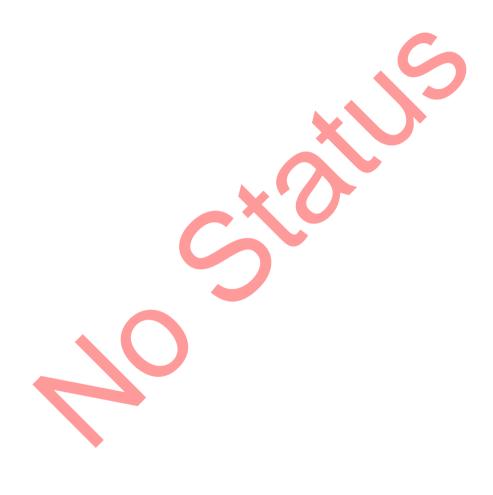
In summary it is essential that the LDP is not altered. Any building developments must be confined to the LDP area and there must be no extension for reasons I have set out in this letter.

(ordered by Representation ID No.)

Representor ID and details: 4013/DP1 Mrs Nicola Matthias

3f - Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)

4b - If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -



(ordered by Representation ID No.)

| Representor ID and details: 4014/DP1 Mrs Janet Thom                  | oson                                    |                          |                                      |                                 |   |                                  |                 |
|--|---|--------------------------|--------------------------------------|---------------------------------|---|----------------------------------|-----------------|
| Date Lodged Status Petition and No. Supporting Evidence 29/03/2012 M | a Additional SA SEA                     |                          | Rep format:<br>Letter                | , ,                             | ur comments to be consie<br>at a hearing session of Pub |                                  | ntations' or do |
| 2a - Do you consider the LDP is Sound? Unanswered                    | •                                       |                          | does not not meet or<br>P2 - Unanswe | ` '                             | soundness, please indicate                              | which test(s) that it fa         | ils.            |
|  | Consistency Tests -                     | C1 - Unanswered          | C2 - Unanswe                         | ered C3 - Unansw                | vered C4 - Unanswei                                     | ed                               |                 |
|  | Coherence and Effecti                   | iveness Tests - CE1 -    | Unanswered Cl                        | E2 - Unanswered                 | CE3 - Unanswered C                                      | E4 - Unanswered                  |                 |
| 3a - Which part of the Deposit Plan are you commenting on?           | Policy Number:                          | <u>Paragraph</u>         |                                      | roposal Map:                    | Constra   | nints Map Appe                   | ndices:         |
| 3b - Do you wish to see any changes made to the Deposit Pla          | n as a result of your rep               |                          |                                      | No" or "Unanswered"             | - go to 3d)   |                                  |                 |
| 3c - What changes would like to see made to the Deposit Plan         | ? New Policy:<br>Unanswered             |                          | New Paragraph:<br>Unanswered         | Amended Paragraph<br>Unanswered | n: New Or Amended Site: Unanswered                      | Other (see Notes):<br>Unanswered |                 |
|  | Notes:                                  |                          |                                      |                                 |   |                                  |                 |
| 3d - If your representation relates to a new, deleted or amend       | ed site, did you submit t<br>Site Name: | he site as a Candidate S | Site? Unanswered                     | (If "Yes", pleas                | e give the Candidate Site<br>Site Reference:            | Name and reference if            | known)          |

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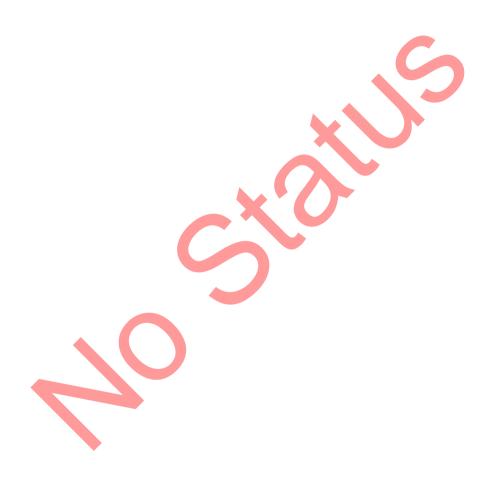
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(ordered by Representation ID No.)

Representor ID and details: 4014/DP1 Mrs Janet Thompson

3f - Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)

4b - If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -



(ordered by Representation ID No.)

| Representor ID and details:        | 4015/DP1 Leah Ellis           |   |                       |                              |                                 |   |                                |                 |  |  |
|------------------------------------|-------------------------------|---|-----------------------|------------------------------|---------------------------------|---|--------------------------------|-----------------|--|--|
| Date Lodged Status Petition  M     | and No. Supporting Evidence 0 | Additional SA SEA                               |                       | Rep format:<br>Comment form  |                                 |   |                                |                 |  |  |
| 2a - Do you consider the LDP is    |                               | 2b - If you think that th<br>Procedural Tests - |                       | does not not meet o          | ( )                             | oundness, please indica                     | ate which test(s) the          | hat it fails.   |  |  |
|                                    |                               | Consistency Tests -                             | C1 - Unanswered       | C2 - Unansw                  | ered C3 - Unansw                | ered C4 - Yes                               |                                |                 |  |  |
|                                    |                               | Coherence and Effecti                           | iveness Tests - CE1 - | Unanswered C                 | CE2 - Unanswered                | CE3 - Unanswered                            | CE4 - Unanswere                | ed              |  |  |
| 3a - Which part of the Deposit P   | lan are you commenting on?    | Policy Number:                                  | <u>Paragraph</u>      | Number: P                    | Proposal Map:                   | Cons  | traints Map                    | Appendices:     |  |  |
|                                    |                               |   |                       |                              | MG2(2 <mark>9)</mark>           |   |                                |                 |  |  |
| 3b - Do you wish to see any cha    | nges made to the Deposit Plan | as a result of your rep                         | resentation? Yes      | (If "                        | No" or "Unanswered" -           | go to 3d)                                   |                                |                 |  |  |
| 3c - What changes would like to    | see made to the Deposit Plan? | New Policy:<br>Unanswered                       |                       | New Paragraph:<br>Unanswered | Amended Paragraph<br>Unanswered | New Or Amended Sit                          | e: Other (see No<br>Unanswered | otes):          |  |  |
|                                    |                               | Notes:  |                       |                              |                                 |   |                                |                 |  |  |
| 3d - If your representation relate | ,                             | d site, did you submit t<br>Site Name: ITV Wale |                       | Site? Yes                    | (If "Yes", please               | e give the Candidate Sit<br>Site Reference: |                                | rence if known) |  |  |
|                                    |                               |   |                       |                              |                                 |   |                                |                 |  |  |

3e - Please set out your representation below:

Re: Local Development Plan - ITV, Culverhouse Cross Development - MG2/29

As a member of a small rural community, I am writing to comment on the planning proposals for the above proposed site that will have a profound effect on my life and the lives of my children.

The Vale of Glamorgan Community Strategy promises that the Vale will be a place "that is safe, clean and attractive, where individuals and communities have sustainable opportunities to improve their health, learning and skills, prosperity and wellbeing, 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 sustainability of the area."

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In addition, the problems that I see with regard to the ITV development are:

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(ordered by Representation ID No.)

Representor ID and details: 4015/DP1 Leah Ellis

- Ensure closer consultation with the small communities on which this site development will impact before the development proposals are prepared and submitted, as well as after any submission;
- Take special care with access and egress from the site so that impacts are kept to a minimum;
- Ensure that St Lythan's Road is suitably 'pinch-pointed' or given road-humps to make the road less attractive to speeding commuter traffic;
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(ordered by Representation ID No.)

| Representor I   | ID and d    | etails:    | 4016/D          | P1 Margaret Jones       |   |                              |                                     |                            |                                |                                |                 |
|-----------------|-------------|------------|-----------------|-------------------------|---|------------------------------|-------------------------------------|----------------------------|--------------------------------|--------------------------------|-----------------|
| Date Lodged     | Status<br>M | Petitio    | on and No.<br>0 | Supporting Evidence     | Additional SA SEA                               |                              | Rep format:<br>Comment for          | <b>1</b>                   | your comments to be co         | ,                              | •               |
| 2a - Do you co  | onsider th  | ne LDP     | s Sound?        |                         | Procedural Tests -                              | P1 - Yes                     | P2 - Unan                           | ` '                        | of soundness, please ind       | icate which test(s) the        | hat it fails.   |
|                 |             |            |                 |                         | Coherence and Effect                            | iveness Tests -              | CE1 - Unanswered                    | CE2 - Unanswered           | CE3 - Unanswered               | CE4 - Unanswere                | ed              |
| 3a - Which pa   | rt of the   | Deposit    | Plan are y      | ou commenting on?       | Policy Number:                                  | <u>Para</u>                  | graph Number:                       | Proposal Map:              | Co                             | nstraints Map                  | Appendices:     |
|                 |             |            |                 |                         |   |                              |                                     | MG2(29)                    | •••                            |                                |                 |
| 3b - Do you wi  | ish to se   | e any ch   | anges ma        | de to the Deposit Plan  | as a result of your rep                         | resentation? Ye              | es (                                | (If "No" or "Unanswered    | d" - go to 3d)                 |                                |                 |
| 3c - What cha   | nges wo     | uld like   | o see mad       | le to the Deposit Plan? | New Policy:<br>Unanswered                       | Amended Policy<br>Unanswered | <u>/: New Paragraph:</u> Unanswered | Amended Paragra Unanswered | <u>New Or Amended :</u><br>Yes | Site: Other (see No Unanswered | otes):          |
|                 |             |            |                 |                         | Notes:  |                              |                                     |                            |                                |                                |                 |
| 3d - If your re | presenta    | ition rela | ates to a ne    | •                       | d site, did you submit t<br>Site Name: ITV Wale |                              |                                     | (If "Yes", ple             | ease give the Candidate        |                                | rence if known) |
| 0 51            |             |            |                 |                         |   |                              |                                     | <del></del>                |                                |                                |                 |

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Representation ID No.)

Representor ID and details: 4016/DP1 Margaret Jones

- Ensure closer consultation with the small communities on which this site development will impact before the development proposals are prepared and submitted, as well as after any submission;
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- 3f Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
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(ordered by Representation ID No.)

| Representor     | ID and d    | letails:   | 4017/DI         | P1 Annette Gee         |   |                         |             |                              |          |                                       |                     |                             |                            |                                    |
|-----------------|-------------|------------|-----------------|------------------------|---|-------------------------|-------------|------------------------------|----------|---------------------------------------|---------------------|-----------------------------|----------------------------|------------------------------------|
| Date Lodged     | Status<br>M | Petitio    | on and No.<br>0 | Supporting Evidence    | Additional SA SEA                             |                         |             | Rep format:<br>Comment for   |          | a - do you want y<br>ou want to speak |                     |                             | •                          | representations' or do on? Written |
| 2a - Do you co  | onsider th  | ne LDP     | is Sound?       |                        | 2b - If you think that the Procedural Tests - |                         | ound and d  | loes not not me<br>P2 - Unar |          | ` '                                   | soundness, ple      | ase indicate                | e which test(s)            | that it fails.                     |
|                 |             |            |                 |                        | Consistency Tests -                           | C1 - Unan               | swered      | C2 - Unar                    | swered   | C3 - Unans                            | wered C4            | - Yes                       |                            |                                    |
|                 |             |            |                 |                        | Coherence and Effect                          | tiveness Tests          | - CE1 - l   | Unanswered                   | CE2 -    | Unanswered                            | CE3 - Unansv        | vered C                     | E4 - Unanswe               | red                                |
| 3a - Which pa   | rt of the   | Deposit    | Plan are yo     | ou commenting on?      | Policy Number:                                | <u> </u>                | Paragraph N | Number:                      | Propo    | sal Map:                              |                     | Constr                      | aints Map                  | Appendices:                        |
|                 |             |            |                 |                        |   |                         |             |                              |          | MG2(29)                               |                     |                             |                            |                                    |
| 3b - Do you w   | ish to se   | e any ch   | nanges mad      | de to the Deposit Plan | as a result of your rep                       | oresentation?           | Yes         |                              | (If "No" | or "Unanswered                        | " - go to 3d)       |                             |                            |                                    |
| 3c - What cha   | inges wo    | uld like   | to see mad      | e to the Deposit Plan? | New Policy:<br>Unanswered                     | Amended P<br>Unanswered |             | lew Paragraph:<br>Jnanswered | ·        | nended Paragrap<br>nanswered          | h: New Or Am<br>Yes | ended Site:                 | Other (see N<br>Unanswered | <del>/-</del>                      |
|                 |             |            |                 |                        | Notes:  |                         |             |                              |          | <b>S</b>                              |                     |                             |                            |                                    |
| 3d - If your re | epresenta   | ation rela | ates to a ne    | ew, deleted or amende  | d site, did you submit<br>Site Name: ITV Wale |                         |             | tite? Yes                    | <b>)</b> | (If "Yes", plea                       | · ·                 | ndidate Site<br>eference: I |                            | erence if known)                   |
|                 |             |            |                 |                        |   |                         |             |                              |          |                                       |                     |                             |                            |                                    |

3e - Please set out your representation below:

Re: Local Development Plan - ITV, Culverhouse Cross Development - MG2/29

As a member of a small rural community, I am writing to comment on the planning proposals for the above proposed site that will have a profound effect on my life and the lives of my children.

The Vale of Glamorgan Community Strategy promises that the Vale will be a place "that is safe, clean and attractive, where individuals and communities have sustainable opportunities to improve their health, learning and skills, prosperity and wellbeing, 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 sustainability of the area."

My first concern about the proposed LDP is the poor process of consultation with local communities. In this area the consultation process was poorly advertised and only the absolute minimum period given to allow community involvement. We have not been given the incentive to make an effective contribution to the process. I understand that some VOG councillors also found the process did not give them opportunities to add or change proposals. Only by organising our own local meeting have we been able, as a small community, to express our individual concerns with regard to the proposed ITV development.

Wenvoe has been identified as a primary settlement that has community facilities. These consist of one shop, three pubs, a church and two community halls. Twyn-yr -Odyn is an even smaller rural hamlet. These facilities are surely inadequate to serve an additional 220 households in the first instance (proposed development of the HTV site) and a further 150 houses if the proposed development in Wenvoe goes ahead. The size of the community will grow as to change Wenvoe entirely and make it, in effect, a commuter village lacking community adherence.

In addition, the problems that I see with regard to the ITV development are:

- Traffic congestion There is already traffic congestion at Culverhouse Cross roundabout, on the A48 from St Nicholas and along Port Road both to and from Barry particularly at peak times. An additional 220 houses on the HTV site would add considerably to the congestion not only at peak times. The Local Development Plan talks of sustainable transport solutions, but realistically each proposed new house would have at least one vehicle. if not more realistically two vehicles:
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- Loss of employment opportunities the removal of the HTV studio complex will result in the loss of current employment opportunities and the inability to create future jobs in this area.

(ordered by Representation ID No.)

Representor ID and details: 4017/DP1 Annette Gee

In conclusion, I would request that the VOG Council should, if the current site proposals proceed:

- Ensure closer consultation with the small communities on which this site development will impact before the development proposals are prepared and submitted, as well as after any submission;
- Take special care with access and egress from the site so that impacts are kept to a minimum;
- Ensure that St Lythan's Road is suitably 'pinch-pointed' or given road-humps to make the road less attractive to speeding commuter traffic;
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(ordered by Representation ID No.)

| Representor     | ID and d    | letails:   | 4018/DI         | P1 Barry Harper        |   |                         |             |                              |              |                                       |                  |                            |  |                                      |
|-----------------|-------------|------------|-----------------|------------------------|---|-------------------------|-------------|------------------------------|--------------|---------------------------------------|------------------|----------------------------|--|--------------------------------------|
| Date Lodged     | Status<br>M | Petitio    | on and No.<br>0 | Supporting Evidence    | Additional SA SEA                             |                         |             | Rep format:<br>Comment for   |              | a - do you want y<br>ou want to speak |                  |                            | •  | n representations' or do on? Written |
| 2a - Do you co  | onsider th  | ne LDP     | is Sound?       |                        | 2b - If you think that the Procedural Tests - |                         | ound and d  | oes not not me<br>P2 - Unar  |              | ` '                                   | soundness, ple   | ease indicat               | te which test(s)   | ) that it fails.                     |
|                 |             |            |                 |                        | Consistency Tests -                           | C1 - Unan               | swered      | C2 - Unar                    | nswered      | C3 - Unans                            | swered C4        | - Yes                      |  |                                      |
|                 |             |            |                 |                        | Coherence and Effect                          | tiveness Tests          | - CE1 - l   | Jnanswered                   | CE2          | - Unanswered                          | CE3 - Unansv     | wered C                    | CE4 - Unanswe  | ered                                 |
| 3a - Which pa   | rt of the   | Deposit    | Plan are yo     | ou commenting on?      | Policy Number:                                | <u> </u>                | Paragraph N | Number:                      | Propo        | osal Map:                             |                  | Constr                     | raints Map   | Appendices:                          |
|                 |             |            |                 |                        |   |                         |             |                              |              | . MG2(29)                             |                  |                            |  |                                      |
| 3b - Do you w   | ish to se   | e any cł   | nanges mad      | de to the Deposit Plan | as a result of your rep                       | oresentation?           | Yes         |                              | (If "No"     | or "Unanswered                        | " - go to 3d)    |                            |  |                                      |
| 3c - What cha   | inges wo    | uld like   | to see mad      | e to the Deposit Plan? | New Policy:<br>Unanswered                     | Amended P<br>Unanswered |             | lew Paragraph:<br>Inanswered | <del>-</del> | mended Paragrap<br>nanswered          | New Or Am<br>Yes | nended Site                | Other (see Note of the Contract of the Contrac |                                      |
|                 |             |            |                 |                        | Notes:  |                         |             |                              |              |                                       |                  |                            |  |                                      |
| 3d - If your re | epresenta   | ation rela | ates to a ne    | ew, deleted or amende  | d site, did you submit<br>Site Name: ITV Wale |                         |             | ite? Yes                     | <b>&gt;</b>  | (If "Yes", plea                       | ŭ                | ndidate Site<br>Reference: |  | ference if known)                    |
|                 |             |            |                 |                        |   |                         |             |                              |              |                                       |                  |                            |  |                                      |

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Representor ID and details: 4018/DP1 Barry Harper

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| Representor     | ID and d    | letails:   | 4019/DI         | P1 Alan Parr           |   |                |             |                              |             |                                       |                  |                            |                                   |                                      |
|-----------------|-------------|------------|-----------------|------------------------|---|----------------|-------------|------------------------------|-------------|---------------------------------------|------------------|----------------------------|-----------------------------------|--------------------------------------|
| Date Lodged     | Status<br>M | Petitio    | on and No.<br>0 | Supporting Evidence    | Additional SA SEA                             |                |             | Rep format:<br>Comment for   |             | a - do you want y<br>ou want to speak |                  |                            | •                                 | n representations' or do on? Written |
| 2a - Do you co  | onsider th  | ne LDP     | is Sound?       |                        | 2b - If you think that the Procedural Tests - |                | ound and do | oes not not me<br>P2 - Unar  |             | ` ,                                   | soundness, ple   | ease indicat               | e which test(s)                   | that it fails.                       |
|                 |             |            |                 |                        | Consistency Tests -                           | C1 - Unan      | swered      | C2 - Unar                    | nswered     | C3 - Unans                            | swered C4        | - Yes                      |                                   |                                      |
|                 |             |            |                 |                        | Coherence and Effect                          | tiveness Tests | - CE1-l     | Jnanswered                   | CE2         | Unanswered                            | CE3 - Unansv     | vered C                    | CE4 - Unanswe                     | ered                                 |
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|                 |             |            |                 |                        |   |                |             |                              |             | . MG2(29)                             |                  |                            |                                   |                                      |
| 3b - Do you w   | ish to se   | e any cł   | nanges mad      | de to the Deposit Plan | as a result of your rep                       | oresentation?  | Yes         |                              | (If "No"    | or "Unanswered                        | " - go to 3d)    |                            |                                   |                                      |
| 3c - What cha   | inges wo    | uld like   | to see mad      | e to the Deposit Plan? | New Policy:<br>Unanswered                     | Amended Pour   |             | lew Paragraph:<br>Jnanswered | ·           | nended Paragrap<br>nanswered          | New Or Am<br>Yes | ended Site                 | Other (see Note of the Unanswered | <u>/-</u>                            |
|                 |             |            |                 |                        | Notes:  |                |             |                              |             | <b>S</b>                              |                  |                            |                                   |                                      |
| 3d - If your re | epresenta   | ation rela | ates to a ne    | ew, deleted or amende  | d site, did you submit<br>Site Name: ITV Wale |                |             | ite? Yes                     | <b>&gt;</b> | (If "Yes", plea                       | ŭ                | ndidate Site<br>Reference: |                                   | erence if known)                     |
|                 |             |            |                 |                        |   |                |             |                              |             |                                       |                  |                            |                                   |                                      |

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(ordered by Representation ID No.)

Representor ID and details: 4019/DP1 Alan Parr

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(ordered by Representation ID No.)

| Representor ID and details: 4020/DP1 S.E.Griffin   |   |   |                                       |   |             |  |  |  |  |
|--|---|---|---------------------------------------|---|-------------|--|--|--|--|
| Date Lodged     Status     Petition and No.     Supporting Evidence       29/03/2012     M     0   | e Additional SA SEA   | Rep format:<br>Comment forr               | · · · · · · · · · · · · · · · · · · · | ur comments to be consiered by 'writ<br>t a hearing session of Public examina |             |  |  |  |  |
| 2a - Do you consider the LDP is Sound? Sound 2b - If you think that the Plan is unsound and does not not meet one or more test(s) of soundness, please indicate which test(s) that it fails.  Procedural Tests - P1 - Unanswered P2 - Unanswered           |   |   |                                       |   |             |  |  |  |  |
| Consistency Tests - C1 - Unanswered C2 - Unanswered C3 - Unanswered C4 - Unanswered  |   |   |                                       |   |             |  |  |  |  |
|  | Coherence and Effectiveness Tests -                         | CE1 - Unanswered                          | CE2 - Unanswered                      | CE3 - Unanswered CE4 - Unans  | wered       |  |  |  |  |
| 3a - Which part of the Deposit Plan are you commenting on?   | Policy Number:  | aragraph Number:                          | Proposal Map:                         | Constraints Map Appendices:   |             |  |  |  |  |
|  |   |   |                                       | Site of Importance of Nati (288)  | ure         |  |  |  |  |
| 3b - Do you wish to see any changes made to the Deposit Plan   | n as a result of your representation?                       | Unanswered                                | If "No" or "Unanswered" -             | go to 3d)   |             |  |  |  |  |
| 3c - What changes would like to see made to the Deposit Plan   | ? New Policy: Amended Po<br>Unanswered Unanswered<br>Notes: | licy: <u>New Paragraph:</u><br>Unanswered | Amended Paragraph<br>Unanswered       | New Or Amended Site: Other (see Unanswered Unanswer                           | <del></del> |  |  |  |  |
| 3d - If your representation relates to a new, deleted or amended site, did you submit the site as a Candidate Site? Yes (If "Yes", please give the Candidate Site Name and reference if known)  Site Name: Land on Port Road East Site Reference: 2597/CS1 |   |   |                                       |   |             |  |  |  |  |
| 3e - Please set out your representation below:  Development would have a negative impact on a designation  | ated special landscape area with ecolog                     | gical and environmental is                | ssues.                                |   |             |  |  |  |  |
| 3f - Please outline the changes you wish to see made to the [  | Deposit Plan to make it sound (if releva                    | nt)                                       |                                       |   |             |  |  |  |  |
| 4b - If you wish to speak, please confirm which part of your re  | presentation you wish to speak to the i                     | nspector about and why t                  | hey consider it be necess             | ary to speak at the hearing -   |             |  |  |  |  |

(ordered by Representation ID No.)

| Representor ID and details: 4021/I         | <b>DP1</b> Mr Douglas Curtin  |                                  |                                 |   |   |
|--|---|----------------------------------|---------------------------------|---|---|
|  | o. Supporting Evidence Additional SA SEA  | <del>-</del>                     | <del></del> -                   | want your comments to be considerable speak at a hearing session of Pul | ered by 'written representations' or do |
| 30/03/2012 M 0                             |   |                                  | omment form you want to         | speak at a fleating session of Fu                                       |   |
| 2a - Do you consider the LDP is Sound?     | ? Unsound 2b - If you think that  | the Plan is unsound and does     | not not meet one or more te     | st(s) of soundness, please indicate                                     | e which test(s) that it fails.          |
|  | Procedural Tests -  | P1 - Yes                         | P2 - Yes                        |   |   |
|  | Consistency Tests -   | C1 - Yes                         | C2 - Yes C3 -                   | Yes C4 - Yes  |   |
|  | Coherence and Effe  | ctiveness Tests - CE1 - Yes      | CE2 - Yes                       | CE3 - Yes C   | E4 - Yes                                |
| 3a - Which part of the Deposit Plan are    | you commenting on? Policy Number:   | Paragraph Nur                    | nber: Proposal Map:             | Constra   | aints Map Appendices:                   |
|  | MG2(19)   |                                  |                                 |   | • • • •                                 |
| 3b - Do you wish to see any changes m      | ade to the Deposit Plan as a result of your re  | epresentation? Yes               | (If "No" or "Unan               | swered" - go to 3d)   |   |
| 3c - What changes would like to see ma     | ade to the Deposit Plan? New Policy:  | Amended Policy: New              | Paragraph: Amended P            | aragraph: New Or Amended Site:  | Other (see Notes):                      |
|  | Yes   | Yes Una                          | nswered Unanswered              | Yes   | Unanswered                              |
|  | Notes:  |                                  |                                 |   |   |
| 3d - If your representation relates to a r | new, deleted or amended site, did you subm  | it the site as a Candidate Site? | Unanswered (If "Ye              | s", please give the Candidate Site                                      | Name and reference if known)            |
|  | Site Name:  |                                  |                                 | Site Reference:   |   |
| 3e - Please set out your representation    | <br>n below:  |                                  |                                 |   |   |
| The total lack of infrastructure to s      | sustain a development of this magnitude. The  | e traffic we have on Cardiff Rd  | and Penyturnpike, not only a    | t "rush hour" but most times of the                                     | day are enormous. The problem is        |
|  | e Merry Harrier and Cogan Spur which you hard<br>Irdiff Rd, are subjected to this all day long. The |                                  |                                 |   |   |
| 3f - Please outline the changes you wis    | sh to see made to the Deposit Plan to make  | it sound (if relevant)           |                                 |   |   |
|  | need 340 new houses, Dinas Powis is a villa   |                                  | h. A relocation of the two juni | or schools. Murch Infants/Murch J                                       | unior to the St Cyres site. Also        |
|  | ealth centre on Cardiff Rd, to the St Cyres sit   |                                  | ,, <b>,.</b>                    |   |   |
| 4b - If you wish to speak, please confirm  | m which part of your representation you wish  | to speak to the inspector abo    | ut and why they consider it b   | e necessary to speak at the hearin                                      | ig -                                    |

(ordered by Representation ID No.)

| Representor ID and details: 4022          | /DP1 Gill Clark          |   |                               |                              |                                |   |                                  |                 |
|---|--------------------------|---|-------------------------------|------------------------------|--------------------------------|---|----------------------------------|-----------------|
| Date Lodged Status Petition and N  M  ☐ 0 | lo. Supporting Evidence  | Additional SA SEA                               |                               | Rep format:<br>Comment form  | , ,                            | our comments to be con<br>at a hearing session of F | •                                | •               |
| 2a - Do you consider the LDP is Sound     |                          | 2b - If you think that the Procedural Tests -   |                               | does not not meet o          | ` '                            | soundness, please indic                             | ate which test(s) t              | that it fails.  |
|   |                          | Consistency Tests -                             | C1 - Unanswered               | C2 - Unansw                  | ered C3 - Unans                | wered C4 - Yes                                      |                                  |                 |
|   |                          | Coherence and Effect                            | iveness Tests - CE1           | - Unanswered C               | CE2 - Unanswered               | CE3 - Unanswered                                    | CE4 - Unanswere                  | ed              |
| 3a - Which part of the Deposit Plan are   | you commenting on?       | Policy Number:                                  | <u>Paragrap</u>               | h Number: F                  | Proposal Map:                  | Cons  | straints Map                     | Appendices:     |
|   |                          |   |                               |                              | MG2(29)                        |   |                                  |                 |
| 3b - Do you wish to see any changes r     | nade to the Deposit Plan | as a result of your rep                         | resentation? Yes              | (If "                        | No" or "Unanswered             | " - go to 3d)                                       |                                  |                 |
| 3c - What changes would like to see m     | ade to the Deposit Plan? | New Policy:<br>Unanswered                       | Amended Policy:<br>Unanswered | New Paragraph:<br>Unanswered | Amended Paragrap<br>Unanswered | oh: New Or Amended Si<br>Yes                        | ite: Other (see No<br>Unanswered | otes):          |
|   |                          | Notes:  |                               |                              |                                |   |                                  |                 |
| 3d - If your representation relates to a  | •                        | d site, did you submit t<br>Site Name: ITV Wale |                               | Site? Yes                    | (If "Yes", plea                | se give the Candidate Si<br>Site Reference          |                                  | rence if known) |
|   |                          |   |                               |                              |                                |   |                                  |                 |

3e - Please set out your representation below:

Re: Local Development Plan - ITV, Culverhouse Cross Development - MG2/29

As a member of a small rural community, I am writing to comment on the planning proposals for the above proposed site that will have a profound effect on my life and the lives of my children.

The Vale of Glamorgan Community Strategy promises that the Vale will be a place "that is safe, clean and attractive, where individuals and communities have sustainable opportunities to improve their health, learning and skills, prosperity and wellbeing, 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 sustainability of the area."

My first concern about the proposed LDP is the poor process of consultation with local communities. In this area the consultation process was poorly advertised and only the absolute minimum period given to allow community involvement. We have not been given the incentive to make an effective contribution to the process. I understand that some VOG councillors also found the process did not give them opportunities to add or change proposals. Only by organising our own local meeting have we been able, as a small community, to express our individual concerns with regard to the proposed ITV development.

Wenvoe has been identified as a primary settlement that has community facilities. These consist of one shop, three pubs, a church and two community halls. Twyn-yr -Odyn is an even smaller rural hamlet. These facilities are surely inadequate to serve an additional 220 households in the first instance (proposed development of the HTV site) and a further 150 houses if the proposed development in Wenvoe goes ahead. The size of the community will grow as to change Wenvoe entirely and make it, in effect, a commuter village lacking community adherence.

In addition, the problems that I see with regard to the ITV development are:

- Traffic congestion There is already traffic congestion at Culverhouse Cross roundabout, on the A48 from St Nicholas and along Port Road both to and from Barry particularly at peak times. An additional 220 houses on the HTV site would add considerably to the congestion not only at peak times. The Local Development Plan talks of sustainable transport solutions, but realistically each proposed new house would have at least one vehicle, if not more realistically two vehicles:
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- Pollution The proposed development would inevitable create more noise, air and light pollution in what is essentially a rural area, as indicated by the proposed 'green wedge' in the Twyn-yr-Odyn area;
- Loss of employment opportunities the removal of the HTV studio complex will result in the loss of current employment opportunities and the inability to create future jobs in this area.

(ordered by Representation ID No.)

Representor ID and details: 4022/DP1 Gill Clark

- Ensure closer consultation with the small communities on which this site development will impact before the development proposals are prepared and submitted, as well as after any submission;
- Take special care with access and egress from the site so that impacts are kept to a minimum;
- Ensure that St Lythan's Road is suitably 'pinch-pointed' or given road-humps to make the road less attractive to speeding commuter traffic;
- Ensure that light, noise and air pollution are considered in the development plans and minimised;
- Ensure that sufficient community facilities and play-areas are available on the development and that enough health and education facilities are available to residents and their families the current proposals seem to want to achieve a maximum density of housing which is unlikely to create a sustainable and healthy community.
- 3f Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
- 4b If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -

(ordered by Representation ID No.)

| Representor ID and details: 4022/DP2 Gill Clark  |   |   |                                       |   |                    |  |  |  |
|--|---|---|---------------------------------------|---|--------------------|--|--|--|
| Date Lodged     Status     Petition and No.     Supporting Evidence       02/04/2012     M     □     0     ✓         | Additional SA SEA   | Rep format:<br>Comment forn                                   | · · · · · · · · · · · · · · · · · · · | our comments to be consiered by 'writte<br>at a hearing session of Public examina | •                  |  |  |  |
| 2a - Do you consider the LDP is Sound? Unsound   | 2b - If you think that the Plan is unsound and does not not meet one or more test(s) of soundness, please indicate which test(s) that it fails.  Procedural Tests - P1 - Unanswered P2 - Unanswered |   |                                       |   |                    |  |  |  |
|  | Consistency Tests - C1 -  | Unanswered C2 - Unans   | swered C3 - Unansv                    | wered C4 - Unanswered   |                    |  |  |  |
|  | Coherence and Effectiveness   | Tests - CE1 - Unanswered                                      | CE2 - Unanswered                      | CE3 - Unanswered CE4 - Yes  |                    |  |  |  |
| 3a - Which part of the Deposit Plan are you commenting on?   | Policy Number:  | Paragraph Number:   | Proposal Map:                         | Constraints Map   | Appendices:        |  |  |  |
|  | 75  |   | MG2(26)                               |   |                    |  |  |  |
| 3b - Do you wish to see any changes made to the Deposit Plan   | as a result of your representa  | tion? Yes (I  | f "No" or "Unanswered"                | - go to 3d)   |                    |  |  |  |
| 3c - What changes would like to see made to the Deposit Plan   |   | <u>ded Policy:</u> <u>New Paragraph:</u><br>swered Unanswered | Amended Paragrap Unanswered           | h: New Or Amended Site: Other (see<br>Yes Unanswere                               | <del></del>        |  |  |  |
|  | Notes:  |   |                                       |   |                    |  |  |  |
| 3d - If your representation relates to a new, deleted or amend   | ed site, did you submit the site<br>Site Name: Land at the Wes  |   | (If "Yes", pleas                      | se give the Candidate Site Name and re<br>Site Reference: 2568/CS1                | eference if known) |  |  |  |
| 3e - Please set out your representation below: For my representation please see the Local Developmen                 | t Plan objection document by F  | lerbert.R.Thomas attached.                                    | <b>,</b>                              |   |                    |  |  |  |
| 3f - Please outline the changes you wish to see made to the DE For my representation please see the Local Developmen |   |   |                                       |   |                    |  |  |  |
| 4h - If you wish to speak please confirm which part of your re   | oresentation you wish to speak  | to the inspector about and why th                             | nev consider it he neces              | sary to speak at the hearing -  |                    |  |  |  |

(ordered by Representation ID No.)

| Representor     | ID and d    | letails:   | 4023/DI         | P1 Roy Carr            |   |                         |             |                             |          |                                       |                     |                             |                            |                                    |
|-----------------|-------------|------------|-----------------|------------------------|---|-------------------------|-------------|-----------------------------|----------|---------------------------------------|---------------------|-----------------------------|----------------------------|------------------------------------|
| Date Lodged     | Status<br>M | Petitio    | on and No.<br>0 | Supporting Evidence    | Additional SA SEA                             |                         |             | Rep format:<br>Comment for  |          | a - do you want y<br>ou want to speak |                     |                             | •                          | representations' or do on? Written |
| 2a - Do you co  | onsider th  | ne LDP     | is Sound?       |                        | 2b - If you think that the Procedural Tests - |                         | ound and do | oes not not me<br>P2 - Unar |          | ` '                                   | soundness, ple      | ase indicat                 | e which test(s)            | that it fails.                     |
|                 |             |            |                 |                        | Consistency Tests -                           | C1 - Unan               | swered      | C2 - Unar                   | swered   | C3 - Unans                            | wered C4            | - Yes                       |                            |                                    |
|                 |             |            |                 |                        | Coherence and Effect                          | tiveness Tests          | - CE1-l     | Jnanswered                  | CE2 -    | Unanswered                            | CE3 - Unansv        | vered C                     | E4 - Unanswe               | red                                |
| 3a - Which pa   | rt of the   | Deposit    | Plan are yo     | ou commenting on?      | Policy Number:                                | <u> </u>                | Paragraph N | Number:                     | Propo    | sal Map:                              |                     | Constr                      | aints Map                  | Appendices:                        |
|                 |             |            |                 |                        |   |                         |             |                             |          | MG2(29)                               |                     |                             |                            |                                    |
| 3b - Do you w   | ish to se   | e any cł   | nanges mad      | de to the Deposit Plan | as a result of your rep                       | oresentation?           | Yes         |                             | (If "No" | or "Unanswered                        | " - go to 3d)       |                             |                            |                                    |
| 3c - What cha   | inges wo    | uld like   | to see mad      | e to the Deposit Plan? | New Policy:<br>Unanswered                     | Amended P<br>Unanswered |             | ew Paragraph:<br>Inanswered |          | nended Paragrap<br>nanswered          | h: New Or Am<br>Yes | ended Site                  | Other (see N<br>Unanswered | <del>/-</del>                      |
|                 |             |            |                 |                        | Notes:  |                         |             |                             |          | <b>S</b>                              |                     |                             |                            |                                    |
| 3d - If your re | epresenta   | ation rela | ates to a ne    | w, deleted or amende   | d site, did you submit<br>Site Name: ITV Wale |                         |             | ite? Yes                    | <b>)</b> | (If "Yes", plea                       | · ·                 | ididate Site<br>eference: I |                            | erence if known)                   |
|                 |             |            |                 |                        |   |                         |             |                             | <b>—</b> |                                       |                     |                             |                            |                                    |

3e - Please set out your representation below:

Re: Local Development Plan - ITV, Culverhouse Cross Development - MG2/29

As a member of a small rural community, I am writing to comment on the planning proposals for the above proposed site that will have a profound effect on my life and the lives of my children.

The Vale of Glamorgan Community Strategy promises that the Vale will be a place "that is safe, clean and attractive, where individuals and communities have sustainable opportunities to improve their health, learning and skills, prosperity and wellbeing, 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 sustainability of the area."

My first concern about the proposed LDP is the poor process of consultation with local communities. In this area the consultation process was poorly advertised and only the absolute minimum period given to allow community involvement. We have not been given the incentive to make an effective contribution to the process. I understand that some VOG councillors also found the process did not give them opportunities to add or change proposals. Only by organising our own local meeting have we been able, as a small community, to express our individual concerns with regard to the proposed ITV development.

Wenvoe has been identified as a primary settlement that has community facilities. These consist of one shop, three pubs, a church and two community halls. Twyn-yr -Odyn is an even smaller rural hamlet. These facilities are surely inadequate to serve an additional 220 households in the first instance (proposed development of the HTV site) and a further 150 houses if the proposed development in Wenvoe goes ahead. The size of the community will grow as to change Wenvoe entirely and make it, in effect, a commuter village lacking community adherence.

In addition, the problems that I see with regard to the ITV development are:

- Traffic congestion There is already traffic congestion at Culverhouse Cross roundabout, on the A48 from St Nicholas and along Port Road both to and from Barry particularly at peak times. An additional 220 houses on the HTV site would add considerably to the congestion not only at peak times. The Local Development Plan talks of sustainable transport solutions, but realistically each proposed new house would have at least one vehicle, if not more realistically two vehicles:
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| In conclusion, I v | would req | uest that the | VOG | Council should | , if the | current site | proposals | proceed: |
|--------------------|-----------|---------------|-----|----------------|----------|--------------|-----------|----------|
|--------------------|-----------|---------------|-----|----------------|----------|--------------|-----------|----------|

Representation ID No.)

Representor ID and details: 4023/DP1 Roy Carr

- Ensure closer consultation with the small communities on which this site development will impact before the development proposals are prepared and submitted, as well as after any submission;
- Take special care with access and egress from the site so that impacts are kept to a minimum;
- Ensure that St Lythan's Road is suitably 'pinch-pointed' or given road-humps to make the road less attractive to speeding commuter traffic;
- Ensure that light, noise and air pollution are considered in the development plans and minimised;
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- 3f Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
- 4b If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -

(ordered by Representation ID No.)

| Representor ID and details: 4024/DP                             | 1 Nicola Harmer                             |  |   |                                 |  |                                 |                |
|---|---|--|---|---------------------------------|--|---------------------------------|----------------|
| Date Lodged     Status     Petition and No.       M     □     0 | Supporting Evidence Additional SA           | A SEA  | Rep format:<br>Comment form             |                                 | our comments to be consi<br>at a hearing session of Po | •                               | •              |
| 2a - Do you consider the LDP is Sound?                          | •   | k that the Plan is unsound and sts - P1 - Yes              | d does not not meet or<br>P2 - Unanswei | ` '                             | soundness, please indica                               | te which test(s) th             | nat it fails.  |
|   | Consistency T                               | ests - C1 - Unanswered                                     | C2 - Unanswei                           | red C3 - Unansw                 | vered C4 - Yes   |                                 |                |
|   | Coherence an                                | d Effectiveness Tests - CE1                                | - Unanswered CE                         | 2 - Unanswered                  | CE3 - Unanswered                                       | CE4 - Unanswere                 | d              |
| 3a - Which part of the Deposit Plan are you                     | u commenting on? Policy Number              | <u>r:</u> <u>Paragrap</u>                                  | h Number: Pro                           | oposal Map:                     | Const  | raints Map                      | Appendices:    |
|   |   |  |   | MG2(29)                         |  |                                 |                |
| 3b - Do you wish to see any changes made                        | e to the Deposit Plan as a result of y      | your representation? Yes                                   | (If "N                                  | o" or "Unanswered"              | - go to 3d)  |                                 |                |
| 3c - What changes would like to see made                        | to the Deposit Plan? New Policy: Unanswered | Amended Policy:<br>Unanswered                              | New Paragraph:<br>Unanswered            | Amended Paragraph<br>Unanswered | n: New Or Amended Site Unanswered                      | e: Other (see Not<br>Unanswered | <u>:es):</u>   |
|   | Notes:                                      |  |   |                                 |  |                                 |                |
| 3d - If your representation relates to a new                    |   | submit the site as a Candidate  V Wales, Culverhouse Cross | Site? Yes                               | (If "Yes", pleas                | e give the Candidate Site<br>Site Reference:           |                                 | ence if known) |
|   |   |  |   |                                 |  |                                 |                |

3e - Please set out your representation below:

Re: Local Development Plan - ITV, Culverhouse Cross Development - MG2/29

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In conclusion, I would request that the VOG Council should, if the current site proposals proceed:

• Ensure closer consultation with the small communities on which this site development will impact before the development proposals are prepared and submitted, as well as after any submission;

Representation ID No.)

Representor ID and details: 4024/DP1 Nicola Harmer

- Take special care with access and egress from the site so that impacts are kept to a minimum;
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- 3f Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
- 4b If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -



(ordered by Representation ID No.)

| Representor     | ID and d    | etails:    | 4025/D          | P1 Mrs M Harper         |   |                           |                                 |                                       |  |                            |                  |
|-----------------|-------------|------------|-----------------|-------------------------|---|---------------------------|---------------------------------|---------------------------------------|--|----------------------------|------------------|
| Date Lodged     | Status<br>M | Petitio    | on and No.<br>0 | Supporting Evidence     | Additional SA SEA                             |                           | Rep format:<br>Comment for      | · · · · · · · · · · · · · · · · · · · | your comments to be cor<br>k at a hearing session of | •                          | •                |
| 2a - Do you co  | onsider th  | ne LDP     | is Sound?       |                         | Procedural Tests -                            | P1 - Yes                  | P2 - Unar                       | nswered                               | f soundness, please indic                            | cate which test(s)         | that it fails.   |
|                 |             |            |                 |                         | Consistency Tests -<br>Coherence and Effect   |                           |                                 | nswered C3 - Unan<br>CE2 - Unanswered |  | CE4 - Unanswe              | red              |
| 3a - Which pa   | rt of the I | Deposit    | Plan are y      | ou commenting on?       | Policy Number:                                | <u>Par</u>                | agraph Number:<br>              | Proposal Map:<br>MG2(29)              | <u>Con</u><br>                                       | nstraints Map              | Appendices:      |
| 3b - Do you w   | ish to see  | e any ch   | nanges ma       | de to the Deposit Plan  | as a result of your rep                       | oresentation? Y           | <br>'es                         | (If "No" or "Unanswered               | d" - go to 3d)                                       |                            |                  |
| 3c - What cha   | nges wo     | uld like 1 | to see mad      | le to the Deposit Plan? | New Policy:<br>Unanswered<br>Notes:           | Amended Police Unanswered | vy: New Paragraph<br>Unanswered | Amended Paragra<br>Unanswered         | nph: New Or Amended S<br>Yes                         | Other (see N<br>Unanswered |                  |
| 3d - If your re | presenta    | ition rela | ates to a ne    | ew, deleted or amende   | d site, did you submit<br>Site Name: ITV Wale |                           |                                 | (If "Yes", ple                        | ase give the Candidate S<br>Site Reference           |                            | erence if known) |

3e - Please set out your representation below:

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- Loss of employment opportunities the removal of the HTV studio complex will result in the loss of current employment opportunities and the inability to create future jobs in this area.

In conclusion, I would request that the VOG Council should, if the current site proposals proceed:

(ordered by Representation ID No.)

Representor ID and details: 4025/DP1 Mrs M Harper

- Ensure closer consultation with the small communities on which this site development will impact before the development proposals are prepared and submitted, as well as after any submission;
- Take special care with access and egress from the site so that impacts are kept to a minimum;
- Ensure that St Lythan's Road is suitably 'pinch-pointed' or given road-humps to make the road less attractive to speeding commuter traffic;
- Ensure that light, noise and air pollution are considered in the development plans and minimised;
- Ensure that sufficient community facilities and play-areas are available on the development and that enough health and education facilities are available to residents and their families the current proposals seem to want to achieve a maximum density of housing which is unlikely to create a sustainable and healthy community.
- 3f Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
- 4b If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -

(ordered by Representation ID No.)

| Representor ID and details: 4026/DP1 Mr Nichol  | as Hewitt   |  |   |
|---|---|--|---|
| Date Lodged     Status     Petition and No.     Supporting E       29/03/2012     M     □     0     □ | vidence Additional SA SEA   |  | comments to be consiered by 'written representations' or do<br>hearing session of Public examination? Written |
| 2a - Do you consider the LDP is Sound? Unanswered   | 2b - If you think that the Plan is unsound at Procedural Tests - P1 - Unanswered  | · ,  | ndness, please indicate which test(s) that it fails.  |
|   | Consistency Tests - C1 - Unanswered   | C2 - Unanswered C3 - Unanswer                      | ed C4 - Unanswered  |
|   | Coherence and Effectiveness Tests - CE  | 1 - Unanswered CE2 - Unanswered CE                 | E3 - Unanswered CE4 - Unanswered  |
| 3a - Which part of the Deposit Plan are you commentin   | g on? Policy Number: Paragra  | ph Number: Proposal Map:                           | Constraints Map Appendices:   |
|   | MG2(4)  |  |   |
| 3b - Do you wish to see any changes made to the Depo  | sit Plan as a result of your representation? Yes  | (If "No" or "Unanswered" - g                       | o to 3d)  |
| 3c - What changes would like to see made to the Depo:   | sit Plan? New Policy: Amended Policy:   | New Paragraph: Amended Paragraph:                  | New Or Amended Site: Other (see Notes):   |
|   | Unanswered Unanswered   | Unanswered Unanswered                              | Yes Unanswered  |
|   | Notes:  |  |   |
| 3d - If your representation relates to a new, deleted or  | amended site, did you submit the site as a Candida<br>Site Name:  | te Site? Unanswered (If "Yes", please o            | give the Candidate Site Name and reference if known) Site Reference:  |
| 3e - Please set out your representation below:  |   |  |   |
| I am strongly against the planned building at Wey   | cock Cross for the following reasons:   |  |   |
| 1.Traffic- The increase in population will surely inc   | rease traffic on an already struggling infrastructure   | in Ba <mark>rry</mark> .                           |   |
| 2.Destruction of green land- There is already very from our town.                                     | little to do in Barry. Building on such land will not or  | nly condemn local wildlife to destruction but also | take away one natural site beauty where many people walk  |
|   | on a day to day basis the loc <mark>al health b</mark> oards burder<br>sk and the adding to the str <mark>ain</mark> on the <mark>hea</mark> lth board. | s. Increasing housing and population will only a   | ndd to the burden of the three struggling local hospitals.  |
| 4.Generally poorly planned and no local input was local authorities care/value their own community.   | sort after. Barry is a strong local community and de  | eserves the right to have a say in such large cor  | nstruction, the fact that this was not done shows how little the  |
| 3f - Please outline the changes you wish to see made  | to the Deposit Plan to make it sound (if relevant)  |  |   |
| 4b - If you wish to speak, please confirm which part of   | your representation you wish to speak to the inspec   | tor about and why they consider it be necessary    | y to speak at the hearing -   |

(ordered by Representation ID No.)

| Representor ID and details: 4027/DP1 Lyndsay Hewitt   |   |  |   |
|---|---|--|---|
| Date Lodged     Status     Petition and No.     Supporting Evidence       29/03/2012     M     □     0     □                              | Additional SA SEA   |  | o be consiered by 'written representations' or do<br>ssion of Public examination? Written       |
| 2a - Do you consider the LDP is Sound? Unanswered   | Procedural Tests - P1 - Unanswered  | pes not not meet one or more test(s) of soundness, ple P2 - Unanswered   | · , ,   |
|   | Consistency Tests - C1 - Unanswered   | C2 - Unanswered C3 - Unanswered C4   |   |
|   | Coherence and Effectiveness Tests - CE1 - U   | Jnanswered CE2 - Unanswered CE3 - Unansw   | rered CE4 - Unanswered  |
| 3a - Which part of the Deposit Plan are you commenting on?  | Policy Number: Paragraph N MG2(4)   | Number: Proposal Map:  | Constraints Map Appendices:   |
| 3b - Do you wish to see any changes made to the Deposit Plan  | as a result of your representation? Yes   | (If "No" or "Unanswered" - go to 3d)   |   |
| 3c - What changes would like to see made to the Deposit Plan?   |   | ew Paragraph: Amended Paragraph: New Or Amended Paragraph: Unanswered Yes                                      | ended Site: Other (see Notes): Unanswered   |
|   | Notes:  |  |   |
| 3d - If your representation relates to a new, deleted or amende   | d site, did you submit the site as a Candidate Sit<br>Site Name:                                  |  | didate Site Name and reference if known) eference:  |
| 3e - Please set out your representation below: I object to the building on the land at Weycock Cross because.                             | ause;   |  |   |
| 1. Traffic along Port Road is already very congested in the<br>the daily commute out of Barry more difficult. Also Weyco<br>ease traffic? | e mornings, especially since development of the ck roundabout often grinds to a standstill during | land at Pencoedtre Lane has begun. More housing est the school run, and with people trying to get to the train | ates converging onto Port Road would only make n station. What measures will be put in place to |
| 2. Destruction of countryside- I find it shocking that you are into these new houses when there are not enough jobs or                    |   |  | arry. Just exactly who do you think will be moving  |
| 3. The effect on wildlife- there are many animals such as removed their natural habitats?   | pheasants and rabbits that rely on woodlands an   | id fields around Weycock to protect them. What is to be  | ecome of all these creatures once you have  |
| 4. I also object to the fact that residents have not been inf   | ormed what type of housing is to be built here. W   | Vill they be affordable housing? Council housing? Or w   | ill they all remain empty after being built?  |
| I strongly believe these plans to build on Weycock Cross  | should be abandoned.  |  |   |
| 3f - Please outline the changes you wish to see made to the D   | eposit Plan to make it sound (if relevant)  |  |   |
| 4b - If you wish to speak, please confirm which part of your rep  | resentation you wish to speak to the inspector a  | about and why they consider it be necessary to speak $arepsilon$   | t the hearing -   |

(ordered by Representation ID No.)

| Representor ID and details: 4028/D          | P1 Johann Van Rooye        | n                         |   |                                    |                                 |  |                                 |                 |
|---|----------------------------|---------------------------|---|------------------------------------|---------------------------------|--|---------------------------------|-----------------|
| Date Lodged Status Petition and No.  M □ 0  | Supporting Evidence        | Additional SA SEA         |   | Rep format:<br>Comment form        | , ,                             | our comments to be cons<br>at a hearing session of F | ,                               | •               |
| 2a - Do you consider the LDP is Sound?      |                            | Procedural Tests -        |   | d does not not meet<br>P2 - Unansw | ` '                             | soundness, please indica                             | ate which test(s) the           | hat it fails.   |
|   | C                          | Consistency Tests -       | C1 - Unanswered                             | C2 - Unansw                        | vered C3 - Unansw               | vered C4 - Yes                                       |                                 |                 |
|   | C                          | Coherence and Effecti     | iveness Tests - CE1                         | - Unanswered (                     | CE2 - Unanswered                | CE3 - Unanswered                                     | CE4 - Unanswere                 | ed              |
| 3a - Which part of the Deposit Plan are y   | ou commenting on? <u>F</u> | Policy Number:            | Paragrap                                    | h Number:                          | Proposal Map:                   | Cons   | straints Map                    | Appendices:     |
|   |                            |                           |   |                                    | MG2(29)                         |  |                                 |                 |
| 3b - Do you wish to see any changes ma      | de to the Deposit Plan a   | s a result of your rep    | resentation? Yes                            | (If '                              | "No" or "Unanswered"            | - go to 3d)  |                                 |                 |
| 3c - What changes would like to see mad     | de to the Deposit Plan?    | New Policy:<br>Unanswered | Amended Policy:<br>Unanswered               | New Paragraph:<br>Unanswered       | Amended Paragraph<br>Unanswered | n: New Or Amended Sit                                | te: Other (see No<br>Unanswered | otes):          |
|   |                            | Notes:                    |   |                                    |                                 |  |                                 |                 |
| 3d - If your representation relates to a ne | •                          | , ,                       | the site as a Candidates, Culverhouse Cross | e Site? Yes                        | (If "Yes", pleas                | e give the Candidate Sit<br>Site Reference:          |                                 | rence if known) |
|   |                            |                           |   |                                    |                                 |  |                                 |                 |

3e - Please set out your representation below:

Re: Local Development Plan - ITV, Culverhouse Cross Development - MG2/29

As a member of a small rural community, I am writing to comment on the planning proposals for the above proposed site that will have a profound effect on my life and the lives of my children.

The Vale of Glamorgan Community Strategy promises that the Vale will be a place "that is safe, clean and attractive, where individuals and communities have sustainable opportunities to improve their health, learning and skills, prosperity and wellbeing, 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 sustainability of the area."

My first concern about the proposed LDP is the poor process of consultation with local communities. In this area the consultation process was poorly advertised and only the absolute minimum period given to allow community involvement. We have not been given the incentive to make an effective contribution to the process. I understand that some VOG councillors also found the process did not give them opportunities to add or change proposals. Only by organising our own local meeting have we been able, as a small community, to express our individual concerns with regard to the proposed ITV development.

Wenvoe has been identified as a primary settlement that has community facilities. These consist of one shop, three pubs, a church and two community halls. Twyn-yr -Odyn is an even smaller rural hamlet. These facilities are surely inadequate to serve an additional 220 households in the first instance (proposed development of the HTV site) and a further 150 houses if the proposed development in Wenvoe goes ahead. The size of the community will grow as to change Wenvoe entirely and make it, in effect, a commuter village lacking community adherence.

In addition, the problems that I see with regard to the ITV development are:

- Traffic congestion There is already traffic congestion at Culverhouse Cross roundabout, on the A48 from St Nicholas and along Port Road both to and from Barry particularly at peak times. An additional 220 houses on the HTV site would add considerably to the congestion not only at peak times. The Local Development Plan talks of sustainable transport solutions, but realistically each proposed new house would have at least one vehicle, if not more realistically two vehicles:
- Access and capacity for traffic on to the A48 and Port Road this will inevitably become a bottle neck on both roads, adding to the current traffic congestion;
- Safety and sustainability St Lythans Road on which the rural hamlets of Twyn-yr-Odyn, St Lythans and Duffryn are situated is a rural lane and not designed to take any volume of traffic. This is already increasingly becoming a 'rat-run', being used by commuters attempting to avoid the congestion down the A48. With a large housing development and further congestion at Culverhouse Cross roundabout and the redevelopment of Five Mile Lane, this can only increase;
- Pollution The proposed development would inevitable create more noise, air and light pollution in what is essentially a rural area, as indicated by the proposed 'green wedge' in the Twyn-yr-Odyn area;
- Loss of employment opportunities the removal of the HTV studio complex will result in the loss of current employment opportunities and the inability to create future jobs in this area.

In conclusion, I would request that the VOG Council should, if the current site proposals proceed:

(ordered by Representation ID No.)

Representor ID and details: 4028/DP1 Johann Van Rooyen

- Ensure closer consultation with the small communities on which this site development will impact before the development proposals are prepared and submitted, as well as after any submission;
- Take special care with access and egress from the site so that impacts are kept to a minimum;
- Ensure that St Lythan's Road is suitably 'pinch-pointed' or given road-humps to make the road less attractive to speeding commuter traffic;
- Ensure that light, noise and air pollution are considered in the development plans and minimised;
- Ensure that sufficient community facilities and play-areas are available on the development and that enough health and education facilities are available to residents and their families the current proposals seem to want to achieve a maximum density of housing which is unlikely to create a sustainable and healthy community.
- 3f Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
- 4b If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -

(ordered by Representation ID No.)

| Representor     | ID and d    | letails:   | 4029/DI         | P1 Rebecca Ellis       |   |                         |             |                              |          |                                       |                     |                              |                            |                                    |
|-----------------|-------------|------------|-----------------|------------------------|---|-------------------------|-------------|------------------------------|----------|---------------------------------------|---------------------|------------------------------|----------------------------|------------------------------------|
| Date Lodged     | Status<br>M | Petitio    | on and No.<br>0 | Supporting Evidence    | Additional SA SEA                             |                         |             | Rep format:<br>Comment for   |          | a - do you want y<br>ou want to speak |                     |                              | •                          | representations' or do on? Written |
| 2a - Do you co  | onsider th  | ne LDP     | is Sound?       |                        | 2b - If you think that the Procedural Tests - |                         | ound and d  | loes not not me<br>P2 - Unar |          | ` '                                   | soundness, ple      | ease indicat                 | e which test(s)            | that it fails.                     |
|                 |             |            |                 |                        | Consistency Tests -                           | C1 - Unan               | swered      | C2 - Unar                    | nswered  | C3 - Unans                            | wered C4            | - Yes                        |                            |                                    |
|                 |             |            |                 |                        | Coherence and Effect                          | tiveness Tests          | CE1 - l     | Unanswered                   | CE2 -    | Unanswered                            | CE3 - Unansv        | vered C                      | E4 - Unanswe               | red                                |
| 3a - Which pa   | rt of the   | Deposit    | Plan are yo     | ou commenting on?      | Policy Number:                                | <u> </u>                | Paragraph N | Number:                      | Propo    | osal Map:                             |                     | Constr                       | aints Map                  | Appendices:                        |
|                 |             |            |                 |                        |   |                         |             |                              |          | MG2(29)                               |                     |                              |                            |                                    |
| 3b - Do you w   | ish to se   | e any cł   | nanges mad      | de to the Deposit Plan | as a result of your rep                       | oresentation?           | Yes         |                              | (If "No" | or "Unanswered                        | " - go to 3d)       |                              |                            |                                    |
| 3c - What cha   | inges wo    | uld like   | to see mad      | e to the Deposit Plan? | New Policy:<br>Unanswered                     | Amended P<br>Unanswered |             | lew Paragraph:<br>Jnanswered |          | nended Paragrap<br>nanswered          | h: New Or Am<br>Yes | ended Site                   | Other (see N<br>Unanswered | <del>/-</del>                      |
|                 |             |            |                 |                        | Notes:  |                         |             |                              |          | <b>—</b>                              |                     |                              |                            |                                    |
| 3d - If your re | epresenta   | ation rela | ates to a ne    | ew, deleted or amende  | d site, did you submit<br>Site Name: ITV Wale |                         |             | tite? Yes                    | <b>)</b> | (If "Yes", plea                       | · ·                 | ndidate Site<br>teference: I |                            | erence if known)                   |
|                 |             |            |                 |                        |   |                         |             |                              |          |                                       |                     |                              |                            |                                    |

3e - Please set out your representation below:

Re: Local Development Plan - ITV, Culverhouse Cross Development - MG2/29

As a member of a small rural community, I am writing to comment on the planning proposals for the above proposed site that will have a profound effect on my life and the lives of my children.

The Vale of Glamorgan Community Strategy promises that the Vale will be a place "that is safe, clean and attractive, where individuals and communities have sustainable opportunities to improve their health, learning and skills, prosperity and wellbeing, 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 sustainability of the area."

My first concern about the proposed LDP is the poor process of consultation with local communities. In this area the consultation process was poorly advertised and only the absolute minimum period given to allow community involvement. We have not been given the incentive to make an effective contribution to the process. I understand that some VOG councillors also found the process did not give them opportunities to add or change proposals. Only by organising our own local meeting have we been able, as a small community, to express our individual concerns with regard to the proposed ITV development.

Wenvoe has been identified as a primary settlement that has community facilities. These consist of one shop, three pubs, a church and two community halls. Twyn-yr -Odyn is an even smaller rural hamlet. These facilities are surely inadequate to serve an additional 220 households in the first instance (proposed development of the HTV site) and a further 150 houses if the proposed development in Wenvoe goes ahead. The size of the community will grow as to change Wenvoe entirely and make it, in effect, a commuter village lacking community adherence.

In addition, the problems that I see with regard to the ITV development are:

- Traffic congestion There is already traffic congestion at Culverhouse Cross roundabout, on the A48 from St Nicholas and along Port Road both to and from Barry particularly at peak times. An additional 220 houses on the HTV site would add considerably to the congestion not only at peak times. The Local Development Plan talks of sustainable transport solutions, but realistically each proposed new house would have at least one vehicle, if not more realistically two vehicles:
- Access and capacity for traffic on to the A48 and Port Road this will inevitably become a bottle neck on both roads, adding to the current traffic congestion;
- Safety and sustainability St Lythans Road on which the rural hamlets of Twyn-yr-Odyn, St Lythans and Duffryn are situated is a rural lane and not designed to take any volume of traffic. This is already increasingly becoming a 'rat-run', being used by commuters attempting to avoid the congestion down the A48. With a large housing development and further congestion at Culverhouse Cross roundabout and the redevelopment of Five Mile Lane, this can only increase;
- Pollution The proposed development would inevitable create more noise, air and light pollution in what is essentially a rural area, as indicated by the proposed 'green wedge' in the Twyn-yr-Odyn area;
- Loss of employment opportunities the removal of the HTV studio complex will result in the loss of current employment opportunities and the inability to create future jobs in this area.

In conclusion, I would request that the VOG Council should, if the current site proposals proceed:

Representation ID No.)

Representor ID and details: 4029/DP1 Rebecca Ellis

- Ensure closer consultation with the small communities on which this site development will impact before the development proposals are prepared and submitted, as well as after any submission;
- Take special care with access and egress from the site so that impacts are kept to a minimum;
- Ensure that St Lythan's Road is suitably 'pinch-pointed' or given road-humps to make the road less attractive to speeding commuter traffic;
- Ensure that light, noise and air pollution are considered in the development plans and minimised;
- Ensure that sufficient community facilities and play-areas are available on the development and that enough health and education facilities are available to residents and their families the current proposals seem to want to achieve a maximum density of housing which is unlikely to create a sustainable and healthy community.
- 3f Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
- 4b If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -

(ordered by Representation ID No.)

| Representor ID and details: 4030/DP1 Cathy Farr  |  |                          |                                     |                         |  |  |
|--|--|--------------------------|-------------------------------------|-------------------------|--|--|
| Date Lodged     Status     Petition and No.     Supporting Evidence       29/03/2012     M     □     0     □ | Additional SA SEA                      |                          | Rep format:<br>Letter               |                         | comments to be consiere a hearing session of Publi | d by 'written representations' or do<br>c examination? |
| 2a - Do you consider the LDP is Sound? Unanswered  | ,                                      |                          | does not not meet o<br>P2 - Unanswe | ` '                     | indness, please indicate v                         | which test(s) that it fails.                           |
|  | Consistency Tests -                    | C1 - Unanswered          | C2 - Unanswe                        | ered C3 - Unanswer      | ed C4 - Unanswere                                  | d  |
|  | Coherence and Effective                | veness Tests - CE1 -     | Unanswered C                        | E2 - Unanswered CE      | E3 - Unanswered CE                                 | 4 - Unanswered   |
| 3a - Which part of the Deposit Plan are you commenting on?   | Policy Number:<br>MG2(19). MG2(20)     | Paragraph<br>            |                                     | roposal Map:            | <u>Constrair</u>                                   | nts Map Appendices:                                    |
| 3b - Do you wish to see any changes made to the Deposit Plan   | as a result of your repr               | esentation? Unanswe      | ered (If "N                         | No" or "Unanswered" - g | o to 3d)   |  |
| 3c - What changes would like to see made to the Deposit Plan   | ? New Policy:<br>Unanswered<br>Notes:  |                          | New Paragraph:<br>Unanswered        |                         | New Or Amended Site: Unanswered                    | Other (see Notes):<br>Unanswered                       |
| 3d - If your representation relates to a new, deleted or amende  | ed site, did you submit the Site Name: | ne site as a Candidate S | Site? Unanswered                    | (If "Yes", please o     | give the Candidate Site No                         | ame and reference if known)                            |

3e - Please set out your representation below:

VALE OF GLAMORGAN DEPOSIT LOCAL DEVELOPMENT PLAN 2011-2026

I refer to the above plan and my comments are as follows:

As a resident of Dinas Powys I wish to express my deep concern re: the implications of the effect that the proposed additional housing would have on the local highways network and on the health, welfare and well-being of the residents of Dinas Powys, together with the economic impacts on the whole of the south east side of the Vale.

In Dinas Powys it is proposed that a minimum of 400 additional houses will be built on the St Cyres annexe and Caerleon Road. Both sites are on the Murch side of the community which is served by only two access points - both of which lead down onto Cardiff Road (A4055). Both these junctions, namely the Infants School traffic lights at Murch Road and Cross Common Road at its junction with the A4055 are either at capacity or structurally suspect.

The 400 houses in Dinas alone would generate between 600-800 additional cars in both directions, particularly at peak times. This additional traffic would have a profound and adverse impact on the community directly as the existing roads are already under considerable pressure; it would also add to the already considerable journey time of anyone travelling from Barry though Dinas Powys into Cardiff (or further) in terms of their own (travel to work time, as well as having a detrimental impact on economic activity in an already challenging economy - the increased delays caused by even longer travel times will soon make doing business in Barry and Dinas Powys uneconomic. And when the full impact of the increased traffic created by the 10,000 homes planned across the south east area of the Vale the effect is very likely to be catastrophic.

Even if traffic is channelled up through Sully and Penarth, it still ends up at the junction of the Merry Harrier or the Ely Road Bridge because these are the only two routes across the Taff and the Ely Rivers. While these remain the only access into Cardiff and beyond from this side of the Vale there will always be a problem - increasing traffic will simply exacerbate it. And throwing money at road widening, such as the complete white elephant that was the road widening exercise exiting Dinas Powys from Eastbrook will (as has been proved) be a complete waste of money.

The slow moving and often stationery traffic at its current volume means that already the air pollution levels are above the maximum recommended level of 40 units along Cardiff Road - an increase in the number of vehicles will only make this situation worse. I would also like to know what the carbon monoxide and PM1Os levels are now and what they would be with the increase traffic - has anyone done these calculations and if so, why have we not been given this information?

I am also concerned about the impact that a significant increase in the local population will have on the local schools and GP surgery, both of which are already pressed for space. What proposals have been recommended to cover this not insignificant issues?

(ordered by Representation ID No.)

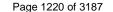
Representor ID and details: 4030/DP1 Cathy Farr

There appears to have been little consideration given to public transport improvements - in fact since the completion of road 'improvements' to create a bus lane out of Dinas on Cardiff Road, one of the hourly buses has been cancelled!

With these points in mind I would therefore request that serious consideration is given to the impact on the already fragile transport infrastructure of this area BEFORE many hundreds of houses significantly increase the current and growing problem. For example - an additional road bridge or vehicle access over the barrage?

3f - Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)

4b - If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -



(ordered by Representation ID No.)

| Representor ID and details: 4031/DP1 Mrs Margaret Price   | ldy   |  |                                     |   |  |                                     |              |
|---|---|--|-------------------------------------|---|--|-------------------------------------|--------------|
| Date LodgedStatusPetition and No.Supporting Evidence29/03/2012M0  | Additional SA SEA                                   |  | Rep format:<br>Comment form         | 4a - do you want your c<br>you want to speak at a |  | ,                                   | •            |
| 2a - Do you consider the LDP is Sound? Unsound  | ,   | Plan is unsound and<br>P1 - Unanswered | does not not meet o<br>P2 - Unanswe | ne or more test(s) of soun                        | dness, please indica                     | te which test(s) th                 | at it fails. |
|   | Consistency Tests -                                 | C1 - Unanswered                        | C2 - Unanswe                        | ered C3 - Unanswere                               | d C4 - Unansw                            | ered                                |              |
|   | Coherence and Effective                             | reness Tests - CE1 -                   | Unanswered C                        | E2 - Yes CE                                       | 3 - Unanswered (                         | CE4 - Unanswered                    | j            |
| 3a - Which part of the Deposit Plan are you commenting on?  | Policy Number:                                      | <u>Paragraph</u>                       | Number: P                           | roposal Map:                                      | Const                                    | raints Map                          | Appendices:  |
|   | MG2(13)   |  |                                     |   |  |                                     |              |
| 3b - Do you wish to see any changes made to the Deposit Plan  | as a result of your repre                           | esentation? Yes                        | (If "N                              | No" or "Unanswered" - go                          | to 3d)                                   |                                     |              |
| 3c - What changes would like to see made to the Deposit Plan  | New Policy: Unanswered                              |  | New Paragraph:<br>Unanswered        | Amended Paragraph: Number of Young                | lew Or Amended Site                      | e: Other (see Note<br>Unanswered    | <u>es):</u>  |
|   | Notes:  |  |                                     |   |  |                                     |              |
| 3d - If your representation relates to a new, deleted or amende   | ed site, did you submit th<br>Site Name: Land to we |  |                                     | ` ''  | ve the Candidate Site<br>Site Reference: | e Name and refere<br>2446/CS1 2446/ | ,            |
| 3e - Please set out your representation below:  |   |  |                                     |   |  |                                     |              |
| 3f - Please outline the changes you wish to see made to the D<br>Have candidate site removed and include as a green wed |   |  | ns                                  |   |  |                                     |              |
| 4b - If you wish to speak, please confirm which part of your re   | presentation you wish to                            | speak to the inspector                 | about and why they                  | consider it be necessary                          | to speak at the heari                    | ing -                               |              |

(ordered by Representation ID No.)

| Representor ID and details: 4032/DP1 Chris Williams              |   |   |                                |                                |  |                                 |                  |
|--|---|---|--------------------------------|--------------------------------|--|---------------------------------|------------------|
| Date LodgedStatusPetition and No.Supporting Evidence28/04/2012M0 | Additional SA SEA                             |   | Rep format:<br>Email           |                                | your comments to be con<br>at a hearing session of l |                                 |                  |
| 2a - Do you consider the LDP is Sound? Unanswered                | 2b - If you think that the Procedural Tests - | he Plan is unsound and<br>P1 - Unanswered | does not not mee<br>P2 - Unans | ` '                            | f soundness, please indic                            | cate which test(s)              | that it fails.   |
|  | Consistency Tests -                           | C1 - Unanswered                           | C2 - Unans                     | wered C3 - Unans               | swered C4 - Unans                                    | wered                           |                  |
|  | Coherence and Effect                          | tiveness Tests - CE1                      | - Unanswered                   | CE2 - Unanswered               | CE3 - Unanswered                                     | CE4 - Unanswe                   | red              |
| 3a - Which part of the Deposit Plan are you commenting on?       | Policy Number:                                | Paragraph                                 | Number:                        | Proposal Map:                  | <u>Con</u> :   | straints Map                    | Appendices:      |
|  | MG2   |   |                                |                                |  |                                 |                  |
| 3b - Do you wish to see any changes made to the Deposit Plan     | as a result of your rep                       | presentation? Unansw                      | vered (If                      | "No" or "Unanswered            | " - go to 3d)  |                                 |                  |
| 3c - What changes would like to see made to the Deposit Plan     | ? <u>New Policy:</u><br>Unanswered            | Amended Policy:<br>Unanswered             | New Paragraph:<br>Unanswered   | Amended Paragram<br>Unanswered | ph: New Or Amended Si<br>Unanswered                  | ite: Other (see N<br>Unanswered | <del></del>      |
|  | Notes:  |   |                                |                                |  |                                 |                  |
| 3d - If your representation relates to a new, deleted or amende  | ed site, did you submit<br>Site Name:         | the site as a Candidate                   | Site? Unanswe                  | red (If "Yes", plea            | ase give the Candidate S<br>Site Reference           |                                 | erence if known) |
|  |   |   |                                | <del>-</del>                   |  |                                 |                  |

3e - Please set out your representation below:

I refer to the above plan and would make the following comments/observations.

As a resident of the Vale of Glamorgan I wish to express the many concerns that I have with the plan.

The proposed additional housing for the Vale can only have serious implications on the fulfilment of many of the plan's objectives. The highways network within the Vale is struggling to cope with the existing housing and whilst I accept that some of the highways infrastructure is dealt with by the Welsh Government unless a cohesive plan for the transport infrastructure is put in place then we are heading for a transport melt down.

The majority of this new housing is around Barry, Penarth, Dinas Powys and Sully and it would be fair to say that this would lead to yet more commuters being funnelled by the Merrie Harriers whether through Dinas Powys or Penarth by road or train. There is not sufficient rolling stock now on Valley Lines so how would you propose they deal with somewhere between 7,721 and 10,945 new houses? I note there is some provision for bus priority measures from Dinas Powys to Leckwith Hill how is this going to be of any benefit, at certain times of the day it is a log jam now so why would anyone get on a bus now let alone in the future.

Also the proposal to build a rail link to Cardiff Airport, an airport that would appear to be dying on it's feet, might have serious implications on the upgrading of the rail network within the Vale and might even cause the closure of the line to Bridgend or at least limit the service even more so. This will only create more issues for commuters bearing in mind with the proposed housing there could tens of thousands more of them as well!

Why is so much importance being given to the Barry Island link road? Is it not obvious that without a cohesive transport plan to dovetail the additional housing planned no one will get to Barry to use it!

To highlight the contradictory nature of the proposed development plan let me quote from it.

'The Barry Waterfront Development Principles Document (July 2009) identified the need to provide access through the Waterfront to Barry Island and states:

"It is imperative that the new road link to the Island, key public transport linkages and sustainable transport connections to the island and the town are available for use prior to the occupation of any part of the development planned for the West pond and South Quay areas".

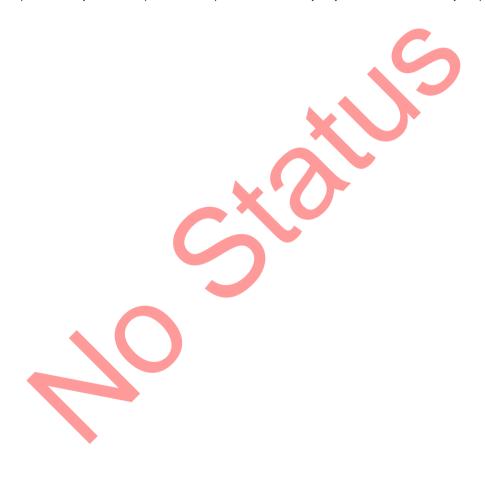
Let me ask, therefore, if it is imperative to do this prior to any part of the development at Barry Waterfront how it is not in the rest of the Vale?

Representation ID No.)

Representor ID and details: 4032/DP1 Chris Williams

I am already tired of politics in the UK being in favour of government that gets results not the attritional tripe we have to witness nowadays but I have to say whilst I might vote in future elections the party that deposited a plan like this would never get my vote again.

- 3f Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
- 4b If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -



(ordered by Representation ID No.)

| Representor ID and details: 4033/DP1 Ms. Elaine Booth  |   |   |  |                        |
|--|---|---|--|------------------------|
| Date Lodged     Status     Petition and No.     Supporting Evidence       29/03/2012     M     □     0     □   | Additional SA SEA   |   | your comments to be consiered by 'written<br>k at a hearing session of Public examinatio | •                      |
| 2a - Do you consider the LDP is Sound? Unsound   | 2b - If you think that the Plan is unsound and d<br>Procedural Tests - P1 - Unanswered              | loes not not meet one or more test(s) o P2 - Unanswered | of soundness, please indicate which test(s)  | that it fails.         |
|  | Consistency Tests - C1 - Unanswered   | C2 - Unanswered C3 - Unan                               | swered C4 - Unanswered   |                        |
|  | Coherence and Effectiveness Tests - CE1 - U   | Unanswered CE2 - Unanswered                             | CE3 - Unanswered CE4 - Unanswe   | red                    |
| 3a - Which part of the Deposit Plan are you commenting on?   | Policy Number: Paragraph I  | Number: Proposal Map:                                   | Constraints Map  | Appendices:            |
|  | MG2(15)   | MG2   |  |                        |
| 3b - Do you wish to see any changes made to the Deposit Plan   | n as a result of your representation? Yes   | (If "No" or "Unanswered                                 | d" - go to 3d)   |                        |
| 3c - What changes would like to see made to the Deposit Plan   |   | lew Paragraph: Amended Paragra Unanswered Unanswered    | ph: New Or Amended Site: Other (see N<br>Unanswered Yes                                  | otes):                 |
|  | Notes:  |   |  |                        |
| 3d - If your representation relates to a new, deleted or amende  | ed site, did you submit the site as a Candidate S<br>Site Name:                                     | ite? Unanswered (If "Yes", ple                          | ase give the Candidate Site Name and refe<br>Site Reference:                             | erence if known)       |
| 3e - Please set out your representation below:  No objection in principle but am concerned as to the entre   | y and exits on the site.  |   |  |                        |
| 3f - Please outline the changes you wish to see made to the D<br>I require more detail regarding the arrangements for pupil<br>particular times of day make the area a danger zone for b<br>blind corners exiting, eventually, onto the main road into L | is safety as there are schools close to the proposoth drivers and pedestrians, especially pupils. F | urther, in the area of Boverton where for               | urther entrances and exits will be required  |                        |
| 4b - If you wish to speak, please confirm which part of your report I respectfully ask that I can verbalise my concerns to the plan. Possibly a reduction in the number of proposed hour   | Inspector as a concerned resident of Heol-y-Feli  |   |  | ation is given to this |

(ordered by Representation ID No.)

| Representor ID and details: 4034/DP1 Mike Harvey, Cri   | ime Prevention Design Advisor, South Wale   | s Police  |   | <del></del>  |
|---|---|---|---|--|
| Date Lodged     Status     Petition and No.     Supporting Evidence       30/03/2012     M     □     0     □      |   | Letter you want   | u want your comments to be consiered by 'writte<br>o speak at a hearing session of Public examina | •  |
| 2a - Do you consider the LDP is Sound? Unanswered   | Procedural Tests - P1 - Unanswere Consistency Tests - C1 - Unanswere Coherence and Effectiveness Tests - Cl | d P2 - Unanswered d C2 - Unanswered C3 E1 - Unanswered CE2 - Unansw |   | ·  |
| 3a - Which part of the Deposit Plan are you commenting on?  | MD2. MD3  | aph Number: Proposal Map  |   | Appendices: Appendix 2 - Supplementary Planning Guidance |
| 3b - Do you wish to see any changes made to the Deposit Pla   | in as a result of your representation? Una  | nswered (If "No" or "Unai   | nswered" - go to 3d)  |  |
| 3c - What changes would like to see made to the Deposit Plar  | n? New Policy: Amended Policy: Unanswered Unanswered Notes:   | New Paragraph: Amended Unanswered Unanswered                        | Paragraph: New Or Amended Site: Other (see Unanswered Unanswered                                  | <del></del>  |
| 3d - If your representation relates to a new, deleted or amend  | ded site, did you submit the site as a Candida<br>Site Name:  | ate Site? Unanswered (If "Y   | es", please give the Candidate Site Name and r<br>Site Reference:                                 | eference if known)                                       |
| 3e - Please set out your representation below: Re: Vale of Glamorgan LDP - South Wales Police Repre               |   |   |   |  |
| In relation to the Deposit Plan written statement, on beha  | alf of the South Wales Police Force I would I   | nake the following representations i                                | n order to address community safety within the  | planning process:-                                       |
| Policy MD2 Place Making.  |   |   |   |  |
| I would request that paragraph 6.8 includes the following   | statement:-   |   |   |  |
| The Design and Access statement should also state how as follows:-  | w the issue of community safety is to be add  | ressed. I would ask for an additional                               | criterion10 and an additional paragraph 6.10 to   | be included and to read                                  |
| 10. Provide a development that is safe and secure.  |   |   |   |  |
| 6.10.The Secured by Design initiative provides recognise public bodies to achieve similar measurable standards. F |   |   |   | and all buildings funded by                              |
| Policy MD3 Design of New Developments.  |   |   |   |  |
| I would request that criterion 11 includes the statement "  | Car Parking provided must be safe".   |   |   |  |
| I would ask that paragraph 6.13 includes the following st   | atement:-   |   |   |  |
| Public car parks should endeavour to meet security stan should be consulted on such developments for advice.      | dards to achieve the Park Mark Safer Car P  | ark Award. This is an initiative of the                             | Association of Chief Police Officers. Crime Pre   | vention Design Advisors                                  |

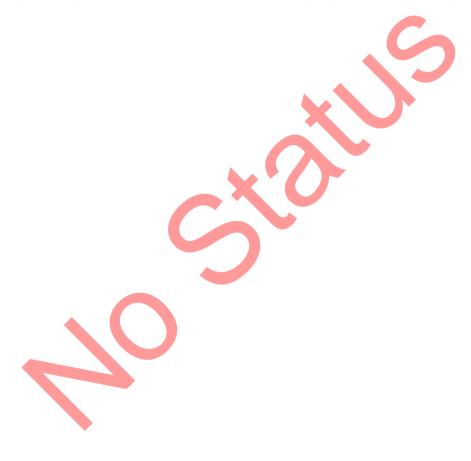
(ordered by Representation ID No.)

Representor ID and details: 4034/DP1 Mike Harvey, Crime Prevention Design Advisor, South Wales Police

Appendix 2 Supplementary Planning Guidance.

I would ask that Community Safety be included as one of the topic areas to be covered. Assistance will be provided by a Police Crime Prevention Design Advisor to produce this document.

- 3f Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
- 4b If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -



(ordered by Representation ID No.)

| Representor ID and details:             | 4035/DP1 Helen Hammond            |  |              |                             |                                 |                        |  |   |
|---|-----------------------------------|--|--------------|-----------------------------|---------------------------------|------------------------|--|---|
| Date Lodged Status Petitic 30/03/2012 M | on and No. Supporting Evidence  0 | Additional SA SEA  |              | Rep format:<br>Comment form | , ,                             |                        | consiered by 'written<br>n of Public examination | representations' or do<br>on? Written       |
| 2a - Do you consider the LDP i          |                                   | 2b - If you think that the Pl<br>Procedural Tests - P1<br>Consistency Tests - C' | I - Yes      | P2 - Yes                    | one or more test(s) of s        | oundness, please       | ` '  | that it fails.                              |
|   |                                   | Coherence and Effectiven   |              |                             |                                 | CE3 - Yes              | CE4 - Yes  |   |
| 3a - Which part of the Deposit          | Plan are you commenting on?       | Policy Number:   | Paragraph N  | Number: P                   | roposal Map:                    |                        | Constraints Map                                  | Appendices:                                 |
|   |                                   | MG9. MD12. MG2   | 7.41. 7.44.  | 6.49. 6.52. M               | MG9 MG9                         |                        | Feb 2012   | Appendix 9 -<br>Supporting<br>Documents     |
| 3b - Do you wish to see any ch          | anges made to the Deposit Plan    | as a result of your represe  | ntation? Yes | (If "                       | No" or "Unanswered"             | - go to 3d)            |  |   |
| 3c - What changes would like t          | o see made to the Deposit Plan?   | New Policy: Ar<br>Unanswered Ye<br>Notes:  |              | ew Paragraph:<br>Inanswered | Amended Paragraph<br>Unanswered | : New Or Amendo<br>Yes | ed Site: Other (see N<br>Unanswered              | <del></del>                                 |
| 3d - If your representation rela        | ites to a new, deleted or amended | d site, did you submit the s<br>Site Name: Land East of                          |              | ite? Yes                    | (If "Yes", pleas                | · ·                    | ite Site Name and refeence: Site Reference       | erence if known)<br>MG 9 / ID 22 Appendix 1 |

3e - Please set out your representation below:

As there are numerous and specific objections to the LDP, these are set out in the document attached below.

I feel that the Vale of Glamorgan has failed in its duty of care to residents in presenting proposal MG9 when, as illustrated by the points below, the basis of the identification of the location in Llangan is not robust and does not demonstrate the kind of diligence that I would expect from my Council.

It would appear that the approach by the council, in failing to consult, or use any other processes or design advised in guidance, has actively created a difficult situation that could have been avoided.

The Vale of Glamorgan, in proposing this site, are saying that it is suitable and the best available when all the evidence, set out in detail below, suggests the opposite.

If, as I believe, the Vale of Glamorgan Council are wrong in proposing Llangan for a large gypsy and traveller site, it is the local residents and the gypsy traveller community, not officers or members of the Council miles away in Barry, who will have to deal with the impact of this unsustainable and inappropriate proposal.

I cannot believe that residents in Llangan are once again having to raise this issue when legal processes, a judicial review and undertaking by the previous council found that the development of this site is not appropriate.

Additional information attached:

REPRESENTATIONS AGAINST ALLOCATION OF GYPSY & TRAVELLER SITE AT LAND EAST OF LLANGAN

TEST P1

The LDP has not been prepared in accordance with the Community Involvement Scheme, see below key points:

- The Emergency Services and Local Primary school have all confirmed that they have NOT been consulted on the proposed site MG9. The LEA confirmed they had not been consulted about the Gypsy site.
- Registered consultees have not been informed of the consultation stages.
- According to the Welsh Government's document 'Travelling to a better future' there is an onus on the LA to consult with its strategic partners in delivering Gypsy & Traveller sites. No consultation has taken

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place.

- Good practice (Welsh Government document 'Good Practice Design in designing Gypsy & Traveller sites') suggests that where Gypsy & Traveller sites are concerned the local community should be engaged as early as possible — we believe that the Council has undertaken the minimum consultation in terms of the LDP and insufficient consultation with respect to the Gypsy & Traveller site in accordance with best practice.

### TEST P2

- 1. The Sustainability Appraisal is flawed and contradictory the proposed sites do not meet with national policy in respect of sustainability. The allocation of Llangan is not consistent with previous Planning Rejections by the Council which considered sustainability (Bonvilston Sept 2011) and with similar determinations by the Planning Inspectorate (Pembroke Sept 2011).
- 2. The allocation of MG9 is not consistent with the proposed LDP policies.

### TEST C1

The Land Use Plan (with regards to Gypsy & Traveller sites) does not relate to any strategy - The Housing Strategy is out dated and does not provide any structure for assessing Gypsy & Traveller needs or site location.

### TESTC2

- 1. The Site allocation does not have regard to the following National Policy:
- -Welsh Government Circular (30/2007):
- The site is RURAL and is "UNSUSTAINABLE" as there are no local services

(no shops, food and drink outlets, doctor, dentist, Library, rail services or any main settlement within 5km etc). Llangan and Fferm Goch both score 0 points for local services in the evidence based assessment 'Sustainable Settlements Appraisal'

- The site would not comply with a RURAL EXCEPTION POLICY as it advocates that all pitches are accommodated on a RURAL site including transient pitches which would not comply with TAN 2.
- Any business operated from the site would be in contradiction of RURAL EXCEPTION guidance.
- The site allocation does not take into account the "SCALE" of the resident community. Llangan has a population of less than 100 with 35 homes and this proposal nearly doubles the size of the Hamlet.
- Example of similar site. In 2007 an application of the Sustainability issue was applied by the Planning inspector in Pembroke where an appeal was refused solely on this basis.
- The VOG Council has refused an application recently in Bonvilston on the basis of Sustainability and services in this case were closer to the site than in the case of Llangan proposal.
- Designing Gypsy and Traveller Sites Good Practice Guide The site is too small; therefore cannot meet the needs identified in the LDP.
- -The site measures 7400 m2 and could only accommodate 14 pitches without infrastructure (guidance is 500m2 per pitch plus refuse area; office; play area; infrastructure (roads etc)
- The access road to the site does not meet the minimum requirements for emergency vehicles (3.7m it is actually 15m)
- The site access is poor and "unsafe" having extended walks (in excess of 800m to bus stop) along an unlit lane with no public footpath or street lighting.
- The proposal of 21 units on the site would restrict the ability of emergency vehicles to manoeuvre around the site.
- New sites grants are available (and cost should not be a material planning consideration).
- -The guidance requires that sites are:
- sustainable the Llangan site proposal is not
- equivalent to standards that would be expected for social housing in the settled community This would not meet the standards and this site would not have been considered appropriate for development for residential in either the current or proposed plans
- have the effect of encouraging and developing good relations between

Gypsies & Travellers and the settled community — the large scale of this proposal could mean that establishing good relations with the local community of Llangan would be unlikely and could also result in increased tensions in the community.

- based on WAG guidance of Design of Gypsy traveller sites the maximum number of pitches is 14, and the proposal at Llangan exceeds this number.
- Travelling to a Better Future

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- Recommends that LA's engage with their Housing Association Partners to bring sites forward. The VOG Council has not done this.
- "Situating transit provision on residential Gypsy sites is not an option preferred by the Gypsy and Traveller community as this can lead to tensions among different family groups and make site management and maintenance very difficult." This creates a sense of "fear" within the settled Gypsy & Traveller community. The proposal is recommending that transient and permanent sites are co-located.
- Planning Policy Wales 2011
- The proposed site at Llangan is greenfield land, according to the definition of brownfield land set out in Figure 4 1 of PPW;
- it will not reduce the need to travel, due to the limited local service provision in close proximity to the site;
- offers very limited access to public transport facilities;
- is not large enough to provide ancillary facilities required to support a sustainable development as set out in paragraph 3.30 in accordance with Designing Gypsy and Travellers Sites Good Practice Guide;
- is located within a Special Landscape Area (SLA) and in close proximity to a Conservation Area. The assessment of the Llangan site incorrectly states that it is not within an SLA, so makes no reference to the sites proximity to the conservation area of Llangan. The location can be clearly seen from the conservation area.
- does not meet the identified needs of Gypsies and Travellers, in the Vale of Glamorgan (Fordham report 2008 evidence);
- does not promote sustainable access to employment, shopping, education, health, community, leisure and sports facilities;
- does not maximise opportunities for community development and social welfare;
- does not foster social inclusion due to the isolated location of the site; and
- does not contribute to improvements in health due to the isolation from services and facilities.
- 2. MG2. The draft policy MG 2 actively discriminates the Gypsy community by excluding them from the wider housing programme and potentially abuses their human rights. Policy MG 2 should be revised to allow the VOG to identify appropriate sites in the same way as Affordable Housing.

### TESTC3

- 1. The policy does not have due regard to the Wales Spatial Plan.
- The key theme of the Wales Spatial Plan is achieving sustainable development through focusing new development in areas which have good access to key services and facilities. As there are no services surrounding the site the allocation of MG9 is not consistent with the objectives of the Wales Spatial Plan. The Gypsy site proposal fails Soundness test Consistency C3 because the policy does not have due regard to the Wales Spatial Plan.

### TESTC4

- 1. The allocation of this site does not have regard to the relevant Community Strategy in the following respects:
- "The diverse needs of local people are met through the provision of customer focused, accessible services and information"- This cannot be achieved by the allocation of a non-accessible rural allocation.
- "Vale of Glamorgan residents and organisations respect the local environment and work together to meet the challenge of climate change"- The allocation of MG9 places heavy emphasis on the use of the car to access the most basic facilities shops, health, education etc.
- "Older people are valued and empowered to remain independent, healthy and active. They have equality of opportunity and receive high quality services to meet their diverse needs"— All services are miles away and inaccessible to

the older community. The VERY POOR public transport system is located

1050m from the site and is in excess of the maximum distances as defined in

the proposed LDP and "Manual for Streets".

- "People of all ages are able to access coordinated learning opportunities and have the necessary skills to reach their full potential helping to remove barriers to employment"—There is no employment opportunity near to the site.

The local primary school has confirmed that it is full and that its projections suggest that it doesn't have the capacity for such a large development (also consider the existing approval of 12 dwellings at Fferm Goch).

- The small local industrial unit has raised concerns in relation to the scale of the proposal.

### TEST CE1

The Plan does not set out a coherent strategy in the following respects

- The Strategy makes the following statements:

| Page | 1   | 220 | Ωf | 21  | Q. |
|------|-----|-----|----|-----|----|
| Page | - 1 | 229 | OI | O.I | 0  |

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Representor ID and details: 4035/DP1 Helen Hammond

The LDP will seek to provide a policy framework which: Manages the housing supply effectively in order to provide a range of good quality, affordable homes in sustainable locations

Reduces out commuting by providing opportunities for new housing, retail and employment development in accessible locations in the Vale of Glamorgan

The allocation of this rural site in open countryside does not meet this objective.

- The LDP also states its vision as being:
- "Our Vision for the Vale of Glamorgan is a place:

That is safe, clean and attractive, where individuals and communities have sustainable opportunities to improve their health, learning and skills, prosperity and wellbeing 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 sustainability of the area." The allocation of this site in policy MG9 does not meet these objectives being in a rural location with inadequate facilities and transport links.

- The Allocation of this site in policy MG9 does not comply with the following objectives of the LDP:
- -Objective 1: To sustain and further the development of sustainable communities within the Vale of Glamorgan, providing opportunities for living, learning, working and socialising for all. The site's location would clearly not meet this objective.
- Objective 2: To ensure that development within the Vale of Glamorgan makes a positive contribution towards reducing the impact of and mitigating the adverse effects of climate change. The allocation of this site will have entirely the opposite effect to this objective.
- Objective 3: To reduce the need for Vale of Glamorgan residents to travel to meet their daily needs and enabling them greater access to sustainable forms of transport. The allocation of this site will have entirely the opposite effect to this objective.
- Objective 4: To protect and enhance the Vale of Glamorgan's historic, built, and natural environment. The development of this site would not meet this objective: a planning refusal on an adjacent site in May 2002 stated "It is a proposal that would adversely affect the undeveloped rural character of the area."
- Objective 5: To maintain, enhance and promote community facilities and services in the Vale of Glamorgan The local primary school has not been consulted, had they been it would have been recognised that the school does not have capacity, nor is it projected to have the capacity.
- Objective 7: To provide the opportunity for people in the Vale of Glamorgan to meet their housing needs-States that development of housing should be in sustainable locations This is not. Furthermore, it brings into question POLICY MD12 which is discriminatory in that Gypsy & Traveller sites are treated differently from other housing allocations. An inclusive policy would see Gypsy & Traveller sites being assessed on the same basis as AFFORDABLE HOUSING and considered for ALL candidate residential sites in the LDP
- Objective 10: To ensure that development within the Vale of Glamorgan uses land effectively and efficiently and to promote the sustainable use and management of natural resources. The inappropriate use of finite resources can impact on the ability of future generations to fulfil their needs. The LDP through favouring the use of previously developed land and the sustainable use of natural resources of whatever kind and wherever they are located, will contribute to preserving their availability for future generations. This is agricultural land in the Special Landscaped Area.

#### TEST CE2

The strategies, policies and allocations are not realistic and appropriate having considered relevant alternatives and are not founded on robust evidence:

- 1. The allocation of Llangan is purely on the basis of site ownership by the Vale and does not meet the requirement of Policy MD12.
- 2. The Gypsy & Traveller site assessment (anecdotal) conflicts with other evidence based background papers; specifically the Sustainable Settlement Appraisal. The SSA states 0 points for public transport but the Gypsy & Traveller site assessment states that public transport facilities are good.
- 3. The Gypsy Traveller site assessment states "good highway access", yet the access falls considerably short of the minimum requirement for vehicle access the access lane is 2.5m wide, against a minimum requirement of 3.7m plus footpath of 1.2m.
- 4. The Gypsy Traveller site assessment does not reflect the current legal obligations of the VOG in respect of this site, yet the other site assessments highlight legal issues.
- 5. Several privately-owned sites were put forward as candidate sites for Gypsy & Traveller sites but were dismissed as they were not in Council ownership. Not being in council ownership should not be a reason to reject privately owned sites.
- 6. The key issue is that the site allocation does not reflect the identified need of the Gypsy & Traveller community as highlighted in the 2008 Fordham report.
- 7. The Gypsy Traveller site assessment suggests that Fferm Goch is the local settlement when Llangan is recognised in this and historic documents as the local settlement being only 150m from the proposed site. It appears that the council has also linking the site at Llangan to the Hamlet of Fferm Goch in order to increase the site assessment positive score.
- 8. The assessment makes no reference that the site is in a Special Landscape Area (SLA).
- 9. The assessment makes no reference that the site is adjacent to a Conservation Area, within the Conservation Management Plan for this area there is a specific requirement to protect the view from the edge of the conservation area over the proposed site. The proposed site is clearly visible form the conservation area.
- 10. The allocation of Fferm Goch as a Minor Rural Settlement is incorrect. The appraisal scored 9 points. 3 are for employment which puts this site on par with the major settlements such as Barry. This is on the

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Representor ID and details: 4035/DP1 Helen Hammond

basis of 4 light industrial buildings. A survey of these employers has confirmed that zero new jobs have become available in the last 9 years and that the units collectively employ fewer than 15 people with no intention to expand. Furthermore, one of the units has been empty and the development is not a popular industrial site.

- 11. Fferm Goch has a population of less than 100 (98)— of the 5 sites in the Vale of Glamorgan with a population of 98 only Fferm Goch is classified as a Minor Rural site (probably based on the 9 points). The remainder are classified as Hamlets and there is a presumption against development in Hamlets (or as a minimum the scale would need to be appropriate and tied to a Rural Exception policy). The guidance requires ALL sites of a population below 100 to be classified as a Hamlet Fferm Goch should be recategorised as a Hamlet.
- 12. The Council has undertaken a study (Fordham report 2008) where the message was extremely strong that the Gypsy & Traveller community wanted smaller sites located on the fringes of larger communities. The report confirmed that isolated, rural sites restricted access to Health, Education and welfare facilities that disadvantaged them and needs to be seen in the light of the above objectives. The following is a quote from the Fordham report:

"Participants living on Shirenewton had three main criticisms: the site was too big, the distance from local amenities along with the lack of local transport,"

"This created many problems for the residents, especially the poorest: 'for a person like me on the bread line it's very tough. I can't afford to use the car', 'everything is a mile away, including the bus stop. It takes a long walk on a busy road to get to the shops and schools".

"The tables demonstrate that access to services such as local shops, health centres and education facilities from both sites is difficult by foot and by local transport systems. This difficulty was eased when participants used their cars, however the level of ease was lower for Roverway due to the difficult entry onto the main road".

"Participants reported that access to local amenities, health services and education was low for both sites by foot or by public transport: Everything is a mile away, including the bus stop. It takes a long walk on a busy road to get to the shops and schools".

"It was thought that smaller sites would reduce the problem of on-site conflicts: 'they need smaller sites and not too many different families, otherwise when you have a row the whole site becomes a war zone"

"This affected the ability of the households interviewed to access local services such as shops, health centres and education facilities. It was reported that this problem mainly affected the women: men take the vehicles that the household own to work during the day, leaving the women without their own transport and often away from public transport routes"

"Participants did not specify where in Cardiff or the Vale of Glamorgan sites should be located. It was noted that sites should be on the outskirts of towns to enable access by foot to local services such as shops, the Launderette and health centres"

"While the focus of the survey was on accommodation requirements, the questionnaire also collected information on access to services, including health and education. Research has found that poor accommodation can prevent access to services and so cannot be seen in isolation."

"Participants living on sites felt that there were site restrictions that limited their work options. These were mainly associated with the location of the sites and lack of access to public transport rather than site regulations: 'no buses, no local transport, Bad access'

"Participants living on local authority sites reported that the lack of local public transport provision in the area affected their ability to send their children to school, access health services and work opportunities, and limited their ability to attend training and education courses"

"Participants were asked about where they would like future sites to be, but were not specific about locations within the County Boroughs, instead emphasising the importance of public transport to any new sites. Government draft guidance on site design stresses the importance of access to services and the promotion of integrated co-existence' between the site and surrounding community."

"The precise location, design and facilities of any new sites should be drawn up in consultation with Gypsies and Travellers to ensure that the additional provision meets their needs. The health and safety implications of a new site's location should be considered in finding a balance between offering sites in good locations and the additional land costs this would entail. The settled community neighbouring the sites should also be involved in the consultation from an early stage."

13. An independent highway study recently undertaken by Capita Symonds, surrounding the proposed site has concluded that:

"The 1km long lane itself is of poor horizontal alignment, with poor forward visibility and unsuitable for regular vehicular traffic. If the site is developed the lane itself would need major upgrading, which would certainly change its appearance within this rural environment."

"The village school is approximately 1km from the village and 900 metres from the proposed site. It is noted that the route does not offer any facilities for pedestrians, such that the only safe way for children to travel between the site and the school safely would be by vehicle. This route would also be potentially hazardous for cycle use for children, the elderly or infirm and could be potentially hazardous for all users other than by car."

"With regard to the appropriateness of the location for a traveller's site development in relation to transportation, it is difficult to refer to standard guidelines, as few relate to "rural highways", most highway design standards for residential development relate to urban areas. Hence, the advice contained within this report is based on best available information, acceptable highway standards for developments of similar size and transport needs of small communities. Welsh Government guidelines state sites should be situated in close proximity to transport links. The Llangan site would not appear to meet that criteria, being situated

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away from the main transport infrastructure, sites should also have ready access to schools, doctors and shops, against which requirements Llangan again appears to fail."

"With regards to the existing lane, it is generally considered that where there is direct access to dwellings, the previous standard for developments. Design Bulletin 32 offers guidance where it states that a desirable minimum carriageway width of 5.5 metres is appropriate, together with 2.0 metre wide footways on both sides. This will allow two way traffic at all times, and safe movement of pedestrians."

"Thus the lane itself should be widened to this minimum standard, which will require the removal of the existing hedge line on one or both sides of the lane and probable acquisition of land from the adjoining fields. This will of course change the environmental character of the area substantially, but is considered essential to cater for increased vehicle and pedestrian traffic"

14. There is complete inconsistency with the allocation of MG9 against the proposed policies.

### TEST CE3

- 1. The VOG council make no reference as to how they are going to manage such a large site. The 21 unit site in Rover Way Cardiff has 3 full time Council staff allocated to it.
- 2. The current Housing Strategy expires April 2012 and makes no relevant reference as to how the Gypsy & Travelling Community will be monitored in terms of growth or need. Indeed, there is no strategy that underpins the Gypsy & Traveller community or housing at all.

### TEST CE4

- 1. Policy MD12 (Gypsy & Traveller) is discriminatory. It offers no flexibility for the Council to bring forward sites that are sustainable / suitable for Gypsies & Travellers through the policies derived within the plan.
- 2. MD12 should be redrafted to enable smaller, sustainable sites to be included within the Affordable Housing requirements and delivered through the Registered Social Landlord sector.
- 3. To argue that the Private Sector has been consulted to offer sites is not accepted. The private sector were not likely to volunteer sites for such a contentious use. The LDP should set clear strategies / policies to deliver sustainable sites for all members of the community; private; social and travelling. The current allocation does not meet this and could strongly be argued breeches the Human Rights of the Gypsy traveller community as it does not provide a suitable, sustainable site that meets the quidelines in the 2008 Fordham report.
- 3f Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)

The proposed Gypsy traveller site at Llangan (Policy MG9) should be removed from the LDP draft plan. The identification of suitable sites is not a role for individual residents. The VOG, with its professional skills and resources, should identify an alternative site that has been assessed according to a relative sustainability appraisal and meets the requirements of the following reports & policies: 2008 Fordham report. RURAL EXCEPTION POLICY (TAN2), Designing Gypsy and Travellers Sites Good Practice Guide and Special Landscape Area's (SLA), conservation area impact. WAG guidance of Design of Gypsy traveller sites the maximum number of pitches (14 max). Planning Policy Wales 2011, Figure 4.1 of PPW. (Greenfield land should not be used).

Policy MD12 should be amended so that it does not discriminate against the Gypsy & Traveller community. All sites during the plan should be assessed on a similar basis as Affordable Housing.

Policy MG 2 should be revised to allow the VOG to identify appropriate sites in the same way as Affordable Housing.

4b - If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -

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|--|--|-----------------------------|------------------------------|---|---|--|--------------------------------|
| Date Lodged     Status     Petition and No.     Supporting Evidence       30/03/2012     M     0 | Additional SA SEA  |                             | Rep format:<br>Comment form  | , ,   | our comments to be co<br>at a hearing session o | ,  | •                              |
| ·  | 2b - If you think that the<br>Procedural Tests -<br>Consistency Tests -<br>Coherence and Effective | P1 - Yes<br>C1 - Unanswered | P2 - Yes<br>C2 - Yes         | C3 - Yes  |   | `  |                                |
| 3a - Which part of the Deposit Plan are you commenting on?                                       | Policy Number: 49  | <u>Paragraph</u><br>5.11    | Number: [                    | Proposal Map: Residential alloc<br>(page 145); MG2 (ID 3<br>Supply Background Pa<br>2011) | Cocations table 0); Housing                     | onstraints Map                             | Appendices: Other - Not Listed |
| 3b - Do you wish to see any changes made to the Deposit Plan                                     | as a result of your repre  | esentation? Yes             | (If                          | "No" or "Unanswered"  | - go to 3d)                                     |  |                                |
| 3c - What changes would like to see made to the Deposit Plan?                                    | New Policy:<br>Unanswered<br>Notes:  |                             | New Paragraph:<br>Unanswered | Amended Paragrap<br>Yes   | h: New Or Amended<br>Yes                        | Site: Other (see Not<br>Unanswered         | es):                           |
| 3d - If your representation relates to a new, deleted or amende                                  | d site, did you submit th<br>Site Name: The Garde  |                             |                              | (If "Yes", plea   | se give the Candidate<br>Site Reference         | Site Name and reference: ID30 in the draft |                                |
| 3e - Please set out your representation below:   |  |                             |                              |   |   |  |                                |

REPRESENTATIONS ON VALE OF GLAMORGAN DRAFT DEPOSIT LDP RELATING TO THE ALLOCATION OF 40 HOUSES AT THE GARDEN EMPORIUM SITE. FFERM GOCH AND THE DESIGNATION OF FFERM GOCH AS A 'MINOR RURAL SETTLEMENT'.

### Summary

- 1) The Garden Emporium site at Fferm Goch is a site with extant planning permission for 12 houses. The rationale for granting this planning permission on this site was overwhelmingly because it is a previouslydeveloped site, with derelict garden centre buildings on the site.
- 2) However, the proposed increase in draft LDP allocation, from 12 to 40 houses, is unacceptable. The principal justification for this increase appears to be the proposed new designation of Fferm Goch as a "Minor Rural Settlement". This designation is incorrect and totally inappropriate, for reasons set out below. Higher densities of development on this site (i.e. above the 12 houses permitted) - in particular for 42 and (after revisions) 24 houses - havebeen considered and rejected by the Council in the past. The issues that led to those rejections in particular that the site is unsustainable and a portion of the site is needed to protect a rare plant - have not changed. If this allocation is allowed there is a very real prospect that this level of housing is built - we are aware that the owners are already in pre-application discussions with the Council for 40 houses on this site, even though such discussions are inappropriately premature.
- 3) The extant planning permission includes conditions requiring the private houses to be livework units and a large portion of the site (approx 30%) to be set aside as a nature conservation area. If 40 houses were permitted on this site the developer would no doubt argue that neither of these conditions could be sustained. Other issues such as lack of public transport and lack of places at the local primary school cannot be satisfactorily resolved through condition or planning agreement.
- 4) For all these reasons, which are expanded on below, the allocation of the Garden Emporium site for 40 houses should not go forward in the draft LDP. The site should be allocated for 12 houses, in line with the extant planning permission and preserving the conditions on that planning permission requiring 1) 30% affordable housing and 2) the back portion of the site (approx 300/0 - edged in green on the attached approved plan) to be a habitat conservation area and excluded from this site altogether 3) the 8 private houses to be live-work units.
- 5) In addition, Fferm Goch should not be designated as a "Minor Rural Settlement". This was due to an incorrect "settlement scoring" of 9 which included 3 points allocated for "employment opportunities within settlement" on the basis of the nearby Westwinds industrial estate. These points should not have been allocated. 3 points puts this site on a par with towns in the Vale like Barry, which is entirely inappropriate. There are only 4 light industrial buildings on this site. A survey of these employers has confirmed that no new jobs have become available in the last 9 years and that the units collectively employ fewer than 15

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people with no intention to expand. Furthermore, one of the units has been empty and the development is not a popular industrial site.

Our representations in relation to each of the tests of 'soundness' are as follows:

TEST PI - It has not been prepared in accordance with the Delivery Agreement including the Community Involvement Scheme

The local community have not been involved in the decision to allocate this site for 40 houses. We understand that neither the school nor the LEA were consulted. We do not believe that Llangan Community Council was consulted at any previous stage in the draft LDP process.

TEST P2 - The plan and its policies have not been subjected to Sustainability Appraisal including Strategic Environmental Assessment

The Sustainability Appraisal of the Garden Emporium site is wrong in its assessment of the Garden Emporium site's ability to meet the Sustainability Appraisal's objectives because:

- 1. The site is incorrectly rated '++' (strongly contributes) as regards objective 1, which is "To provide the opportunity for people to meet their housing needs." Although this site falls within the Rural Vale, the Rural Vale is a very large area and there is no particular local specific need for this housing. As far as affordable housing is concerned, it is only proposed that the site provides the standard 35% affordable housing which means it is no different to better than any other site. The '++' rating should be reduced to '+' (contributes).
- 2. The site is incorrectly rated '+' (contributes) as regards objective 2, which is "To maintain, promote and enhance the range of local facilities". There is no suggestion that the proposed development will in any way enhance the local facilities. In fact it will place increased pressure on the following existing local facilities: the primary school, which has no spaces; the playground/open space at Fferm Goch, as we note there is no suggestion of on-site open space being provided on the Garden Emporium site (particularly given the high density of housing which 40 homes would involve and in fact on-site provision was not offered even for the extant planning permission for 12 houses); and the community hall, which already serves a large number of houses and is of a limited capacity. This' +' rating should be changed to a '- -' ( strongly detracts) rating.
- 3. The site is incorrectly rated '++' (strongly contributes) as regards objective 8, which is "To use land effectively and efficiently". Although part of the site is 'brownfield' and has been previously developed as a garden centre, a large section at the rear of the site (approximately 30% of the entire site) has never been developed. It was this area which was identified as a habitat management area in the extant planning permission for 12 houses. The requirement for a habitat management area was in part due to the presence of a very rare species of plant on the site (Bithynian vetch). This rating should be reduced to a '+' (contributes) rating, to acknowledge the fact that while the development would reuse the developed part of the site, it would also use a currently undeveloped, greenfield, area.
- 4. The site is incorrectly rated '++' (strongly contributes) as regards objective 9, which is "To protect and enhance the built environment and natural environment". This is wrong for the reasons given in point 3 above. If the site was developed for 40 houses there would be no room whatsoever for any habitat management or other effective biodiversity area as has been required by the extant planning permission. This will mean the loss of a very rare plant species which has only been found in two other locations in the whole of Wales. This rating should therefore be reduced altogether to a '--' (strongly detracts) rating.
- 5. The site is incorrectly rated '0' (neutral) as regards objective 11, which is "To protect, enhance and promote the quality and character of the Vale of Glamorgan's culture and heritage." This is wrong for the same reasons as at points 3 and 4 above. The Council has resolved to protect the very rare plant species which has been added to its local biodiversity action plan. This resolution by the Council (which was made specifically in response to the survey which identified this plant on this site) indicates its recognition of the species' importance to the culture and heritage of the Vale of Glamorgan. This rating should therefore be reduced to a '--' (strongly detracts) rating.
- 6. The site is incorrectly rated '+' (contributes) rating as regards objective 12, which is, "To reduce the need to travel and enable the use of more sustainable modes of transport". This rating is wrong because although it will be possible to travel by foot or bicycle to the primary school and the community hall, every other service and local amenity including employment can only be accessed by private car. The bus service to the site is so poor that it does not even merit a rating on the Council's sustainable settlements score. This rating should therefore be reduced to a '- -' (strongly detracts) rating.

TEST C2 - It does not have regard to National Policy

- A) The proposed allocation of the Garden Emporium site for 40 houses fails to meet Planning Policy Wales (February 2011) ("PPW") in the following respects:
- 1. The Garden Emporium site is totally unsustainable. It is located in the Rural Vale, surrounded by open countryside and 7 miles from Cowbridge and 8 miles from Bridgend. Realistically anyone living in this location will rely on private cars to get to and from the site for work, shops, everything except the primary school, which, as stated below, is full.
- 2. The nearest corner shop is in Pencoed to which there is no public transport; otherwise it is necessary to drive to Cowbridge or Bridgend or one of the large supermarkets on the edge of Bridgend.

The current planning permission for the site is for 12 houses, of which at least 30% (i.e. 4) are to be affordable. There is a condition forming part of the planning permission (condition 10) which requires each of the 8 private units to be live-work units and requires that the business floor space of the live/work unit shall be finished ready for occupation before the residential floor space is occupied. The reason given for

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this condition is "In order to ensure a satisfactory and sustainable form of development which will support and enhance the local rural community and in order for the development to comply with policies ENV27, ENV29 and EMP2 of the UDP." It is apparent from reading documents associated with the planning permission that although the application originally proposed the live-work units and made much of them improving the sustainability of the site, at a later date the applicant asked the LP A not to impose this condition. However, the LP A insisted it was required.

There is no suggestion that the 40 houses now proposed for the site would be live-work units. Even if this condition was imposed this site would still be unsustainable as the residents would need to drive for everything except work. It also seems likely that they would need to make business-related journeys and of course, depending upon their business, additional car journeys could in fact be created by these businesses (for example, a hairdressers).

This is contrary to PPW (paragraph 4.6.2) which states, 'Development plans ... should secure a sustainable settlement pattern which meets the needs of the economy, the environment and health, while respecting local diversity and protecting the character and cultural identity of communities.'

2. The Garden Emporium site is very poorly served by public transport - there is only a very limited bus service to and from Fferm Goch (5 buses per day to Bridgend; 4 per day from Bridgend which go on to Cowbridge). There is no bus service to the nearest train station at Pencoed (3 miles away, along roads with no pedestrian footway). This is contrary to PPW (paragraph 4.6.4), which states, 'Local planning authorities should assess the extent to which their development plan settlement strategies and new development are consistent with minimising the need to travel and increasing accessibility by modes other than the private car. "Higher density development, including residential development, should be encouraged near public transport nodes or near corridors well served by public transport (or with the potential to be so served).'

This is added to by paragraph 4.6.7 PPW which stresses that, 'In rural areas the majority of new development should be located in those settlements which have relatively good accessibility by non-car modes.' This is emphasized again in paragraph 8.7.3 PPW which states, 'It is also expected that the proposed access to a development will reflect the likely travel patterns involved. It should ensure that people can reach the development, as far as practicable, by walking, cycling and public transport, as well as by car.'

3. The existing local infrastructure will not be able to serve a further 40 houses at the Garden Emporium site. There is very little local infrastructure available at this site, but two issues are relevant - the local primary school (Llangan primary school) and highways issues:

### Llangan primary school

Llangan primary school is within walking distance of the site. However, this school is very small and is full. The Local Education Authority has told us that Llangan primary school's maximum capacity is 111 pupils, and the number on the roll as at September 2011 was 108 pupils. The admission number of new pupils each year is no more than 15. This is because several year groups are combined (i. e. two year groups being taught as a single class, in one classroom) and the LEA needs to comply with the requirement in its education plan to have no more than 30 children in each classroom. Although in some circumstances it might be appropriate to deal with this by seeking a s 1 06 contribution from the developers to increase the capacity of the school, in this case the school has neither the space nor the land to expand to take on more pupils.

Two classes are already being taught in terrapins located in the playground and the school only has a relatively small area of grass which has already been diminished as a result of building a new school hall and two classrooms a few years ago. It is noted that in the planning officer's report for the current 12-house planning permission the education authority thought that there was enough space in local primary school~ (it did not specify any in particular) to accommodate the children from 12 houses- 40 houses is very different. From speaking to the LEA, we understand that according to their formula for calculating the number of primary school places generated by new houses, 40 new houses would result in 15 primary age children needing places. There is therefore currently no possibility for the school to provide places for the primary-age children from this development who would have to be driven to other schools some distance away.

### Highway safety issues

When Council considered the current planning permission the highways department was originally concerned about there being more than one exit from the site, when there were only 12 houses. The extant planning permission includes a condition (condition 20) that the site shall be served by no more than two means of access onto Ruthin Road - with the primary access to serve no more than 8 dwellings and the secondary access to serve no more than 4 dwellings. How many exits would be proposed for 40? This road is used heavily by traffic, particularly during peak times - many drivers, including a significant number of large lorries, use it as a short cut from the A48 to the M4. It is also the main pedestrian cycleway to Llangan primary school from Fferm Goch Heol Llidiard/St Mary Hill and is used on a daily basis by those residents for that purpose. Currently only a few single houses have driveways onto this road. Having an additional 40 houses here will increase the traffic considerably, at increased safety risk to existing drivers and pedestrians and cyclists.

This is therefore contrary to paragraph 4.6.8 of PPW which states, 'Development in the countryside should be located within and adjoining those settlements where it can be best accommodated in terms of infrastructure, access and habitat and landscape conservation.' It is also contrary to paragraph 9.2.9 of PPW which states, 'Local planning authorities should consider the following criteria in deciding which sites to allocate for housing in their development plans: ...

• the location of potential development sites and their accessibility to jobs, shops and services by modes other than the car, and the potential for improving such accessibility

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- the capacity of existing and potential infrastructure including public transport ... and social infrastructure (such as schools ... ), to absorb further development and the cost of adding further infrastructure ... "
- 4. The development of the Garden Emporium site cannot be described as infilling or a minor extension to Fferm Goch. It is located adjacent to Fferm Goch, but the proposed 40 houses are more than Fferm Goch and Heol Llidiard combined (which amount to 33 houses). It is totally out of scale for this area.

It also cannot be claimed to meet any "local need" for affordable housing. The Council's own background documents recognise that the need for affordable housing is greater in the larger settlements in the Vale, such as Barry. Section 3.9 of the draft LDP states that, 'The findings of the [Local Housing Market Assessment 2010] make clear that the area of greatest need is Barry followed by the coastal settlements of Rhoose, Llantwit Major and Penarth as well as the Rural and Eastern Vale." This statement is supported by the Council's 'Affordable Housing' background paper (November 2011), in which Table 2 in paragraph 3.7 specifies an identified need of 3.5 units of affordable housing per year in the Rural Vale. This is a very low number of units to be accommodated within a large area of land and there is no need for such a high concentration of units to be accommodated on the Garden Emporium site. In fact, the existing houses at Fferm Goch are sold at considerably less than the average house price in this area (i.e. the Rural Vale). No.3 Fferm Goch was sold in June 2011 for £180,000 and No.8 has been on the market for £185,000.

Notwithstanding these prices, these houses often remain on the market for some time – at least a year. Fferm Goch is private market housing which was originally Agricultural Settlement Houses (a form of Council housing) developed by the Welsh Land Society in 1939. Why do we need more houses at affordable prices in this location? There is no identified local need to be met.

We understand from speaking to a Council officer that the main reason the Council are prepared to consider 40 houses on this site is the need for more affordable housing in the Vale. While we have no problem with the principle of 35% of new housing being affordable, we do not think that this policy should be used to 'reverse engineer' such a huge increase in the total number of houses being proposed on this site. With the original planning permission 12 houses, 30% would have resulted in an entirely sensible allocation of 4 affordable houses. To invert this reasoning and specify a total of 40 houses in the hopes of raising the number of affordable houses from the existing planning permission - at the cost of an increase of 18 private houses (from 8 to 26). The detrimental impact this development will have on the local community is a disproportionate sacrifice to make for an additional 10 affordable houses.

The proposal for 40 houses on this site is therefore contrary to paragraph 4.6.8 of PPW which states, "Infilling or minor extensions to existing settlements may be acceptable, in particular where it meets a local need for affordable housing, but new building in the open countryside away from existing settlements or areas allocated for development in development plans must continue to be strictly controlled. All new development should respect the character of the surrounding area and should be of appropriate scale and design.

If 40 houses are built on the Garden Emporium site this will be significant overdevelopment of this site at a density which should not be permitted in this location. The following points are relevant:

- a) It is acknowledged and accepted that the site has existing planning permission for 12 houses; this is a brownfield site where there has been a number of failed garden centres and it was perhaps inevitable that it would eventually be developed for housing. The development of the site with 12 houses is accepted, although even with 12 houses there are still concerns about the impact these will have on the local school and highways.
- b) However, 40 houses will make the site crowded and out of keeping with the rural area. Fferm Goch has a particular and special history it was built by the Welsh Land Society in 1939 to promote employment in rural areas and in this case to provide social housing and a community for farm workers at the large farm across the road and the houses at Fferm Goch form 3 sides of a square with a large grass pitch and play area in the middle. There is no suggestion that the proposal for the Garden Emporium site would be designed in a similar way. Fferm Goch should not in any event be used as an excuse to set a "precedent" for this locality, where other housing consists of isolated dwellings.
- c) The previous planning history of the site is relevant the Council previously considered proposals for 42 and 24 houses and rejected both on grounds of over-development, of this site.

This is contrary to paragraph 9.2.12 ofPPW which states, 'Strong pressure for development may give rise to inappropriately high densities if not carefully controlled.' In paragraph 9.2.22 it states, 'In order to safeguard the character and appearance of the countryside, to reduce the need to travel by car and to economise on the provision of services, new houses in the countryside away from existing settlements recognised in development plans or from other areas allocated for development must be strictly controlled. Many parts of the countryside have isolated groups of dwellings. Sensitive filling-in of small gaps or minor extensions to such groups, in particular for affordable housing to meet local need, may be acceptable but much depends on the character of the surroundings, the pattern of development in the area and the accessibility to main towns and villages.' In paragraph 9.3.4 PPW states, 'In determining applications for new housing, local planning authorities should ensure that the proposed development does not damage an area's character and amenity.' The proposed development of this site with 40 houses would significantly damage the character of this area.

6. If 40 houses are built on the Garden Emporium Site, it will result in the loss of a rare plant species, Bithynian Vetch, which has been identified by the Council in its Local Biodiversity Action Plan.

The extant planning permission for the Garden Emporium site includes:

a) a condition (condition 9) that a significant proportion of the site (approx. 30% - being the whole of the back strip of the site edged green on the approved plan) shall have no buildings located on it and all

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properties shall be located at least 10 metres from this boundary within the development site; and

b) another condition (condition 12) that this area shall be designated as a habitat management area to be supported by a comprehensive habitat management plan. The plan is to pay particular regard to the areas where Bithynian vetch has been found and seek to maintain and conserve this species.

These conditions were imposed in particular to preserve the species Bithynian vetch. It is apparent from the planning officer's report associated with the current planning permission that Bithynian vetch was found on the site during the course of an ecological survey being carried out, at the request of the Countryside Council for Wales. The report states that Bithynian vetch is a rare species, included as vulnerable on the UK vascular plant red data list and endangered on the Welsh list. The report says that this species was previously unknown to occur in the Vale of Glamorgan and is known to occur on only 2 other sites in the whole of Wales. As a result, the Council held a special meeting to decide to protect this plant by placing it on the Council's 2002 Local Biodiversity Action Plan.

There is no suggestion in the draft LDP that this large part of the site - which the planning officer's report recognises is open land rather than previously-developed land - would not be open to development and it would seem difficult/impossible for a planning permission for 40 houses on this site to protect the same area as a "no-build" zone. The Proposals map includes this part of the site within the area proposed to be allocated for 40 houses. The fact that this open area of land at the back of the site would not be built on under the terms of the current planning permission was a material consideration for the planning officer in recommending approval of the planning application for 12 houses (see the planning officer's report, page 12).

The allocation of 40 houses is therefore contrary to PPW paragraph 5.2.8 which states, 'Local planning authorities must address biodiversity issues, in so far as they relate to land use planning in both development plans and development control decisions. Paragraph 5.2.2 of PPW recognises that, 'The Natural Environment and Rural Communities Act 2006 places a duty on every public authority, in exercising its functions, to have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity.' The extant planning permission allowed for the preservation of this rare plant by allocating a significant portion of the site to be a no-build zone - a habitat conservation area. This area will not be possible if 40 houses are built.

B) The proposed designation of Fferm Goch as a "Minor Rural Settlement" also fails to meet PPW because it is plainly not a sustainable settlement and has been incorrectly assessed by the Council. This incorrect designation (which is considered in detail in Test CE2 below) infringes the following paragraphs of PPW: 4.6.2, 4.6.4, 4.6.7, 4.6.8, 8.7.3, 9.2.9, 9.2.12, 9.2.22 and 9.3.4 (all as cited above). If it were identified as a Minor Rural Settlement, Fferm Goch would be at risk of future residential development being allowed in this location through policy MG7 of the draft LDP. Fferm Goch is not a location where new development should routinely be permitted since it would infringe all the sustainability principles for development in rural locations.

TEST C3 - It does not have regard to the Wales Spatial Plan (wSP)

The Wales Spatial Plan update 2008 states at paragraph 1.4 that, 'It is a principle of the Wales Spatial Plan that development should be sustainable. Sustainable development is about improving wellbeing and quality of life by integrating social, economic and environmental objectives in the context of more efficient use of natural resources.' The Garden Emporium Site is a totally unsustainable site for reasons given above (Test C2).

TEST C4 - It does not have regard to the relevant Community Strategy

The Community Strategy for the Vale 2011-21 sets out 10 priority outcomes. The allocation of the Garden Emporium for 40 houses fails to have regard to the following of these priorities:

- "2. The diverse needs of local people are met through the provision of customer focused, accessible services and information." This priority is not met because the Garden Emporium site is so far from shops, health services, local amenities and workplaces as well as having poor public transport.
- "3. Vale residents and organisations respect the local environment and work together to meet the challenge of climate change." This priority is not met because the Garden Emporium site will require all its residents to travel by car to access every local service save the primary school (which does not have sufficient space for the children of 40 families, so primary school pupils will have to travel by car to other schools) "4. Older people are valued and empowered to remain independent, healthy and active.

They have equality of opportunity and receive high quality services to meet their diverse needs." This priority is not met because public transport to this site is very poor both in terms of timetabling and route, which greatly inhibits their chance of remaining independent.

Also, there are no local services available to them such as healthcare, library or other local amenities.

- "5. Children and Young people in the Vale are well informed and supported to access a broad range of quality services that enable them to take full advantage of the life opportunities available in their local communities and beyond." This priority is not met because the local primary school is unable to accommodate the projected increase in pupil numbers from 40 new homes. Children will need to travel to other primary schools. Public transport from this site is very poor. Children will need to travel by car to primary school and to all other activities and services including leisure activities.
- "6. People of all ages are able to access coordinated learning opportunities and have the necessary skills to reach their full potential, helping to remove barriers to employment." This priority is not met because

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there are no learning opportunities present near the site nor, more importantly, are there any employment opportunities near the site either.

"7. The underlying causes of deprivation are tackled and the regeneration of the Vale continues, opportunities for individuals. and businesses are developed and the quality of the built and natural environment is protected and enhanced." This priority is not met because the proposed allocation of 40 houses on the Garden Emporium will not protect and enhance the natural environment of the Vale: in order to develop 40 houses the entirety of the site will have to be developed, whereas the current planning permission requires the back third of the site to be allocated as a habitat management area. A key reason for this habitat management area was to preserve a very rare plant species growing on the site.

"10. Health inequalities are reduced and residents are able to access the necessary services, information and advice to improve their wellbeing and quality of life." This priority is not met because there are no local health services near the site. Such services can only be accessed by driving to one of the nearby towns.

TEST C5 - The Plan does not set out a coherent strategy from which its policies and allocations logically flow and, where cross boundary issues are relevant, it is not compatible with the development plans prepared by neighbouring authorities.

The draft LDP Strategy is stated (page 23) to comprise four key elements - one of these is 'Other sustainable settlements to accommodate further housing and associated development'.

This element of the draft LDP strategy is based on the designation of certain towns and villages within the Vale as "sustainable settlements". However, Fferm Goch is wrongly identified in the strategy as a "Minor Rural Settlement", for reasons set out under Test CE2 below.

The draft LDP at Section 5. 10 (page 25) states that minor rural settlements are those 'considered to have sufficient population, services and facilities to assimilate growth without it having a detrimental impact on their existing character and local environment.' Also, at Section 5.16 of the draft LDP (page 27), 'The types of services and facilities typically found within the minor rural settlements include places of worship, community halls, small-scale retail uses and formal recreational facilities. A number of the smaller rural settlements also provide small-scale local employment opportunities, either within or in close proximity to the settlements.'

Neither of these descriptions fit Fferm Goch - for reasons set out under Test CE2. The strategy base for the rest of the LDP policies is therefore wrong in this respect.

The draft LDP Strategy is stated to follow on from the Vision and Objectives set out in the draft LDP. The Vision is stated to be for the Vale of Glamorgan to be "a place:

- That is safe, clean and attractive, where individuals and communities have sustainable opportunities to improve their health, learning and skills, prosperity and wellbeing ... "

The proposed allocation of the Garden Emporium site will be contrary to this Vision, being unsustainable development in an area with very poor public transport where there are no employment prospects and allieaming, health and other facilities can only be accessed using the car.

The allocation of this site will also be contrary to the following Objectives set out in the draft LDP:

"Objective 1: To sustain and further the development of sustainable communities within the Vale of Glamorgan, providing opportunities for living, learning, working and socialising for all" - The proposed Garden Emporium site is in a wholly unsustainable location, as is the adjacent Fferm Goch.

"Objective 2: To ensure that development within the Vale of Glamorgan makes a positive contribution towards reducing the impact of and mitigating the adverse effects of climate change." - The effects of climate change will be increased if a further 40 houses are built in this location where people will have to use cars to meet their daily needs.

"Objective 3: To reduce the need for Vale of Glamorgan residents to travel to meet their daily needs and enabling them greater access to sustainable forms of transport" - Public transport at this site is very poor.

"Objective 4: To protect and enhance the Vale of Glamorgan's historic, built and natural environment" - The proposed development of the Garden Emporium site represents overdevelopment of this site, which is out of keeping with the rural area. It will also fail to preserve the back third of the site as a habitat conservation area, as proposed by the extant planning permission for 12 houses on the site.

"Objective 5: To maintain, enhance and promote community facilities and services in the Vale of Glamorgan" - The proposed development at the Garden Emporium site will place increased pressure on resources - in particular Llangan primary school which is full.

"Objective 7: To provide the opportunity for people in the Vale of Glamorgan to meet their housing !leeds." - There is no need for this housing at this location.

"Objective 10: To ensure that development within the Vale of Glamorgan uses land effectively and efficiently and to promote the sustainable use and management of natural resources." – If 40 houses are allowed to be built at the Garden Emporium site then the rear part of the Garden Emporium site, which is greenfield and has not previously been built on, will be.

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TEST 2 - The strategy, policies and allocations are not realistic and appropriate having considered the relevant alternatives and/or are not founded on a robust and credible evidence base.

1. Incorrect classification of Fferm Goch as a Minor Rural Settlement (Section 5.11 of the draft LDP):

Fferm Goch has been wrongly classified by the Council as a "Minor Rural Settlement" for the following reasons:

- a) In the Council's 'Sustainable Settlements Appraisal Review' Background paper (November 2011) ('the SSAR') -Fferm Goch should have been classified as being one of the rural, hamlets and isolated areas of the Vale of Glamorgan with an 'Anomaly Settlement' score. In paragraph 5.15 of the SSAR, the Council recognises that there are a number of settlements with relatively high scores which have been identified with anomaly scores because, for example, the settlement is located within walking distance of a one-off, high-scoring facility. Paragraph 5.15 says anomaly settlements have been identified by 'overriding' or 'limiting' factors such as:
- (i) a general limited range of services and facilities within the settlement,
- (ii) a low population (generally below 100), and/or
- (iv) the settlement being in an otherwise isolated or sensitive location.

All of these factors apply to Fferm Goch. Fferm Goch is a classic example of an anomaly settlement since it receives a full 3' score due to its proximity to a primary school. The employment score is wrong (see below), so its overall score should have been 6. It has a population of 98 (i.e. below 100). It is in an isolated location.

- b) It is the smallest of the "Minor Rural Settlements" with only 98 residents (nb Council say should have over 100) there are several other settlements with higher populations which are not classified as Minor Rural Settlements.
- c) Unlike all the other "Minor Rural Settlements" it is not recognised locally as a village it has no place sign of its own, only a street sign.
- d) it was not originally classified as a "Minor Rural Settlement" it seems to have been reclassified during the development plan process probably due to representations by the property developers who own the Garden Emporium (we note representations made by Winchester Properties on the draft preferred strategy in March 2009).
- e) The settlement scoring criteria for Fferm Goch is wrong in the SSAR Fferm Goch scores 3 for employment which is defined as meaning that there are employment opportunities on site. The only employment opportunity near Fferm Goch is Westwinds industrial estate.

This is a very small estate with only 4 light industrial buildings. A survey of these employers has confirmed that no new jobs have become available in the last 9 years and that the units collectively employ fewer than 15 people with no intention to expand.

Furthermore, one of the units has been empty and the development is not a popular industrial site. It cannot be right that this small industrial estate is classified as the same employment opportunity as those available in towns in the Vale, such as Barry, Penarth and Cowbridge. We believe Fferm Goch should score 0 for employment.

- f) Fferm Goch rightly does not have any designation as a settlement in the current UDP it is correctly classified along with other small hamlets as "open countryside". In the planning officer's report which considered the current planning permission it was "concluded that the development of the site for no more than 12 residential units, when taking into account the other material considerations would be sufficient to outweigh the local policy presumption against such development found in the Unitary Development Plan, subject to conditions and a Section 106 Legal Agreement requiring contributions to mitigate the impacts of the development" (page 22). The planning officer's report also noted, at page 12, that, "Categorising the site as brown field or previously developed land is a material consideration that does not, on its own, justify its suitability for residential development, however, the proposed amendments to the scheme concentrating development into the previously built up part of the site does have a bearing on the consequent policy position",
- g) If the list of other Minor Rural Settlements is considered, together with those which the Council decided were Anomaly Settlements or simply HamletslRural Areas, Fferm Goch stands out as an odd allocation we would strongly suggest it cannot be considered equal to any of the other Minor Rural Settlements, including nearby Graig Penllyn and Treoes, which are both substantial villages. It is much more similar to The Herberts, which the Council considered to be an Anomaly Settlement inspite of it having a primary school like Fferm Goch, although The Herberts scores for having a bus service and being much nearer to Cowbridge, whereas Fferm Goch does not. There are also villages which again are much more substantial than Fferm Goch which are not recognised as Minor Rural Settlements, including nearby Llangan and Welsh St Donats.
- h) The draft LDP at Section 5.19 (page 33) sets out the following 'common objectives' for the Minor Rural Settlements:
- Favour proposals which seek to protect and enhance the viability, accessibility or community value of existing village facilities and transport services.

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- Provide for an appropriate level, range and choice of housing, including affordable rural housing to meet local need.
- Encourage the diversification of the rural economy by favouring appropriate employment and tourism related developments.

Further, these objects are supported by Policy MG7 which at section 7.34 (page 83) states,

'New development however must always be of an appropriate scale, form and design that is sympathetic to and respects the existing character of the village and the range of services and facilities that are available. This will generally comprise infilling or limited small scale extensions to the minor rural settlements, in particular where they meet the need for local affordable housing.' Considering these statements as a whole it is apparent that Fferm Goch does not fit comfortably as a Minor Rural Settlement.

- i) If it were identified as a Minor Rural Settlement, Fferm Goch would be at risk of future residential development being allowed in this location through policy MG7 of the draft LDP. Fferm Goch is not a location where new development should routinely be permitted since it would infringe all the sustainability principles for development in rural locations. The only reason housing development has been permitted at the Garden Emporium site is because it is a brownfield site this is an exceptional site in this location.
- 2. Inappropriate allocation of 40 houses at the Garden Emporium site at Fferm Goch (policy MG2):

The allocation of 40 houses at the Garden Emporium site is inappropriate for the following reasons:

- a) A large part of the argument for allowing a huge increase in the number of houses proposed at the Garden Emporium site appears to be the classification of fferm Goch as a minor rural settlement, which is incorrect for the reasons stated above.
- b) The number of houses to be allocated at the Garden Emporium should reflect the extant planning permission for 12 houses. The draft LDP, Section 7.11 (page 75) states that, 'The number of units proposed for each identified site [which includes the Garden Emporium] is based on a density range between 25 and 30 units net per hectare or where they are available, planning application or pre-application details. Where site densities differ from these levels, this reflects local site circumstances or sensitivities.' In this case there is an existing planning permission for 12 units which should therefore have been the starting point for this site and there are good reasons why a higher density of units should not be permitted and has been consistently refused by the Council on planning applications considered to date (unsustainability, lack of local infrastructure and employment, very poor public transport and preservation of a rare plant).
- c) Policy MG8 (page 84) states 'In Minor Rural Settlements, a net residential density of 25 net dwellings per hectare will be required.' It then continues 'Lower density levels will be permitted where it can be demonstrated that:
- 1. Development at the prescribed densities would have an unacceptable impact on the character of the surrounding area;
- 2. Reduced densities are required ... to preserve a feature that would contribute to existing or future local amenity. '-

In relation to point 1, above, development of 40 houses would have an unacceptable impact on this area which with the exception of Fferm Goch consists of isolated and dispersed rural houses.

In relation to point 2. above, there is an identified rare plant on this site which would be preserved by the extant planning permission.

- 3f Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
  - a) Section 5.11 (page 26)- delete Fferm Goch from the list of Minor Rural Settlements.
  - b) Policy MG2 (page 74)- amend the number of houses allocated to The Garden Emporium, Fferm Goch from 40 to 12.
  - c) Residential allocations table (page 145)- amend number of dwellings at The Garden Emporium, Fferm Goch from 40 to 12
  - d) Proposals map- amend to exclude back area of site MG2(30) identified as habitat management area edged green on attached plan
  - e) Housing Supply Background Paper (November 2011) error in table 1 site no.30 The Garden Emporium, Fferm Goch number of units should be 12, not 220.
- 4b If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -

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|--|---|-----------------------------------|--|---|---|
| Date Lodged     Status     Petition and No.     Supporting Evidence       30/03/2012     M     □     0     □ | Additional SA SEA   | Rep format:<br>Comment form       | , ,                                    | mments to be consiered by 'writte earing session of Public examinat | •                                       |
| 2a - Do you consider the LDP is Sound? Unsound   | 2b - If you think that the Plan is unsound and do Procedural Tests - P1 - Yes         | pes not not meet or<br>P2 - Yes   | ne or more test(s) of sound            | Iness, please indicate which test(s                                 | s) that it fails.                       |
|  | Consistency Tests - C1 - Yes  | C2 - Yes                          | C3 - Yes                               | C4 - Yes  |   |
|  | Coherence and Effectiveness Tests - CE1 - Y   | es CE                             | 2 - Yes CE3                            | - Yes CE4 - Yes   |   |
| 3a - Which part of the Deposit Plan are you commenting on?   | Policy Number: Paragraph N  | Number: Pr                        | oposal Map:                            | Constraints Map   | Appendices:                             |
|  | MG9. MD12. MG2 7.41. 7.44.  | 6.49. 6.52. MG                    | G9                                     | Feb 2012  | Appendix 9 -<br>Supporting<br>Documents |
| 3b - Do you wish to see any changes made to the Deposit Plan   | as a result of your representation? Yes   | (If "N                            | lo" or "Unanswered" - go t             | to 3d)  |   |
| 3c - What changes would like to see made to the Deposit Plan?  |   | ew <u>Paragraph:</u><br>nanswered | Amended Paragraph: No<br>Unanswered Ye | ew Or Amended Site: Other (see<br>es Unanswere                      | <del></del>                             |
| 3d - If your representation relates to a new, deleted or amende  | nd site, did you submit the site as a Candidate Si<br>Site Name: Land East of Llangan | te? Yes                           | (If "Yes", please giv                  | e the Candidate Site Name and re<br>Site Reference: Site reference  | ,                                       |

3e - Please set out vour representation below:

The proposal MG9 to develop a large, unsustainable Gypsy traveller site on a greenfield site very close to the Hamlet of Llangan, will nearly double the population of Llangan Hamlet and place pressure on local infrastructure and services. I feel this proposal is clearly disproportionate and the council has shown little or no concern for our community or that of the Gypsy travellers in putting forward this totally unfair, unsustainable policy.

The site location at Llangan is against both local and national policy, in terms of development and does not meet the identified needs of the gypsy and traveller community (2008 Fordham report) plus other national policies such as the, RURAL EXCEPTION POLICY (TAN2), Designing Gypsy and Travellers Sites Good Practice Guide, Special Landscape Area's (SLA), conservation area impact and WAG guidance of Design of Gypsy traveller sites.

The council did not consulted with the local community, emergency services, primary school or police, before putting forward this unfair proposal into the draft LDP.

It's also find it very hard too hard to believe that the council is once again challenging the residents of Llangan over the proposal for a large Gypsy traveller site, when they have failed to take any action after a judicial review and undertaking by the previous council found that the development of a single family Gypsy site at Llangan was not appropriate. The council would have had many opportunities to move the family of the current unauthorised site to a more suitable site that would meets there needs but failed to do so over many years.

Looking at the site assessments undertaken by Llangan action group, it is guite clear that the VOG has access to other sites that meet the above criteria and would be sustainable.

Additional information attached:

REPRESENTATIONS AGAINST ALLOCATION OF GYPSY & TRAVELLER SITE AT LAND EAST OF LLANGAN

TEST P1

The LDP has not been prepared in accordance with the Community Involvement Scheme, see below key points:

- The Emergency Services and Local Primary school have all confirmed that they have NOT been consulted on the proposed site MG9. The LEA confirmed they had not been consulted about the Gypsy site.
- Registered consultees have not been informed of the consultation stages.
- According to the Welsh Government's document 'Travelling to a better future' there is an onus on the LA to consult with its strategic partners in delivering Gypsy & Traveller sites. No consultation has taken

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place.

- Good practice (Welsh Government document 'Good Practice Design in designing Gypsy & Traveller sites') suggests that where Gypsy & Traveller sites are concerned the local community should be engaged as early as possible — we believe that the Council has undertaken the minimum consultation in terms of the LDP and insufficient consultation with respect to the Gypsy & Traveller site in accordance with best practice.

### TEST P2

- 1. The Sustainability Appraisal is flawed and contradictory the proposed sites do not meet with national policy in respect of sustainability. The allocation of Llangan is not consistent with previous Planning Rejections by the Council which considered sustainability (Bonvilston Sept 2011) and with similar determinations by the Planning Inspectorate (Pembroke Sept 2011).
- 2. The allocation of MG9 is not consistent with the proposed LDP policies.

### TEST C1

The Land Use Plan (with regards to Gypsy & Traveller sites) does not relate to any strategy - The Housing Strategy is out dated and does not provide any structure for assessing Gypsy & Traveller needs or site location.

### TESTC2

- 1. The Site allocation does not have regard to the following National Policy:
- -Welsh Government Circular (30/2007):
- The site is RURAL and is "UNSUSTAINABLE" as there are no local services

(no shops, food and drink outlets, doctor, dentist, Library, rail services or any main settlement within 5km etc). Llangan and Fferm Goch both score 0 points for local services in the evidence based assessment 'Sustainable Settlements Appraisal'

- The site would not comply with a RURAL EXCEPTION POLICY as it advocates that all pitches are accommodated on a RURAL site including transient pitches which would not comply with TAN 2.
- Any business operated from the site would be in contradiction of RURAL EXCEPTION guidance.
- The site allocation does not take into account the "SCALE" of the resident community. Llangan has a population of less than 100 with 35 homes and this proposal nearly doubles the size of the Hamlet.
- Example of similar site. In 2007 an application of the Sustainability issue was applied by the Planning inspector in Pembroke where an appeal was refused solely on this basis.
- The VOG Council has refused an application recently in Bonvilston on the basis of Sustainability and services in this case were closer to the site than in the case of Llangan proposal.
- Designing Gypsy and Traveller Sites Good Practice Guide The site is too small; therefore cannot meet the needs identified in the LDP.
- -The site measures 7400 m2 and could only accommodate 14 pitches without infrastructure (guidance is 500m2 per pitch plus refuse area; office; play area; infrastructure (roads etc)
- The access road to the site does not meet the minimum requirements for emergency vehicles (3.7m it is actually 15m)
- The site access is poor and "unsafe" having extended walks (in excess of 800m to bus stop) along an unlit lane with no public footpath or street lighting.
- The proposal of 21 units on the site would restrict the ability of emergency vehicles to manoeuvre around the site.
- New sites grants are available (and cost should not be a material planning consideration).
- -The guidance requires that sites are:
- sustainable the Llangan site proposal is not
- equivalent to standards that would be expected for social housing in the settled community This would not meet the standards and this site would not have been considered appropriate for development for residential in either the current or proposed plans
- have the effect of encouraging and developing good relations between

Gypsies & Travellers and the settled community — the large scale of this proposal could mean that establishing good relations with the local community of Llangan would be unlikely and could also result in increased tensions in the community.

- based on WAG guidance of Design of Gypsy traveller sites the maximum number of pitches is 14, and the proposal at Llangan exceeds this number.
- Travelling to a Better Future

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- Recommends that LA's engage with their Housing Association Partners to bring sites forward. The VOG Council has not done this.
- "Situating transit provision on residential Gypsy sites is not an option preferred by the Gypsy and Traveller community as this can lead to tensions among different family groups and make site management and maintenance very difficult." This creates a sense of "fear" within the settled Gypsy & Traveller community. The proposal is recommending that transient and permanent sites are co-located.
- Planning Policy Wales 2011
- The proposed site at Llangan is greenfield land, according to the definition of brownfield land set out in Figure 4 1 of PPW;
- it will not reduce the need to travel, due to the limited local service provision in close proximity to the site;
- offers very limited access to public transport facilities;
- is not large enough to provide ancillary facilities required to support a sustainable development as set out in paragraph 3.30 in accordance with Designing Gypsy and Travellers Sites Good Practice Guide;
- is located within a Special Landscape Area (SLA) and in close proximity to a Conservation Area. The assessment of the Llangan site incorrectly states that it is not within an SLA, so makes no reference to the sites proximity to the conservation area of Llangan. The location can be clearly seen from the conservation area.
- does not meet the identified needs of Gypsies and Travellers, in the Vale of Glamorgan (Fordham report 2008 evidence);
- does not promote sustainable access to employment, shopping, education, health, community, leisure and sports facilities;
- does not maximise opportunities for community development and social welfare;
- does not foster social inclusion due to the isolated location of the site; and
- does not contribute to improvements in health due to the isolation from services and facilities.
- 2. MG2. The draft policy MG 2 actively discriminates the Gypsy community by excluding them from the wider housing programme and potentially abuses their human rights. Policy MG 2 should be revised to allow the VOG to identify appropriate sites in the same way as Affordable Housing.

### TESTC3

- 1. The policy does not have due regard to the Wales Spatial Plan.
- The key theme of the Wales Spatial Plan is achieving sustainable development through focusing new development in areas which have good access to key services and facilities. As there are no services surrounding the site the allocation of MG9 is not consistent with the objectives of the Wales Spatial Plan. The Gypsy site proposal fails Soundness test Consistency C3 because the policy does not have due regard to the Wales Spatial Plan.

### TESTC4

- 1. The allocation of this site does not have regard to the relevant Community Strategy in the following respects:
- "The diverse needs of local people are met through the provision of customer focused, accessible services and information". This cannot be achieved by the allocation of a non-accessible rural allocation.
- "Vale of Glamorgan residents and organisations respect the local environment and work together to meet the challenge of climate change"- The allocation of MG9 places heavy emphasis on the use of the car to access the most basic facilities shops, health, education etc.
- "Older people are valued and empowered to remain independent, healthy and active. They have equality of opportunity and receive high quality services to meet their diverse needs"— All services are miles away and inaccessible to

the older community. The VERY POOR public transport system is located

1050m from the site and is in excess of the maximum distances as defined in

the proposed LDP and "Manual for Streets".

- "People of all ages are able to access coordinated learning opportunities and have the necessary skills to reach their full potential helping to remove barriers to employment"—There is no employment opportunity near to the site.

The local primary school has confirmed that it is full and that its projections suggest that it doesn't have the capacity for such a large development (also consider the existing approval of 12 dwellings at Fferm Goch).

- The small local industrial unit has raised concerns in relation to the scale of the proposal.

### TEST CE1

The Plan does not set out a coherent strategy in the following respects

- The Strategy makes the following statements:

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The LDP will seek to provide a policy framework which: Manages the housing supply effectively in order to provide a range of good quality, affordable homes in sustainable locations

Reduces out commuting by providing opportunities for new housing, retail and employment development in accessible locations in the Vale of Glamorgan

The allocation of this rural site in open countryside does not meet this objective.

- The LDP also states its vision as being:
- "Our Vision for the Vale of Glamorgan is a place:

That is safe, clean and attractive, where individuals and communities have sustainable opportunities to improve their health, learning and skills, prosperity and wellbeing 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 sustainability of the area." The allocation of this site in policy MG9 does not meet these objectives being in a rural location with inadequate facilities and transport links.

- The Allocation of this site in policy MG9 does not comply with the following objectives of the LDP:
- -Objective 1: To sustain and further the development of sustainable communities within the Vale of Glamorgan, providing opportunities for living, learning, working and socialising for all. The site's location would clearly not meet this objective.
- Objective 2: To ensure that development within the Vale of Glamorgan makes a positive contribution towards reducing the impact of and mitigating the adverse effects of climate change. The allocation of this site will have entirely the opposite effect to this objective.
- Objective 3: To reduce the need for Vale of Glamorgan residents to travel to meet their daily needs and enabling them greater access to sustainable forms of transport. The allocation of this site will have entirely the opposite effect to this objective.
- Objective 4: To protect and enhance the Vale of Glamorgan's historic, built, and natural environment. The development of this site would not meet this objective: a planning refusal on an adjacent site in May 2002 stated "It is a proposal that would adversely affect the undeveloped rural character of the area"
- Objective 5: To maintain, enhance and promote community facilities and services in the Vale of Glamorgan The local primary school has not been consulted, had they been it would have been recognised that the school does not have capacity, nor is it projected to have the capacity.
- Objective 7: To provide the opportunity for people in the Vale of Glamorgan to meet their housing needs- States that development of housing should be in sustainable locations This is not. Furthermore, it brings into question POLICY MD12 which is discriminatory in that Gypsy & Traveller sites are treated differently from other housing allocations. An inclusive policy would see Gypsy & Traveller sites being assessed on the same basis as AFFORDABLE HOUSING and considered for ALL candidate residential sites in the LDP
- Objective 10: To ensure that development within the Vale of Glamorgan uses land effectively and efficiently and to promote the sustainable use and management of natural resources. The inappropriate use of finite resources can impact on the ability of future generations to fulfil their needs. The LDP through favouring the use of previously developed land and the sustainable use of natural resources of whatever kind and wherever they are located, will contribute to preserving their availability for future generations. This is agricultural land in the Special Landscaped Area.

#### TEST CE2

The strategies, policies and allocations are not realistic and appropriate having considered relevant alternatives and are not founded on robust evidence:

- 1. The allocation of Llangan is purely on the basis of site ownership by the Vale and does not meet the requirement of Policy MD12.
- 2. The Gypsy & Traveller site assessment (anecdotal) conflicts with other evidence based background papers; specifically the Sustainable Settlement Appraisal. The SSA states 0 points for public transport but the Gypsy & Traveller site assessment states that public transport facilities are good.
- 3. The Gypsy Traveller site assessment states "good highway access", yet the access falls considerably short of the minimum requirement for vehicle access the access lane is 2.5m wide, against a minimum requirement of 3.7m plus footpath of 1.2m.
- 4. The Gypsy Traveller site assessment does not reflect the current legal obligations of the VOG in respect of this site, yet the other site assessments highlight legal issues.
- 5. Several privately-owned sites were put forward as candidate sites for Gypsy & Traveller sites but were dismissed as they were not in Council ownership. Not being in council ownership should not be a reason to reject privately owned sites.
- 6. The key issue is that the site allocation does not reflect the identified need of the Gypsy & Traveller community as highlighted in the 2008 Fordham report.
- 7. The Gypsy Traveller site assessment suggests that Fferm Goch is the local settlement when Llangan is recognised in this and historic documents as the local settlement being only 150m from the proposed site. It appears that the council has also linking the site at Llangan to the Hamlet of Fferm Goch in order to increase the site assessment positive score.
- 8. The assessment makes no reference that the site is in a Special Landscape Area (SLA).
- 9. The assessment makes no reference that the site is adjacent to a Conservation Area, within the Conservation Management Plan for this area there is a specific requirement to protect the view from the edge of the conservation area over the proposed site. The proposed site is clearly visible form the conservation area.
- 10. The allocation of Fferm Goch as a Minor Rural Settlement is incorrect. The appraisal scored 9 points. 3 are for employment which puts this site on par with the major settlements such as Barry. This is on the

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basis of 4 light industrial buildings. A survey of these employers has confirmed that zero new jobs have become available in the last 9 years and that the units collectively employ fewer than 15 people with no intention to expand. Furthermore, one of the units has been empty and the development is not a popular industrial site.

- 11. Fferm Goch has a population of less than 100 (98)— of the 5 sites in the Vale of Glamorgan with a population of 98 only Fferm Goch is classified as a Minor Rural site (probably based on the 9 points). The remainder are classified as Hamlets and there is a presumption against development in Hamlets (or as a minimum the scale would need to be appropriate and tied to a Rural Exception policy). The guidance requires ALL sites of a population below 100 to be classified as a Hamlet Fferm Goch should be recategorised as a Hamlet.
- 12. The Council has undertaken a study (Fordham report 2008) where the message was extremely strong that the Gypsy & Traveller community wanted smaller sites located on the fringes of larger communities. The report confirmed that isolated, rural sites restricted access to Health, Education and welfare facilities that disadvantaged them and needs to be seen in the light of the above objectives. The following is a quote from the Fordham report:

"Participants living on Shirenewton had three main criticisms: the site was too big, the distance from local amenities along with the lack of local transport,"

"This created many problems for the residents, especially the poorest: 'for a person like me on the bread line it's very tough. I can't afford to use the car', 'everything is a mile away, including the bus stop. It takes a long walk on a busy road to get to the shops and schools".

"The tables demonstrate that access to services such as local shops, health centres and education facilities from both sites is difficult by foot and by local transport systems. This difficulty was eased when participants used their cars, however the level of ease was lower for Roverway due to the difficult entry onto the main road".

"Participants reported that access to local amenities, health services and education was low for both sites by foot or by public transport: Everything is a mile away, including the bus stop. It takes a long walk on a busy road to get to the shops and schools".

"It was thought that smaller sites would reduce the problem of on-site conflicts: 'they need smaller sites and not too many different families, otherwise when you have a row the whole site becomes a war zone"

"This affected the ability of the households interviewed to access local services such as shops, health centres and education facilities. It was reported that this problem mainly affected the women: men take the vehicles that the household own to work during the day, leaving the women without their own transport and often away from public transport routes"

"Participants did not specify where in Cardiff or the Vale of Glamorgan sites should be located. It was noted that sites should be on the outskirts of towns to enable access by foot to local services such as shops, the Launderette and health centres"

"While the focus of the survey was on accommodation requirements, the questionnaire also collected information on access to services, including health and education. Research has found that poor accommodation can prevent access to services and so cannot be seen in isolation."

"Participants living on sites felt that there were site restrictions that limited their work options. These were mainly associated with the location of the sites and lack of access to public transport rather than site regulations: 'no buses, no local transport, Bad access'

"Participants living on local authority sites reported that the lack of local public transport provision in the area affected their ability to send their children to school, access health services and work opportunities, and limited their ability to attend training and education courses"

"Participants were asked about where they would like future sites to be, but were not specific about locations within the County Boroughs, instead emphasising the importance of public transport to any new sites. Government draft guidance on site design stresses the importance of access to services and the promotion of integrated co-existence' between the site and surrounding community."

"The precise location, design and facilities of any new sites should be drawn up in consultation with Gypsies and Travellers to ensure that the additional provision meets their needs. The health and safety implications of a new site's location should be considered in finding a balance between offering sites in good locations and the additional land costs this would entail. The settled community neighbouring the sites should also be involved in the consultation from an early stage."

13. An independent highway study recently undertaken by Capita Symonds, surrounding the proposed site has concluded that:

"The 1km long lane itself is of poor horizontal alignment, with poor forward visibility and unsuitable for regular vehicular traffic. If the site is developed the lane itself would need major upgrading, which would certainly change its appearance within this rural environment."

"The village school is approximately 1km from the village and 900 metres from the proposed site. It is noted that the route does not offer any facilities for pedestrians, such that the only safe way for children to travel between the site and the school safely would be by vehicle. This route would also be potentially hazardous for cycle use for children, the elderly or infirm and could be potentially hazardous for all users other than by car."

"With regard to the appropriateness of the location for a traveller's site development in relation to transportation, it is difficult to refer to standard guidelines, as few relate to "rural highways", most highway design standards for residential development relate to urban areas. Hence, the advice contained within this report is based on best available information, acceptable highway standards for developments of similar size and transport needs of small communities. Welsh Government guidelines state sites should be situated in close proximity to transport links. The Llangan site would not appear to meet that criteria, being situated

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away from the main transport infrastructure, sites should also have ready access to schools, doctors and shops, against which requirements Llangan again appears to fail."

"With regards to the existing lane, it is generally considered that where there is direct access to dwellings, the previous standard for developments, Design Bulletin 32 offers guidance where it states that a desirable minimum carriageway width of 5.5 metres is appropriate, together with 2.0 metre wide footways on both sides. This will allow two way traffic at all times, and safe movement of pedestrians."

"Thus the lane itself should be widened to this minimum standard, which will require the removal of the existing hedge line on one or both sides of the lane and probable acquisition of land from the adjoining fields. This will of course change the environmental character of the area substantially, but is considered essential to cater for increased vehicle and pedestrian traffic"

14. There is complete inconsistency with the allocation of MG9 against the proposed policies.

#### TEST CE3

- 1. The VOG council make no reference as to how they are going to manage such a large site. The 21 unit site in Rover Way Cardiff has 3 full time Council staff allocated to it.
- 2. The current Housing Strategy expires April 2012 and makes no relevant reference as to how the Gypsy & Travelling Community will be monitored in terms of growth or need. Indeed, there is no strategy that underpins the Gypsy & Traveller community or housing at all.

#### TEST CE4

- 1. Policy MD12 (Gypsy & Traveller) is discriminatory. It offers no flexibility for the Council to bring forward sites that are sustainable / suitable for Gypsies & Travellers through the policies derived within the plan.
- 2. MD12 should be redrafted to enable smaller, sustainable sites to be included within the Affordable Housing requirements and delivered through the Registered Social Landlord sector.
- 3. To argue that the Private Sector has been consulted to offer sites is not accepted. The private sector were not likely to volunteer sites for such a contentious use. The LDP should set clear strategies / policies to deliver sustainable sites for all members of the community; private; social and travelling. The current allocation does not meet this and could strongly be argued breeches the Human Rights of the Gypsy traveller community as it does not provide a suitable, sustainable site that meets the guidelines in the 2008 Fordham report.
- 3f Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)

The proposed Gypsy traveller site at Llangan (Policy MG9) should be removed from the LDP draft plan. The VOG should identify an alternative site that has been assessed according to a relative sustainability appraisal and meets the requirements of the following reports & policies: 2008 Fordham report, RURAL EXCEPTION POLICY (TAN2), Designing Gypsy and Travellers Sites Good Practice Guide and Special Landscape Area's (SLA), conservation area impact. WAG guidance of Design of Gypsy traveller sites the maximum number of pitches (14 max). Planning Policy Wales2OII, Figure4.1 of PPW—(Greenfield land should not be used).

Note. Alternative sites have been identified by Llangan Action (report prepared by Barton Willmore LLP on behalf of Llangan Action). I would like to offer the Llangan Action alternative site assessments and planning objection as related information to my personal objection.

Policy MD12 should be amended so that it does not discriminate against the Gypsy & Traveller community. All sites during the plan should be assessed on a similar basis as Affordable Housing.

Policy MG 2 should be revised to allow the VOG to identify appropriate sites in the same way as Affordable Housing.

4b - If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing The Policy MG 9 (proposed Gypsy site at Llangan) does not meet with national policy in respect of sustainability, nor does it comply with a RURAL EXCEPTION POLICY. The number of pitches is too high when compared to the "Designing Gypsy and Traveller Sites Good Practice Guide".

(ordered by Representation ID No.)

| Representor ID and details: 4037/DP1 F & R Jamieson  |  |                         |                                      |                        |  |   |        |
|--|--|-------------------------|--------------------------------------|------------------------|--|---|--------|
| Date Lodged     Status     Petition and No.     Supporting Evidence       30/03/2012     M     0 | Additional SA SEA                                |                         | Rep format:<br>Letter                | ,                      | comments to be consideral control cont | ered by 'written representations' or oblic examination? | olo    |
| 2a - Do you consider the LDP is Sound? Unanswered  | 2b - If you think that the<br>Procedural Tests - |                         | oes not not meet on<br>P2 - Unanswer | ` '                    | undness, please indicate   | e which test(s) that it fails.                          |        |
|  | Consistency Tests -                              | C1 - Unanswered         | C2 - Unanswer                        | red C3 - Unanswei      | red C4 - Unanswe   | ered  |        |
|  | Coherence and Effective                          | eness Tests - CE1 - l   | Jnanswered CE                        | 2 - Unanswered C       | E3 - Unanswered C  | E4 - Unanswered   |        |
| 3a - Which part of the Deposit Plan are you commenting on?                                       | Policy Number:<br>MG2(19). MG2(20)               | Paragraph N             |                                      | oposal Map:            | Constra  | aints Map Appendices:                                   | .===== |
| 3b - Do you wish to see any changes made to the Deposit Plar                                     | n as a result of your repre                      | sentation? Unanswe      | red (If "N                           | o" or "Unanswered" - g | go to 3d)  |   |        |
| 3c - What changes would like to see made to the Deposit Plan                                     | <del></del>                                      |                         |                                      |                        | New Or Amended Site:<br>Unanswered   | Other (see Notes): Unanswered                           |        |
| 3d - If your representation relates to a new, deleted or amende                                  | ed site, did you submit the<br>Site Name:        | e site as a Candidate S | ite? Unanswered                      | (If "Yes", please      | give the Candidate Site<br>Site Reference:   | Name and reference if known)                            |        |

3e - Please set out your representation below:

As a resident of Dinas Powys I wish to express my concerns re, the implications of the effect that the proposed additional housing would have on the local highways network.

In Dinas Powys it is proposed that a minimum of 400 addition houses will be built on the St Cyres annexe and Caerleon Road, Both sites are on the Murch side of the community which is served by only two access points to the main road [A4055]. Both these junctions, namely the Infants School traffic lights at Murch Bridge and Cross Common Road at its junction with the A4055 are either at capacity or structurally suspect.

The 400 houses would generate between 600 to 800 additional cars in both directions, particularly at peak times. The additional traffic would have a profound and adverse impact on the community as the existing roads are under great pressure now.

Further, I am concerned that there have not been any proposed extra community facilities of substance. A local church is in desperate need of a permanent base, the local sporting facilities are not adequate for the present demand and medical services are restricted due to the limitations of space at the Dinas Powys Surgery premises on Cardiff Road.

There appears to be no serious consideration having been given to other views as to the future possible use of St Cyres Annexe, Murch Road. It is worth noting that the school buildings are in good condition although in need of a little investment. To simply seek to tear down the school without any reference to the community needs would be a shameful waste. I also have concerns regarding the capacity of the local schools to accommodate the extra pupils due to the additional houses.

Then there is the wider consideration of the Plan. Up to 10,000 additional houses are planned, many in the south east area of the Vale, e.g. 2,000 units already having been approved at the Waterfront, Barry.

Much of this traffic will be funnelled through Dinas Powys and join the ever lengthening queues leading to and from the Merrie Harrier. The proposals in Sully, Penarth, Lavernock and the land adjacent St Josephs' School, Sully Road will only add to the existing congestion at this junction.

Already the air pollution levels are excessive. The Nitrogen Dioxide [N02] levels are recorded as being 43.8 units with the maximum recommended level being 40 units along Cardiff Road, Eastbrook. An increase in vehicles, particularly standing traffic, would exacerbate the situation. The level of other emissions such as CO (carbon monoxide) and Particulates [PM105] are not available but need clarifying

The Deposit plan does not indicate what measures will be taken to encourage the availability and use of public transport. I understand that there is a serious lack of rolling stock in Wales and providing extra trains will be a major challenge. Additional buses would simply be caught up in the traffic chaos the extra housing would cause.

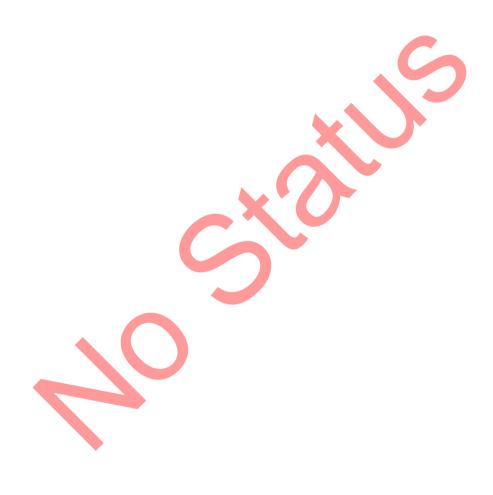
It is essential that major highway infrastructure improvements are made BEFORE hundreds of additional housing could even be considered.

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Representor ID and details: 4037/DP1 F & R Jamieson

3f - Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)

4b - If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -



| Representor ID and details: 4038/DP1 William H Pugh  |   |                      |                                  |                            |                       |   |   |
|--|---|----------------------|----------------------------------|----------------------------|-----------------------|---|---|
| Date Lodged     Status     Petition and No.     Supporting Evidence       02/04/2012     M     0 | Additional SA SEA                                 |                      | Rep format:<br>Comment for       | ·                          | ,                     | be consiered by 'written resion of Public examination | •   |
| ·  | Procedural Tests -                                | P1 - Yes             | P2 - Yes                         | ` '                        |                       | ase indicate which test(s) th                         | nat it fails.                                 |
|  | Consistency Tests - Coherence and Effective       |                      | C2 - Yes                         | C3 - Yes                   | C4 -<br>CE3 - Yes     | CE4 - Yes   |   |
| · · · · · · · · · · · · · · · · · · ·  | Policy Number:<br>MD12. MG9                       |                      | ragraph Number:<br>) - All       | Proposal Map:              | )                     | Constraints Map February 2012                         | Appendices: Appendix 9 - Supporting Documents |
| 3b - Do you wish to see any changes made to the Deposit Plan                                     | as a result of your repre                         | esentation?          | Yes                              | If "No" or "Unanswered     | d" - go to 3d)        |   |   |
| 3c - What changes would like to see made to the Deposit Plan?                                    | New Policy:<br>Unanswered<br>Notes:               | Amended Polic<br>Yes | cy: New Paragraph:<br>Unanswered | Amended Paragra Unanswered | ph: New Or Ame<br>Yes | ended Site: Other (see No<br>Unanswered               | <u>tes):</u>                                  |
| 3d - If your representation relates to a new, deleted or amende                                  | d site, did you submit th<br>Site Name: Land East |                      | ndidate Site? Yes                | (If "Yes", plea            | ū                     | didate Site Name and reference: Site reference M      | ,   |
| 3e - Please set out your representation below:   |   |                      |                                  |                            |                       |   |   |

- 1 Emergency Services and local primary school have not been consulted on proposed site MG9.
- 2. WG Good Practice Design for Gypsy and traveller sites suggests that the local community should be engaged as early as possible Vale of Glam has carried out the minimum consultation possible.
- 3. Proposed site does not meet with national policy in respect of sustainability.
- 4. The allocation of MG9 is not consistent with the proposed LDP policies.
- 5. The Land Use Plan and Housing Strategy is outdated and does not provide any structure for assessing G & T needs or site location.
- 6. The site is Rural and therefore unsustainable no shops, public transport, amenities, healthcare, education, etc. The Vale of Glam has previously refused an application for a site in Bonvilston where these services were closer. There is no street lighting or footways to/from the site or to the local bus stop, (distance 800m form the site), therefore unsafe for pedestrians who would be living at this site.
- 7. The allocation of the MG9 Site places heavy emphasis on the use of the car to access the above most basic facilities.
- 8. Minimum vehicle access in the G&T site assessment states 'good highway access'. However, the minimum requirements are 3.7m for the road with a 1 .2m footway. The existing access lane is only 2.5m with no footpath. There is also no safe pedestrian access or footways from the proposed site to the local primary school.
- 9. Business would be generated from the site in contradiction of the Rural Exceptance guidance.
- 10. The proposed site would double the population of the Hamlet of Llangan. A recent application in Pembroke was refused by the Planning Inspector solely on this basis.
- 11. The site is too small and does not meet the minimum requirements for emergency vehicles.
- 12. The proposal is for a mixed Transient and Residential G & T site this can lead to tensions among different family groups and potential unrest in the community.

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Representor ID and details:

4038/DP1 William H Pugh

- 13. The site is Greenfield land within a Special Landscape Area and close to a Conservation Area.
- 14. Very poor public transport system for older people and in excess of the maximum distances as defined in the proposed LDP and 'Manual for Streets'.
- 15. No employment opportunities near to the site.
- 16. Concerns form the occupants of the local industrial units regarding the risk of anti-social behaviour please consider evidence within Fordham Report and Guidance for G&T which recommends sites not larger than I4units and not mixed permanent/transient.
- 17. The allocation of this rural site does not meet the objective of the policy framework in the LDP to provide a range of good quality, affordable homes in sustainable locations.
- 18. The allocation of the Llangan site is purely on the basis of site ownership by the Vale of Glam and does not meet the requirement of Policy MD12.
- 19. The key issue is that the site does not reflect the identified need of the G&T community as highlighted in the Fordham Report.
- 20. The Fordham Report undertaken by the Vale of Glam strongly indicated that the G&T community wanted smaller sites located on the fringes of larger communities. The report confirmed however that isolated, rural sites restricted access to Health, Education and welfare facilities that would disadvantage the G&T community.
- 21. In summary, there seems to be a complete contradiction with the allocation of the MG9 site against the proposed LA policies.
- 3f Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
  - 1. I am suggesting that the site MG9 is removed from the plan and an alternative site that has been assessed according to a relative sustainability appraisal is put in its place.
  - 2. I am suggesting that Policy MD12 is amended so that it does not discriminate against the Gypsy and Traveller community. All sites during the plan should be assessed on a similar basis as affordable housing.
- 4b If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -

| Representor ID and details: 4039/DP1 K & G Taylor   |  |                              |                                 |  |   |       |
|---|--|------------------------------|---------------------------------|--|---|-------|
| Date Lodged     Status     Petition and No.     Supporting Evidence       30/03/2012     M     0      | Additional SA SEA  | Rep format:<br>Letter        | , ,                             | our comments to be consier<br>at a hearing session of Publ | ed by 'written representations'<br>lic examination? | or do |
| 2a - Do you consider the LDP is Sound? Unanswered   | 2b - If you think that the Plan is unsound ar Procedural Tests - P1 - Unanswered   |                              | ` '                             | soundness, please indicate                                 | which test(s) that it fails.                        |       |
|   | Consistency Tests - C1 - Unanswered  | C2 - Unans                   | wered C3 - Unansv               | vered C4 - Unanswere                                       | ed  |       |
|   | Coherence and Effectiveness Tests - CE   | 1 - Unanswered               | CE2 - Unanswered                | CE3 - Unanswered CE  | 4 - Unanswered                                      |       |
| 3a - Which part of the Deposit Plan are you commenting on?  | Policy Number:         Paragra           MG2(19).         MG2(20).         . | ph Number:                   | Proposal Map:                   | <u>Constrai</u>  | ints Map Appendices:                                |       |
| 3b - Do you wish to see any changes made to the Deposit Plan  | as a result of your representation? Unan   | swered (If                   | f "No" or "Unanswered"          | - go to 3d)  |   |       |
| 3c - What changes would like to see made to the Deposit Plan?   | New Policy: Amended Policy: Unanswered Unanswered  | New Paragraph:<br>Unanswered | Amended Paragraph<br>Unanswered | n: New Or Amended Site: Unanswered                         | Other (see Notes):<br>Unanswered                    |       |
|   | Notes:   |                              |                                 |  |   |       |
| 3d - If your representation relates to a new, deleted or amende                                       | d site, did you submit the site as a Candidat<br>Site Name:  | te Site? Unanswer            | red (If "Yes", pleas            | se give the Candidate Site N<br>Site Reference:            | Name and reference if known)                        |       |
| 3e - Please set out your representation below:  Vale of Glamorgan Deposit Local Development Plan 2011 | - 2026   |                              | <b>,</b>                        |  |   |       |
| Words almost fail us!!  |  |                              |                                 |  |   |       |
| Does anyone involved with these ludicrous plans have an   | y idea of the traffic problems in and around   | Dinas Powys now.             |                                 |  |   |       |
| Gridlock along the Cardiff Rd through Eastbrook (stretching   | ig back to McDonalds early morning). Traffic   | c speeding through N         | Mill Rd and Pen-y-Turnpi        | ike.   |   |       |
| An accident waiting to happen at the corner of Castle Driv  | e opposite Tesco.  |                              |                                 |  |   |       |
| I drive a mini-bus for the old people, driving up Murch Cre   | scent can be a problem and as for Windy R  | idge - fine after six, 3     | 3 points turns!!                |  |   |       |
| This whole fiasco should be binned.   |  |                              |                                 |  |   |       |
| 3f - Please outline the changes you wish to see made to the D   | eposit Plan to make it sound (if relevant)   |                              |                                 |  |   |       |
| 4h - If you wish to speak please confirm which part of your rer                                       | vesentation you wish to speak to the inspec  | tor about and why th         | nev consider it he neces        | sary to speak at the hearing                               |   |       |

| Representor ID and details: 4040/DP1 K Taylor   |  |                            |                                  |                             |                                     |  |                |
|---|--|----------------------------|----------------------------------|-----------------------------|-------------------------------------|--|----------------|
| Date LodgedStatusPetition and No.Supporting Evidence30/03/2012M0                                    | Additional SA SEA                                |                            | Rep format:<br>Letter            |                             |                                     | consiered by 'written rong of Public examination |                |
| 2a - Do you consider the LDP is Sound? Unanswered   | 2b - If you think that the<br>Procedural Tests - | Plan is unsound and d      | loes not not meet<br>P2 - Unansv | ` '                         | soundness, please i                 | indicate which test(s) th                        | ıat it fails.  |
|   | Consistency Tests -                              | C1 - Unanswered            | C2 - Unansv                      | wered C3 - Unans            | swered C4 - Un                      | answered   |                |
|   | Coherence and Effective                          | eness Tests - CE1 - I      | Unanswered                       | CE2 - Unanswered            | CE3 - Unanswered                    | CE4 - Unanswere                                  | d              |
| 3a - Which part of the Deposit Plan are you commenting on?  | Policy Number:                                   | Paragraph l                | Number:                          | Proposal Map:               |                                     | Constraints Map                                  | Appendices:    |
|   | MG2  |                            |                                  |                             |                                     |  |                |
| 3b - Do you wish to see any changes made to the Deposit Plan  | as a result of your repre                        | esentation? Unanswe        | ered (If                         | "No" or "Unanswered         | " - go to 3d)                       |  |                |
| 3c - What changes would like to see made to the Deposit Plan  | <del></del>                                      |                            | New Paragraph:<br>Unanswered     | Amended Paragray Unanswered | oh: New Or Amende<br>Unanswered     | ed Site: Other (see No<br>Unanswered             | <u>ies):</u>   |
|   | Notes:   |                            |                                  |                             |                                     |  |                |
| 3d - If your representation relates to a new, deleted or amende                                     | ed site, did you submit th<br>Site Name:         | e site as a Candidate S    | Site? Unanswer                   | ed (If "Yes", plea          | ase give the Candida<br>Site Refere | te Site Name and reference:                      | ence if known) |
| 3e - Please set out your representation below: Vale of Glamorgan Deposit Local Development Plan 201 | 1 - 2026   |                            |                                  |                             |                                     |  |                |
| The whole plan should be scrapped - Dinas Powys cannot  | t take any more people o                         | or motor vehciles. It is o | obvious that no re               | search has been done        | . Speaking on bealf                 | of young families.                               |                |
| Huw Marks and Karen Holloway - Permission given to me   | e to write on their behalf.                      |                            |                                  |                             |                                     |  |                |
| 3f - Please outline the changes you wish to see made to the D                                       | eposit Plan to make it so                        | ound (if relevant)         |                                  |                             |                                     |  |                |
| 4b - If you wish to speak, please confirm which part of your rel                                    | oresentation you wish to                         | speak to the inspector     | about and why the                | ev consider it be nece      | ssarv to speak at the               | hearing -  |                |

| Representor ID and details: 4041/DP1 Lisa Davighi & Da   | avid Moorse   |
|--|---|
| Date Lodged     Status     Petition and No.     Supporting Evidence       30/03/2012     M     □     0     □ | Additional SA SEA Rep format: 4a - do you want your comments to be consiered by 'written representations' or d Letter you want to speak at a hearing session of Public examination?   |
| 2a - Do you consider the LDP is Sound? Unanswered  | 2b - If you think that the Plan is unsound and does not not meet one or more test(s) of soundness, please indicate which test(s) that it fails.  Procedural Tests - P1 - Unanswered P2 - Unanswered C3 - Unanswered C4 - Unanswered  Consistency Tests - C1 - Unanswered C2 - Unanswered C3 - Unanswered C4 - Unanswered C5 - Unanswered C62 - Unanswered C63 - Unanswered C64 - Unanswered C64 - Unanswered C65 - Unanswered |
| 3a - Which part of the Deposit Plan are you commenting on?   | Policy Number:     Paragraph Number:     Proposal Map:     Constraints Map     Appendices:       MG2(33)  |
| 3b - Do you wish to see any changes made to the Deposit Plan   | as a result of your representation? Unanswered (If "No" or "Unanswered" - go to 3d)   |
| 3c - What changes would like to see made to the Deposit Plan'  | ? New Policy: Amended Policy: New Paragraph: Amended Paragraph: New Or Amended Site: Other (see Notes): Unanswered Unanswered Unanswered Unanswered Unanswered Notes:   |
| 3d - If your representation relates to a new, deleted or amende  | ed site, did you submit the site as a Candidate Site? Unanswered (If "Yes", please give the Candidate Site Name and reference if known) Site Name:  |
| 3e - Please set out your representation below: Re: Planned Development Ref: MG2(33) at St Nicholas, \        |   |
| We are writing to complain in the strongest terms about the  | ne above proposed development plan.   |
| The huge scale and density of the proposed development   | t is completely out of proportion and would not only swamp the village but is at odds with and would completely change the rural character of St Nichol   |
|  | development which should in any way be considered for a village of this size, increasing the number of houses by @ 30% and population by presuma ght through. The impact on traffic alone in rush hour will cause access problems to an already congested main road and is totally inappropriate.   |
| It is our belief that the proposed site allocation Ref no: MC  | G2(33) St Nicholas is unsound and should be deleted from the local development plan.  |
| 3f - Please outline the changes you wish to see made to the D  | eposit Plan to make it sound (if relevant)  |
| 4b - If you wish to speak, please confirm which part of your rer   | presentation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -   |

(ordered by Representation ID No.)

| Representor ID and detail                                  | s: 4042/DF      | P1 Wick Action Group   | p  |   |                             |                                  |   |                           |               |
|--|-----------------|------------------------|--|---|-----------------------------|----------------------------------|---|---------------------------|---------------|
| Date Lodged Status Pe<br>27/03/2012 M ✓                    |                 | Supporting Evidence    | Additional SA SEA                          |   | Rep format:<br>Comment form | , ,                              | r comments to be consideral a hearing session of Pu | ,                         | •             |
| 2a - Do you consider the LE                                | OP is Sound?    |                        | •  | he Plan is unsound and<br>P1 - Unanswered       | does not not meet of        |                                  | pundness, please indicat                            | e which test(s) that      | at it fails.  |
|  |                 |                        | Consistency Tests -                        | C1 - Yes  | C2 - Yes                    | C3 - Unanswe                     | ered C4 - Yes                                       |                           |               |
|  |                 |                        | Coherence and Effect                       | tiveness Tests - CE1                            | - Yes C                     | E2 - Yes                         | CE3 - Unanswered C                                  | CE4 - Unanswered          | 1             |
| 3a - Which part of the Deposit Plan are you commenting on? |                 |                        | Policy Number:                             | <u>Paragraph</u>                                | n Number: P                 | roposal Map:                     | Constr  | raints Map                | Appendices:   |
|  |                 |                        | Vision . LDP Strategy<br>MG2(34). Managing | •   |                             |                                  |   |                           |               |
| 3b - Do you wish to see any                                | y changes mad   | de to the Deposit Plan | as a result of your rep                    | oresentation? Yes                               | (If "                       | No" or "Unanswered" -            | go to 3d)   |                           |               |
| 3c - What changes would li                                 | ke to see mad   | e to the Deposit Plan? | Unanswered                                 |   | New Paragraph: Unanswered   | Amended Paragraph:<br>Unanswered | New Or Amended Site<br>Yes                          | o: Other (see Note<br>Yes | <u>}s):</u>   |
| 3d - If your representation                                | relates to a ne | •                      | •  | the site as a Candidate<br>St Brides Road, Wick | Site? Yes                   | (If "Yes", please                | give the Candidate Site                             |                           | nce if known) |
| 20 Places set out your ro                                  | procentation b  | volow:                 |  |   |                             |                                  |   |                           |               |

This document has been compiled by Wick Action Group acting on behalf of the villagers of Wick and in full consultation with them. The members of the Action Group are:

Robert Ball - Resident

Nicola Gandi - Resident

Deborah Carr - Resident

Richard Lewis — Resident

Carol Brown — Chair Wick Community Council

Allan Brown — Resident of Monknash, Chair St Donats Community Council.

Following an initial meeting of some 100 villagers, in which a unanimous weight of opposition was expressed across a range of concerns, it became clear that a structured and co-ordinated course of action was needed to present all relevant objections in a coherent, comprehensive form. In order to do so, thorough examination of the LDP was undertaken, as well as its relation with National Planning Policy Wales 2011 and the current Unitary Development Plan (UDP). Regular meetings were undertaken and ample opportunities provided for the feedback of local views, whether for or against, which were duly recorded for inclusion in this document. An overwhelming opposition to the LDP proposal emerged with resentment focussing particularly on its scale together with many various, associated implications for its impact on the village.

Scrutiny of the LDP revealed many contradictions between its stated objectives, policies and strategies and the particular proposal made for Wick.

Similarly the LDP in certain respects proved to be in conflict with the UDP. This document addresses all of these issues in, what we believe to be, a balanced rational and objective approach. To the villagers of Wick, the proposal of 150 houses in Wick, close to doubling its size and population, seems inexplicably ill considered.

In discussion with villagers it became clear that a sensible measure of growth was reasonable and desirable as opposed to adopting a position of no growth.

There is a certainly a need for the introduction of an appropriate level of growth and housing especially to cater for those people who have various links with the village. For example there are young people who wish to stay in or return to the village. The proposal made therefore seeks to address such needs as well as meeting more closely the relevant policies strategies and objectives contained within the LDP.

THE PETITION

(ordered by Representation ID No.)

Representor ID and details: 4042/DP1 Wick Action Group

This petition has been completed under the supervision of members the ACTION COMMITTEE in the Pavilion building in Wick. Before signing, everyone has been made clearly aware of the range, nature and form of the objections being made on their behalf as well as being given every opportunity to comment, agree or disagree as each person sees fit. It has not been conducted on a casual basis e.g. in the village shop or pub, for people to sign without a full explanation and understanding of its contents. Those who have signed expressed great concern regarding the full implications of the LDP Proposal for Wick and gave wholehearted support for both the objections and the alternative proposal the ACTION COMMITTEE has put forward.

The petition can therefore be presented as a fair, well considered, representation of those villagers of Wick and Broughton who have signed. Members of Wick Community Council have been made aware of the objections presented by the Action Group and fully support them. It should be added that many of the villagers expressed dismay with the objection form supplied by the Vale Council, as being difficult to understand ie its jargon and the cumbersome need to complete a different form for each objection. This proved a deterrent to some. Hence the petition came as a welcome, sensible alternative.

Also the time scale of a mere 6 weeks to respond has been inadequate and has been very difficult to achieve especially insofar as we have sought to gain a measured and true presentation, fully and properly recorded in a comprehensive document.

On behalf of the considerable majority of Wick and Broughton villagers, who have signed this petition, the Action group puts forward the objections cited within this document in good faith and trusts that they will be treated with the full consideration and respect they deserve.

Of all the residents requested to sign the petition only 4 individuals refused to sign. Inevitably not all residents were available and a number of properties were found to be empty. Approximately 97% of the population have signed the petition. It is important to note that the petition was only signed by residents within the jurisdiction of Wick Community Council. The action group focused the petition this way in order to highlight the amount of local objection to the plan. It would have been easy to collect a lot more signatures by asking passers by and family members to sign the petition; however the Action group considered that the petition should be about quality and not quantity.

- 3f Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
- 4b If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing All- to fully explain Wick Action Groups objections to the plan.



| Representor ID and details: 4043/D  | P1 Mr D R Thomas  |  |   |                              |                                      |                                   |  |                           |
|---|---|--|---|------------------------------|--------------------------------------|-----------------------------------|--|---------------------------|
| Date Lodged     Status     Petition and No       30/03/2012     M     □     0   | . Supporting Evidence A   | Additional SA SEA  |   | Rep format:<br>Letter        |                                      |                                   | e consiered by 'written in of Public examination |                           |
| 2a - Do you consider the LDP is Sound?  | Pro   | ocedural Tests - F   | P1 - Unanswered   | P2 - Unansw                  | /ered<br>                            |                                   | indicate which test(s) t                         | hat it fails.             |
|   |   | onsistency Tests - Coherence and Effective   |   |                              | vered C3 - Unans<br>CE2 - Unanswered | CE3 - Unanswered                  |  | ed                        |
| 3a - Which part of the Deposit Plan are y   | ou commenting on? Pol   | llicy Number:  | Paragraph   |                              | Proposal Map:                        | )                                 | Constraints Map                                  | Appendices:               |
| 3b - Do you wish to see any changes ma  | ade to the Deposit Plan as  | a result of your repres  | sentation? Unanswe  | ered (If '                   | "No" or "Unanswered"                 | - go to 3d)                       |  |                           |
| 3c - What changes would like to see ma  | · ·   |  |   | New Paragraph:<br>Unanswered | Amended Paragrap<br>Unanswered       | h: New Or Amende<br>Unanswered    | ed Site: Other (see No<br>Unanswered             | otes):                    |
|   | N   | Notes:   |   |                              |                                      |                                   |  |                           |
| 3d - If your representation relates to a n  |   | ite, did you submit the e Name:  | site as a Candidate S                                       | Site? Unanswere              | ed (If "Yes", plea                   | se give the Candida<br>Site Refer | ate Site Name and reference:                     | rence if known)           |
| 3e - Please set out your representation Re Candidate Site No. 2407/CS1 I would like to state that I strongly s a. Any change would have a negat b. There would be a reduction of op c. Any alterations to existing plans d. Based on the above item traffic e. There may well be a negative im I sincerely hope this show of suppo- | support the current LDP in a live effect on designated lar on areas which could be un would mean the road and congestion could lead to sapact on ecological/environ | Indscape areas.  used for general leisur  communications syste  afety issues within the  nmental issues. | e purposes.<br>ems could not cope.<br>community i.e. school |                              | l base my support on t               | he following factors              | , which I stress are not                         | in any order of criteria. |
| 3f - Please outline the changes you wish  | h to see made to the Depo   | osit Plan to make it sou   | und (if relevant)   |                              |                                      |                                   |  |                           |
| 4b - If you wish to speak, please confirm   | n which part of your repres   | sentation you wish to s  | peak to the inspector                                       | about and why the            | ey consider it be neces              | sary to speak at the              | e hearing -                                      |                           |

| vale of Glaffio                        | rgan Counc            | ii - Locai Deve           | elopinent Plan                                  | DEPOSIT PL                               | AN (February                 | / 2012) - REP                       | RESENTATIO                                 | N DETAILS:                   | Representation ID No.)                  |
|--|-----------------------|---------------------------|---|--|------------------------------|-------------------------------------|--|------------------------------|---|
| Representor ID and d                   | letails: 4044/D       | P1 Mrs A Harries          |   |  |                              |                                     |  |                              |   |
| Date Lodged Status<br>27/03/2012 M     | Petition and No.      | Supporting Evidence       | Additional SA SEA                               |  | <u>Rep format:</u><br>Email  | •                                   | your comments to be k at a hearing session | •                            | n representations' or do ion?           |
| 2a - Do you consider tl                | ne LDP is Sound?      | Unanswered                | 2b - If you think that the Procedural Tests -   | ne Plan is unsound an<br>P1 - Unanswered | d does not not meet o        | ` '                                 | of soundness, please in                    | ndicate which test(s         | ) that it fails.                        |
|  |                       |                           | Consistency Tests - Coherence and Effect        |  |                              | vered C3 - Unan<br>CE2 - Unanswered | swered C4 - Una<br>CE3 - Unanswered        |                              |   |
| Ba - Which part of the                 | Deposit Plan are y    | ou commenting on?         | Policy Number:<br>MG2(19). MG2(20).             |  |                              | Proposal Map:                       | . <u>(</u>                                 | Constraints Map              | Appendices:                             |
| Bb - Do you wish to se                 | e any changes ma      | de to the Deposit Plan    | as a result of your rep                         | oresentation? Unans                      | swered (If "                 | 'No" or "Unanswered                 | d" - go to 3d)                             |                              |   |
| 3c - What changes wo                   | uld like to see mad   | le to the Deposit Plan?   | New Policy: Unanswered Notes:                   | Amended Policy:<br>Unanswered            | New Paragraph:<br>Unanswered | Amended Paragra<br>Unanswered       | nph: New Or Amende<br>Unanswered           | d Site: Other (see Unanswere | <del></del>                             |
| 3d - If your representa                | ation relates to a ne | ew, deleted or amende     | d site, did you submit d<br>Site Name:          | the site as a Candidat                   | e Site? Unanswere            | d (If "Yes", ple                    | ase give the Candidat<br>Site Refere       |                              | ference if known)                       |
| 3e - Please set out yo<br>VALE OF GLAM | •                     | pelow:<br>LOCAL DEVELOPME | ENT PLAN 2011-2026                              |  |                              |                                     |  |                              |   |
|  |                       |                           | s I wish to express my<br>and Caerleon Road wil |  |                              |                                     |  | of more houses in I          | Dinas Powys. The                        |
| •                                      |                       | •                         | ch School and the exit                          | ,  |                              |                                     |  | ,                            | will become gridlocked ccess to the new |

development, particularly as this is used by horses, walkers alike - there is a problem already from cars speeding through the lanes to try and beat the traffic and using this as a short cut to get through to Sully and Barry.

Public Transport links - will not be able to cope with the extra commuters who will be using trains and buses to avoid the delays in driving into Cardiff, the trains are already packed to bursting in the mornings and evenings with people having to stand all the way to Cardiff. There are no extra carriages ever to accommodate the current level of commuters, the extra pressure that more would cause would be dangerous. The buses would only get stuck in the traffic anyway, the new bus lane has made very little difference to the buses that use it, they end up queuing at the traffic lights to join the traffic flow, what a waste of money that was.

Traffic - Dinas Powys struggles to cope with the current level of traffic that funnels through the village, it takes me 20 minutes to get to Penarth at rush hour. It creates frustrated drivers not to mention the accidents that have happened on this stretch of road, the emergency services struggle now to get through the traffic to calls and last year when the Port Road was closed following an accident, the traffic was diverted through Dinas Powys which led to the traffic stopping at one point, there was nowhere for anyone to go.

Environmental issues - the air pollution levels are excessive along Cardiff Road. The Nitrogen Dioxide NO2 levels are recorded as being 43.8 units with the maximum recommended level being 40 units along Cardiff Road nr Eastbrook. An increase in vehicles particular standing traffic would exacerbate the situation. And what is by the traffic lights. Murch Infant School - how is this going to effect their long term health prospects?

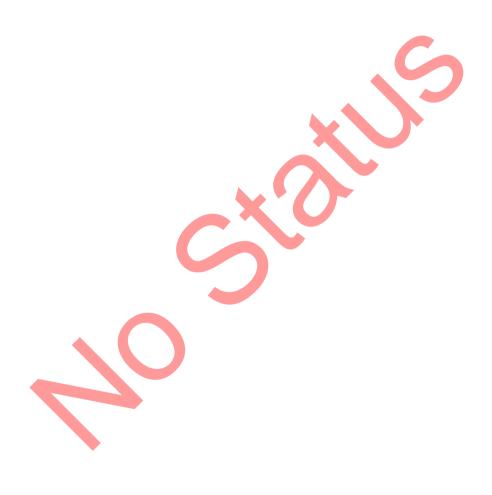
Economic climate - who in their right mind will want to invest in any new business in Dinas Powys, people will not want to come to the Village to spend money as they won't be able to get out! The volume of extra traffic created with the opening of Tesco Metro in Dinas Powys is another accident waiting to happen, customers using the store do not use the car park at the back of the store but insist on parking anywhere outside the shop making visibility extremely hard and extremely dangerous.

3f - Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)

(ordered by Representation ID No.)

Representor ID and details: 4044/DP1 Mrs A Harries

4b - If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -



| Representor ID and details: 4045/DP1 Dr Samia Salam   |   |  |   |
|---|---|--|---|
| Date Lodged     Status     Petition and No.     Supporting Evidenc       29/03/2012     M     0 | Additional SA SEA Rep 1  Lette  | <del></del>  | be consiered by 'written representations' or do sion of Public examination?   |
| 2a - Do you consider the LDP is Sound? Unanswered   |   | Unanswered C3 - Unanswered C4 -  | Unanswered  |
| 3a - Which part of the Deposit Plan are you commenting on?                                      | Policy Number: Paragraph Number  MG2(16)  | Proposal Map:  | Constraints Map Appendices:   |
| 3b - Do you wish to see any changes made to the Deposit Pla                                     | as a result of your representation? Unanswered  | (If "No" or "Unanswered" - go to 3d)   |   |
| 3c - What changes would like to see made to the Deposit Plar                                    | ? New Policy:     Amended Policy:     New Par       Unanswered     Unanswered     Unanswered  |  |   |
| 3d - If your representation relates to a new, deleted or amend                                  | ed site, did you submit the site as a Candidate Site?<br>Site Name:   |  | lidate Site Name and reference if known) eference:  |
|   | opments in order to meet the demand for new homes. with enormous impact on an already densely populated and in the early planning phase of such a large development of the early planning phase of such a large development of the early planning phase of such a large development of the early planning phase of such a large development of the early planning phase of such a large development of the early planning phase of such a large development of the early planning to use the early planning to use the early planning to use the early planning phase of such a large development of the early planning to use the early planning phase of such a large development of the early planning to use the early planning phase of such a large development of the early planning phase of such a large development of the early planning phase of such a large development of the early planning phase of such a large development of the early planning phase of such a large development of the early planning phase of such a large development of the early planning phase of such a large development of the early planning phase of such a large development of the early planning phase of such a large development of the early planning phase of such a large development of such a large | It part of Penarth.  Inent site:  Inock Road (Brockhill Rise, Caynham Avenue, Statious impact on the Cliff Walk recreational area. residential roads (Brockhill Rise to Whitcliffe Drive of dog owners (irrespective of the weather) as well to restricted belt of park area along the cliff top. We this could have implications. | anton Way and Whitcliffe Drive) for feeding into The same holds true for the traffic by the new e) in order to gain access to the MG 2 (16) site.  Il as many walkers and cyclists (especially on a |
| 3f - Please outline the changes you wish to see made to the I                                   |   |  |   |
| 4b - If you wish to speak, please confirm which part of your re                                 | presentation you wish to speak to the inspector about a   | nd why they consider it be necessary to speak at   | the hearing -   |

| Representor                   | ID and            | details:                           | 4046/D                                  | P1 Dr Luc Vandamm                                 | Э  |   |  |  |  |   |  |
|-------------------------------|-------------------|------------------------------------|---|---|--|---|--|--|--|---|--|
| Date Lodged<br>29/03/2012     |                   | Petiti                             | on and No.<br>0                         | Supporting Evidence                               | Additional SA SEA  |   | Rep format:<br>Comment forn                                      | · · · · · · · · · · · · · · · · · · ·            |  | e consiered by 'written<br>on of Public examination | n representations' or do on? Written               |
| 2a - Do you d                 | consider t        | he LDP                             | is Sound?                               |   | 2b - If you think that the Procedural Tests -                                  | ne Plan is unsound and<br>P1 - Unanswered                                 | d does not not mee<br>P2 - Unans                                 | et one or more test(s) of<br>swered              | f soundness, please                            | indicate which test(s)                              | that it fails.                                     |
|                               |                   |                                    |   |   | Consistency Tests -  | C1 - Unanswered   | C2 - Unans   | swered C3 - Unans                                | swered C4 - U                                  | nanswered   |  |
|                               |                   |                                    |   |   | Coherence and Effect   | iveness Tests - CE1   | - Unanswered   | CE2 - Yes  | CE3 - Unanswere                                | d CE4 - Unanswe                                     | ered   |
| 3a - Which p                  | art of the        | Deposit                            | Plan are y                              | ou commenting on?                                 | Policy Number:   | Paragrap  | <u>oh Number:</u>  | Proposal Map:                                    |  | Constraints Map                                     | Appendices:  |
|                               |                   |                                    |   |   |  |   |  | MG2(13)  |  |   |  |
| 3b - Do you v                 | vish to se        | e any cl                           | hanges ma                               | de to the Deposit Plan                            | as a result of your rep  | resentation? Yes  | (I   | f "No" or "Unanswered                            | " - go to 3d)                                  |   |  |
| 3c - What ch                  | anges wo          | ould like                          | to see mad                              | de to the Deposit Plan?                           | New Policy:<br>Unanswered  | Amended Policy:<br>Unanswered   | New Paragraph:<br>Unanswered                                     | Amended Paragray Unanswered                      | ph: New Or Amend<br>Yes                        | led Site: Other (see N<br>Unanswered                |  |
|                               |                   |                                    |   |   | Notes:   |   |  |  |  |   |  |
| 3d - If your r                | epresent          | ation rel                          | ates to a no                            | ew, deleted or amende                             | •  |   |  | (If "Yes", pleato east of St Athan Roa           | -  | ate Site Name and reference: 2446/CS1, 244          | ,  |
| 3e - Please                   | set out yo        | our repre                          | esentation l                            | below:  |  |   |  | <del>y</del>                                     |  |   |  |
| number<br>propose<br>local la | of browred develo | nfield site<br>opment v<br>as St A | es already<br>would put e<br>than Road. | available. The propose<br>xtra strain on resource | d site is a special land<br>as already struggling to<br>states would increase, | scape area and should<br>cope: schools, GPs, s<br>causing extra pollutior | d be protected as s<br>sewerage, parking,<br>n and stress. Peopl | traffic. The access to t le from the proposed si | footpaths, nature pre<br>he site is not accept | eservation, protection table and would spoil t      | of rural areas. In addtion the "country" nature of |
| 3f - Please o                 | outline the       | e change                           | es you wish                             | n to see made to the De                           | eposit Plan to make it   | sound (if relevant)   |  |  |  |   |  |
| Have ca                       | andidate          | site rem                           | oved and ir                             | nclude as a green wedç                            | ge to prevent further de   | evelopment considerat   | ions.  |  |  |   |  |
| 4b - If you w                 | ich to en         | aak nla:                           | ase confirm                             | which part of your ren                            | resentation you wish to  | n sneak to the inspect  | or about and why th  | hev consider it he nece                          | ssary to speak at the                          | a haaring -   |  |

| Representor ID and details: 4047/DP1 S.A. & D.L.Rees  |   |   |   |
|---|---|---|---|
| Date Lodged     Status     Petition and No.     Supporting Evidence       29/03/2012     M     0  |   |   | ont your comments to be consiered by 'written representations' or do leak at a hearing session of Public examination?                         |
| 2a - Do you consider the LDP is Sound? Unanswered   |   | and does not not meet one or more test(d P2 - Unanswered C3 - Unanswered C3 - U     | s) of soundness, please indicate which test(s) that it fails.   |
| 3a - Which part of the Deposit Plan are you commenting on?  | Policy Number: Paragr<br>MG2(16)  | aph Number: Proposal Map:   | Constraints Map Appendices:   |
| 3b - Do you wish to see any changes made to the Deposit Plan  |   | nswered (If "No" or "Unanswe  | ered" - go to 3d)   |
| 3c - What changes would like to see made to the Deposit Plan?   |   |   | graph: New Or Amended Site: Other (see Notes): Unanswered Unanswered  |
| 3d - If your representation relates to a new, deleted or amende   | d site, did you submit the site as a Candida<br>Site Name:  | ate Site? Unanswered (If "Yes",   | please give the Candidate Site Name and reference if known) Site Reference:   |
| massive expansion of the Lower Penarth residential area  We have the following concerns, which need to be include   | opments in order to meet the demand for no<br>with enormous impact on an already dense<br>ed in the early planning phase of such a lar    | ely populated part of Penarth. ge development site:                                 | G2 (16) include the construction of 450 "dwellings", which is a Caynham Avenue, Stanton Way and Whitcliffe Drive) for feeding into            |
| the new development site. The construction traffic would  | lead to serious traffic congestions and wou   | lld have a serious impact on the Cliff Wa   | Ik recreational area. The same holds true for the traffic by the new ise to Whitcliffe Drive) in order to gain access to the MG 2 (16) site.  |
| 2. Recreational area – The Cliff Walk is a very busy recreclear day). The MG 2 (16) development site with its planr own recreational area, which may an extension of the exist  | ed 450 dwelling would cause a "collapse" of   | a multitude of dog owners (irrespective of the current restricted belt of park area | of the weather) as well as many walkers and cyclists (especially on a along the cliff top. We, therefore, demand that the new site create its |
| Additional Remarks: To consider also: -The bridge on Brockhill Rise would not take the added we- Impossible to exit Brockhill to Lavernock Road often. Inc Increased children in area – primary schools in Penarth a -With the receding cliff line, I don't believe the "Cliff Walk" -The width of the road is not supportive of additional traffic | reased traffic will exacerbate this problem.<br>Ilready full/over capacity in some cases.<br>road would cope with the additional traffic. | ighway.   |   |
| 3f - Please outline the changes you wish to see made to the D   |   |   |   |
| 4b - If you wish to speak, please confirm which part of your rep  | presentation you wish to speak to the inspe   | ctor about and why they consider it be n  | ecessary to speak at the hearing -  |

| Representor ID and details: 4048/DP1 Mr Jeffrey & Mrs Cecily Beard   |
|--|
| Date LodgedStatusPetition and No.Supporting EvidenceAdditional SA SEARep format:4a - do you want your comments to be consiered by 'written representations' or do29/03/2012M0Letteryou want to speak at a hearing session of Public examination?   |
| 2a - Do you consider the LDP is Sound? Unanswered  2b - If you think that the Plan is unsound and does not not meet one or more test(s) of soundness, please indicate which test(s) that it fails.  Procedural Tests - P1 - Unanswered  Consistency Tests - C1 - Unanswered  Coherence and Effectiveness Tests - CE1 - Unanswered  CE2 - Unanswered  CE3 - Unanswered  CE4 - Unanswered  |
| 3a - Which part of the Deposit Plan are you commenting on? Policy Number: Paragraph Number: Proposal Map: Constraints Map Appendices:  |
| 3b - Do you wish to see any changes made to the Deposit Plan as a result of your representation? Unanswered (If "No" or "Unanswered" - go to 3d)   |
| 3c - What changes would like to see made to the Deposit Plan?    New Policy: Unanswered   Unansw |
| 3d - If your representation relates to a new, deleted or amended site, did you submit the site as a Candidate Site? Unanswered (If "Yes", please give the Candidate Site Name and reference if known) Site Reference:  |
| Response to The Vale of Glamorgan Local Development Plan (LDP) 2011-26  To the Planning Commission of the LDP We fully understand the need for further residential developments in order to meet the demand for new homes. The plans for site location MG2 (16) include the construction of 450 "dwellings", which is a massive expansion of the Lower Penarth residential area with enormous impact on an already densely populated part of Penarth.  We have the following concerns, which need to be included in the early planning phase of such a large development site:  1. Traffic (residential and construction) — It is absolutely impossible to use the current residential roads off Lavernock Road (Brockhill Rise, Caynham Avenue, Stanton Way and Whitcliffe Drive) for feeding into the new development site. The construction traffic would lead to serious traffic congestions and would have a serious impact on the Cliff Walk recreational area. The same holds true for the traffic by the new residents once construction has been completed. We, therefore, strictly object to any idea involving the current residential roads (Brockhill Rise to Whitcliffe Drive) in order to gain access to the MG 2 (16) site.  2. Recreational area — The Cliff Walk is a very busy recreational area in Lower Penarth that attracts a multitude of dog owners (irrespective of the weather) as well as many walkers and cyclists (especially on a clear day). The MG 2 (16) development site with its planned 450 dwelling would cause a "collapse" of the current restricted belt of park area along the cliff top. We, therefore, demand that the new site create its own recreational area, which may an extension of the existing cliff walk.  Additional remarks:  Penarth has developed the Esplanade & Cliff Walk areas to enhance not only the town, but also the entire S. Glam coastline. One of the charms of this area for its many users is the semi seclusion (wide-open vistas and relatively little traffic). This must be preserved! Keeping access to this area via non-through roads helps t |
| 3f - Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)  |
| 4b - If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -   |

| Representor ID and details: 4049/DP1   | Mrs June M Vandamme   |  |  |  |                   |
|--|---|--|--|--|-------------------|
| Date Lodged     Status     Petition and No.     Sup       29/03/2012     M     □     0   | pporting Evidence Additional SA SEA   | Rep format:<br>Comment fo  | 4a - do you want your commer<br>orm you want to speak at a hearing |  |                   |
| 2a - Do you consider the LDP is Sound? Unsound 2b - If you think that the Plan is unsound and does not not meet one or more test(s) of soundness, please indicate which test(s) that it fails.  Procedural Tests - P1 - Unanswered P2 - Unanswered |   |  |  |  | s) that it fails. |
|  | Consistency Tests -   | C1 - Yes C2 - Una  | answered C3 - Unanswered (   | C4 - Unanswered                                      |                   |
|  | Coherence and Effec   | tiveness Tests - CE1 - Unanswered  | CE2 - Yes CE3 - Una  | nswered CE4 - Unansv                                 | vered             |
| 3a - Which part of the Deposit Plan are you co   | ommenting on? Policy Number:  | Paragraph Number:  | Proposal Map:  | Constraints Map                                      | Appendices:       |
|  |   |  | MG2(1 <mark>3)</mark>  |  |                   |
| 3b - Do you wish to see any changes made to  | the Deposit Plan as a result of your rep  | presentation? Yes  | (If "No" or "Unanswered" - go to 3d)                               |  |                   |
| 3c - What changes would like to see made to  | the Deposit Plan? New Policy: Unanswered  | Amended Policy: New Paragraph<br>Unanswered Unanswered                             | Amended Paragraph: New Or<br>Unanswered Yes                        | Amended Site: Other (see Unanswere                   | <del></del>       |
|  | Notes:  |  |  |  |                   |
| 3d - If your representation relates to a new, de   |   | the site as a Candidate Site? Yes<br>west of St Athan Road Llanblethian, Lan       | ` ',   | Candidate Site Name and rule Reference: 2446/CS1, 24 | ,                 |
| 3e - Please set out your representation below  | r.  |  |  |  |                   |
| The Council's own policy MD1 states that increase strain on local amenities. School Sewerage works cannot cope with more existing estates and St Athan Road shou   | ols already oversubscribed, traffic level, doctors sugeries cannot cope as it is. | and parking already strained in Cowbrid<br>There are enough brownfield sites in th | dge, especially if Cattle Market is built                          | upon.  | . ,               |
| 3f - Please outline the changes you wish to se   | ee made to the Deposit Plan to make it  | sound (if relevant)  |  |  |                   |
| Have candidate site removed and include  | e as a green wedge to prevent further d   | evelopment considerations.   |  |  |                   |
| 4h - If you wish to speak please confirm which   | ch part of your representation you wish   | to speak to the inspector about and who  | , they consider it he necessary to spec                            | ak at the hearing -                                  |                   |

| Representor ID and details: 4050/DP1 Mr D. & Mrs K.Cu   | llen   |   |  |
|---|--|---|--|
| Date Lodged     Status     Petition and No.     Supporting Evidence       29/03/2012     M     0  | Additional SA SEA  | Rep format: 4a - do you want your comments to Letter you want to speak at a hearing ses   | be consiered by 'written representations' or do sion of Public examination?  |
| 2a - Do you consider the LDP is Sound? Unanswered   | 2b - If you think that the Plan is unsound and de<br>Procedural Tests - P1 - Unanswered  | oes not not meet one or more test(s) of soundness, plea<br>P2 - Unanswered  | se indicate which test(s) that it fails.   |
|   | Consistency Tests - C1 - Unanswered  | C2 - Unanswered C3 - Unanswered C4 -  | Unanswered   |
|   | Coherence and Effectiveness Tests - CE1 - L  | Jnanswered CE2 - Unanswered CE3 - Unanswe   | ered CE4 - Unanswered  |
| 3a - Which part of the Deposit Plan are you commenting on?  | Policy Number: Paragraph N   | Number: Proposal Map:   | Constraints Map Appendices:  |
|   | MG2(16)  |   |  |
| 3b - Do you wish to see any changes made to the Deposit Plan  | as a result of your representation? Unanswe  | red (If "No" or "Unanswered" - go to 3d)  |  |
| 3c - What changes would like to see made to the Deposit Plan?   |  | ew Paragraph: Amended Paragraph: New Or Ame<br>Inanswered Unanswered Unanswered   | nded Site: Other (see Notes): Unanswered   |
|   | Notes:   |   |  |
| 3d - If your representation relates to a new, deleted or amende   | d site, did you submit the site as a Candidate Si<br>Site Name:  |   | lidate Site Name and reference if known) ference:  |
| 3e - Please set out your representation below: Response to The Vale of Glamorgan Local Development Plan (LDP) 20  | 011-26   |   |  |
| To the Planning Commission of the LDP We fully understand the need for further residential develor massive expansion of the Lower Penarth residential area  |  |   | onstruction of 450 "dwellings", which is a   |
| We have the following concerns, which need to be include  | ed in the early planning phase of such a large de  | evelopment site:  |  |
| <ol> <li>Traffic (residential and construction) – It is absolutely in<br/>the new development site. The construction traffic would<br/>residents once construction has been completed. We, the</li> </ol>   | lead to serious traffic congestions and would ha   | ve a serious impact on the Cliff Walk recreational area.  | The same holds true for the traffic by the new   |
| <ol> <li>Recreational area – The Cliff Walk is a very busy recreated clear day). The MG 2 (16) development site with its plann own recreational area, which may an extension of the exist</li> </ol>  | ed 450 dwelling would cause a "collapse" of the  |   |  |
| 3f - Please outline the changes you wish to see made to the D   | eposit Plan to make it sound (if relevant)   |   |  |
| 4b - If you wish to speak, please confirm which part of your rep  | resentation you wish to speak to the inspector a   | about and why they consider it be necessary to speak at   | the hearing -  |
| Response to The Vale of Glamorgan Local Development Plan (LDP) 20 To the Planning Commission of the LDP We fully understand the need for further residential develor massive expansion of the Lower Penarth residential area We have the following concerns, which need to be include  1. Traffic (residential and construction) – It is absolutely in the new development site. The construction traffic would residents once construction has been completed. We, the  2. Recreational area – The Cliff Walk is a very busy recreational day). The MG 2 (16) development site with its plannown recreational area, which may an extension of the existance. | epments in order to meet the demand for new howith enormous impact on an already densely post of in the early planning phase of such a large dempossible to use the current residential roads of lead to serious traffic congestions and would have erefore, strictly object to any idea involving the cational area in Lower Penarth that attracts a mule ded 450 dwelling would cause a "collapse" of the ting cliff walk. | pulated part of Penarth.  evelopment site:  If Lavernock Road (Brockhill Rise, Caynham Avenue, Stave a serious impact on the Cliff Walk recreational area. current residential roads (Brockhill Rise to Whitcliffe Driverlitude of dog owners (irrespective of the weather) as well a current restricted belt of park area along the cliff top. | anton Way and Whitcliffe Drive) for feeding into The same holds true for the traffic by the new e) in order to gain access to the MG 2 (16) site. Il as many walkers and cyclists (especially on a l/e, therefore, demand that the new site create its |

| Representor ID and details: 4051/DP1 Mr Robert & Mrs E  | eth Anstead   |  |  |  |
|---|---|--|--|--|
| Date Lodged     Status     Petition and No.     Supporting Evidence       29/03/2012     M     □     0     □  | Additional SA SEA Rep format: 4a - do you want your comments to be consiered by 'written representations' or do you want to speak at a hearing session of Public examination?   |  |  |  |
| ·   | 2b - If you think that the Plan is unsound and does not not meet one or more test(s) of soundness, please indicate which test(s) that it fails.  Procedural Tests - P1 - Unanswered P2 - Unanswered  Consistency Tests - C1 - Unanswered C2 - Unanswered C3 - Unanswered C4 - Unanswered  Coherence and Effectiveness Tests - CE1 - Unanswered CE2 - Unanswered CE3 - Unanswered CE4 - Unanswered   |  |  |  |
| , , ,   | Policy Number: Paragraph Number: Proposal Map: Constraints Map Appendices:  MG2(16)   |  |  |  |
| 3b - Do you wish to see any changes made to the Deposit Plan  | as a result of your representation? Unanswered (If "No" or "Unanswered" - go to 3d)   |  |  |  |
| 3c - What changes would like to see made to the Deposit Plan?   | New Policy: Amended Policy: New Paragraph: Amended Paragraph: New Or Amended Site: Other (see Notes): Unanswered Unanswered Unanswered Unanswered Unanswered  |  |  |  |
|   | Notes:  |  |  |  |
|   | d site, did you submit the site as a Candidate Site? Unanswered (If "Yes", please give the Candidate Site Name and reference if known) Site Name:   |  |  |  |
| 3e - Please set out your representation below:  |   |  |  |  |
| Response to<br>The Vale of Glamorgan Local Development Plan (LDP) 20  | 11-26   |  |  |  |
|   | pments in order to meet the demand for new homes. The plans for site location MG2 (16) include the construction of 450 "dwellings", which is a with enormous impact on an already densely populated part of Penarth.  |  |  |  |
| We have the following concerns, which need to be include  | d in the early planning phase of such a large development site:   |  |  |  |
| the new development site. The construction traffic would I  | npossible to use the current residential roads off Lavernock Road (Brockhill Rise, Caynham Avenue, Stanton Way and Whitcliffe Drive) for feeding into ead to serious traffic congestions and would have a serious impact on the Cliff Walk recreational area. The same holds true for the traffic by the new prefore, strictly object to any idea involving the current residential roads (Brockhill Rise to Whitcliffe Drive) in order to gain access to the MG 2 (16) site. |  |  |  |
| 2. Recreational area – The Cliff Walk is a very busy recreational area in Lower Penarth that attracts a multitude of dog owners (irrespective of the weather) as well as many walkers and cyclists (especially on a clear day). The MG 2 (16) development site with its planned 450 dwelling would cause a "collapse" of the current restricted belt of park area along the cliff top. We, therefore, demand that the new site create its own recreational area, which may an extension of the existing cliff walk. |   |  |  |  |
| Additional Remarks 3) The sewerage system which barely manages with the e   | xisting population would completely collapse with additional households.  |  |  |  |
| Erosion of the actual cliff is another major concern to re building commences.  | sidents, after all who would buy /insure a house that may be falling into the sea in a few years! A full geological study should be carried out before any  |  |  |  |
| 3f - Please outline the changes you wish to see made to the De  | posit Plan to make it sound (if relevant)   |  |  |  |
| 4b - If you wish to speak, please confirm which part of your rep  | resentation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -  |  |  |  |

| Representor ID and details: 4052/DP1 Mr Reg & Mrs Bet  | ty Jones  |   |   |
|--|---|---|---|
| Date Lodged     Status     Petition and No.     Supporting Evidence       29/03/2012     M     0   |   |   | r comments to be consiered by 'written representations' or do a hearing session of Public examination?  |
| 2a - Do you consider the LDP is Sound? Unanswered  |   | oes not not meet one or more test(s) of so<br>P2 - Unanswered<br>C2 - Unanswered C3 - Unanswe   | undness, please indicate which test(s) that it fails.   |
|  | Policy Number: Paragraph N MG2(16)  |   | Constraints Map Appendices:   |
| 3b - Do you wish to see any changes made to the Deposit Plan   | as a result of your representation? Unanswer  | red (If "No" or "Unanswered" -  | go to 3d)   |
| 3c - What changes would like to see made to the Deposit Plan?  |   | ew Paragraph: Inanswered  Amended Paragraph: Unanswered   | New Or Amended Site: Other (see Notes): Unanswered Unanswered   |
| 3d - If your representation relates to a new, deleted or amende  | d site, did you submit the site as a Candidate Si<br>Site Name:   | ite? Unanswered (If "Yes", please   | give the Candidate Site Name and reference if known) Site Reference:  |
| the new development site. The construction traffic would residents once construction has been completed. We, the 2. Recreational area – The Cliff Walk is a very busy recrectlear day). The MG 2 (16) development site with its plann own recreational area, which may an extension of the exist Additional Remarks  We totally agree with your fears which may be caused by | pments in order to meet the demand for new howith enormous impact on an already densely point in the early planning phase of such a large dempossible to use the current residential roads of lead to serious traffic congestions and would have refore, strictly object to any idea involving the cational area in Lower Penarth that attracts a muled 450 dwelling would cause a "collapse" of the ting cliff walk. | pulated part of Penarth.  evelopment site:  If Lavernock Road (Brockhill Rise, Caynhave a serious impact on the Cliff Walk recrurrent residential roads (Brockhill Rise to lititude of dog owners (irrespective of the wear current restricted belt of park area along).  In particular the problem now existing of | Im Avenue, Stanton Way and Whitcliffe Drive) for feeding into eational area. The same holds true for the traffic by the new Whitcliffe Drive) in order to gain access to the MG 2 (16) site. The eather) as well as many walkers and cyclists (especially on a the cliff top. We, therefore, demand that the new site create its gaining vehicular access onto Lavernock Road would be even |
| further exacerbated. The proposed Sully development wo   | ·   | eeding access to schools and routes to Pe   | enarth and Cardiff.   |
|  | ·   |   |   |
| 4b - If you wish to speak, please confirm which part of your rep   | resentation you wish to speak to the inspector a  | about and why they consider it be necessa   | ry to speak at the hearing -  |

| Representor ID and details: 4053/DP1 Ms Lois Strong  |  |  |  |
|--|--|--|--|
| Date Lodged     Status     Petition and No.     Supporting Evidence       29/03/2012     M     □     0     □   |  |  | our comments to be consiered by 'written representations' or do at a hearing session of Public examination?  |
| •  |  | oes not not meet one or more test(s) of P2 - Unanswered C2 - Unanswered C3 - Unans | soundness, please indicate which test(s) that it fails.  |
|  | Policy Number: Paragraph N<br>MG2(16)                          |  | Constraints Map Appendices:  |
| 3b - Do you wish to see any changes made to the Deposit Plan   | as a result of your representation? Unanswe                    | red (If "No" or "Unanswered  | - go to 3d)  |
| 3c - What changes would like to see made to the Deposit Plan?  |  | lew Paragraph: Amended Paragrap<br>Jnanswered Unanswered                           | <u>New Or Amended Site:</u> <u>Other (see Notes):</u> Unanswered   |
|  | Notes:   |  |  |
| 3d - If your representation relates to a new, deleted or amende  | d site, did you submit the site as a Candidate S<br>Site Name: | ite? Unanswered (If "Yes", plea  | ase give the Candidate Site Name and reference if known) Site Reference:   |
| 3e - Please set out your representation below:   |  |  |  |
| Response to The Vale of Glamorgan Local Development Plan (LDP) 20  | 111-26   |  |  |
| To the Planning Commission of the LDP<br>We fully understand the need for further residential develor<br>massive expansion of the Lower Penarth residential area |  |  | (16) include the construction of 450 "dwellings", which is a   |
| We have the following concerns, which need to be include   | d in the early planning phase of such a large de               | evelopment site:   |  |
| the new development site. The construction traffic would   | lead to serious traffic congestions and would ha               | ave a serious impact on the Cliff Walk re  | cham Avenue, Stanton Way and Whitcliffe Drive) for feeding into ecreational area. The same holds true for the traffic by the new to Whitcliffe Drive) in order to gain access to the MG 2 (16) site. |
|  | ed 450 dwelling would cause a "collapse" of the                |  | e weather) as well as many walkers and cyclists (especially on a ng the cliff top. We, therefore, demand that the new site create its  |
| Additional Remarks   |  |  |  |
| The above concerns should be addressed in the planning   | of such a large development. The junction and                  | roads off Brockhill Rise are not adequa  | ate to support the planned development.  |
| 3f - Please outline the changes you wish to see made to the D  |  |  |  |
| 4b - If you wish to speak, please confirm which part of your rep   |  |  | ssary to speak at the hearing -  |

| Representor ID and details: 4054/DP1 Ms Janet Evan   | s-Seal  |  |  |
|--|---|--|--|
| Date Lodged Status Petition and No. Supporting Evider 29/03/2012 M   | ce Additional SA SEA  |  | ur comments to be consiered by 'written representations' or do<br>it a hearing session of Public examination?  |
| 2a - Do you consider the LDP is Sound? Unanswered  | 2b - If you think that the Plan is unsound and Procedural Tests - P1 - Unanswered Consistency Tests - C1 - Unanswered Coherence and Effectiveness Tests - CE1 | P2 - Unanswered C2 - Unanswered C3 - Unansw  | oundness, please indicate which test(s) that it fails.  ered C4 - Unanswered  CE3 - Unanswered CE4 - Unanswered  |
| 3a - Which part of the Deposit Plan are you commenting on?   |   | Number: Proposal Map:  | Constraints Map Appendices:  |
| 3b - Do you wish to see any changes made to the Deposit P  | an as a result of your representation? Unansw   | vered (If "No" or "Unanswered" -   | go to 3d)  |
| 3c - What changes would like to see made to the Deposit Pla  | nn? New Policy: Amended Policy: Unanswered Unanswered Notes:  | New Paragraph: Unanswered  Amended Paragraph Unanswered                                  | New Or Amended Site: Other (see Notes): Unanswered Unanswered  |
| 3d - If your representation relates to a new, deleted or amer  | Site Name:  | Site? Unanswered (ii Yes , piease  | e give the Candidate Site Name and reference if known) Site Reference:   |
| 3e - Please set out your representation below: Response to   | Oile Ivalite.   |  | Oile Reference.  |
| To the Planning Commission of the LDP We fully understand the need for further residential dev massive expansion of the Lower Penarth residential are We have the following concerns, which need to be inclu-  | ea with enormous impact on an already densely p   | populated part of Penarth.   | 6) include the construction of 450 "dwellings", which is a   |
| Traffic (residential and construction) – It is absoluted the new development site. The construction traffic would be a second to the construction traffic. | y impossible to use the current residential roads<br>Id lead to serious traffic congestions and would h   | off Lavernock Road (Brockhill Rise, Caynh<br>nave a serious impact on the Cliff Walk rec | nam Avenue, Stanton Way and Whitcliffe Drive) for feeding into reational area. The same holds true for the traffic by the new b Whitcliffe Drive) in order to gain access to the MG 2 (16) site. |
|  | nned 450 dwelling would cause a "collapse" of the   |  | weather) as well as many walkers and cyclists (especially on a the cliff top. We, therefore, demand that the new site create its   |
| Additional Remarks   |   |  |  |
| The two main access routes from Penarth to Cardiff are which is unacceptable.  | e already incredibly congested especially during  | rush hours – having an extra possible 900 d  | cars using these routes will cause even more delays and chaos,   |
| 3f - Please outline the changes you wish to see made to the  |   |  |  |
| 4b - If you wish to speak, please confirm which part of your   | representation you wish to speak to the inspecto  |  | ary to speak at the hearing -  |
|  |   |  |  |

| Representor ID and details: 4055/DP1 Mrs Phillips  |   |  |  |  |
|--|---|--|--|--|
| Date Lodged     Status       29/03/2012     M         Petition and No.     Supporting Evidence       0 | Additional SA SEA Rep format: 4a - do you want your comments to be consiered by 'written representations' or do Letter you want to speak at a hearing session of Public examination?  |  |  |  |
| 2a - Do you consider the LDP is Sound? Unanswered  | 2b - If you think that the Plan is unsound and does not not meet one or more test(s) of soundness, please indicate which test(s) that it fails.  Procedural Tests - P1 - Unanswered P2 - Unanswered  Consistency Tests - C1 - Unanswered C2 - Unanswered C3 - Unanswered C4 - Unanswered  Coherence and Effectiveness Tests - CE1 - Unanswered CE2 - Unanswered CE3 - Unanswered CE4 - Unanswered   |  |  |  |
| 3a - Which part of the Deposit Plan are you commenting on?   | Policy Number:     Paragraph Number:     Proposal Map:     Constraints Map     Appendices:       MG2(16)  |  |  |  |
| 3b - Do you wish to see any changes made to the Deposit Plan   | as a result of your representation? Unanswered (If "No" or "Unanswered" - go to 3d)   |  |  |  |
| 3c - What changes would like to see made to the Deposit Plan   | New Policy: Amended Policy: New Paragraph: Amended Paragraph: New Or Amended Site: Other (see Notes): Unanswered Unans |  |  |  |
| 3d - If your representation relates to a new, deleted or amend   | ed site, did you submit the site as a Candidate Site? Unanswered (If "Yes", please give the Candidate Site Name and reference if known) Site Name:  |  |  |  |
|  |   |  |  |  |
| 3f - Please outline the changes you wish to see made to the D  | eposit Plan to make it sound (if relevant)  |  |  |  |
| 4b - If you wish to speak, please confirm which part of your re  | presentation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -   |  |  |  |

| Representor ID and details: 4056/DP1 Mrs M Christofera   | ito  |   |  |  |  |
|--|--|---|--|--|--|
| Date Lodged Status Petition and No. Supporting Evidence  | Additional SA SEA  |   | our comments to be consiered by 'written representations' or do<br>at a hearing session of Public examination? Written |  |  |
| 30/03/2012 M   |  | Comment form you want to speak                          | at a ficaling 3c33ion of rabile examination: witten  |  |  |
| 2a - Do you consider the LDP is Sound? Sound   | 2b - If you think that the Plan is unsound and d<br>Procedural Tests - P1 - Unanswered | oes not not meet one or more test(s) of P2 - Unanswered | soundness, please indicate which test(s) that it fails.  |  |  |
|  | Consistency Tests - C1 - Unanswered  | C2 - Unanswered C3 - Unans                              | wered C4 - Unanswered  |  |  |
|  | Coherence and Effectiveness Tests - CE1 -  | Jnanswered CE2 - Unanswered                             | CE3 - Unanswered CE4 - Unanswered  |  |  |
| 3a - Which part of the Deposit Plan are you commenting on?   | Policy Number: Paragraph   | Number: Proposal Map:                                   | Constraints Map Appendices:  |  |  |
|  |  |   |  |  |  |
| 3b - Do you wish to see any changes made to the Deposit Plan   | as a result of your representation? No   | (If "No" or "Unanswered"                                | - go to 3d)  |  |  |
| 3c - What changes would like to see made to the Deposit Plan   | <del></del>  | lew Paragraph: Amended Paragrap  Unanswered Unanswered  | h: New Or Amended Site: Other (see Notes): Unanswered Unanswered   |  |  |
|  | Notes:   |   |  |  |  |
| 3d - If your representation relates to a new, deleted or amended site, did you submit the site as a Candidate Site? Yes (If "Yes", please give the Candidate Site Name and reference if known)  Site Name: Brynhill Golf Club Land |  |   |  |  |  |
| 3e - Please set out your representation below:  Brynhill Golf Club must be kept outside of the residentials  | settlement boundary so that houses cannot be b   | uilt on the land. Do not change the Dep                 | osit LDP.  |  |  |
| 3f - Please outline the changes you wish to see made to the D  | eposit Plan to make it sound (if relevant)   |   |  |  |  |
| 4b - If you wish to speak, please confirm which part of your rep   | presentation you wish to speak to the inspector  | about and why they consider it be neces                 | sary to speak at the hearing -   |  |  |

(ordered by Representation ID No.)

| Representor ID and details: 4057/DP1 Gary & Patricia F   | orrest  |                          |                              |                                |  |                                |                 |
|--|---|--------------------------|------------------------------|--------------------------------|--|--------------------------------|-----------------|
| Date Lodged     Status     Petition and No.     Supporting Evidence       29/03/2012     M     0 | Additional SA SEA                             |                          | Rep format:<br>Letter        | , ,                            | our comments to be cons<br>at a hearing session of P | •                              | •               |
| 2a - Do you consider the LDP is Sound? Unanswered  | 2b - If you think that the Procedural Tests - | he Plan is unsound and o | does not not meet            | ` '                            | soundness, please indica                             | ate which test(s) t            | hat it fails.   |
|  | Consistency Tests -                           | C1 - Unanswered          | C2 - Unansw                  | ered C3 - Unans                | wered C4 - Unansw                                    | vered                          |                 |
|  | Coherence and Effect                          | tiveness Tests - CE1 -   | Unanswered (                 | CE2 - Unanswered               | CE3 - Unanswered                                     | CE4 - Unanswere                | ed              |
| 3a - Which part of the Deposit Plan are you commenting on?                                       | Policy Number:                                | <u>Paragraph</u>         | Number: F                    | Proposal Map:                  | Cons   | traints Map                    | Appendices:     |
|  | MG2(16)                                       |                          |                              |                                |  |                                |                 |
| 3b - Do you wish to see any changes made to the Deposit Plan                                     | as a result of your rep                       | presentation? Unansw     | ered (If '                   | 'No" or "Unanswered"           | - go to 3d)  |                                |                 |
| 3c - What changes would like to see made to the Deposit Plan'                                    | ? <u>New Policy:</u><br>Unanswered            |                          | New Paragraph:<br>Unanswered | Amended Paragrap<br>Unanswered | h: New Or Amended Sit<br>Unanswered                  | e: Other (see No<br>Unanswered | <u>otes):</u>   |
|  | Notes:  |                          |                              |                                |  |                                |                 |
| 3d - If your representation relates to a new, deleted or amende                                  | ed site, did you submit<br>Site Name:         | the site as a Candidate  | Site? Unanswere              | ed (If "Yes", pleas            | se give the Candidate Sit<br>Site Reference:         | e Name and refe                | rence if known) |
|  |   |                          | <b>—</b>                     |                                |  |                                |                 |

3e - Please set out your representation below:

Response to

The Vale of Glamorgan Local Development Plan (LDP) 2011-26

To the Planning Commission of the LDP

We fully understand the need for further residential developments in order to meet the demand for new homes. The plans for site location MG2 (16) include the construction of 450 "dwellings", which is a massive expansion of the Lower Penarth residential area with enormous impact on an already densely populated part of Penarth.

We have the following concerns, which need to be included in the early planning phase of such a large development site:

- 1. Traffic (residential and construction) It is absolutely impossible to use the current residential roads off Lavernock Road (Brockhill Rise, Caynham Avenue, Stanton Way and Whitcliffe Drive) for feeding into the new development site. The construction traffic would lead to serious traffic congestions and would have a serious impact on the Cliff Walk recreational area. The same holds true for the traffic by the new residents once construction has been completed. We, therefore, strictly object to any idea involving the current residential roads (Brockhill Rise to Whitcliffe Drive) in order to gain access to the MG 2 (16) site.
- 2. Recreational area The Cliff Walk is a very busy recreational area in Lower Penarth that attracts a multitude of dog owners (irrespective of the weather) as well as many walkers and cyclists (especially on a clear day). The MG 2 (16) development site with its planned 450 dwelling would cause a "collapse" of the current restricted belt of park area along the cliff top. We, therefore, demand that the new site create its own recreational area, which may an extension of the existing cliff walk.

Additional Planning and Development Comments

Further to the Vale of Glamorgan's statutory Consultation requirements for the Local Development Plans Reference Number 2011 -2026. MG2 (16):

The following planning objections are raised to the Development of

1. Infrastructure capacity

The development would be served by two existing local roads. One from the Cosmeston Estate and the second off Brockhill Rise and via Stanton Way and Whitcliffe Drive.

The Brockhill Rise access point is constructed to highway standards that are less than the current minimum requirements for adoption by the local authority and are less than 70 metres in width from the point

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(ordered by Representation ID No.)

Representor ID and details: 4057/DP1 Gary & Patricia Forrest

where the highway accesses the current development at the junction of Caynham Avenue and Brockhill Rise.

- 1a) The increased traffic flows generated from this development alone has the capacity to add an additional 900 traffic movements at peak times. This needs to considered in tandem with the additional flows that would be generated with the proposed development at the junction of Lavernock Road and Cog Road in Sully. This would double the figure to 1800 traffic movements at peak times. Lavernock Road / Redlands Road is already at capacity and the junction at The Merrier Harrier is a bottleneck with long delays. There has been no evidence of traffic counts at these times but simple observation of the junctions of Brockhill Rise and The Cosmeston Estate show that access onto the highway is currently not easily achieved with standing times being in excess of 10 minutes at the peak morning rush. The junction at Brockhill Rise/Lavernock Road is substandard with poor visibility and is already the site of many minor accidents. The additional traffic would result in this junction becoming more dangerous. There is no space available for the modification of these junctions which would mean that both estates would be grid locked.
- 1b) There is a capacity issue on the current drainage infrastructure and the potential for the current Cardiff West Trunk sewer to have the capacity to service the additional houses with their separate foul and surface water systems to enable the development..
- 1c) Increased traffic flows during the development and the generation of additional Noise, dust and Nuisance. There is a statutory responsibility of the local authority to take this into consideration for all new developments. Currently the ambient noise level for this area is very low the new development will exceed this level by a large margin in the construction phase alone and is detrimental to both the current urban development as well as the local environment and ecosystems and habitats. There is no reported evidence of monitoring of the current levels and on how the development would impact on these levels.

#### 2. Environmental Impact

The site of this development is an important habitat and flora and fauna, many of these habitats are protected by legislation.

There is evidence of specialised habitats in the area with the presence of Bee Orchids which are a protected species. The woodland area is also used as a nesting spot for birds of prey and lies on the migratory both of migratory birds who feed here in the winter. As this area has the same lithology and geology as Cosmeston and will by default house the same species. It also shares the same habitat as the nature reserve at Lavernock Head to St Mary's Well Bay.

The cliff face is also fragile and the current heritage footway and propose heritage footway improvement lies directly adjacent to this development. This line has had to be modified and moved inland over time because of cliff falls.

The development will impact on this and may increase this risk of cliff falls.

#### 3. Old Landfill Site

This has been mentioned in the proposals. However there is no detailed consideration made of the potential impact of this on the development. The tipping history of this site is not known but it is of the same age and lies in the original Cosmeston clay pit/quarry development. The tip that is located on the Cosmeston Lakes development has raised major concerns in the past because of the potential of pollution from the tipped material. There are currently monitoring stations to check the condition of the groundwater that flows through the Cosmeston Lakes site.

The landfill in the proposed development was backfilled at a time when there were no statutory controls on what could be tipped and the contents of the tip are unknown. The uncontrolled landfill many potentially contain harmful materials that could be hazardous to human health and the environment. Any modification of the status quo could result in major impacts on the groundwater quality in this area. There is also the potential for biodegradable waste having been disposed of which would result in the generation of landfill gas. There is no monitoring information available for this site.

#### 4. Loss of Amenity

This area forms an important recreational amenity and is green belt which maintains the separate identities of Lavernock and Sully. The development would diminish both the amenity and destroy the small area of greenbelt that is left.

#### 5. Service provision

The schools of Penarth are at capacity, the health system is at capacity. How can this development be serviced by the Local Authority?

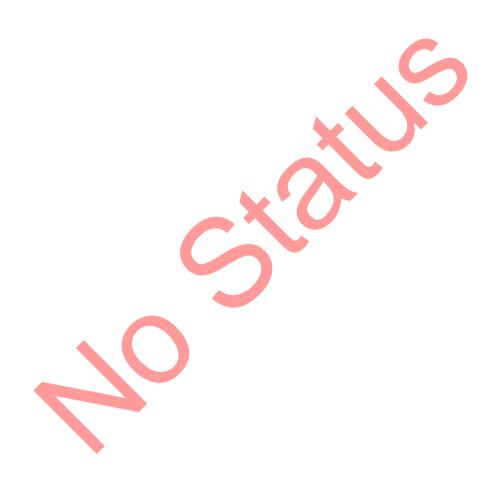
- 3f Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
- 4b If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -

| Representor ID and details: 4058/DP1 Mr R.Page   |   |
|--|---|
| Date Lodged Status Petition and No. Supporting Evidence 29/03/2012 M 0   | Additional SA SEA Rep format:  Letter 4a - do you want your comments to be consiered by 'written representations' or do you want to speak at a hearing session of Public examination?   |
| 2a - Do you consider the LDP is Sound? Unanswered  | 2b - If you think that the Plan is unsound and does not not meet one or more test(s) of soundness, please indicate which test(s) that it fails.  Procedural Tests - P1 - Unanswered P2 - Unanswered  Consistency Tests - C1 - Unanswered C2 - Unanswered C3 - Unanswered C4 - Unanswered  Coherence and Effectiveness Tests - CE1 - Unanswered CE2 - Unanswered CE3 - Unanswered CE4 - Unanswered   |
| 3a - Which part of the Deposit Plan are you commenting on?   | Policy Number:     Paragraph Number:     Proposal Map:     Constraints Map     Appendices:       MG2(16)  |
| 3b - Do you wish to see any changes made to the Deposit Plar   | as a result of your representation? Unanswered (If "No" or "Unanswered" - go to 3d)   |
| 3c - What changes would like to see made to the Deposit Plan   | ? New Policy: Amended Policy: New Paragraph: Amended Paragraph: New Or Amended Site: Other (see Notes): Unanswered Una |
| 3d - If your representation relates to a new, deleted or amende  | ed site, did you submit the site as a Candidate Site? Unanswered (If "Yes", please give the Candidate Site Name and reference if known) Site Name:  |
| massive expansion of the Lower Penarth residential area  We have the following concerns, which need to be include  1. Traffic (residential and construction) – It is absolutely is the new development site. The construction traffic would residents once construction has been completed. We, the Refn 1-3 Meeting Cllr. Clive Williams Note 2-3-2012  2. Recreational area – The Cliff Walk is a very busy recrectlear day). The MG 2 (16) development site with its plant own recreational area, which may an extension of the exist Additional Remarks  1. An extension of "Ribbon Development"  2. Justification for c/o 1,300 residents  3. VOG has approved massive extension of Barry Docks | opments in order to meet the demand for new homes. The plans for site location MG2 (16) include the construction of 450 "dwellings", which is a with enormous impact on an already densely populated part of Penarth.  ed in the early planning phase of such a large development site:  mpossible to use the current residential roads off Lavernock Road (Brockhill Rise, Caynham Avenue, Stanton Way and Whitcliffe Drive) for feeding into lead to serious traffic congestions and would have a serious impact on the Cliff Walk recreational area. The same holds true for the traffic by the new erefore, strictly object to any idea involving the current residential roads (Brockhill Rise to Whitcliffe Drive) in order to gain access to the MG 2 (16) site. —  ational area in Lower Penarth that attracts a multitude of dog owners (irrespective of the weather) as well as many walkers and cyclists (especially on a need 450 dwelling would cause a "collapse" of the current restricted belt of park area along the cliff top. We, therefore, demand that the new site create its   |
| 3f - Please outline the changes you wish to see made to the D  | reposit Plan to make it sound (if relevant)   |

Representation ID No.)

Representor ID and details: 4058/DP1 Mr R.Page

4b - If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -



| Representor ID and details: 4059/DP1 Mr & Mrs Thomas   | <b>;</b>  |  |   |   |                        |
|--|---|--|---|---|------------------------|
| Date Lodged     Status     Petition and No.     Supporting Evidence       29/03/2012     M     □     0     □   | Additional SA SEA   | <u>Rep format:</u><br>Letter                                   | 4a - do you want your comment<br>you want to speak at a hearing |   |                        |
| 2a - Do you consider the LDP is Sound? Unanswered  | 2b - If you think that the Plan is un<br>Procedural Tests - P1 - Una<br>Consistency Tests - C1 - Una<br>Coherence and Effectiveness Tes | answered P2 - Unans<br>answered C2 - Unans                     |   | 4 - Unanswered                            |                        |
| 3a - Which part of the Deposit Plan are you commenting on?   | Policy Number:  | Paragraph Number:  | Proposal Map:   | Constraints Map                           | Appendices:            |
|  | MG2(16)   |  |   |   |                        |
| 3b - Do you wish to see any changes made to the Deposit Plan   | as a result of your representation  | P Unanswered (If   | "No" or "Unanswered" - go to 3d)                                |   |                        |
| 3c - What changes would like to see made to the Deposit Plan   | New Policy: Amended Unanswered Unanswe  |  | Amended Paragraph: New Or A<br>Unanswered Unanswer              |   | otes):                 |
|  | Notes:  |  |   |   |                        |
| 3d - If your representation relates to a new, deleted or amende  | d site, did you submit the site as a<br>Site Name:  | Candidate Site? Unanswe  | ` ' '   | andidate Site Name and refe<br>Reference: | rence if known)        |
| 3e - Please set out your representation below: Response to The Vale of Glamorgan Local Development Plan (LDP) 2  To the Planning Commission of the LDP We fully understand the need for further residential development plansive expansion of the Lower Penarth residential area | opments in order to meet the dema   |  |   | ne construction of 450 "dwellin           | ngs", which is a       |
| We have the following concerns, which need to be includ  | ed in the early planning phase of si  | uch a large development site:                                  |   |   |                        |
| 1. Traffic (residential and construction) – It is absolutely the new development site. The construction traffic would residents once construction has been completed. We, th Refn 1-3 Meeting Cllr. Clive Williams Note 2-3-2012   | mpossible to use the current reside   | ential roads off Lavernock Roa<br>and would have a serious imp | pact on the Cliff Walk recreational are                         | ea. The same holds true for t             | the traffic by the new |
| 2. Recreational area – The Cliff Walk is a very busy recre<br>clear day). The MG 2 (16) development site with its plan<br>own recreational area, which may be an extension of the  | ned 450 <mark>dwe</mark> lling would cause a "co<br>existing Clif <mark>f Wa</mark> lk.   |  |   |   |                        |
| 3f - Please outline the changes you wish to see made to the D  | •   | evant)   |   |   |                        |
| 4b - If you wish to speak, please confirm which part of your re  |   |  | nev consider it be necessary to spea                            | k at the hearing -                        |                        |
| in just in just to opening product of your to  |   |  | , to opou   |   |                        |

| Representor ID and details: 4060/DP1 Mrs M.C.Richard   | s- Davies   |  |  |  |
|--|---|--|--|--|
| Date Lodged     Status     Petition and No.     Supporting Evidence       29/03/2012     M     0 | Additional SA SEA Rep format:  Letter 4a - do you want your comments to be consiered by 'written representations' or do you want to speak at a hearing session of Public examination?   |  |  |  |
| 2a - Do you consider the LDP is Sound? Unanswered  | 2b - If you think that the Plan is unsound and does not not meet one or more test(s) of soundness, please indicate which test(s) that it fails.  Procedural Tests - P1 - Unanswered P2 - Unanswered  Consistency Tests - C1 - Unanswered C2 - Unanswered C3 - Unanswered C4 - Unanswered  Coherence and Effectiveness Tests - CE1 - Unanswered CE2 - Unanswered CE3 - Unanswered CE4 - Unanswered   |  |  |  |
| 3a - Which part of the Deposit Plan are you commenting on?                                       | Policy Number:     Paragraph Number:     Proposal Map:     Constraints Map     Appendices:       MG2(16)  |  |  |  |
| 3b - Do you wish to see any changes made to the Deposit Plan                                     | as a result of your representation? Unanswered (If "No" or "Unanswered" - go to 3d)   |  |  |  |
| 3c - What changes would like to see made to the Deposit Plan                                     | New Policy: Amended Policy: New Paragraph: Amended Paragraph: New Or Amended Site: Other (see Notes): Unanswered Unans |  |  |  |
| 3d - If your representation relates to a new, deleted or amend                                   | ed site, did you submit the site as a Candidate Site? Unanswered (If "Yes", please give the Candidate Site Name and reference if known) Site Name:  |  |  |  |
|  |   |  |  |  |
| 3f - Please outline the changes you wish to see made to the D                                    | eposit Plan to make it sound (if relevant)  |  |  |  |
|  | presentation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -   |  |  |  |

| Representor ID and details: 4061/DP1 Mrs D Thomas   |   |  |   |  |  |
|---|---|--|---|--|--|
| Date Lodged     Status     Petition and No.     Supporting Evidence       30/03/2012     M     0                                  | Additional SA SEA   |  | our comments to be consiered by 'written representations' or do at a hearing session of Public examination? Written |  |  |
| 2a - Do you consider the LDP is Sound? Sound  | 2b - If you think that the Plan is unsound and does not not meet one or more test(s) of soundness, please indicate which test(s) that it fails.  Procedural Tests - P1 - Unanswered P2 - Unanswered   |  |   |  |  |
|   | Consistency Tests - C1 - Unanswered C2 - Unanswered C3 - Unanswered C4 - Unanswered   |  |   |  |  |
|   | Coherence and Effectiveness Tests - CE1 - | Unanswered CE2 - Unanswered            | CE3 - Unanswered CE4 - Unanswered   |  |  |
| 3a - Which part of the Deposit Plan are you commenting on?  | Policy Number: Paragraph  | Number: <u>Proposal Map:</u>           | Constraints Map Appendices:   |  |  |
|   |   |  |   |  |  |
| 3b - Do you wish to see any changes made to the Deposit Plan  | as a result of your representation? No  | (If "No" or "Unanswered                | "- go to 3d)  |  |  |
| 3c - What changes would like to see made to the Deposit Plan  |   |  | lew Or Amended Site: Other (see Notes):  Unanswered Unanswered  |  |  |
|   | Notes:  |  |   |  |  |
| 3d - If your representation relates to a new, deleted or amende   | ed site, did you submit the site as a Candidate S<br>Site Name: Brynhill Golf Club Land   | Site? Yes (If "Yes", plea              | ase give the Candidate Site Name and reference if known) Site Reference: 2407/CS1                                   |  |  |
| 3e - Please set out your representation below: Please keep Brynhill Golf Club as green field land, so tha it to be kept this way. | t it cannot be built upon by housing developers.  | The Deposit LDP is showing Brynhill G  | olf Club as outside the residential settlement boundary, and I want   |  |  |
| 3f - Please outline the changes you wish to see made to the D   | eposit Plan to make it sound (if relevant)  | <b>/</b>                               |   |  |  |
| 4b - If you wish to speak, please confirm which part of your re   | presentation you wish to speak to the inspector   | about and why they consider it be nece | ssary to speak at the hearing -   |  |  |

| Representor ID and details: 4062/DP1 Mr David Davies  |   |   |  |  |  |  |  |  |
|---|---|---|--|--|--|--|--|--|
| Date Lodged     Status     Petition and No.     Supporting Evidence       29/03/2012     M     □     0     □  |   |   | r comments to be consiered by 'written representations' or do a hearing session of Public examination? |  |  |  |  |  |
| •   | 2b - If you think that the Plan is unsound and does not not meet one or more test(s) of soundness, please indicate which test(s) that it fails.  Procedural Tests - P1 - Unanswered P2 - Unanswered  Consistency Tests - C1 - Unanswered C2 - Unanswered C3 - Unanswered C4 - Unanswered  Coherence and Effectiveness Tests - CE1 - Unanswered CE2 - Unanswered CE3 - Unanswered CE4 - Unanswered |   |  |  |  |  |  |  |
| 3a - Which part of the Deposit Plan are you commenting on?  | Policy Number: Paragraph MG2(16)  | Number: Proposal Map:                                   | Constraints Map Appendices:  |  |  |  |  |  |
| 3b - Do you wish to see any changes made to the Deposit Plan as a result of your representation? Unanswered (If "No" or "Unanswered" - go to 3d)  |   |   |  |  |  |  |  |  |
| 3c - What changes would like to see made to the Deposit Plan?   | New Policy: Amended Policy: Unanswered Unanswered   | New Paragraph: Amended Paragraph: Unanswered Unanswered | New Or Amended Site: Other (see Notes): Unanswered Unanswered  |  |  |  |  |  |
|   | Notes:  |   |  |  |  |  |  |  |
| 3d - If your representation relates to a new, deleted or amended site, did you submit the site as a Candidate Site? Unanswered (If "Yes", please give the Candidate Site Name and reference if known)  Site Name:   |   |   |  |  |  |  |  |  |
| 3e - Please set out your representation below: Response to The Vale of Glamorgan Local Development Plan (LDP) 2011-26   |   |   |  |  |  |  |  |  |
| To the Planning Commission of the LDP We fully understand the need for further residential developments in order to meet the demand for new homes. The plans for site location MG2 (16) include the construction of 450 "dwellings", which is a massive expansion of the Lower Penarth residential area with enormous impact on an already densely populated part of Penarth.   |   |   |  |  |  |  |  |  |
| We have the following concerns, which need to be included in the early planning phase of such a large development site:   |   |   |  |  |  |  |  |  |
| 1. Traffic (residential and construction) – It is absolutely impossible to use the current residential roads off Lavernock Road (Brockhill Rise, Caynham Avenue, Stanton Way and Whitcliffe Drive) for feeding into the new development site. The construction traffic would lead to serious traffic congestions and would have a serious impact on the Cliff Walk recreational area. The same holds true for the traffic by the new residents once construction has been completed. We, therefore, strictly object to any idea involving the current residential roads (Brockhill Rise to Whitcliffe Drive) in order to gain access to the MG 2 (16) site. |   |   |  |  |  |  |  |  |
| 2. Recreational area – The Cliff Walk is a very busy recreational area in Lower Penarth that attracts a multitude of dog owners (irrespective of the weather) as well as many walkers and cyclists (especially on a clear day). The MG 2 (16) development site with its planned 450 dwelling would cause a "collapse" of the current restricted belt of park area along the cliff top. We, therefore, demand that the new site create its own recreational area, which may an extension of the existing cliff walk.   |   |   |  |  |  |  |  |  |
| Additional Remarks  |   |   |  |  |  |  |  |  |
| Lavernock Road congested to high heaven at the present time. Any more traffic early morning will mean a travel time of approx 1 hour to Cardiff.  |   |   |  |  |  |  |  |  |
| 3f - Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)   |   |   |  |  |  |  |  |  |
| 4b - If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -  |   |   |  |  |  |  |  |  |

| Representor ID and details: 4063/DP1 Jill Jones   |   |  |   |                        |
|---|---|--|---|------------------------|
| Date Lodged Status Petition and No. Supporting Evidence   | Additional SA SEA   |  | mments to be consiered by 'written re earing session of Public examination? |                        |
| 30/03/2012 M  |   | Comment form you want to speak at a n                            |   |                        |
| 2a - Do you consider the LDP is Sound? Sound  | 2b - If you think that the Plan is unsound and do Procedural Tests - P1 - Unanswered                      | oes not not meet one or more test(s) of sound<br>P2 - Unanswered | dness, please indicate which test(s) that                                   | at it fails.           |
|   | Consistency Tests - C1 - Unanswered   | C2 - Unanswered C3 - Unanswered                                  | C4 - Unanswered   |                        |
|   | Coherence and Effectiveness Tests - CE1 - U   | Jnanswered CE2 - Unanswered CE3                                  | - Unanswered CE4 - Unanswered   |                        |
| 3a - Which part of the Deposit Plan are you commenting on?  | Policy Number: Paragraph N  | Number: Proposal Map:  | Constraints Map   | Appendices:            |
|   |   | MG23(288)  |   |                        |
| 3b - Do you wish to see any changes made to the Deposit Plan  | as a result of your representation? No  | (If "No" or "Unanswered" - go t                                  | o 3d)   |                        |
| 3c - What changes would like to see made to the Deposit Plan?   |   |  | ew Or Amended Site: Other (see Note<br>nanswered Unanswered                 | <u>es):</u>            |
|   | Notes:  |  |   |                        |
| 3d - If your representation relates to a new, deleted or amende   | d site, did you submit the site as a Candidate Si<br>Site Name: Land at Port Road East, Barry             | ite? Yes (If "Yes", please give                                  | e the Candidate Site Name and refere<br>Site Reference: 2597/CS1            | nce if known)          |
| 3e - Please set out your representation below:  |   |  |   |                        |
| The land at Port Road East, Barry is a haven for the wildli of Importance for Nature Conservation" and it should be k | fe in the area. This woodland is in its pure natural ept this way for nature and the wildlife that live o | al state with a small stream that the wildlife us<br>on it.      | se for drinking. The Deposit LDP show                                       | s this land as a "Site |
| Do not allow anyone to build on this land.  |   |  |   |                        |
| 3f - Please outline the changes you wish to see made to the D   | eposit Plan to make it sound (if relevant)  | 7  |   |                        |
| 4h If you wish to speak please confirm which part of your rar   | procentation you wish to speak to the inspector of  | shout and why they consider it be necessary t                    | a speak at the hearing  |                        |

| Representor ID and details: 4064/DP1 Richard Parry  |  |  |  |
|---|--|--|--|
| Date Lodged     Status     Petition and No.     Supporting Evidence       29/03/2012     M     □     0     □                  | Additional SA SEA  |  | comments to be consiered by 'written representations' or do hearing session of Public examination?           |
| 2a - Do you consider the LDP is Sound? Unanswered   | 2b - If you think that the Plan is unsound and or Procedural Tests - P1 - Unanswered | does not not meet one or more test(s) of soul<br>P2 - Unanswered | ndness, please indicate which test(s) that it fails.   |
|   | Consistency Tests - C1 - Unanswered  | C2 - Unanswered C3 - Unanswere                                   | ed C4 - Unanswered   |
|   | Coherence and Effectiveness Tests - CE1 -  | Unanswered CE2 - Unanswered CE                                   | 3 - Unanswered CE4 - Unanswered  |
| 3a - Which part of the Deposit Plan are you commenting on?  | Policy Number: Paragraph MG2(19)   | Number: Proposal Map:  | Constraints Map Appendices:  |
| 3b - Do you wish to see any changes made to the Deposit Plar  | ı as a result of your representation? Unansw   | ered (If "No" or "Unanswered" - go                               | o to 3d)   |
| 3c - What changes would like to see made to the Deposit Plan  |  |  | New Or Amended Site: Other (see Notes): Unanswered Unanswered  |
|   | Notes:   |  |  |
| 3d - If your representation relates to a new, deleted or amende   | ed site, did you submit the site as a Candidate S<br>Site Name:                      | Site? Unanswered (If "Yes", please g                             | ive the Candidate Site Name and reference if known) Site Reference:  |
| 3e - Please set out your representation below:  |  |  |  |
| Proposed Housing Development St Cyres Annexe, Dinas   | Powys.   |  |  |
| As a resident of Dinas Powys, I am writing to you to exprepresent extremely poor local highways network.                      | ess my concerns regarding the above proposals  | s, in particular the implications of the effect th               | nat this development will have on the level of traffic using the   |
| I live in close proximity to the traffic lights at the Cardiff R their children at the Infant school. There is complete disre |  |  | tion in this area twice daily caused by parents dropping off bious privilege, I pay a very high Council Tax. |
| Whilst I have no objections to the housing development p  | er se, I do if there is no improvement to the pre                                    | esent infrastructure both highways and educa                     | tional.  |
| While I appreciate that the Council may wish to maximise  | income from the sale of assets, the Council m  | ust appreciate that a certain level of expendit                  | ture would be required in these circumstances.   |
| I would be prepared to give an oral submission in any end   | quiry.   |  |  |
| 3f - Please outline the changes you wish to see made to the D   | eposit Plan to make it sound (if relevant)   |  |  |
| 4b - If you wish to speak please confirm which part of your rel   | presentation you wish to speak to the inspector                                      | about and why they consider it be necessary                      | to speak at the hearing -  |

| Representor ID and details: 4065/DP1 Mr A Trezise  |   |                                  |
|--|---|----------------------------------|
| Date Lodged     Status     Petition and No.     Supporting Evidence       29/03/2012     M     □     0     □   | Additional SA SEA Rep format: 4a - do you want your comments to be consiered by 'written representations' of Letter you want to speak at a hearing session of Public examination?   | or do                            |
| 2a - Do you consider the LDP is Sound? Unanswered  | 2b - If you think that the Plan is unsound and does not not meet one or more test(s) of soundness, please indicate which test(s) that it fails.  Procedural Tests - P1 - Unanswered P2 - Unanswered  Consistency Tests - C1 - Unanswered C2 - Unanswered C3 - Unanswered C4 - Unanswered  |                                  |
| 3a - Which part of the Deposit Plan are you commenting on?   | Coherence and Effectiveness Tests - CE1 - Unanswered CE2 - Unanswered CE3 - Unanswered CE4 - Unanswered CE5 |                                  |
| 3b - Do you wish to see any changes made to the Deposit Plan   | as a result of your representation? Unanswered (If "No" or "Unanswered" - go to 3d)   |                                  |
| 3c - What changes would like to see made to the Deposit Plan   |   |                                  |
| 3d - If your representation relates to a new, deleted or amende  | d site, did you submit the site as a Candidate Site? Unanswered (If "Yes", please give the Candidate Site Name and reference if known) Site Name:   |                                  |
| massive expansion of the Lower Penarth residential area We have the following concerns, which need to be include  1. Traffic (residential and construction) – It is absolutely i the new development site. The construction traffic would residents once construction has been completed. We, th  2. Recreational area – The Cliff Walk is a very busy recre clear day). The MG 2 (16) development site with its planr own recreational area, which may an extension of the exis  Additional Remarks | pments in order to meet the demand for new homes. The plans for site location MG2 (16) include the construction of 450 "dwellings", which is a with enormous impact on an already densely populated part of Penarth.  In the early planning phase of such a large development site:  In possible to use the current residential roads off Lavernock Road (Brockhill Rise, Caynham Avenue, Stanton Way and Whitcliffe Drive) for feeding lead to serious traffic congestions and would have a serious impact on the Cliff Walk recreational area. The same holds true for the traffic by the reference, strictly object to any idea involving the current residential roads (Brockhill Rise to Whitcliffe Drive) in order to gain access to the MG 2 (16) ational area in Lower Penarth that attracts a multitude of dog owners (irrespective of the weather) as well as many walkers and cyclists (especially ed 450 dwelling would cause a "collapse" of the current restricted belt of park area along the cliff top. We, therefore, demand that the new site creence.  | new<br>site.<br>on a<br>eate its |
| ·  | Planta mala it accord (if relevant)   |                                  |
|  | eposit Plan to make it sound (if relevant)  |                                  |
| 4b - it you wish to speak, please confirm which part of your rep   | resentation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -  |                                  |

| Representor ID and details: 4066/DP1 Mr T.E.Wood   |  |   |  |
|--|--|---|--|
| Date Lodged     Status     Petition and No.     Supporting Evidence       29/03/2012     M     □     0     □   |  | <del></del>   | r comments to be consiered by 'written representations' or do a hearing session of Public examination?   |
| 2a - Do you consider the LDP is Sound? Unanswered  | 2b - If you think that the Plan is unsound and of Procedural Tests - P1 - Unanswered Consistency Tests - C1 - Unanswered Coherence and Effectiveness Tests - CE1 - | P2 - Unanswered C2 - Unanswered C3 - Unanswe Unanswered CE2 - Unanswered C                | oundness, please indicate which test(s) that it fails.  ered C4 - Unanswered  CE3 - Unanswered CE4 - Unanswered  |
| 3a - Which part of the Deposit Plan are you commenting on?   | Policy Number: Paragraph MG2(16)   | Number: Proposal Map:   | Constraints Map Appendices:  |
| 3b - Do you wish to see any changes made to the Deposit Plan   | as a result of your representation? Unanswe  | ered (If "No" or "Unanswered" -   | go to 3d)  |
| 3c - What changes would like to see made to the Deposit Plan?  | New Policy: Amended Policy: New Policy:  |   | New Or Amended Site: Other (see Notes): Unanswered Unanswered  |
| 3d - If your representation relates to a new, deleted or amende  | d site, did you submit the site as a Candidate S<br>Site Name:   | Site? Unanswered (If "Yes", please  | give the Candidate Site Name and reference if known) Site Reference:   |
| 3e - Please set out your representation below: Response to The Vale of Glamorgan Local Development   | Plan (I DP) 2011 26  |   |  |
| To the Planning Commission of the LDP We fully understand the need for further residential develor massive expansion of the Lower Penarth residential area                     | pments in order to meet the demand for new h   |   | s) include the construction of 450 "dwellings", which is a   |
| We have the following concerns, which need to be include   | ed in the early planning phase of such a large do  | evelopment site:  |  |
| the new development site. The construction traffic would   | lead to serious traffic congestions and would ha   | ave a serious impact on the Cliff Walk recre  | am Avenue, Stanton Way and Whitcliffe Drive) for feeding into eational area. The same holds true for the traffic by the new Whitcliffe Drive) in order to gain access to the MG 2 (16) site. |
| 2. Recreational area – The Cliff Walk is a very busy recreclear day). The MG 2 (16) development site with its planr own recreational area, which may an extension of the exist | ed 450 dwelling would cause a "collapse" of the  | ultitude of dog owners (irrespective of the we current restricted belt of park area along | veather) as well as many walkers and cyclists (especially on a the cliff top. We, therefore, demand that the new site create its   |
| Additional Remarks   |  |   |  |
| Utter overdevelopment to add to the already overcrowded  | roads, surgeries, dentists, doctors and schools  |   |  |
| 3f - Please outline the changes you wish to see made to the D  |  |   |  |
| 4b - If you wish to speak, please confirm which part of your rep   | resentation you wish to speak to the inspector   | about and why they consider it be necessa   | ıry to speak at the hearing -  |

| Representor ID and details: 4067/DP1 Mrs E.Wood  |   |  |   |
|--|---|--|---|
| Date Lodged     Status     Petition and No.     Supporting Evidence       29/03/2012     M     0   | Additional SA SEA   |  | t your comments to be consiered by 'written representations' or do ak at a hearing session of Public examination?   |
| 2a - Do you consider the LDP is Sound? Unanswered  | 2b - If you think that the Plan is unsound and Procedural Tests - P1 - Unanswered Consistency Tests - C1 - Unanswered Coherence and Effectiveness Tests - CE1   | P2 - Unanswered<br>C2 - Unanswered C3 - Una  | of soundness, please indicate which test(s) that it fails.  nswered C4 - Unanswered  CE3 - Unanswered CE4 - Unanswered  |
| 3a - Which part of the Deposit Plan are you commenting on?   | Policy Number: Paragrap MG2(16)   | h Number: Proposal Map:  | Constraints Map Appendices:   |
| 3b - Do you wish to see any changes made to the Deposit Plan   | as a result of your representation? Unans   | wered (If "No" or "Unanswere   | - go to 3d)   |
| 3c - What changes would like to see made to the Deposit Plan?  | New Policy: Amended Policy: Unanswered Unanswered   | New Paragraph: Amended Paragr<br>Unanswered Unanswered   | aph: New Or Amended Site: Other (see Notes): Unanswered Unanswered  |
|  | Notes:  |  |   |
| 3d - If your representation relates to a new, deleted or amende  | d site, did you submit the site as a Candidate<br>Site Name:  | e Site? Unanswered (If "Yes", pl   | ease give the Candidate Site Name and reference if known) Site Reference:   |
| we have the following concerns, which need to be included 1. Traffic (residential and construction) – It is absolutely in the new development site. The construction traffic would residents once construction has been completed. We, the 2. Recreational area – The Cliff Walk is a very busy recreatlear day). The MG 2 (16) development site with its plann own recreational area, which may an extension of the exist Additional Remarks  Added to the above, where are the schools to house the construction of the schools. | pments in order to meet the demand for new with enormous impact on an already densely d in the early planning phase of such a large appossible to use the current residential roads ead to serious traffic congestions and would refore, strictly object to any idea involving the tional area in Lower Penarth that attracts a red 450 dwelling would cause a "collapse" of ting cliff walk. | populated part of Penarth.  development site:  s off Lavernock Road (Brockhill Rise, Cahave a serious impact on the Cliff Walk e current residential roads (Brockhill Rismultitude of dog owners (irrespective of the current restricted belt of park area a | 2 (16) include the construction of 450 "dwellings", which is a synham Avenue, Stanton Way and Whitcliffe Drive) for feeding into recreational area. The same holds true for the traffic by the new e to Whitcliffe Drive) in order to gain access to the MG 2 (16) site. the weather) as well as many walkers and cyclists (especially on a long the cliff top. We, therefore, demand that the new site create its seent – not to mention the disturbance to the elderly in this area, of |
| which there are many.  | District Annual Charles   |  |   |
|  | ·   |  |   |
| 4b - If you wish to speak, please confirm which part of your rep   | resentation you wish to speak to the inspector  | or about and why they consider it be nec   | essary to speak at the hearing -  |

| Representor ID and details: 4068/DP1 Mr William Richa   | rd   |   |   |
|---|--|---|---|
| Date Lodged     Status     Petition and No.     Supporting Evidence       29/03/2012     M     □     0     □  | Additional SA SEA  |   | your comments to be consiered by 'written representations' or do k at a hearing session of Public examination?  |
| 2a - Do you consider the LDP is Sound? Unanswered   | Procedural Tests - P1 - Unanswered  Consistency Tests - C1 - Unanswered  Coherence and Effectiveness Tests - CE1                                 | P2 - Unanswered C2 - Unanswered C3 - Unanswered Unanswered CE2 - Unanswered   | CE3 - Unanswered CE4 - Unanswered   |
| 3a - Which part of the Deposit Plan are you commenting on?  | Policy Number: Paragraph MG2(16)   | Number: Proposal Map:   | Constraints Map Appendices:   |
| 3b - Do you wish to see any changes made to the Deposit Plan  |  |   |   |
| 3c - What changes would like to see made to the Deposit Plan  | ? New Policy: Amended Policy:<br>Unanswered Unanswered<br>Notes:   | New Paragraph: Amended Paragra Unanswered Unanswered  | ph: New Or Amended Site: Other (see Notes): Unanswered Unanswered   |
|   | Notes.   |   |   |
| 3d - If your representation relates to a new, deleted or amende   | ed site, did you submit the site as a Candidate<br>Site Name:  | Site? Unanswered (If "Yes", plea  | ase give the Candidate Site Name and reference if known) Site Reference:  |
| 3e - Please set out your representation below: Response to The Vale of Glamorgan Local Development To the Planning Commission of the LDP We fully understand the need for further residential development massive expansion of the Lower Penarth residential area | opments in order to meet the demand for new  |   | (16) include the construction of 450 "dwellings", which is a  |
| We have the following concerns, which need to be includ-  |  | '   |   |
| Traffic (residential and construction) – It is absolutely in the new development site. The construction traffic would residents once construction has been completed. We, the   | mpossible to use the current residential roads lead to serious traffic congestions and would herefore, strictly object to any idea involving the | off Lavernock Road (Brockhill Rise, Cay<br>have a serious impact on the Cliff Walk r<br>current residential roads (Brockhill Rise | rnham Avenue, Stanton Way and Whitcliffe Drive) for feeding into ecreational area. The same holds true for the traffic by the new to Whitcliffe Drive) in order to gain access to the MG 2 (16) site. |
|   | ned 450 dwelling would cause a "collapse" of the existing Cliff Walk.  |   | ne weather) as well as many walkers and cyclists (especially on a uning the cliff top. We, therefore, demand that the new site create its   |
| 3f - Please outline the changes you wish to see made to the D   |  |   |   |
| 4b - If you wish to speak, please confirm which part of your re   | presentation you wish to speak to the inspecto   | about and why they consider it be nece  | essary to speak at the hearing -  |

| Representor ID and details: 4069/DP1 Mr James Curtis  |  |   |   |
|---|--|---|---|
| Date Lodged     Status     Petition and No.     Supporting Evidence       29/03/2012     M     0                    |  |   | comments to be consiered by 'written representations' or do a hearing session of Public examination?  |
|   | Procedural Tests - P1 - Unanswered  Consistency Tests - C1 - Unanswered  Coherence and Effectiveness Tests - CE1 - Unanswered  | P2 - Unanswered C2 - Unanswered C3 - Unanswe Unanswered CE2 - Unanswered C  | undness, please indicate which test(s) that it fails.  red C4 - Unanswered  E3 - Unanswered CE4 - Unanswered  |
| 3a - Which part of the Deposit Plan are you commenting on?  | Policy Number: Paragraph N<br>MG2(16)  |   | Constraints Map Appendices:   |
| 3b - Do you wish to see any changes made to the Deposit Plan  | as a result of your representation? Unanswe  | red (If "No" or "Unanswered" - g  | go to 3d)   |
| 3c - What changes would like to see made to the Deposit Plan?   | New Policy: Amended Policy: N  |   | New Or Amended Site: Other (see Notes): Unanswered Unanswered   |
| 3d - If your representation relates to a new, deleted or amende   | d site, did you submit the site as a Candidate Si<br>Site Name:  | te? Unanswered (If "Yes", please  | give the Candidate Site Name and reference if known) Site Reference:  |
| the new development site. The construction traffic would residents once construction has been completed. We, the    | pments in order to meet the demand for new howith enormous impact on an already densely pool in the early planning phase of such a large dempossible to use the current residential roads of ead to serious traffic congestions and would have refore, strictly object to any idea involving the contents. | pulated part of Penarth.  velopment site:  f Lavernock Road (Brockhill Rise, Caynha ve a serious impact on the Cliff Walk recre urrent residential roads (Brockhill Rise to \ | m Avenue, Stanton Way and Whitcliffe Drive) for feeding into eational area. The same holds true for the traffic by the new Whitcliffe Drive) in order to gain access to the MG 2 (16) site. |
| clear day). The MG 2 (16) development site with its plann own recreational area, which may an extension of the exis | ed 450 dwelling would cause a "collapse" of the  | current restricted belt of park area along t  | he cliff top. We, therefore, demand that the new site create its  |
| It is very difficult at present to access Lavernock Road and  | I with extra housing anticipated it will be impose   | ihlo  |   |
| · · · · · · · · · · · · · · · · · · ·   |  |   |   |
| 3f - Please outline the changes you wish to see made to the De  | ·<br>  |   |   |
| 4b - If you wish to speak, please confirm which part of your rep  | resentation you wish to speak to the inspector a   | about and why they consider it be necessa   | ry to speak at the hearing -  |

(ordered by Representation ID No.)

| Representor ID and details: 4070/DP1 J R White  |   |                            |                                |                               |  |                                 |                |
|---|---|----------------------------|--------------------------------|-------------------------------|--|---------------------------------|----------------|
| Date Lodged     Status     Petition and No.     Supporting Evidence       30/03/2012     WD     0 | Additional SA SEA                             |                            | Rep format:<br>Letter          |                               | your comments to be cons                       | •                               | •              |
| 2a - Do you consider the LDP is Sound? Unanswered   | 2b - If you think that the Procedural Tests - |                            | does not not mee<br>P2 - Unans | ` '                           | f soundness, please indica                     | te which test(s) th             | at it fails.   |
|   | Consistency Tests -                           | C1 - Unanswered            | C2 - Unans                     | wered C3 - Unan               | swered C4 - Unansw                             | ered                            |                |
|   | Coherence and Effect                          | iveness Tests - CE1        | - Unanswered                   | CE2 - Unanswered              | CE3 - Unanswered                               | CE4 - Unanswere                 | d              |
| 3a - Which part of the Deposit Plan are you commenting on?  | Policy Number:                                | <u>Paragrapl</u>           | h Number:                      | Proposal Map:                 | Const  | raints Map                      | Appendices:    |
|   | MG2   |                            |                                |                               |  |                                 |                |
| 3b - Do you wish to see any changes made to the Deposit Plan                                      | as a result of your rep                       | resentation? Unansv        | vered (If                      | "No" or "Unanswered           | <b>"</b> - go to 3d)                           |                                 |                |
| 3c - What changes would like to see made to the Deposit Plan'                                     | ? New Policy:<br>Unanswered                   | Amended Policy: Unanswered | New Paragraph:<br>Unanswered   | Amended Paragra<br>Unanswered | ph: New Or Amended Site Unanswered             | e: Other (see Not<br>Unanswered | <u>es):</u>    |
|   | Notes:  |                            |                                |                               |  |                                 |                |
| 3d - If your representation relates to a new, deleted or amende                                   | ed site, did you submit t<br>Site Name:       | the site as a Candidate    | Site? Unanswer                 | ed (If "Yes", plea            | ase give the Candidate Site<br>Site Reference: | e Name and refer                | ence if known) |
|   |   |                            |                                | <b>Z</b>                      |  |                                 |                |

3e - Please set out your representation below:

As a resident of Dinas Powys I wish to express my concerns re. the implications of the effect that the proposed additional housing would have on the local highways network.

In Dinas Powys it is proposed that a minimum of 400 addition houses will be built on the St Cyres annexe and Caerleon Road, Both sites are on the Murch side of the community which is served by only two access points to the main road [A4055]. Both these junctions, namely the Infants School traffic lights at Murch Bridge and Cross Common Road at its junction with the A4055 are either at capacity or structurally suspect.

The 400 houses would generate between 600 to 800 additional cars in both directions, particularly at peak times. The additional traffic would have a profound and adverse impact on the community as the existing roads are under great pressure now.

Further, I am concerned that there have not been any proposed extra community facilities of substance. A local church is in desperate need of a permanent base, the local sporting facilities are not adequate for the present demand and medical services are restricted due to the limitations of space at the Dinas Powys Surgery premises on Cardiff Road.

There appears to be no serious consideration having been given to other views as to the future possible use of St Cyres Annexe, Murch Road. It is worth noting that the school buildings are in good condition although in need of a little investment. To simply seek to tear down the school without any reference to the community needs would be a shameful waste. I also have concerns regarding the capacity of the local schools to accommodate the extra pupils due to the additional houses.

Then there is the wider consideration of the Plan. Up to 10,000 additional houses are planned, many in the south east area of the Vale, e.g. 2,000 units already having been approved at the Waterfront, Barry.

Much of this traffic will be funnelled through Dinas Powys and join the ever lengthening queues leading to and from the Merrie Harrier. The proposals in Sully, Penarth, Lavernock and the land adjacent St Josephs' School, Sully Road will only add to the existing congestion at this junction.

Already the air pollution levels are excessive. The Nitrogen Dioxide [N02] levels are recorded as being 43.8 units with the maximum recommended level being 40 units along Cardiff Road, Eastbrook. An increase in vehicles, particularly standing traffic, would exacerbate the situation. The level of other emissions such as CO (carbon monoxide) and Particulates [PM105] are not available but need clarifying

The Deposit plan does not indicate what measures will be taken to encourage the availability and use of public transport. I understand that there is a serious lack of rolling stock in Wales and providing extra trains will be a major challenge. Additional buses would simply be caught up in the traffic chaos the extra housing would cause.

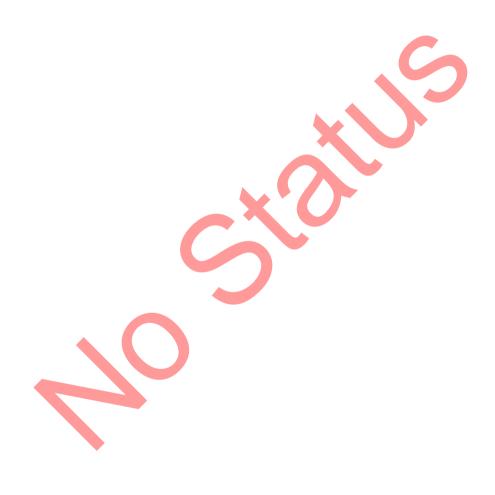
It is essential that major highway infrastructure improvements are made BEFORE hundreds of additional housing could even be considered.

(ordered by Representation ID No.)

Representor ID and details: 4070/DP1 J R White

3f - Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)

4b - If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -



| Representor ID and details: 4071/DP1 Mrs P Curtis  |   |   |  |
|--|---|---|--|
| Date Lodged     Status     Petition and No.     Supporting Evidence       29/03/2012     M     0   |   | Letter you want to  | want your comments to be consiered by 'written representations' or do speak at a hearing session of Public examination?  |
| 2a - Do you consider the LDP is Sound? Unanswered  | 2b - If you think that the Plan is unsound and Procedural Tests - P1 - Unanswered Consistency Tests - C1 - Unanswered Coherence and Effectiveness Tests - CE1   | does not not meet one or more to P2 - Unanswered C2 - Unanswered C3 Unanswered CE2 - Unanswered   | st(s) of soundness, please indicate which test(s) that it fails.  Unanswered C4 - Unanswered  ered CE3 - Unanswered CE4 - Unanswered   |
| 3a - Which part of the Deposit Plan are you commenting on?   |   | h Number: Proposal Map:   | Constraints Map Appendices:  |
| 3b - Do you wish to see any changes made to the Deposit Plar   | as a result of your representation? Unansy  | wered (If "No" or "Unan   | swered" - go to 3d)  |
| 3c - What changes would like to see made to the Deposit Plan   |   |   | aragraph: New Or Amended Site: Other (see Notes): Unanswered Unanswered  |
| 3d - If your representation relates to a new, deleted or amende  | ed site, did you submit the site as a Candidate<br>Site Name:   | Site? Unanswered (If "Ye  | s", please give the Candidate Site Name and reference if known)<br>Site Reference:   |
| massive expansion of the Lower Penarth residential area  We have the following concerns, which need to be include  1. Traffic (residential and construction) – It is absolutely i the new development site. The construction traffic would residents once construction has been completed. We, th  2. Recreational area – The Cliff Walk is a very busy recre clear day). The MG 2 (16) development site with its plant own recreational area, which may an extension of the exist  Additional Remarks | opments in order to meet the demand for new with enormous impact on an already denselyed in the early planning phase of such a large impossible to use the current residential roads lead to serious traffic congestions and would erefore, strictly object to any idea involving the ational area in Lower Penarth that attracts a med 450 dwelling would cause a "collapse" of the string cliff walk. | populated part of Penarth.  development site:  s off Lavernock Road (Brockhill Rishave a serious impact on the Cliff e current residential roads (Brockhoultitude of dog owners (irrespective current restricted belt of park a | e, Caynham Avenue, Stanton Way and Whitcliffe Drive) for feeding into Walk recreational area. The same holds true for the traffic by the new ill Rise to Whitcliffe Drive) in order to gain access to the MG 2 (16) site. The vee of the weather) as well as many walkers and cyclists (especially on a rea along the cliff top. We, therefore, demand that the new site create its mal roads are planned along with these developments the problem will |
| 3f - Please outline the changes you wish to see made to the D  | eposit Plan to make it sound (if relevant)  |   |  |
| 4b - If you wish to speak, please confirm which part of your rep   | presentation you wish to speak to the inspector   |   | e necessary to speak at the hearing -  |

(ordered by Representation ID No.)

| Representor ID and details: 4072/DP1 Craig & Judith Je                                    | rwood  |                              |                               |                                   |                       |  | <del>_</del>       |
|---|--|------------------------------|-------------------------------|-----------------------------------|-----------------------|--|--------------------|
| Date Lodged Status Petition and No. Supporting Evidence 30/03/2012 M 0                    | Additional SA SEA                              |                              | Rep forma<br>Comment          | <del>-</del> 1                    | ,                     | to be consiered by 'writter<br>ssion of Public examinati | •                  |
| 2a - Do you consider the LDP is Sound? Unsound  | 2b - If you think that the Procedural Tests -  | ne Plan is unsou<br>P1 - Yes | nd and does not not i         | meet one or more test(s) o        | of soundness, ple     | ase indicate which test(s                                | ) that it fails.   |
|   | Consistency Tests -                            | C1 - Yes                     | C2 - Ye                       | es C3 - Yes                       | C4                    | - Yes  |                    |
|   | Coherence and Effect                           | iveness Tests -              | CE1 - Yes                     | CE2 - Yes                         | CE3 - Yes             | CE4 - Yes  |                    |
| 3a - Which part of the Deposit Plan are you commenting on?                                | Policy Number:                                 | <u>Pa</u>                    | ragraph Number:               | Proposal Map:                     |                       | Constraints Map  | Appendices:        |
|   | MG9. MD12. MG2.                                | . 6.4                        | 9. 7.41                       | MG9                               |                       | Feb 2012   | Other - Not Listed |
| 3b - Do you wish to see any changes made to the Deposit Plan                              | as a result of your rep                        | resentation?                 | Yes                           | (If "No" or "Unanswere            | d" - go to 3d)        |  |                    |
| 3c - What changes would like to see made to the Deposit Plan'                             | ? New Policy:<br>Unanswered<br>Notes:          | Amended Poli<br>Yes          | cy: New Paragra<br>Unanswered | oh: Amended Paragra<br>Unanswered | nph: New Or Am<br>Yes | ended Site: Other (see I                                 |                    |
| 3d - If your representation relates to a new, deleted or amende                           | ed site, did you submit of Site Name: Land Eas |                              | ndidate Site? Yes             | (If "Yes", ple                    | •                     | ndidate Site Name and re                                 | •                  |
| 3e - Please set out your representation below: REPRESENTATIONS AGAINST ALLOCATION OF GYPE | SY & TRAVELLER SIT                             | E AT LAND EAS                | ST OF LLANGAN                 |                                   |                       |  |                    |

TEST P1

The LDP has not been prepared in accordance with the Community Involvement Scheme, see below key points:

- The Emergency Services and Local Primary school have all confirmed that they have NOT been consulted on the proposed site MG9. The LEA confirmed they had not been consulted about the Gypsy site.
- Registered consultees have not been informed of the consultation stages.
- According to the Welsh Government's document 'Travelling to a better future' there is an onus on the LA to consult with its strategic partners in delivering Gypsy & Traveller sites. No consultation has taken place.
- Good practice (Welsh Government document 'Good Practice Design in designing Gypsy & Traveller sites') suggests that where Gypsy & Traveller sites are concerned the local community should be engaged as early as possible we believe that the Council has undertaken the minimum consultation in terms of the LDP and insufficient consultation with respect to the Gypsy & Traveller site in accordance with best practice.

TEST P2

- 1. The Sustainability Appraisal is flawed and contradictory the proposed sites do not meet with national policy in respect of sustainability. The allocation of Llangan is not consistent with previous Planning Rejections by the Council which considered sustainability (Bonvilston Sept 2011) and with similar determinations by the Planning Inspectorate (Pembroke Sept 2011).
- 2. The allocation of MG9 is not consistent with the proposed LDP policies.

TEST C1

The Land Use Plan (with regards to Gypsy & Traveller sites) does not relate to any strategy - The Housing Strategy is out dated and does not provide any structure for assessing Gypsy & Traveller needs or site location.

TESTC2

(ordered by Representation ID No.)

Representor ID and details: 4072/DP1 Craig & Judith Jerwood

- 1. The Site allocation does not have regard to the following National Policy:
- -Welsh Government Circular (30/2007):
- The site is RURAL and is "UNSUSTAINABLE" as there are no local services (no shops, food and drink outlets, doctor, dentist, Library, rail services or any main settlement within 5km etc). Llangan and Fferm Goch both score 0 points for local services in the evidence based assessment 'Sustainable Settlements Appraisal'
- The site would not comply with a RURAL EXCEPTION POLICY as it advocates that all pitches are accommodated on a RURAL site including transient pitches which would not comply with TAN 2.
- Any business operated from the site would be in contradiction of RURAL EXCEPTION guidance.
- The site allocation does not take into account the "SCALE" of the resident community. Llangan has a population of less than 100 with 35 homes and this proposal nearly doubles the size of the Hamlet.
- Example of similar site. In 2007 an application of the Sustainability issue was applied by the Planning inspector in Pembroke where an appleal was refused solely on this basis.
- The VOG Council has refused an application recently in Bonvilston on the basis of Sustainability and services in this case were closer to the site than in the case of Llangan proposal.
- Designing Gypsy and Traveller Sites Good Practice Guide The site is too small; therefore cannot meet the needs identified in the LDP.
- -The site measures 7400 m2 and could only accommodate 14 pitches without infrastructure (quidance is 500m2 per pitch plus refuse area; office; play area; infrastructure (roads etc)
- The access road to the site does not meet the minimum requirements for emergency vehicles (3.7m it is actually 15m)
- The site access is poor and "unsafe" having extended walks (in excess of 800m to bus stop) along an unlit lane with no public footpath or street lighting.
- The proposal of 21 units on the site would restrict the ability of emergency vehicles to manoeuvre around the site.
- New sites grants are available (and cost should not be a material planning consideration).
- -The guidance requires that sites are:
- sustainable the Llangan site proposal is not
- equivalent to standards that would be expected for social housing in the settled community This would not meet the standards and this site would not have been considered appropriate for development for residential in either the current or proposed plans
- have the effect of encouraging and developing good relations between

Gypsies & Travellers and the settled community — the large scale of this proposal could mean that establishing good relations with the local community of Llangan would be unlikely and could also result in increased tensions in the community.

- based on WAG guidance of Design of Gypsy traveller sites the maximum number of pitches is 14, and the proposal at Llangan exceeds this number.
- Travelling to a Better Future
- Recommends that LA's engage with their Housing Association Partners to bring sites forward. The VOG Council has not done this.
- "Situating transit provision on residential Gypsy sites is not an option preferred by the Gypsy and Traveller community as this can lead to tensions among different family groups and make site management and maintenance very difficult." This creates a sense of "fear" within the settled Gypsy & Traveller community. The proposal is recommending that transient and permanent sites are co-located.
- Planning Policy Wales 2011
- The proposed site at Llangan is greenfield land, according to the definition of brownfield land set out in Figure 4 1 of PPW;
- it will not reduce the need to travel, due to the limited local service provision in close proximity to the site;
- offers very limited access to public transport facilities;
- is not large enough to provide ancillary facilities required to support a sustainable development as set out in paragraph 3.30 in accordance with Designing Gypsy and Travellers Sites Good Practice Guide;
- is located within a Special Landscape Area (SLA) and in close proximity to a Conservation Area. The assessment of the Llangan site incorrectly states that it is not within an SLA, so makes no reference to the sites proximity to the conservation area of Llangan. The location can be clearly seen from the conservation area.
- does not meet the identified needs of Gypsies and Travellers, in the Vale of Glamorgan (Fordham report 2008 evidence);
- does not promote sustainable access to employment, shopping, education, health, community, leisure and sports facilities;
- does not maximise opportunities for community development and social welfare:
- does not foster social inclusion due to the isolated location of the site; and
- does not contribute to improvements in health due to the isolation from services and facilities.

(ordered by Representation ID No.)

Representor ID and details: 4072/DP1 Craig & Judith Jerwood

2. MG2. The draft policy MG 2 actively discriminates the Gypsy community by excluding them from the wider housing programme and potentially abuses their human rights. Policy MG 2 should be revised to allow the VOG to identify appropriate sites in the same way as Affordable Housing.

#### TESTC3

- 1. The policy does not have due regard to the Wales Spatial Plan.
- The key theme of the Wales Spatial Plan is achieving sustainable development through focusing new development in areas which have good access to key services and facilities. As there are no services surrounding the site the allocation of MG9 is not consistent with the objectives of the Wales Spatial Plan. The Gypsy site proposal fails Soundness test Consistency C3 because the policy does not have due regard to the Wales Spatial Plan.

#### TESTC4

- 1. The allocation of this site does not have regard to the relevant Community Strategy in the following respects:
- "The diverse needs of local people are met through the provision of customer focused, accessible services and information" This cannot be achieved by the allocation of a non-accessible rural allocation.
- "Vale of Glamorgan residents and organisations respect the local environment and work together to meet the challenge of climate change". The allocation of MG9 places heavy emphasis on the use of the car to access the most basic facilities shops, health, education etc.
- "Older people are valued and empowered to remain independent, healthy and active. They have equality of opportunity and receive high quality services to meet their diverse needs"— All services are miles away and inaccessible to

the older community. The VERY POOR public transport system is located

1050m from the site and is in excess of the maximum distances as defined in

the proposed LDP and "Manual for Streets".

- "People of all ages are able to access coordinated learning opportunities and have the necessary skills to reach their full potential helping to remove barriers to employment"—There is no employment opportunity near to the site.
- The local primary school has confirmed that it is full and that its projections suggest that it doesn't have the capacity for such a large development (also consider the existing approval of 12 dwellings at Fferm Goch).
- The small local industrial unit has raised concerns in relation to the scale of the proposal.

#### TEST CE1

The Plan does not set out a coherent strategy in the following respects

- The Strategy makes the following statements:

The LDP will seek to provide a policy framework which: Manages the housing supply effectively in order to provide a range of good quality, affordable homes in sustainable locations

Reduces out commuting by providing opportunities for new housing, retail and employment development in accessible locations in the Vale of Glamorgan

The allocation of this rural site in open countryside does not meet this objective.

- The LDP also states its vision as being:
- "Our Vision for the Vale of Glamorgan is a place:

That is safe, clean and attractive, where individuals and communities have sustainable opportunities to improve their health, learning and skills, prosperity and wellbeing 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 sustainability of the area." The allocation of this site in policy MG9 does not meet these objectives being in a rural location with inadequate facilities and transport links.

- The Allocation of this site in policy MG9 does not comply with the following objectives of the LDP:
- -Objective 1: To sustain and further the development of sustainable communities within the Vale of Glamorgan, providing opportunities for living, learning, working and socialising for all. The site's location would clearly not meet this objective.
- Objective 2: To ensure that development within the Vale of Glamorgan makes a positive contribution towards reducing the impact of and mitigating the adverse effects of climate change. The allocation of this

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Representor ID and details: 4072/DP1 Craig & Judith Jerwood

site will have entirely the opposite effect to this objective.

- Objective 3: To reduce the need for Vale of Glamorgan residents to travel to meet their daily needs and enabling them greater access to sustainable forms of transport. The allocation of this site will have entirely the opposite effect to this objective.
- Objective 4: To protect and enhance the Vale of Glamorgan's historic, built, and natural environment. The development of this site would not meet this objective: a planning refusal on an adjacent site in May 2002 stated "It is a proposal that would adversely affect the undeveloped rural character of the area"
- Objective 5: To maintain, enhance and promote community facilities and services in the Vale of Glamorgan The local primary school has not been consulted, had they been it would have been recognised that the school does not have capacity, nor is it projected to have the capacity.
- Objective 7: To provide the opportunity for people in the Vale of Glamorgan to meet their housing needs- States that development of housing should be in sustainable locations This is not. Furthermore, it brings into question POLICY MD12 which is discriminatory in that Gypsy & Traveller sites are treated differently from other housing allocations. An inclusive policy would see Gypsy & Traveller sites being assessed on the same basis as AFFORDABLE HOUSING and considered for ALL candidate residential sites in the LDP
- Objective 10: To ensure that development within the Vale of Glamorgan uses land effectively and efficiently and to promote the sustainable use and management of natural resources. The inappropriate use of finite resources can impact on the ability of future generations to fulfil their needs. The LDP through favouring the use of previously developed land and the sustainable use of natural resources of whatever kind and wherever they are located, will contribute to preserving their availability for future generations. This is agricultural land in the Special Landscaped Area.

#### TEST CE2

The strategies, policies and allocations are not realistic and appropriate having considered relevant alternatives and are not founded on robust evidence:

- 1. The allocation of Llangan is purely on the basis of site ownership by the Vale and does not meet the requirement of Policy MD12.
- 2. The Gypsy & Traveller site assessment (anecdotal) conflicts with other evidence based background papers; specifically the Sustainable Settlement Appraisal. The SSA states 0 points for public transport but the Gypsy & Traveller site assessment states that public transport facilities are good.
- 3. The Gypsy Traveller site assessment states "good highway access", yet the access falls considerably short of the minimum requirement for vehicle access the access lane is 2.5m wide, against a minimum requirement of 3.7m plus footpath of 1.2m.
- 4. The Gypsy Traveller site assessment does not reflect the current legal obligations of the VOG in respect of this site, yet the other site assessments highlight legal issues.
- 5. Several privately-owned sites were put forward as candidate sites for Gypsy & Traveller sites but were dismissed as they were not in Council ownership. Not being in council ownership should not be a reason to reject privately owned sites.
- 6. The key issue is that the site allocation does not reflect the identified need of the Gypsy & Traveller community as highlighted in the 2008 Fordham report.
- 7. The Gypsy Traveller site assessment suggests that Fferm Goch is the local settlement when Llangan is recognised in this and historic documents as the local settlement being only 150m from the proposed site. It appears that the council has also linking the site at Llangan to the Hamlet of Fferm Goch in order to increase the site assessment positive score.
- 8. The assessment makes no reference that the site is in a Special Landscape Area (SLA).
- 9. The assessment makes no reference that the site is adjacent to a Conservation Area, within the Conservation Management Plan for this area there is a specific requirement to protect the view from the edge of the conservation area over the proposed site. The proposed site is clearly visible form the conservation area.
- 10. The allocation of Fferm Goch as a Minor Rural Settlement is incorrect. The appraisal scored 9 points. 3 are for employment which puts this site on par with the major settlements such as Barry. This is on the basis of 4 light industrial buildings. A survey of these employers has confirmed that zero new jobs have become available in the last 9 years and that the units collectively employ fewer than 15 people with no intention to expand. Furthermore, one of the units has been empty and the development is not a popular industrial site.
- 11. Fferm Goch has a population of less than 100 (98)— of the 5 sites in the Vale of Glamorgan with a population of 98 only Fferm Goch is classified as a Minor Rural site (probably based on the 9 points). The remainder are classified as Hamlets and there is a presumption against development in Hamlets (or as a minimum the scale would need to be appropriate and tied to a Rural Exception policy). The guidance requires ALL sites of a population below 100 to be classified as a Hamlet Fferm Goch should be recategorised as a Hamlet.
- 12. The Council has undertaken a study (Fordham report 2008) where the message was extremely strong that the Gypsy & Traveller community wanted smaller sites located on the fringes of larger communities. The report confirmed that isolated, rural sites restricted access to Health, Education and welfare facilities that disadvantaged them and needs to be seen in the light of the above objectives. The following is a quote from the Fordham report:
- "Participants living on Shirenewton had three main criticisms: the site was too big, the distance from local amenities along with the lack of local transport,"

"This created many problems for the residents, especially the poorest: 'for a person like me on the bread line it's very tough. I can't afford to use the car', 'everything is a mile away, including the bus stop. It takes a long walk on a busy road to get to the shops and schools".

"The tables demonstrate that access to services such as local shops, health centres and education facilities from both sites is difficult by foot and by local transport systems. This difficulty was eased when participants used their cars, however the level of ease was lower for Roverway due to the difficult entry onto the main road".

"Participants reported that access to local amenities, health services and education was low for both sites by foot or by public transport: 'Everything is a mile away, including the bus stop. It takes a long walk on a busy road to get to the shops and schools".

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"It was thought that smaller sites would reduce the problem of on-site conflicts: 'they need smaller sites and not too many different families, otherwise when you have a row the whole site becomes a war zone"

"This affected the ability of the households interviewed to access local services such as shops, health centres and education facilities. It was reported that this problem mainly affected the women: men take the vehicles that the household own to work during the day, leaving the women without their own transport and often away from public transport routes"

"Participants did not specify where in Cardiff or the Vale of Glamorgan sites should be located. It was noted that sites should be on the outskirts of towns to enable access by foot to local services such as shops, the Launderette and health centres"

"While the focus of the survey was on accommodation requirements, the questionnaire also collected information on access to services, including health and education. Research has found that poor accommodation can prevent access to services and so cannot be seen in isolation."

"Participants living on sites felt that there were site restrictions that limited their work options. These were mainly associated with the location of the sites and lack of access to public transport rather than site regulations: 'no buses, no local transport. Bad access"

"Participants living on local authority sites reported that the lack of local public transport provision in the area affected their ability to send their children to school, access health services and work opportunities, and limited their ability to attend training and education courses"

"Participants were asked about where they would like future sites to be, but were not specific about locations within the County Boroughs, instead emphasising the importance of public transport to any new sites. Government draft guidance on site design stresses the importance of access to services and the promotion of integrated co-existence' between the site and surrounding community."

"The precise location, design and facilities of any new sites should be drawn up in consultation with Gypsies and Travellers to ensure that the additional provision meets their needs. The health and safety implications of a new site's location should be considered in finding a balance between offering sites in good locations and the additional land costs this would entail. The settled community neighbouring the sites should also be involved in the consultation from an early stage."

13. An independent highway study recently undertaken by Capita Symonds, surrounding the proposed site has concluded that:

"The 1km long lane itself is of poor horizontal alignment, with poor forward visibility and unsuitable for regular vehicular traffic. If the site is developed the lane itself would need major upgrading, which would certainly change its appearance within this rural environment."

"The village school is approximately 1km from the village and 900 metres from the proposed site. It is noted that the route does not offer any facilities for pedestrians, such that the only safe way for children to travel between the site and the school safely would be by vehicle. This route would also be potentially hazardous for cycle use for children, the elderly or infirm and could be potentially hazardous for all users other than by car."

"With regard to the appropriateness of the location for a traveller's site development in relation to transportation, it is difficult to refer to standard guidelines, as few relate to "rural highways", most highway design standards for residential development relate to urban areas. Hence, the advice contained within this report is based on best available information, acceptable highway standards for developments of similar size and transport needs of small communities. Welsh Government guidelines state sites should be situated in close proximity to transport links. The Llangan site would not appear to meet that criteria, being situated away from the main transport infrastructure, sites should also have ready access to schools, doctors and shops, against which requirements Llangan again appears to fail."

"With regards to the existing lane, it is generally considered that where there is direct access to dwellings, the previous standard for developments, Design Bulletin 32 offers guidance where it states that a desirable minimum carriageway width of 5.5 metres is appropriate, together with 2.0 metre wide footways on both sides. This will allow two way traffic at all times, and safe movement of pedestrians."

"Thus the lane itself should be widened to this minimum standard, which will require the removal of the existing hedge line on one or both sides of the lane and probable acquisition of land from the adjoining fields. This will of course change the environmental character of the area substantially, but is considered essential to cater for increased vehicle and pedestrian traffic"

14. There is complete inconsistency with the allocation of MG9 against the proposed policies.

#### TEST CE3

- 1. The VOG council make no reference as to how they are going to manage such a large site. The 21 unit site in Rover Way Cardiff has 3 full time Council staff allocated to it.
- 2. The current Housing Strategy expires April 2012 and makes no relevant reference as to how the Gypsy & Travelling Community will be monitored in terms of growth or need. Indeed, there is no strategy that underpins the Gypsy & Traveller community or housing at all.

(ordered by Representation ID No.)

Representor ID and details: 4072/DP1 Craig & Judith Jerwood

- 1. Policy MD12 (Gypsy & Traveller) is discriminatory. It offers no flexibility for the Council to bring forward sites that are sustainable / suitable for Gypsies & Travellers through the policies derived within the plan.

  2. MD12 should be redrafted to enable smaller, sustainable sites to be included within the Affordable Housing requirements and delivered through the Registered Social Landlord sector.
- 3. To argue that the Private Sector has been consulted to offer sites is not accepted. The private sector were not likely to volunteer sites for such a contentious use. The LDP should set clear strategies / policies to deliver sustainable sites for all members of the community; private; social and travelling. The current allocation does not meet this and could strongly be argued breeches the Human Rights of the Gypsy traveller community as it does not provide a suitable, sustainable site that meets the guidelines in the 2008 Fordham report.
- 3f Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)

The proposed Gypsy traveller site at Llangan (Policy MG9) should be removed from the LDP draft plan. The VOG should identify an alternative site that has been assessed according to a relative sustainability appraisal and meets the requirements of the Gypsy community as listed in the 2008 Fordham report.

Policy MD12 should be amended so that it does not discriminate against the Gypsy and Traveller community. All sites during the plan should be assessed on a similar basis as Affordable Housing.

4b - If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -



(ordered by Representation ID No.)

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|-------------------------|-----------|------------|--------------|-------------------------|---|------------|-----------|----------------------|------------|----------|-----------------------|-------------------|---|--|
| Representor             | ID and    | details:   | 4073/D       | P1 Mr Mervyn Seymo      | our   |            |           |                      |            |          |                       |                   |   |  |
| Date Lodged             | Status    | Petitio    | on and No.   | Supporting Evidence     | Additional SA SEA                             |            |           |                      | Rep for    | mat:     | •                     | •                 | to be consiered by 'writte                            | •  |
| 30/03/2012              | M         |            | 0            |                         |   |            |           |                      | Comme      | ent forn | you want to spea      | ak at a hearing s | ession of Public examinat                             | tion? Written                                  |
| 2a - Do you co          | onsider t | he LDP     | is Sound?    | Unsound                 | 2b - If you think that the                    | he Plan    | is unsou  | und and              | does not n | ot mee   | t one or more test(s) | of soundness, pl  | ease indicate which test(s                            | s) that it fails.                              |
|                         |           |            |              |                         | Procedural Tests -                            | P1 -       | Yes       |                      | P2 -       | Yes      |                       |                   |   |  |
|                         |           |            |              |                         | Consistency Tests -                           | C1 -       | Yes       |                      | C2 -       | Yes      | C3 - Yes              | C4                | - Yes   |  |
|                         |           |            |              |                         | Coherence and Effect                          | tivenes    | s Tests - | CE1                  | - Yes      |          | CE2 - Yes             | CE3 - Yes         | CE4 - Yes   |  |
| 3a - Which pa           | rt of the | Deposit    | Plan are ye  | ou commenting on?       | Policy Number:                                |            | <u>Pa</u> | aragraph             | Number:    |          | Proposal Map:         | ,                 | Constraints Map                                       | Appendices:                                    |
|                         |           |            |              |                         | MG9. MD12. MG2.                               |            | 6.4       | 49. 7.4 <sup>-</sup> | 1          |          | MG9                   |                   | Feb 2012  | Other - Not Listed                             |
| 3b - Do you w           | ish to se | e any cl   | nanges ma    | de to the Deposit Plan  | as a result of your rep                       | resenta    | ation?    | Yes                  |            | (I       | f "No" or "Unanswere  | ed" - go to 3d)   |   |  |
| 3c - What cha           | nges wo   | uld like   | to see mad   | le to the Deposit Plan? | New Policy:                                   | <u>Ame</u> | nded Pol  | licy:                | New Parag  | graph:   | Amended Paragr        | aph: New Or Ar    | nended Site: Other (see                               | Notes):  |
|                         |           |            |              |                         | Unanswered                                    | Yes        |           |                      | Unanswer   | ed 📜     | Unanswered            | Yes               | Unanswere   | ed   |
|                         |           |            |              |                         | Notes:  |            |           |                      |            |          |                       |                   |   |  |
| 3d - If your re         | present   | ation rela | ates to a ne | ·                       | d site, did you submit<br>Site Name: Land Eas |            |           | ndidate              | Site? Ye   | es       | (If "Yes", ple        | Ū                 | ndidate Site Name and re<br>Reference: Site Reference | eference if known)<br>ce MG9/ ID 22 Appendix 1 |
| 3e - Please s<br>REPRES | •         |            |              |                         | SY & TRAVELLER SIT                            | ΓΕ AT L    | AND EA    | ST OF                | LLANGAN    | <b>)</b> | ,                     |                   |   |  |
| TEST P                  | 1         |            |              |                         |   |            |           |                      |            |          |                       |                   |   |  |

The LDP has not been prepared in accordance with the Community Involvement Scheme, see below key points:

- The Emergency Services and Local Primary school have all confirmed that they have NOT been consulted on the proposed site MG9. The LEA confirmed they had not been consulted about the Gypsy site.
- Registered consultees have not been informed of the consultation stages.
- According to the Welsh Government's document 'Travelling to a better future' there is an onus on the LA to consult with its strategic partners in delivering Gypsy & Traveller sites. No consultation has taken place.
- Good practice (Welsh Government document 'Good Practice Design in designing Gypsy & Traveller sites') suggests that where Gypsy & Traveller sites are concerned the local community should be engaged as early as possible we believe that the Council has undertaken the minimum consultation in terms of the LDP and insufficient consultation with respect to the Gypsy & Traveller site in accordance with best practice.

TEST P2

- 1. The Sustainability Appraisal is flawed and contradictory the proposed sites do not meet with national policy in respect of sustainability. The allocation of Llangan is not consistent with previous Planning Rejections by the Council which considered sustainability (Bonvilston Sept 2011) and with similar determinations by the Planning Inspectorate (Pembroke Sept 2011).
- 2. The allocation of MG9 is not consistent with the proposed LDP policies.

TEST C1

The Land Use Plan (with regards to Gypsy & Traveller sites) does not relate to any strategy - The Housing Strategy is out dated and does not provide any structure for assessing Gypsy & Traveller needs or site location.

TESTC2

(ordered by Representation ID No.)

Representor ID and details: 4073/DP1 Mr Mervyn Seymour

- 1. The Site allocation does not have regard to the following National Policy:
- -Welsh Government Circular (30/2007):
- The site is RURAL and is "UNSUSTAINABLE" as there are no local services (no shops, food and drink outlets, doctor, dentist, Library, rail services or any main settlement within 5km etc). Llangan and Fferm Goch both score 0 points for local services in the evidence based assessment 'Sustainable Settlements Appraisal'
- The site would not comply with a RURAL EXCEPTION POLICY as it advocates that all pitches are accommodated on a RURAL site including transient pitches which would not comply with TAN 2.
- Any business operated from the site would be in contradiction of RURAL EXCEPTION guidance.
- The site allocation does not take into account the "SCALE" of the resident community. Llangan has a population of less than 100 with 35 homes and this proposal nearly doubles the size of the Hamlet.
- Example of similar site. In 2007 an application of the Sustainability issue was applied by the Planning inspector in Pembroke where an appeal was refused solely on this basis.
- The VOG Council has refused an application recently in Bonvilston on the basis of Sustainability and services in this case were closer to the site than in the case of Llangan proposal.
- Designing Gypsy and Traveller Sites Good Practice Guide The site is too small; therefore cannot meet the needs identified in the LDP.
- -The site measures 7400 m2 and could only accommodate 14 pitches without infrastructure (quidance is 500m2 per pitch plus refuse area; office; play area; infrastructure (roads etc)
- The access road to the site does not meet the minimum requirements for emergency vehicles (3.7m it is actually 15m)
- The site access is poor and "unsafe" having extended walks (in excess of 800m to bus stop) along an unlit lane with no public footpath or street lighting.
- The proposal of 21 units on the site would restrict the ability of emergency vehicles to manoeuvre around the site.
- New sites grants are available (and cost should not be a material planning consideration).
- -The guidance requires that sites are:
- sustainable the Llangan site proposal is not
- equivalent to standards that would be expected for social housing in the settled community This would not meet the standards and this site would not have been considered appropriate for development for residential in either the current or proposed plans
- have the effect of encouraging and developing good relations between
- Gypsies & Travellers and the settled community the large scale of this proposal could mean that establishing good relations with the local community of Llangan would be unlikely and could also result in increased tensions in the community.
- based on WAG guidance of Design of Gypsy traveller sites the maximum number of pitches is 14, and the proposal at Llangan exceeds this number.
- Travelling to a Better Future
- Recommends that LA's engage with their Housing Association Partners to bring sites forward. The VOG Council has not done this.
- "Situating transit provision on residential Gypsy sites is not an option preferred by the Gypsy and Traveller community as this can lead to tensions among different family groups and make site management and maintenance very difficult." This creates a sense of "fear" within the settled Gypsy & Traveller community. The proposal is recommending that transient and permanent sites are co-located.
- Planning Policy Wales 2011
- The proposed site at Llangan is greenfield land, according to the definition of brownfield land set out in Figure 4 1 of PPW;
- it will not reduce the need to travel, due to the limited local service provision in close proximity to the site;
- offers very limited access to public transport facilities;
- is not large enough to provide ancillary facilities required to support a sustainable development as set out in paragraph 3.30 in accordance with Designing Gypsy and Travellers Sites Good Practice Guide;
- is located within a Special Landscape Area (SLA) and in close proximity to a Conservation Area. The assessment of the Llangan site incorrectly states that it is not within an SLA, so makes no reference to the sites proximity to the conservation area of Llangan. The location can be clearly seen from the conservation area.
- does not meet the identified needs of Gypsies and Travellers, in the Vale of Glamorgan (Fordham report 2008 evidence);
- does not promote sustainable access to employment, shopping, education, health, community, leisure and sports facilities;
- does not maximise opportunities for community development and social welfare:
- does not foster social inclusion due to the isolated location of the site; and
- does not contribute to improvements in health due to the isolation from services and facilities.

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Representor ID and details: 4073/DP1 Mr Mervyn Seymour

2. MG2. The draft policy MG 2 actively discriminates the Gypsy community by excluding them from the wider housing programme and potentially abuses their human rights. Policy MG 2 should be revised to allow the VOG to identify appropriate sites in the same way as Affordable Housing.

#### TESTC3

- 1. The policy does not have due regard to the Wales Spatial Plan.
- The key theme of the Wales Spatial Plan is achieving sustainable development through focusing new development in areas which have good access to key services and facilities. As there are no services surrounding the site the allocation of MG9 is not consistent with the objectives of the Wales Spatial Plan. The Gypsy site proposal fails Soundness test Consistency C3 because the policy does not have due regard to the Wales Spatial Plan.

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- 9. The assessment makes no reference that the site is adjacent to a Conservation Area, within the Conservation Management Plan for this area there is a specific requirement to protect the view from the edge of the conservation area over the proposed site. The proposed site is clearly visible form the conservation area.
- 10. The allocation of Fferm Goch as a Minor Rural Settlement is incorrect. The appraisal scored 9 points. 3 are for employment which puts this site on par with the major settlements such as Barry. This is on the basis of 4 light industrial buildings. A survey of these employers has confirmed that zero new jobs have become available in the last 9 years and that the units collectively employ fewer than 15 people with no intention to expand. Furthermore, one of the units has been empty and the development is not a popular industrial site.
- 11. Fferm Goch has a population of less than 100 (98)— of the 5 sites in the Vale of Glamorgan with a population of 98 only Fferm Goch is classified as a Minor Rural site (probably based on the 9 points). The remainder are classified as Hamlets and there is a presumption against development in Hamlets (or as a minimum the scale would need to be appropriate and tied to a Rural Exception policy). The guidance requires ALL sites of a population below 100 to be classified as a Hamlet Fferm Goch should be recategorised as a Hamlet.
- 12. The Council has undertaken a study (Fordham report 2008) where the message was extremely strong that the Gypsy & Traveller community wanted smaller sites located on the fringes of larger communities. The report confirmed that isolated, rural sites restricted access to Health, Education and welfare facilities that disadvantaged them and needs to be seen in the light of the above objectives. The following is a quote from the Fordham report:
- "Participants living on Shirenewton had three main criticisms: the site was too big, the distance from local amenities along with the lack of local transport,"

"This created many problems for the residents, especially the poorest: 'for a person like me on the bread line it's very tough. I can't afford to use the car', 'everything is a mile away, including the bus stop. It takes a long walk on a busy road to get to the shops and schools".

"The tables demonstrate that access to services such as local shops, health centres and education facilities from both sites is difficult by foot and by local transport systems. This difficulty was eased when participants used their cars, however the level of ease was lower for Roverway due to the difficult entry onto the main road".

"Participants reported that access to local amenities, health services and education was low for both sites by foot or by public transport: 'Everything is a mile away, including the bus stop. It takes a long walk on a busy road to get to the shops and schools".

(ordered by Representation ID No.)

Representor ID and details: 4073/DP1 Mr Mervyn Seymour

"It was thought that smaller sites would reduce the problem of on-site conflicts: 'they need smaller sites and not too many different families, otherwise when you have a row the whole site becomes a war zone"

"This affected the ability of the households interviewed to access local services such as shops, health centres and education facilities. It was reported that this problem mainly affected the women: men take the vehicles that the household own to work during the day, leaving the women without their own transport and often away from public transport routes"

"Participants did not specify where in Cardiff or the Vale of Glamorgan sites should be located. It was noted that sites should be on the outskirts of towns to enable access by foot to local services such as shops, the Launderette and health centres"

"While the focus of the survey was on accommodation requirements, the questionnaire also collected information on access to services, including health and education. Research has found that poor accommodation can prevent access to services and so cannot be seen in isolation."

"Participants living on sites felt that there were site restrictions that limited their work options. These were mainly associated with the location of the sites and lack of access to public transport rather than site regulations: 'no buses, no local transport. Bad access"

"Participants living on local authority sites reported that the lack of local public transport provision in the area affected their ability to send their children to school, access health services and work opportunities, and limited their ability to attend training and education courses"

"Participants were asked about where they would like future sites to be, but were not specific about locations within the County Boroughs, instead emphasising the importance of public transport to any new sites. Government draft guidance on site design stresses the importance of access to services and the promotion of integrated co-existence' between the site and surrounding community."

"The precise location, design and facilities of any new sites should be drawn up in consultation with Gypsies and Travellers to ensure that the additional provision meets their needs. The health and safety implications of a new site's location should be considered in finding a balance between offering sites in good locations and the additional land costs this would entail. The settled community neighbouring the sites should also be involved in the consultation from an early stage."

13. An independent highway study recently undertaken by Capita Symonds, surrounding the proposed site has concluded that:

"The 1km long lane itself is of poor horizontal alignment, with poor forward visibility and unsuitable for regular vehicular traffic. If the site is developed the lane itself would need major upgrading, which would certainly change its appearance within this rural environment."

"The village school is approximately 1km from the village and 900 metres from the proposed site. It is noted that the route does not offer any facilities for pedestrians, such that the only safe way for children to travel between the site and the school safely would be by vehicle. This route would also be potentially hazardous for cycle use for children, the elderly or infirm and could be potentially hazardous for all users other than by car."

"With regard to the appropriateness of the location for a traveller's site development in relation to transportation, it is difficult to refer to standard guidelines, as few relate to "rural highways", most highway design standards for residential development relate to urban areas. Hence, the advice contained within this report is based on best available information, acceptable highway standards for developments of similar size and transport needs of small communities. Welsh Government guidelines state sites should be situated in close proximity to transport links. The Llangan site would not appear to meet that criteria, being situated away from the main transport infrastructure, sites should also have ready access to schools, doctors and shops, against which requirements Llangan again appears to fail."

"With regards to the existing lane, it is generally considered that where there is direct access to dwellings, the previous standard for developments, Design Bulletin 32 offers guidance where it states that a desirable minimum carriageway width of 5.5 metres is appropriate, together with 2.0 metre wide footways on both sides. This will allow two way traffic at all times, and safe movement of pedestrians."

"Thus the lane itself should be widened to this minimum standard, which will require the removal of the existing hedge line on one or both sides of the lane and probable acquisition of land from the adjoining fields. This will of course change the environmental character of the area substantially, but is considered essential to cater for increased vehicle and pedestrian traffic"

14. There is complete inconsistency with the allocation of MG9 against the proposed policies.

#### TEST CE3

- 1. The VOG council make no reference as to how they are going to manage such a large site. The 21 unit site in Rover Way Cardiff has 3 full time Council staff allocated to it.
- 2. The current Housing Strategy expires April 2012 and makes no relevant reference as to how the Gypsy & Travelling Community will be monitored in terms of growth or need. Indeed, there is no strategy that underpins the Gypsy & Traveller community or housing at all.

(ordered by Representation ID No.)

Representor ID and details: 4073/DP1 Mr Mervyn Seymour

- 1. Policy MD12 (Gypsy & Traveller) is discriminatory. It offers no flexibility for the Council to bring forward sites that are sustainable / suitable for Gypsies & Travellers through the policies derived within the plan.

  2. MD12 should be redrafted to enable smaller, sustainable sites to be included within the Affordable Housing requirements and delivered through the Registered Social Landlord sector.
- 3. To argue that the Private Sector has been consulted to offer sites is not accepted. The private sector were not likely to volunteer sites for such a contentious use. The LDP should set clear strategies / policies to deliver sustainable sites for all members of the community; private; social and travelling. The current allocation does not meet this and could strongly be argued breeches the Human Rights of the Gypsy traveller community as it does not provide a suitable, sustainable site that meets the guidelines in the 2008 Fordham report.
- 3f Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)

The proposed Gypsy traveller site at Llangan (Policy MG9) should be removed from the LDP draft plan. The VOG should identify an alternative site that has been assessed according to a relative sustainability appraisal and meets the requirements of the Gypsy community as listed in the 2008 Fordham report.

Policy MD12 should be amended so that it does not discriminate against the Gypsy and Traveller community. All sites during the plan should be assessed on a similar basis as Affordable Housing.

4b - If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -



| Representor ID and details: 4074/DP1 Sir Peter Phillips  |   |   |                              |  |                                      |  |                                    |
|--|---|---|------------------------------|--|--------------------------------------|--|------------------------------------|
| Date Lodged     Status     Petition and No.     Supporting Evidence       30/03/2012     M     0                         | Additional SA SEA                             |   | Rep format:<br>Comment form  | 4a - do you want you<br>you want to speak at |                                      | •                                      | representations' or do on? Written |
| •  | 2b - If you think that the Procedural Tests - | ne Plan is unsound and o<br>P1 - Unanswered       | does not not meet o          | one or more test(s) of so<br>rered           | oundness, please ind                 | icate which test(s)                    | that it fails.                     |
|  | Consistency Tests -                           | C1 - Unanswered                                   | C2 - Unansw                  | ered C3 - Unanswe                            | ered C4 - Unan                       | swered                                 |                                    |
|  | Coherence and Effect                          | iveness Tests - CE1 -                             | Unanswered C                 | CE2 - Yes                                    | CE3 - Unanswered                     | CE4 - Unanswe                          | red                                |
| , , ,  | Policy Number:<br>MG2(13)                     | <u>Paragraph</u><br>                              | <u> </u>                     | Proposal Map:                                | <u>Co</u><br>                        | nstraints Map                          | Appendices:                        |
| 3b - Do you wish to see any changes made to the Deposit Plan   | as a result of your rep                       | resentation? Yes                                  | (If "                        | 'No" or "Unanswered" -                       | go to 3d)                            |  |                                    |
| 3c - What changes would like to see made to the Deposit Plan?  | New Policy: Unanswered Notes:                 |   | New Paragraph:<br>Unanswered | Amended Paragraph:<br>Unanswered             | New Or Amended<br>Yes                | Site: Other (see N<br>Unanswered       | <del></del>                        |
| 3d - If your representation relates to a new, deleted or amende  |   | the site as a Candidate svest of St Athan Rd Llan |                              | ` · ·  | give the Candidate<br>Site Reference | Site Name and refo<br>ce: 2446/CS1 244 | ,                                  |
| 3e - Please set out your representation below:   |   |   |                              |  |                                      |  |                                    |
| 3f - Please outline the changes you wish to see made to the Di<br>Have candidate site removed and include as a green wed | •   |   | ns.                          |  |                                      |  |                                    |
| 4b - If you wish to speak, please confirm which part of your rep   | resentation you wish t                        | o speak to the inspector                          | about and why the            | ey consider it be necessa                    | ary to speak at the he               | earing -                               |                                    |

| Representor ID and details: 4075/DP1 Mr & Mrs Marlor   |  |  |  |  |  |   |
|--|--|--|--|--|--|---|
| Date Lodged     Status     Petition and No.     Supporting Evidence       30/03/2012     M     □     0     □   | e Additional SA SEA  | Rep format:<br>Comment forn  |  |  | be consiered by 'writter<br>sion of Public examination |   |
| 2a - Do you consider the LDP is Sound? Unsound   | 2b - If you think that the Plan is unsound Procedural Tests - P1 - Yes  Consistency Tests - C1 - Yes  Coherence and Effectiveness Tests - C  | P2 - Yes<br>C2 - Yes   | t one or more test(s) c  C3 - Yes  CE2 - Yes | f soundness, plea<br>C4 -<br>CE3 - Yes |  | that it fails.                                |
| 3a - Which part of the Deposit Plan are you commenting on?   |  | <u>rraph Number:</u><br>All  | Proposal Map:                                | )                                      | Constraints Map Feb 2012                               | Appendices: Appendix 9 - Supporting Documents |
| 3b - Do you wish to see any changes made to the Deposit Plan   | n as a result of your representation? Yes  | s (I   | f "No" or "Unanswere                         | d" - go to 3d)                         |  |   |
| 3c - What changes would like to see made to the Deposit Plan   | ? New Policy: Amended Policy: Unanswered Yes Notes:  | New Paragraph:<br>Unanswered   | Amended Paragra<br>Unanswered                | New Or Ame<br>Yes                      | nded Site: Other (see N<br>Unanswered                  | <del></del>                                   |
| 3d - If your representation relates to a new, deleted or amende  | ed site, did you submit the site as a Candid<br>Site Name: Land east of Llangan  | date Site? Yes   | (If "Yes", ple                               | · ·                                    | lidate Site Name and ref<br>ference: MG 9 / ID 22 a    | ,   |
| 3e - Please set out your representation below: Test C2 1. The Site allocation (in regards to gypsy and travellers) Policy: • The site is RURAL and is "UNSUSTAINABLE" as there SETTLEMENTS APPRAISAL • The site would not comply with a RURAL EXCEPTION • Business would be operated from the site in contradiction. • The site allocation does not take into account the "SCA" • Recent application of the Sustainability issue was applient to VoG has refused an application in Bonvilston on the | are no local services (shops; transport; he POLICY as it advocates that all pitches are on of RURAL EXCEPTION guidance. LE" of the resident community. Llangan ha ed by the Planning inspector in Pembroke v | e accommodated on a<br>s a population of less<br>where an appeal was i | RURAL site including                         | transient pitches                      | which would not comply                                 | with TAN 2.                                   |
| 3f - Please outline the changes you wish to see made to the D<br>We feel a more suitable "brown field" site with adjacent a  |  |  |  |  |  |   |
| 4b - If you wish to speak, please confirm which part of your re  | presentation you wish to speak to the insp   | ector about and why the  | nev consider it be nece                      | essary to speak at                     | the hearing -  |   |

(ordered by Representation ID No.)

| Representor ID and details: 4076/DP1 C & A Asbrey                |   |                               |                              |                                |  |                                 |                  |  |  |
|--|---|-------------------------------|------------------------------|--------------------------------|--|---------------------------------|------------------|--|--|
| Date LodgedStatusPetition and No.Supporting Evidence30/03/2012M0 | Additional SA SEA   |                               | Rep format:<br>Letter        |                                | our comments to be cons<br>at a hearing session of F |                                 |                  |  |  |
| 2a - Do you consider the LDP is Sound? Unanswered                | 2b - If you think that the Plan is unsound and does not not meet one or more test(s) of soundness, please indicate which test(s) that it fails.  Procedural Tests - P1 - Unanswered P2 - Unanswered |                               |                              |                                |  |                                 |                  |  |  |
|  | Consistency Tests -   | C1 - Unanswered               | C2 - Unansv                  | wered C3 - Unans               | wered C4 - Unansv                                    | vered                           |                  |  |  |
|  | Coherence and Effect  | iveness Tests - CE1           | - Unanswered                 | CE2 - Unanswered               | CE3 - Unanswered                                     | CE4 - Unanswer                  | ed               |  |  |
| 3a - Which part of the Deposit Plan are you commenting on?       | Policy Number:<br>MG2(19). MG2(20).   | Paragraph                     |                              | Proposal Map:                  | <u>Cons</u>  | straints Map                    | Appendices:      |  |  |
| 3b - Do you wish to see any changes made to the Deposit Plan     | as a result of your rep   | resentation? Unansw           | vered (If                    | "No" or "Unanswered"           | " - go to 3d)  |                                 |                  |  |  |
| 3c - What changes would like to see made to the Deposit Plan?    | ? <u>New Policy:</u><br>Unanswered  | Amended Policy:<br>Unanswered | New Paragraph:<br>Unanswered | Amended Paragrap<br>Unanswered | oh: New Or Amended Sit<br>Unanswered                 | te: Other (see Note: Unanswered | otes):           |  |  |
|  | Notes:  |                               |                              |                                |  |                                 |                  |  |  |
| 3d - If your representation relates to a new, deleted or amende  | ed site, did you submit t<br>Site Name:   | the site as a Candidate       | Site? Unanswer               | ed (If "Yes", plea             | se give the Candidate Si<br>Site Reference           |                                 | erence if known) |  |  |
|  |   |                               |                              |                                |  |                                 |                  |  |  |

3e - Please set out your representation below:

I wish to object to the Vale of Glamorgan's deposit plan for additional housing in Dinas Powys and Barry with particular reference to the school site at Dinas Powys.

It seems to me that the perception that the production of a local plan necessarily requires new housing areas to be identified at all costs is a misunderstanding of what is required.

It is surely only proper to identify housing possibilities if other considerations which are more important are met.

In this regard I refer to the absence of any attempt to alleviate an already intense traffic problem affecting Dinas Powys particularly at crucial times of the day. I had understood that money considerations had prevented the Dinas by Pass road being built. But for money considerations it would have been. It is self-evident that there is need for such a road because of existing problems. It therefore makes no sense at all to increase those problems not only for existing residents but for all those who come under these proposals. Extra homes in Dinas and Barry means very difficult times for all.

The traffic problem is not simply a problem associated with slowness. It is the dangers such traffic presents which is of most concern. The very thought of people coming down from the defunct school toward the school on the main road sends shivers down my spine.

This is particularly worrying when one considers that the only other exit from the Murch is the weak bridge already needing attention.

As if the above ought to be enough for anyone with a bit of common sense to say this is not the right time to do this development.

There are other considerations. One of the most important is the nature of Dinas Powys. Since I was a child this 'village' has expanded out of all recognition. Uniquely it has somehow managed to maintain its village atmosphere. Quite how, I do not know. As a village the quality of life is different. It is very good. Further development puts at risk that quality of life. The argument will be that another 1000 homes will not make a difference. This is a serious point not easily disposed of by such arguments. There are real grounds for saying this area ought not to further developed.

Otherwise I adopt all the arguments raised in the standard letter of Plaid Cymru which I attach.

I would welcome any opportunity to speak to the Inspector if this matter is not summarily disposed of as it ought to be.

As a resident of Dinas Powys I wish to express my concerns re. the implications of the effect that the proposed additional housing would have on the local highways network.

In Dinas Powys it is proposed that a minimum of 400 addition houses will be built on the St Cyres annexe and Caerleon Road, Both sites are on the Murch side of the community which is served by only two

(ordered by Representation ID No.)

Representor ID and details: 4076/DP1 C & A Asbrey

access points to the main road [A4055]. Both these junctions, namely the Infants School traffic lights at Murch Bridge and Cross Common Road at its junction with the A4055 are either at capacity or structurally suspect.

The 400 houses would generate between 600 to 800 additional cars in both directions, particularly at peak times,. The additional traffic would have a profound and adverse impact on the community as the existing roads are under great pressure now.

Further, I am concerned that there have not been any proposed extra community facilities of substance. A local church is in desperate need of a permanent base, the local sporting facilities are not adequate for the present demand and medical services are restricted due to the limitations of space at the Dinas Powys Surgery premises on Cardiff Road.

There appears to be no serious consideration having been given to other views as to the future possible use of St Cyres Annexe, Murch Road. It is worth noting that the school buildings are in good condition although in need of a little investment. To simply seek to tear down the school without any reference to the community needs would be a shameful waste. I also have concerns regarding the capacity of the local schools to accommodate the extra pupils due to the additional houses.

Then there is the wider consideration of the Plan. Up to 10,000 additional houses are planned, many in the south east area of the Vale, e.g. 2,000 units already having been approved at the Waterfront, Barry.

Much of this traffic will be funnelled through Dinas Powys and join the ever lengthening queues leading to and from the Merrie Harrier. The proposals in Sully, Penarth, Lavernock and the land adjacent St Josephs' School, Sully Road will only add to the existing congestion at this junction.

Already the air pollution levels are excessive. The Nitrogen Dioxide [N02] levels are recorded as being 43.8 units with the maximum recommended level being 40 units along Cardiff Road, Eastbrook. An increase in vehicles, particularly standing traffic, would exacerbate the situation. The level of other emissions such as CO (carbon monoxide) and Particulates [PM105] are not available but need clarifying

The Deposit plan does not indicate what measures will be taken to encourage the availability and use of public transport. I understand that there is a serious lack of rolling stock in Wales and providing extra trains will be a major challenge. Additional buses would simply be caught up in the traffic chaos the extra housing would cause.

It is essential that major highway infrastructure improvements are made BEFORE hundreds of additional housing could even be considered.

- 3f Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
- 4b If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -

(ordered by Representation ID No.)

| Representor ID and details: 4077/DP1 Jackie Cross  |   |                               |                              |                              |   |  |  |  |  |
|--|---|-------------------------------|------------------------------|------------------------------|---|--|--|--|--|
| Date Lodged     Status     Petition and No.     Supporting Evidence       30/03/2012     M     0 | Additional SA SEA   |                               | Rep format:<br>Letter        |                              | ur comments to be cons<br>at a hearing session of P | siered by 'written representations' or do<br>Public examination? |  |  |  |
| 2a - Do you consider the LDP is Sound? Unanswered  | 2b - If you think that the Plan is unsound and does not not meet one or more test(s) of soundness, please indicate which test(s) that it fails.  Procedural Tests - P1 - Unanswered P2 - Unanswered |                               |                              |                              |   |  |  |  |  |
|  | Consistency Tests -   | C1 - Unanswered               | C2 - Unansv                  | wered C3 - Unansw            | vered C4 - Unansw                                   | vered  |  |  |  |
|  | Coherence and Effect  | iveness Tests - CE1           | - Unanswered                 | CE2 - Unanswered             | CE3 - Unanswered                                    | CE4 - Unanswered   |  |  |  |
| 3a - Which part of the Deposit Plan are you commenting on?                                       | Policy Number:  | Paragraph                     | n Number:                    | Proposal Map:                | Cons  | traints Map Appendices:  |  |  |  |
|  | MG2(34)   |                               |                              |                              |   |  |  |  |  |
| 3b - Do you wish to see any changes made to the Deposit Plar                                     | as a result of your rep   | resentation? Unansv           | vered (If                    | "No" or "Unanswered"         | - go to 3d)   |  |  |  |  |
| 3c - What changes would like to see made to the Deposit Plan                                     | ? New Policy:<br>Unanswered   | Amended Policy:<br>Unanswered | New Paragraph:<br>Unanswered | Amended Paragraph Unanswered | : New Or Amended Sit<br>Unanswered                  | te: Other (see Notes): Unanswered                                |  |  |  |
|  | Notes:  |                               |                              |                              |   |  |  |  |  |
| 3d - If your representation relates to a new, deleted or amende                                  | ed site, did you submit t<br>Site Name:   | the site as a Candidate       | Site? Unanswere              | ed (If "Yes", pleas          | e give the Candidate Sit<br>Site Reference:         | te Name and reference if known)                                  |  |  |  |

3e - Please set out your representation below:

RE: Vale of Glamorgan Deposit Local Development Plan 2012 - 2026

I am willing to present this representation to the planning Inspector at the examination in public and participate in further discussions.

I would like to make an objection to the proposal of the Vale of Glamorgan's Development Plan 2012 — 2026 to build 150 houses in the minor rural settlement of Wick. The Deposit LDP does not meet the objectives, strategy and policies for managing development in the Vale of Glamorgan set out by the county council in the Deposit plan. Basically the site does not provide the necessary infrastructure, amenities, transport or employment opportunities. The proposed increase in housing is a 65% increase on the present size of the village, which is excessive in scale to the rest of the village this will completely change the character of the village and place undue stress on the present facilities. This increase is far greater than most other minor rural settlements i.e. Aberthin, Colwinston, Fferm Goch, St Nicholas, Ystradowen. The village of Wick is an area of exceptional natural beauty seen from the Heritage Coast and therefore should be treated with the upmost care and respect.

However, I do feel that there should be some development in the village to meet local needs. I am proposing a growth of 10% (25 houses) individually designed to fit in with the style and character of the village (i.e. a mix of houses and bungalows). These houses can be fitted into infill sites/brownfield sites of which there are many dotted around the village. For the remainder of this quota (i.e. 125 houses) I suggest you use the brownfield site at Llandow and areas where sites were submitted but have not appeared in the LDP such as Bonvilston, St Brides Major, Southerndown, Corntown and Ewenny.

#### WICK VILLAGE:

The village of Wick is positioned one mile from the Heritage Designation Coast, four and a half miles from Llantwit Major, six and a half miles from Bridgend, five miles from Cowbridge and 20 miles from Cardiff. The village amenities comprise of one church, one primary school, one shop (sells basics), one sports pavilion 1 rugby pitch, one community hall, a village green with swings and two public houses. At present there are about 232 houses in the village, an estimated population of 500.

#### **EVIDENCE:**

S.E.W Regional Transport Plan (2.19 P.11 LDP) says: 'Reduce the demand for travel. Develop an efficient and reliable transport system with reduced levels of congestion. Reduce significantly the emission of greenhouse gases and air pollution from transportation.' Why build 150 houses in a remote/unsustainable village where everybody that lives there has to travel to shops, health centres, employment, education, leisure etc in the Service Centre settlements, therefore adding to congestion particularly on the two main transport corridors le B4265 and A48. There are no plans in the LDP to develop either pedestrian walkways or cycle tracks in the Wick area. Both the B4265 and the A48 are dangerous roads to cycle or walk on. Due to the nature of Wick, being a small village there are no pavements, again this would be a danger if the population of Wick was increased by potentially 150 houses. I do not feel that the roads around Wick will cope with the extra traffic that this development will bring. The bus service to Wick is one an hour. In order to catch a train it is necessary to go to Llantwit Major or Bridgend. These services/roads would require improving at great expense, if the development of 150 houses in Wick went ahead.

(ordered by Representation ID No.)

Representor ID and details: 4077/DP1 Jackie Cross

This is contrary to the Planning Policy Wales edition 2 P.113 8.1.3, 8.1.4, 8.1.5, 8.1.7, 8.21, 8.2.2

The Community Strategy (LDP 2.22 P.11) says: 'the diverse needs of local people are met through the provision of customer focused accessible services.'

Wick village does not provide adequate amenities for an extra 150 houses, potentially a minimum of 300 people plus children (national average is 2.4 children per family). Children will have no facilities; nothing to do tend to get bored, boredom leads to anti-social behaviour this would have a negative impact on the village. New residents will need to use public transport or cars to travel to necessary amenities/facilities. There are no plans in the LDP to develop the necessary public services/facilities to cater for an increase of 150 houses.

This is contrary to Planning Policy Wales Edition 2 4.5 P.49 Priorities for urban and rural areas. 4.5.3, 4.6.7. Socio-Economic Portrait (LDP 3.6 p.15) says: '....many of the towns and villages in the Vale of Glamorgan are prosperous'. The people that live in the villages in the Vale of Glamorgan are wealthy because they have highly paid jobs and can afford to travel to Cardiff and other major Service Centre Settlements for employment. There are no job opportunities in the rural part of the Vale of

Glamorgan i.e. Wick. The problem with building extra housing, particularly affordable housing for people who either have low paid jobs or worse still no job, is that they will not be able to afford to travel to employment in the major Service Centre settlements causing poverty and deprivation, this would have a negative impact on the village of Wick.

I feel that the Planning Policy Wales Edition 2 p.134 9.2.22, 9.2.23 backs up this point and also emphasises the importance where possible of using infill sites for development.

'The Employment Land Study (2007) indicates the range of the employment sectors currently operating in the Vale. The employment sector is dominated by public administration, education and health which accounts for 36% of all employment'.

There are massive redundancies in the public sector at the present therefore these jobs are not available to those moving into rural areas of the Vale. Housing development should be restricted to areas of regeneration and industrial/retail development, these are the sustainable areas of the future i.e. Barry, Penarth, Rhoose, St Athens.

Historic trends in Cardiff indicate that approximately 40,000 jobs have been created over the last 10-15 years. Recent evidence published by Cardiff CC indicates that this is anticipated to continue over the next 10/15 years, reinforced by the proposed Enterprise Zone in the city centre. This large agglomeration of jobs, continued growth at such a location should have a large bearing on the Vale's LDP. This reinforces the point that the urban areas at the eastern end of the Vale offer the greatest opportunity to locate growth in the most sustainable location, on public transport corridors near to future job growth. Wick is at the opposite end of the Vale and housing at this location would create an unsustainable location, unlike the towns stated above.

This statement is reinforced by the following:

LDP 3.14 P.16 'The Regional Transport Plan (2010) estimates that 28.000 people, equivalent to 46% of Vale residents, travel out of the area every day to work'

The LDP states that 'High levels of out commuting for work resulting in peak time congestion on the main distributor roads in eastern Vale of Glamorgan'.

New housing development in Minor rural settlements i.e. Wick adds to these problems and of course completely goes against 'The Wales Transport Strategy of 'reducing greenhouse gas emissions'.

This is also contrary to the Planning Policy Wales Edition 2 P.51 4.6.4. LOP 3.8 P.15 'The proximity of the Vale of Glamorgan to Cardiff coupled with the rich and diverse nature of the towns and villages in the area has resulted in significant pressure for new residential development'.

The village of Wick is 20 miles from Cardiff, a long daily commute with poor public bus/train service. It takes a good one and a half hours each way by public transport and 40 minutes each way by car to travel to Cardiff.

This travelling issue is contrary to the Planning Policy Wales Edition 2 P.113 8.1.3, 8.1.4, 8.1.5 LDP 3.9 P.15 'The Local Housing Market assessment 2010 identified need for affordable housing in Barry, Rhoose, Llantwit Major and Penarth'.

LDP 3.15 P16 states that 'Retail in the Vale is centred principally in Barry, Penarth, Llantwit Major and Cowbridge'.

It makes sense to build affordable housing where the employment opportunities are high not in rural areas where there are no jobs i.e. Wick. In addition, the delivery of affordable housing should match the identified level of need. The proposed 150 houses at Wick would result in approximately 52 affordable units (@35% as per the LDP) greatly in excess of local need. This does pose the question of 'importing need' to a minor village, in an unsustainable location, potentially also impacting on community integration.

The LDP 3.20 P.17 talks about challenges and opportunities. It states 'that although the Vale of Glamorgan is a comparatively affluent area, there are still a number of factors that need to be managed if the Vale of Glamorgan is to meet the needs of current and future residents in a sustainable manner.'

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Building 150 houses in Wick and making no plans to develop public services, facilities, infrastructure and opportunities for local employment is not addressing the statement made above.

The LDP Objective 1 (4.5 P.20) states; 'new development is of a scale appropriate to its location, supports the local economy and sustains and wherever possible improves local services and facilities.'

The proposal to build 150 houses in Wick is of an inappropriate scale to its location, it is not sustainable, does not support the local economy. As already mentioned there are inadequate facilities and employment, therefore necessary to travel to the main Service Centre Settlements. There are no plans in the LDP to improve facilities, amenities, employment opportunities and infrastructure.

This is contrary to the Planning Policy Wales Development control and housing P.135 9.3.2.

The LDP Objective 2 (4.6 P20) states: 'The LDP will seek to ensure that new development makes a positive contribution towards reducing the impact of and mitigation against the adverse effects of climate change. New developments will be located in sustainable locations that minimise the needs to travel'.

This objective is not being met when proposing 150 houses at Wick.

The LDP Objective 5 (4.9 P21) states: 'The LDP will seek to ensure that new development, particularly housing, does not impose undue pressure on community facilities such as schools'. The development of 150 houses will put immense pressure on the existing facilities in Wick village in fact the amenities will not cope with the extra demand. The Wick Primary school will need to be increased in size and children of secondary school age will need to be bussed to Bridgend, Llantwit Major or Cowbridge at great expense. This would add additional financial burdens to development to ensure that the appropriate infrastructure is in place, ahead of development, questioning the viability of the development itself.

The LDP (5.2 P23) states: 'The strategy aims to protect and enhance the areas' unique natural and built assets and recognises the potential economic benefit that can arise from the promotion of sustainable tourism'.

The village of Wick is in an area of exceptional natural beauty, one mile from the Heritage coast. The development of 150' box-like' houses on the edge of the village, creating a completely separate housing estate from the village, that can be seen from the Heritage Coast and as you approach the village from the west (St Brides) on the coastal road (B4265), will have a very negative visual impact on this beautiful area. This would be most notable at night with increased light pollution visible from St. Brides on the western approach as the development crests the ridgeline, contrary to PPW, paragraph 13.13, page 190. This could adversely affect tourism in the area and therefore the economy.

This is contrary to The Planning Policy Wales Edition 2 P.52 4.6.8.

The LDP (5.10 P.25) states: 'the LOP strategy has identified other sustained settlements which could accommodate additional housing some minor rural settlements are considered to have sufficient populations, services, and facilities to assimilate growth without it having a detrimental impact on their character and local environment'.

As already stated Wick does not have adequate facilities/services/public transport/employment opportunities/schools to cope with 150 new houses, as this is a 65% increase in its present size (of 232 houses). This will change the character of the village and damage the local environment. The sites allocated for the development are presently green fields. There are infill sites/brownfield sites in the village that could be used.

Using Greenfield sites instead of brownfield sites is contrary to the Planning Policy Wales Edition 2 P.55 4.8.

There is also a brownfield site at Llandow I would like to know why this area is not being developed.

In accordance with Planning Policy Wales Edition 2 P.134 9.2.24 'Development plans should — specify the circumstances in which previously developed sites would be deemed to perform so poorly that their use would not be favoured before that of a (particular) Greenfield site'.

LDP 5.17 P28 explains that growth 'will need to be of a scale, form and design that respects the existing character of the village'.

This statement reinforces the need for housing development must be in character with the rest of the village, i.e. infill, one row depth (along road side), bungalows and houses, different architectural design not dense box-like characterless estate houses.

POLICY MG 8(I.DP P.84) — HOUSING DENSITIES: 'In minor rural settlements, a net residential density of 25 net dwellings per hectare will be required'.

In Wick all housing is one row depth along the side of the road, which gives the village character, a feeling of open space, views onto open countryside. The proposal to build 150 houses in two allocated fields at a 'density of 25 net dwellings per hectare' is totally out of character of the rest of the village and will have a negative visual effect on the appearance of the village. It should be noted that the proposal of 150

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dwellings on a site of just over 5 hectares at Wick is in conflict with the LDPs own density policy.

LDP 5.17 P.28 mentions 'the need for some moderate growth in the minor rural settlements to meet local housing need and to support existing local services. In these villages, the emphasis will be on development that assists rural diversification such as new rural enterprises and sustainable tourism'.

Increasing the size of Wick by 65% does not represent moderate growth and there are no plans in the LOP for developing 'new enterprises and sustainable tourism' in order to provide jobs for these new residents.

This is contrary to the Planning Policy Wales Edition 2 P.103 7.3 Promoting diversification in the rural economy. 7.3.1, 7.3.2, 7.3.3, Development plans and the economy 7.5.1 (LDP P.33 — Minor rural settlements says:

- 1. Favour proposals which seek to protect and enhance the viability, accessibility or community value of existing village facilities and transport services. The proposed increase of Wick by 150 houses will not 'protect and enhance' existing village facilities, present facilities will not cope with the extra demand.
- 2. Provide for an appropriate level, range and choice of housing, including affordable rural housing to meet local needs'. 150 (65% increase) houses is not an appropriate level of housing for Wick.
- 3. Encourage the diversification of the rural economy by favouring appropriate employment and tourism related developments'.

The LDP does not mention any developments in the tourist industry or any other employment opportunities in the area around Wick. This area is mainly agriculture. LDP 5.20 P.33 states that 'the LDP has sought to minimise risk by adopting a balanced approach to growth which promotes the development of a range of sites at several locations'.

There are examples in the LDP were 'a balanced approach to growth' has not been adopted i.e. 65% growth in Wick, less than 10% growth in Penarth, Llantwit Major, Cowbridge and no growth in St Brides Major, Corntown, Llandow, Ewenny, Southerndown.

LDP 5.25 P.34 POLICY SP1 — '5. Protecting and enhancing the built, natural and coastal environment'.

The development of 150 houses in two greenfields on the edge of Wick village has a negative visual impact approaching the village from St Brides Major on the B4265 and the site can be seen from the Heritage Coast.

LDP 5.47 P.41 — The Employment Land Study (2007) found that; 'Significant daily out commuting to Cardiff and the wider region; lack of good quality serviced industrial land; poor provision of serviced office accommodation and decline in the traditional rural economy'.

None of these issues have been addressed in the LDP in the Wick area.

LDP P.43 POLICY SP7 states; 'All new developments that have a direct impact on the strategic Transportation infrastructure will be required to deliver appropriate improvements to the network'.

The Welsh government states that 75% of households have one car or more, with an extra 150 houses at Wick and possibly a maximum of 300 cars this will lead to congestion on the local road network. However there is no mention of any improvement to the road network or public transport network or developing pedestrian walkways/cycle paths.

LDP POLICY SP10 5.74 P.49 says; 'Similarly, new development will be required to minimise its impact on natural systems, landscapes, species and habitats'.

The area of potential development in Wick is a habitat for all kinds of wild life, therefore I would like it checked for door mice, great crested newts.

This point is emphasised in the Planning Policy Wales Edition 2 P. 69 5.2.

LDP POLICY MD1 6.2 P.51; 'In directing development to the most sustainable locations the council recognises the importance of ensuring that development is carefully managed ensuring that development does not have an unacceptable impact on existing infrastructure, local amenity or result in the redevelopment of important open space or community facilities.'

150 houses in Wick are not sustainable and will put an unacceptable strain on the infrastructure/local amenities/facilities.

I do not feel that the 'criteria in deciding which sites to allocate for housing' in the Planning Policy Wales Edition 2 P. 131 9.2.9 were considered when deciding to build 150 new houses in the village of Wick.

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LDP POLICY MD2 P.52 PLACE MAKING states that the development should;

- '1. Be of a high standard of design that positively contributes to the context and character of the surrounding natural and built environment.
- 2. Respond appropriately to the local context and character of neighbouring buildings in type, form, scale, mix and density'.

This point has already been discussed earlier.

- 3f Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
- 4b If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -

(ordered by Representation ID No.)

| 30/03/2012      | Status<br>M | Petitio    | n and No.    | Supporting Evidence    | Additional SA SEA                                |                 |                | Rep format: Comment form | ,  | ,                   | be consiered by 'writte<br>ion of Public examinat | n representations' or denotion? Written |
|-----------------|-------------|------------|--------------|------------------------|--|-----------------|----------------|--------------------------|--|---------------------|---|---|
|                 |             |            |              |                        |  |                 |                |                          |  |                     |   |   |
| a - Do you co   | nsider th   | e LDP      | s Sound?     |                        | 2b - If you think that the                       |                 |                |                          |  | of soundness, pleas | e indicate which test(s                           | s) that it fails.                       |
|                 |             |            |              |                        | Procedural Tests -                               | P1 - Unansv     | verea          | P2 - Unanswe             |  |                     |   |   |
|                 |             |            |              |                        | Consistency Tests -                              | C1 - Yes        |                | C2 - Unanswe             | ered C3 - Una                                      | nswered C4 - `      | Yes   |   |
|                 |             |            |              |                        | Coherence and Effect                             | iveness Tests - | CE1 - U        | nanswered C              | E2 - Yes   | CE3 - Unanswer      | ed CE4 - Yes                                      |   |
| a - Which par   | rt of the [ | Deposit    | Plan are yo  | ou commenting on?      | Policy Number:                                   | <u>Pa</u>       | ragraph N      | umber: P                 | roposal Map:                                       |                     | Constraints Map                                   | Appendices:                             |
|                 |             |            |              |                        |  |                 |                | G                        | Please see m<br>lamorgan LDP Repontinuation sheets | oresentation form   |   |   |
| b - Do you wi   | sh to see   | e any ch   | anges mad    | de to the Deposit Plan | as a result of your rep                          | resentation?    | Yes            | (If "N                   | No" or "Unanswere                                  | ed" - go to 3d)     |   |   |
| c - What chai   | nges wou    | uld like t | o see mad    | e to the Deposit Plan? | New Policy:                                      | Amended Pol     | icy: <u>Ne</u> | w Paragraph:             | Amended Paragr                                     | aph: New Or Amen    | ded Site: Other (see                              | Notes):                                 |
|                 |             |            |              |                        | Unanswered                                       | Unanswered      | Ur             | nanswered                | Unanswered   | Yes                 | Yes   |   |
|                 |             |            |              |                        | Notes:   |                 |                |                          |  |                     |   |   |
| 3d - If your re | presenta    | tion rela  | ites to a ne | w, deleted or amended  | d site, did you submit t<br>Site Name: What is a |                 |                |                          |  | J                   | date Site Name and received                       | eference if known)                      |
| 3e - Please se  | et out you  | ur repre   | sentation b  | elow:                  |  |                 |                |                          |  |                     |   |   |

- this, my comments relating to one area may upset the balance of another area, elsewhere on the form.
- 2. In other words, the representation form itself is too narrow and prescriptive a vehicle for the remarks it seeks and my comments do not lend themselves to be constrained within the rigid framework of this rather user-unfriendly document. Consequently, they are presented here for consideration by the nominated Welsh Assembly Government (WAG) inspector. I sincerely hope that he/she will find this format acceptable and my comments constructive.
- 3. My particular area of concern relates to the "Living" Section of the LDP (page 71) and is predicated on 3 principles used as foundations to the report. The findings of the report would seem to contradict these principles which are as follows:
- a. A cornerstone for the selection of land for dwellings is that: "The release of housing land will be phased in 5 year periods with priority being given to brown field sites". (Pages 37 and 71.)
- b. A second, important criterion in the selection of land for dwellings is that: "New development ... will only be permitted where the proposed development makes efficient use of previously development ... buildings". (Policy MG6, page 81.)
- c. "Agriculture and fishing, once dominant in the Vale of Glamorgan, accounts for only 1% of the employment market." (Para 3.10, Page 15.)

These guiding principles seem to have been overlooked when considering future housing development in St Athan and Llantwit Major (the latter location already having a significant resident population (para 5.15)). There are obvious alternative sites which do meet the above mentioned planning criteria; these are discussed below.

St ATHAN

4. It is intended to construct 280 dwellings on land to the west of Higher End (page 79, para 7.21b(ii)) and 250 dwellings on land to the east of Church Farm (page 79, para 7.21b(iii)). Both are undeveloped, green

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field sites (and will encroach upon potential/actual agricultural land).

- 5. This is surely unnecessary. With the exception of the military Special Forces Support Group (SFSG) enclave, a 125 year lease of the entire MOD St Athan site (including Picketston to the north) was signed in 2005 and is held by the WAG. The decision not to construct the Defence Training College on this site will mean that the current MOD St Athan East Camp's RAF tenant, No 4 School of Technical Training (No 4SoffT), will disband and its function move to England by 2020 at the latest (but more likely before).
- 6. This presents the Vale of Glamorgan with a golden opportunity. This previously developed, brown field site, which has most of the utilities in place, will be an ideal site for residential development especially as it is intended to "improve access to and within St Athan through a range of transport measures to support and facilitate economic investment" (page 32). (Even the great crested newt population has been systematically corralled and 2 exclusive bat houses have been constructed. This site, therefore, also makes sense ecologically!) Add the Picketston site, which is also inhabited with derelict buildings and a further, massive, previously developed brown field site is not only available but crying out for redevelopment.
- 7. Contrary to the rather hopeful statement at para 5.32, the only military training that is forecast to take place at the MOD St Athan site once No 4SofTT departs will be that undertaken by the SFSG on its own, MOD freehold property outside the St Athan SEZ/OA.

#### St ATHAN SEZ/OA

8. At this point, I think it is worth commenting on the St Athan SEZ/OA ambitions (Para 5.7). Firstly, the SEZIOA status is clearly not a bar to the construction of dwellings. Para 7.21 b(ii) already includes the intention to build houses within the SEZ/OA. Secondly, the creation of an aerospace sector/business park has been an aspiration of the WAG since it took the lease on the MOD St Athan site. However, the reality is that several clients have come and gone. The current, civilian residents (South Wales Police Helicopter Unit and a vintage aircraft flying club) are all that will remain after 7 years of effort when No 4S0tTT disbands - and they take up relatively little space, leaving WAG leased areas to the south and west, together with the massive Red Dragon hangar, for any future, commercial occupation.

#### St ATHAN SUMMARY

9. In short summary, therefore, it is strongly recommended that the intention to build 530 houses on green field sites near the Higher End and Church Farm areas of St Athan be discarded in favour of dwelling construction on the previously developed, brown field, WAG leased land of the former MOD St Athan and Picketston sites. Ecologically purged (East Camp) and with most utilities in place, this should also be a cheaper option (especially with the highway improvements to the B4265 - a key transport corridor - page 78 and para 7.21a) and will not detract from the SEZIOA ambitions for St Athan (as explained on page 32) and the mixed uses intention (as explained on page 35).

#### LLANTW1T MAJOR

- 10. It is intended to construct 120 houses at Plasnewydd Farm (page 129) and hold in reserve a site to the rear of Heol-y-Felin for up to 345 dwellings (page 130). Both are green field sites. Yet, just to the north of Llantwit Major is the disused airfield at Llandow a massive, previously developed, brown field site, furnished in the main, by dilapidated industrial units. There is excellent potential to use the already open spaces on this site for dwellings whilst at the same time, deconflicting the residential from the industrial areas. This alternative should be considered ahead of the proposals for Llantwit Major then most of the conditions and constraints listed on pages 129-131 could be mitigated.
- 11. Before concluding. I have a few additional points to make concerning the Llantwit Major proposals. These are as follows:
- a. MG2[15] on page 130 states that: "potential highway access could be gained (to the land to the rear of Heol-y-Felin) from Nant yr Aber'; for the sake of accuracy, this should read Nant yr Adar.
- B. The Heol-y-Felin estate is a very quiet, residential area and access through it to the proposed housing estate behind will, no doubt, be vigorously opposed.
- C. Continuing with the access theme to the Heol-y-Felin area, you are no doubt aware that this increased traffic will have to pass no less than 3 schools along Ham Lane. This in itself is likely to cause considerable consternation, not to mention opposition.
- D. Lastly, the Heol-y-Felin proposal is on the flight path of the predominant St Athan runway (with the prevailing wind from the west). The matrix at page 130 should, therefore, include a safety risk assessment (forced landing possibility) and noise assessment.

#### CONCLUSIONS

12. In spite of the fact that agriculture and fishing, once dominant in the Vale of Glamorgan, accounts for only 1% of employment within the Vale, the LDP seeks to reduce this potential even further by choosing green field sites for housing within St Athan and Llantwit Major. Furthermore, the choice of land within these 2 areas goes against the stated and fundamental planning criteria of the LDP which should give priority for future dwelling land to brown field and committed sites, as well as making efficient use of previously developed land. There are alternative brown field, previously developed sites available at Llandow

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and the former MOD St Athan areas which will be quicker, easier and cheaper to develop than those earmarked within St Athan and Llantwit Major.

#### RECOMMENDATIONS

- 13. It is recommended that the green field sites chosen for housing development in both St Athan and Llantwit Major be replaced by selected sites within the WAG leased land of the former MOD St Athan and the disused airfield at Llandow.
- 3f Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
- 4b If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -

| Representor ID and details: 4079/DP1 J.Smith  |  |  |                                 |                               |  |                                     |                  |
|---|--|--|---------------------------------|-------------------------------|--|-------------------------------------|------------------|
| Date Lodged     Status     Petition and No.     Supporting Evidence       30/03/2012     M     0  | Additional SA SEA  |  | Rep format:<br>Letter           | ,                             | your comments to be o                  | ,                                   | •                |
| •   | 2b - If you think that the Procedural Tests -  | e Plan is unsound and<br>P1 - Unanswered | does not not meet<br>P2 - Unans | ` '                           | f soundness, please in                 | ndicate which test(s)               | that it fails.   |
|   | Consistency Tests -  | C1 - Unanswered                          | C2 - Unansv                     | wered C3 - Unan               | swered C4 - Una                        | answered                            |                  |
|   | Coherence and Effective  | veness Tests - CE1                       | - Unanswered                    | CE2 - Unanswered              | CE3 - Unanswered                       | CE4 - Unanswer                      | ed               |
| 3a - Which part of the Deposit Plan are you commenting on?  | Policy Number:   | <u>Paragraph</u>                         | <u>Number:</u>                  | Proposal Map:                 | <u>C</u>                               | Constraints Map                     | Appendices:      |
|   |  |  |                                 |                               |  |                                     |                  |
| 3b - Do you wish to see any changes made to the Deposit Plan  | as a result of your repre  | esentation? Unansv                       | vered (If                       | "No" or "Unanswered           | d" - go to 3d)                         |                                     |                  |
| 3c - What changes would like to see made to the Deposit Plan?   | New Policy:<br>Unanswered  | Amended Policy:<br>Unanswered            | New Paragraph:<br>Unanswered    | Amended Paragra<br>Unanswered | ph: New Or Amended Unanswered          | d Site: Other (see No<br>Unanswered | otes):           |
|   | Notes:   |  |                                 |                               |  |                                     |                  |
| 3d - If your representation relates to a new, deleted or amende   | d site, did you submit th<br>Site Name:  | ne site as a Candidate                   | Site? Unanswer                  | red (If "Yes", ple            | ase give the Candidate<br>Site Referer |                                     | erence if known) |
| 3e - Please set out your representation below:  I wish to support the current LDP No 2407/CS1 for the foll 1. Development would not impact on a Special Landscape 2. There would be a destruction of an open space used fo 3. There would be inferior road infrastructure grid lock of to 4. There would be negative impact on ecological environm 5. I am strongly opposed to what I believe an over develop | e Area.<br>r leisure purposes which<br>raffic safety to the childr<br>nental issues. | en and patients of sch                   |                                 | ı close proximity.            |  |                                     |                  |
| 3f - Please outline the changes you wish to see made to the De  | eposit Plan to make it s   | ound (if relevant)                       |                                 |                               |  |                                     |                  |
| 4b - If you wish to speak, please confirm which part of your rep  | resentation you wish to  | speak to the inspecto                    | r about and why th              | ey consider it be nece        | essary to speak at the h               | hearing -                           |                  |

| Representor ID and details: 4080/DP1 Mr Peter Llewwlly   | 'n   |                                    |                              |                                |                              |  |                           |
|--|--|------------------------------------|------------------------------|--------------------------------|------------------------------|--|---------------------------|
| Date Lodged Status Petition and No. Supporting Evidence 30/03/2012 M 0   | Additional SA SEA  |                                    | Rep format:<br>Comment form  |                                |                              | be consiered by 'written ion of Public examination |                           |
| 2a - Do you consider the LDP is Sound? Unsound   | 2b - If you think that the I<br>Procedural Tests - F<br>Consistency Tests - C<br>Coherence and Effective | P1 - Unanswered<br>C1 - Unanswered | P2 - Unansv                  | ` '                            |                              | ``   |                           |
| 3a - Which part of the Deposit Plan are you commenting on?   | Policy Number:<br>MG2(11). MG12(11). M   | <u>Paragraph</u><br>G15            |                              | Proposal Map:<br>MG2(11)       | )                            | Constraints Map                                    | Appendices:               |
| 3b - Do you wish to see any changes made to the Deposit Plan   | as a result of your repres   | sentation? Yes                     | (If                          | "No" or "Unanswered            | " - go to 3d)                |  |                           |
| 3c - What changes would like to see made to the Deposit Plan   |  |                                    | New Paragraph:<br>Unanswered | Amended Paragrap<br>Unanswered | h: <u>New Or Amer</u><br>Yes | nded Site: Other (see Nother Unanswered            | otes):                    |
| 3d - If your representation relates to a new, deleted or amende  | ed site, did you submit the<br>Site Name: Cowbridge (  |                                    |                              | \ ' ' '                        | 0                            | date Site Name and reference: 178/CS1 2440         | ,                         |
| 3e - Please set out your representation below:<br>Policy MG2 (11) states that Cowbridge Cattle Market has                      | been allocated for resider   | ntial development. Th              | is is unsound and            | objected to on the gro         | unds that-                   |  |                           |
| The Cowbridge Cattle Market, which sells on average 500  | head of sheep per week,  | , is trading successfu             | lly and supporting           | the farming community          | y of the Vale of Gl          | amorgan and should not                             | be closed.                |
| On non market days the site is used for car and coach paramade within the LDP for the lost car and coach parking smarket town. |  |                                    |                              |                                |                              |  |                           |
| Policies MG12 (11) and MG15 refer to a proposed site fo policy is objected to as being unsound.                                | r the replacement cattle m   | arket. This is a green             | field site and prop          | oosals are made within         | the LDP for its pu           | rchase and developmen                              | t as a market. The        |
| 3f - Please outline the changes you wish to see made to the D Delete Policies MG2 (11), MG12(11) and MG15.                     | Peposit Plan to make it sou  | und (if relevant)                  |                              |                                |                              |  |                           |
| An additional policy should be included upholding the con on the site to support the attractiveness of Cowbridge as            |  |                                    |                              | tural economy of the V         | ale of Glamorgan             | and the provision of imp                           | proved parking facilities |
| 4b - If you wish to speak, please confirm which part of your re  | presentation you wish to s   | peak to the inspector              | about and why th             | ey consider it be neces        | ssary to speak at t          | the hearing -                                      |                           |

(ordered by Representation ID No.)

| Representor ID and details: 4081/DP1 R W Begg                    |   |                          |                              |                         |  |  |  |  |  |
|--|---|--------------------------|------------------------------|-------------------------|--|--|--|--|--|
| Date LodgedStatusPetition and No.Supporting Evidence30/03/2012M0 | Additional SA SEA   |                          | Rep format:<br>Letter        |                         | comments to be consiere a hearing session of Publi | ed by 'written representations' or do c examination? |  |  |  |
| 2a - Do you consider the LDP is Sound? Unanswered                | 2b - If you think that the Plan is unsound and does not not meet one or more test(s) of soundness, please indicate which test(s) that it fails.  Procedural Tests - P1 - Unanswered P2 - Unanswered |                          |                              |                         |  |  |  |  |  |
|  | Consistency Tests -   | C1 - Unanswered          | C2 - Unanswe                 | ered C3 - Unanswer      | ed C4 - Unanswere                                  | d  |  |  |  |
|  | Coherence and Effective   | veness Tests - CE1 -     | Unanswered C                 | E2 - Unanswered CI      | E3 - Unanswered CE                                 | 4 - Unanswered                                       |  |  |  |
| 3a - Which part of the Deposit Plan are you commenting on?       | Policy Number:<br>MG2(19). MG2(20)  | <u>Paragraph</u>         |                              | roposal Map:            | Constrair  | nts Map Appendices:                                  |  |  |  |
| 3b - Do you wish to see any changes made to the Deposit Plan     | as a result of your repre   | esentation? Unanswe      | ered (If "N                  | No" or "Unanswered" - g | o to 3d)   |  |  |  |  |
| 3c - What changes would like to see made to the Deposit Plan     | ? New Policy:<br>Unanswered<br>Notes:   |                          | New Paragraph:<br>Unanswered |                         | New Or Amended Site:<br>Unanswered                 | Other (see Notes):<br>Unanswered                     |  |  |  |
| 3d - If your representation relates to a new, deleted or amende  | ed site, did you submit th<br>Site Name:  | ne site as a Candidate S | Site? Unanswered             | (If "Yes", please o     | give the Candidate Site N<br>Site Reference:       | ame and reference if known)                          |  |  |  |

3e - Please set out your representation below:

VALE OF GLAMORGAN DEPOSIT LOCAL DEVELOPMENT PLAN 2011-2026

I have been made aware of the above Development Plan and I am most concerned that it will have a significant impact upon the residents and the infrastructure of the village of Dinas Powis where I have lived for more than 40 years.

Dinas Powis has grown from a small village to a large conurbation that has seen the existing roads totally overpowered by traffic etc. with no meaningful regard having been applied to the alleviation of traffic congestion which is now critical. To further exasperate the situation road development and extensive house building in Barry has created a situation where traffic bottlenecks occur daily and drivers are using narrow urban side roads and country lanes as "rat runs" to avoid the chaos that occurs daily at the Merry Harriers and throughout the village.

The incidence of heavy traffic and delays along the A4055 is dangerous to residents and no doubt frustrating to drivers themselves, hence road rage. The A4055 will not take this traffic and there is no scope within the village to alleviate the problem without extensive property demolition. This has been the case for many years and the situation has escalated year on year to the extent that it now needs serious consideration. However, the proposal of the Council, to build at least 400 new houses on the St Cyres School site and land nearby, which will further increase the traffic in the village by at least 800 cars; apparently without due regard to the mayhem that will be caused by these additional vehicles and people spewing out of residential roads and adding to the already chaotic situation of traffic and queues as expansive traffic, cars and heavy vehicles try to negotiate the village from Barry and beyond.

To give some idea of what is involved, when my daughter was 16 years of age, and a student at the local comprehensive school she did, with the help of several adult residents, a dissertation on the theme "Does Dinas Powis need a by-pass? Traffic counts, speed tests and photographs were taken at strategic points along the A4055 as it traversed the village. The results were horrendous and totally accepted by authoritative persons as confirming the need for a by-pass. This was thirty years ago (she is now 46) and before the present rigorous Health and Safety dictates arrived. I will leave it to your imagination to assess the critical state of the present position.

Shortly after the survey was completed the South Glamorgan County Council, who were then the highway authority, decided that Dinas Powis did need a by-pass and I know that plans were drawn up and the line of the proposed new road was agreed. This commenced at Green Lane on the outskirts of the village and bypassed the village to the east. Funding was obtained but for some obscure reason this was diverted to provide a bypass road to another village in the Vale of Glamorgan. I believe this was Llantwit Major and I have never been able to understand how or why this priority was decided. The "upshot" of all this is that a serious traffic situation still exists at Dinas Powis and as far as I can see the only traffic consideration has been the provision of a few hundred metres of bus lane at Eastbrook that is restricted and bottlenecked at both ends and does nothing to alleviate the problem.

I am not opposed to the closure of the St Cyres School annex as I have no facts at my disposal to make a judgement; neither am I against additional building programmes, but I cannot agree that it is sensible or desirable to do this without considering the needs of the existing residents of the village. Young pupils will be required to make their own way to St Cyres in Penarth in all winds and weather. Most of them will

(ordered by Representation ID No.)

Representor ID and details: 4081/DP1 R W Begg

4001/DI 1 10 W Dogg

have to walk considerable distances in the rain and cold as they do not live within the criteria of a free bus service.

The doctor's surgeries at Dinas Powis are crammed to overflow and they are crying out for extra accommodation to not only provide for basic surgery duties but also for those services they are being called upon to provide, more than ever, for an expanding and dependable population. As an aside one wonders whether the doctors themselves have ever been consulted.

Other public facilities in the village are either non existent or lacking as they have not kept pace with the expansion of the village or the needs of an extended population.

In my opinion the needs of the present residents of Dinas Powis should initially be assessed in the light of modern facilities, health, air quality and infrastructure before any further additional burdens cause a genuine total collapse in the structure of this community.

I have tried to be brief in my summations but to my mind the situation is critical and much more necessary to Dinas Powis and the surrounding area than just the proposals mentioned in the Local Development Plan. To leave things alone can only result in them becoming much worse.

- 3f Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
- 4b If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -



| Representor ID and details: 4082/DP1 Geoffrey R.D Wir  | ter  |   |  |
|--|--|---|--|
| Date Lodged     Status     Petition and No.     Supporting Evidence       30/03/2012     M     0   |  | Letter you want to speak at   | comments to be consiered by 'written representations' or do a hearing session of Public examination?                     |
| 2a - Do you consider the LDP is Sound? Unanswered  |  |   | undness, please indicate which test(s) that it fails.  |
|  | Consistency Tests - C1 - Unanswered  Coherence and Effectiveness Tests - CE1 -   | C2 - Unanswered C3 - Unanswered CE2 - Unanswered C  | red C4 - Unanswered<br>E3 - Unanswered CE4 - Unanswered  |
| 3a - Which part of the Deposit Plan are you commenting on?   | Policy Number:         Paragraph           MG2(19).         MG2(20).         . |   | Constraints Map Appendices:  |
| 3b - Do you wish to see any changes made to the Deposit Plar   | as a result of your representation? Unansw   |   | jo to 3d)  |
| 3c - What changes would like to see made to the Deposit Plan   |  | New Paragraph: Amended Paragraph: Unanswered Unanswered   | New Or Amended Site: Other (see Notes): Unanswered Unanswered  |
|  | Notes:   |   |  |
| 3d - If your representation relates to a new, deleted or amende  | ed site, did you submit the site as a Candidate s<br>Site Name:  | Site? Unanswered (If "Yes", please  | give the Candidate Site Name and reference if known) Site Reference:   |
| 3e - Please set out your representation below: As a resident of Dinas Powys I wish to express my conce   | rns regarding the implications of the effect that  | the proposed additional housing would have  | e on the local highways network.   |
| In Dinas Powys it is proposed that a minimum of 400 add directions, particularly at peak times. The additional traffic   |  |   |  |
| To add to that there are already 2000 houses approved a drive through Dinas Powys, using both the main road and is Dinas Powys expected to take?                                       |  |   | the additional vehicles arising from that development will and Britway Road will also be affected. How much more traffic |
| As it is, residents within the older part of the Village are a and Pen-y-Turnpike. Theses roads are subjected to streat particularly standing traffic, would exacerbate the potential. | ms of cars, particularly at peak times. Michaels   | fic coming from the Barry direction that trav-<br>ston-le-Pit would also be affected at its junct | els on the alternative route through Station Road, Mill Road on with the Pen-y-Turnpike Road. An increase in vehicles,   |
| Further, I am concerned that there have not been any prothe present demand and medical services are restricted of  | posed extra community facilities of substance.<br>lue to the limitations of space at the Dinas Pow   | A local church is in desperate need of a persys Surgery premises on Cardiff Road.                 | manent base, the local sporting facilities are not adequate for  |
| The Deposit plan does not indicate what measures will be trains will be a major challenge. Additional buses would s  | e taken to encourage the availability and use of imply be caught up in the traffic chaos the extra   | public transport. I understand that there is a a housing would cause.                             | serious lack of rolling stock in Wales and providing extra   |
| It is essential that major highway infrastructure improvem   | ents are made BEFORE hundreds of additiona   | I housing could even be considered.   |  |
| 3f - Please outline the changes you wish to see made to the D  | eposit Plan to make it sound (if relevant)   |   |  |
| 4b - If you wish to speak, please confirm which part of your re  | presentation you wish to speak to the inspector  | about and why they consider it be necessa   | y to speak at the hearing -  |

| Representor ID and details: 4083/DP1 Mr and Mrs D Ric   | nards  |   |   |  |  |  |  |  |
|---|--|---|---|--|--|--|--|--|
| Date Lodged     Status     Petition and No.     Supporting Evidence       30/03/2012     M     0  | Additional SA SEA  | <del></del>                                   | our comments to be consiered by 'written representations' or do at a hearing session of Public examination? Written |  |  |  |  |  |
| 2a - Do you consider the LDP is Sound? Unsound  | 2b - If you think that the Plan is unsound and of Procedural Tests - P1 - Unanswered Consistency Tests - C1 - Unanswered Coherence and Effectiveness Tests - CE1 - | P2 - Unanswered<br>C2 - Unanswered C3 - Unans | soundness, please indicate which test(s) that it fails.  wered C4 - Unanswered  CE3 - Unanswered CE4 - Unanswered   |  |  |  |  |  |
| 3a - Which part of the Deposit Plan are you commenting on?  | Policy Number: Paragraph   | Number: Proposal Map:                         | Constraints Map Appendices:   |  |  |  |  |  |
| 3b - Do you wish to see any changes made to the Deposit Plan  | as a result of your representation? Yes  | (If "No" or "Unanswered"                      | - go to 3d)   |  |  |  |  |  |
| 3c - What changes would like to see made to the Deposit Plan'   | P New Policy: Amended Policy: 1  |   | h: New Or Amended Site: Other (see Notes): Yes Unanswered   |  |  |  |  |  |
| 3d - If your representation relates to a new, deleted or amende   | ed site, did you submit the site as a Candidate S<br>Site Name:  | Site? Unanswered (If "Yes", plea              | se give the Candidate Site Name and reference if known) Site Reference:   |  |  |  |  |  |
| 3e - Please set out your representation below: We consider the proposed development of 350 houses to the rear of Nant y Adar, Heol-y-Felin as totally unacceptable for many reasons  1. Such a development would create havoc and massive disturbance to the local residents. 2. Presumably (if it were to go ahead) the period that construction is going on would be intolerable and may likely to go on for several years. 3. All traffic would have to pass down or up Ham Lane East which is already very busy as there is the Welsh School, Leisure Centre, Comprehensive School, Junior School and Catholic Church here. 4. The proposed land forms part of the Heritage Coast which surely should never be built upon. Also the site is on a Flood plain from the Hodnant stream. NB Our garden has seen flooding on several occasions. 5. Finally if this plan goes ahead (with 350 houses rear of Nant y Adar and a further 150 houses elsewhere) it would increase the population of Llantwit by 25% while services are being significantly reduced in all areas i.e. Job Centre, closed. VGBC offices closed, HSBC Bank closed, Bus services reduced 6. Also, far less job opportunities exist in Llantwit than there were. RAF St Athan with the Training Establishment unlikely to happen – employ less than half the manpower of past years. Aberthaw Power Station now employ less than ½ the people than 20 years ago. 7. Also try parking in the town today – would be impossible with another 500 or so cars.  This plan should be scrapped. |  |   |   |  |  |  |  |  |
| 3f - Please outline the changes you wish to see made to the D This plan should be scrapped.   | eposit Plan to make it sound (if relevant)   |   |   |  |  |  |  |  |
| 4h - If you wish to speak please confirm which part of your ren   | presentation you wish to speak to the inspector  | about and why they consider it he neces       | sary to speak at the hearing -  |  |  |  |  |  |

(ordered by Representation ID No.)

| Representor ID and details: 4084/DP1 Mrs Gloria Brook            |                                       |   |                                 |                                |  |                                 |                  |
|--|---------------------------------------|---|---------------------------------|--------------------------------|--|---------------------------------|------------------|
| Date LodgedStatusPetition and No.Supporting Evidence30/03/2012M0 | Additional SA SEA                     |   | Rep format:<br>Letter           |                                | your comments to be con<br>at a hearing session of l |                                 |                  |
| 2a - Do you consider the LDP is Sound? Unanswered                | •                                     | he Plan is unsound and<br>P1 - Unanswered | does not not meet<br>P2 - Unans | ` '                            | f soundness, please indic                            | cate which test(s)              | that it fails.   |
|  | Consistency Tests -                   | C1 - Unanswered                           | C2 - Unans                      | wered C3 - Unans               | swered C4 - Unans                                    | wered                           |                  |
|  | Coherence and Effect                  | tiveness Tests - CE1                      | - Unanswered                    | CE2 - Unanswered               | CE3 - Unanswered                                     | CE4 - Unanswer                  | :ed              |
| 3a - Which part of the Deposit Plan are you commenting on?       | Policy Number:                        | <u>Paragraph</u>                          | Number:                         | Proposal Map:                  | <u>Con</u> :   | straints Map                    | Appendices:      |
|  | MG2(27)                               |   |                                 |                                |  |                                 |                  |
| 3b - Do you wish to see any changes made to the Deposit Plan     | as a result of your rep               | presentation? Unansw                      | vered (If                       | "No" or "Unanswered            | " - go to 3d)  |                                 |                  |
| 3c - What changes would like to see made to the Deposit Plan'    | ? <u>New Policy:</u><br>Unanswered    |   | New Paragraph:<br>Unanswered    | Amended Paragram<br>Unanswered | ph: New Or Amended Si<br>Unanswered                  | ite: Other (see N<br>Unanswered | <u>otes):</u>    |
|  | Notes:                                |   |                                 |                                |  |                                 |                  |
| 3d - If your representation relates to a new, deleted or amende  | ed site, did you submit<br>Site Name: | the site as a Candidate                   | Site? Unanswer                  | ed (If "Yes", plea             | ase give the Candidate S<br>Site Reference           |                                 | erence if known) |
|  |                                       |   |                                 | <b>-</b>                       |  |                                 |                  |

3e - Please set out your representation below:

Objection to the inclusion in the LDP of Site MG2(27) - Land adjacent to Court Close Aberthin

Objections are

1. Greenfield site outside the natural boundaries of Aberthin

Existing housing on this side of Aberthin is contained within a line running from Court Farm to Skaife House. The proposed development would form an unsightly extension rather than blending in with existing housing. This would detract from the appearance of the village when viewed from Stalling Down.

#### 2. Road Access

The LDP refers to "Potential access from Court Close"

This would involve construction and eventually, residential traffic coming from the A4222 along Whitefields Farm Lane then into Court Close. Although the LDP refers to "Highways improvements at the junction of the Whitefields Farm Lane and Court Close" this totally ignores the fact that Whitefield Farm Lane is only 3.6 metres wide between the The Orchard and Downs View and 3.7 metres between The Orchard and Court Close.

Access to the proposed site from Whitefields Farm Lane itself is impossible as it is even narrower between Great House and Court farm. This would mean that any traffic involved in construction, materials and removal of spoil (the site is sloping and would involve significant landscaping) would have to use Court Close which is also below the minimum standard for such traffic.

#### 3. Road Safety and the A4222

The junction with the A4222 by the hare and Hounds is very busy, particularly at morning and evening rush hours. Traffic from the direction of Ystradowen heading for Cowbridge or using Penylan Hill as a shortcut to the A48 is heavy at these time and turning out from Whitefields Farm Land is difficult due to the fact that many drivers exceed the speed limit. Efforts by SW Police have caught a few drivers but this remains a problem. Warning speed indicators signs are proposed but unlikely to solve the problem.

The proposed development would increase the number of houses where residents would have to use this junction by 35%. The volume of construction traffic would also mean an unacceptable risk of serious accidents.

(ordered by Representation ID No.)

Representor ID and details: 4084/DP1 Mrs Gloria Brook

It must be remembered that a highways inspector has looked at the road adjacent to this junction with the past year and deemed it was too dangerous to install a pedestrian crossing near the bus stop adjacent to Maes Lloi.

#### 4. Drainage

Water from the fields behind the proposed site and from the site itself runs down Whitefields Farm Lane and Court Close and has caused flooding by the Hare and Hounds at the junction with A4222. This will increase if agricultural land is built on. This is surface water at times of heavy rain, which we experience regularly and it usually mare that normal roadside drains can cope with.

#### 5. Previous Planning Applications

It is worth remembering that in 1981 and application for 10 houses on this site was refused. Application 1981/00660 refers. In an appeal against refusal the Welsh Office Inspector cited (i) the sloping site outside of the natural line of the village, (ii) the view of the village from Stalling Down; and (iii) the junction with the A4222 among reasons for upholding the refusal.

The Inspector described the A4222 junction as "comparatively dangerous". This was 28 years ago and traffic has increased very significantly in the interval.

- 3f Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
- 4b If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -

| Representor ID and details: 4085/DP1 Mrs Sarah Price   |   |  |  |  |               |
|--|---|--|--|--|---------------|
| <u>Date Lodged</u> <u>Status</u> <u>Petition and No.</u> <u>Supporting Evidence</u>  | Additional SA SEA   | Rep format:  |  | omments to be consiered by 'written re                                   |               |
| 30/03/2012 M   |   | Comment form   | you want to speak at a h                                 | nearing session of Public examination                                    | ? Written     |
| 2a - Do you consider the LDP is Sound? Unsound   | •   | unsound and does not not meet  Jnanswered P2 - Unans                         | ` '  | dness, please indicate which test(s) th                                  | nat it fails. |
|  | Consistency Tests - C1 - U  | Jnanswered C2 - Unans  | wered C3 - Unanswered                                    | C4 - Unanswered  |               |
|  | Coherence and Effectiveness T   | ests - CE1 - Unanswered  | CE2 - Yes CE3  | - Unanswered CE4 - Unanswere   | d             |
| 3a - Which part of the Deposit Plan are you commenting on?   | Policy Number:  | Paragraph Number:  | Proposal Map:  | Constraints Map  | Appendices:   |
|  |   |  | MG2(13)  |  |               |
| 3b - Do you wish to see any changes made to the Deposit Plan   | as a result of your representation  | on? Yes (If  | "No" or "Unanswered" - go                                | to 3d)   |               |
| 3c - What changes would like to see made to the Deposit Plan?  | New Policy: Amende<br>Unanswered Unansw   | ed Policy: New Paragraph: vered Unanswered                                   |  | ew Or Amended Site: Other (see Not Unanswered                            | <u>tes):</u>  |
|  | Notes:  |  |  |  |               |
| 3d - If your representation relates to a new, deleted or amende  |   | s a Candidate Site? Yes<br>f St Athan Road Llanblethian, La                  | ` ' '  | re the Candidate Site Name and refere<br>Site Reference: 2446/CS1, 2446/ | ,             |
| 3e - Please set out your representation below:   |   |  | <del></del>  |  |               |
| <ol> <li>Access from St Athan Road very dangerous. Children householders will not be able to join Cowbridge main road should not be considered an alternative emergency acces</li> <li>Sewerage problems have already been a problem- this</li> <li>The existing medical centre and schools are not coping</li> <li>Additional car parking- the town centre is already strug.</li> </ol> | from Broadway at peak hours-<br>s- it is at the crest of a hill and n<br>will only get worse<br>with the present population- wh | which will mean queues on Broa<br>arrow.<br>ere are the new children to be e | dway, causing very dangeror ducated and families given h | us situations for both schools on Broa                                   |               |
| 3f - Please outline the changes you wish to see made to the D<br>Have candidate site removed and include as a green wed  |   | ,  |  |  |               |
| 4b - If you wish to speak, please confirm which part of your rer   | presentation you wish to speak to   | the inspector about and why th   | ev consider it be necessary t                            | to speak at the hearing -  |               |

(ordered by Representation ID No.)

| Representor ID and details: 4086/DP1 Mr Stephen Winds  | sor   |                          |                              |                                 |   |                                 |                  |
|--|---|--------------------------|------------------------------|---------------------------------|---|---------------------------------|------------------|
| Date Lodged     Status     Petition and No.     Supporting Evidence       30/03/2012     M     0 | Additional SA SEA                             |                          | Rep format:<br>Letter        |                                 | our comments to be con<br>at a hearing session of | •                               | •                |
| •  | 2b - If you think that the Procedural Tests - | e Plan is unsound and o  | does not not meet o          | ` '                             | soundness, please indic                           | cate which test(s)              | that it fails.   |
|  | Consistency Tests - Coherence and Effective   |                          |                              |                                 | wered C4 - Unans<br>CE3 - Unanswered              |                                 | red              |
|  | Policy Number:<br>MG2(19). MG2(20)            | <u>Paragraph</u>         |                              | roposal Map:                    | <u>Con</u>  | straints Map                    | Appendices:      |
| 3b - Do you wish to see any changes made to the Deposit Plan                                     | as a result of your repre                     | esentation? Unanswe      | ered (If "I                  | No" or "Unanswered"             | - go to 3d)                                       |                                 |                  |
| 3c - What changes would like to see made to the Deposit Plan?                                    | New Policy: Unanswered Notes:                 |                          | New Paragraph:<br>Unanswered | Amended Paragraph<br>Unanswered | h: New Or Amended S<br>Unanswered                 | ite: Other (see N<br>Unanswered | lotes):          |
| 3d - If your representation relates to a new, deleted or amende                                  | d site, did you submit th<br>Site Name:       | ne site as a Candidate S | Site? Unanswered             | d (If "Yes", pleas              | se give the Candidate S<br>Site Reference         |                                 | erence if known) |

3e - Please set out your representation below:

As a resident of Dinas Powys I wish to express my concerns re. the implications of the effect that the proposed additional housing would have on the local highways network.

In Dinas Powys it is proposed that a minimum of 400 addition houses will be built on the St Cyres annexe and Caerleon Road, Both sites are on the Murch side of the community which is served by only two access points to the main road [A4055]. Both these junctions, namely the Infants School traffic lights at Murch Bridge and Cross Common Road at its junction with the A4055 are either at capacity or structurally suspect.

The 400 houses would generate between 600 to 800 additional cars in both directions, particularly at peak times. The additional traffic would have a profound and adverse impact on the community as the existing roads are under great pressure now.

Further, I am concerned that there have not been any proposed extra community facilities of substance. A local church is in desperate need of a permanent base, the local sporting facilities are not adequate for the present demand and medical services are restricted due to the limitations of space at the Dinas Powys Surgery premises on Cardiff Road.

There appears to be no serious consideration having been given to other views as to the future possible use of St Cyres Annexe, Murch Road. It is worth noting that the school buildings are in good condition although in need of a little investment. To simply seek to tear down the school without any reference to the community needs would be a shameful waste. I also have concerns regarding the capacity of the local schools to accommodate the extra pupils due to the additional houses.

Then there is the wider consideration of the Plan. Up to 10,000 additional houses are planned, many in the south east area of the Vale, e.g. 2,000 units already having been approved at the Waterfront, Barry.

Much of this traffic will be funnelled through Dinas Powys and join the ever lengthening queues leading to and from the Merrie Harrier. The proposals in Sully, Penarth, Lavernock and the land adjacent St Josephs' School, Sully Road will only add to the existing congestion at this junction.

Already the air pollution levels are excessive. The Nitrogen Dioxide [N02] levels are recorded as being 43.8 units with the maximum recommended level being 40 units along Cardiff Road, Eastbrook. An increase in vehicles, particularly standing traffic, would exacerbate the situation. The level of other emissions such as CO (carbon monoxide) and Particulates [PM105] are not available but need clarifying

The Deposit plan does not indicate what measures will be taken to encourage the availability and use of public transport. I understand that there is a serious lack of rolling stock in Wales and providing extra trains will be a major challenge. Additional buses would simply be caught up in the traffic chaos the extra housing would cause.

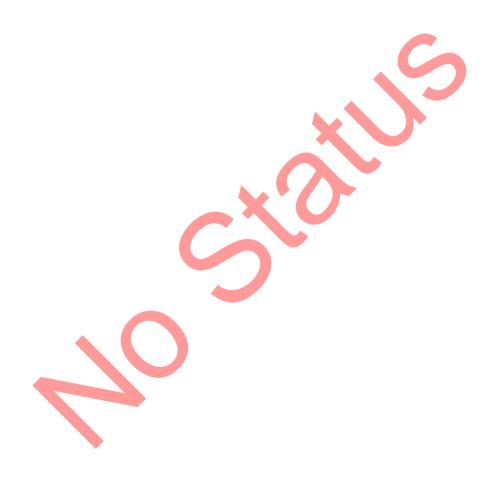
It is essential that major highway infrastructure improvements are made BEFORE hundreds of additional housing could even be considered.

(ordered by Representation ID No.)

Representor ID and details: 4086/DP1 Mr Stephen Windsor

3f - Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)

4b - If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -



| Representor ID and details: 4087/DP1 Ms K.Robinson  |  |   |   |  |                      |
|---|--|---|---|--|----------------------|
| Date Lodged     Status     Petition and No.     Supporting Evidence       30/03/2012     M     □     0     □  | Additional SA SEA  | Rep format:<br>Comment form   | ·   | our comments to be consiered by 'writter at a hearing session of Public examination  |                      |
| 2a - Do you consider the LDP is Sound? Unsound  | 2b - If you think that the Plan is unsour Procedural Tests - P1 - Unanswe  |   | ` '   | soundness, please indicate which test(s)   | ) that it fails.     |
|   | Consistency Tests - C1 - Unanswe   | ered C2 - Unans   | wered C3 - Unansw   | vered C4 - Unanswered  |                      |
|   | Coherence and Effectiveness Tests -  | CE1 - Unanswered  | CE2 - Yes   | CE3 - Unanswered CE4 - Unanswe   | ered                 |
| 3a - Which part of the Deposit Plan are you commenting on?  |  | agraph Number:  | Proposal Map:   | Constraints Map  | Appendices:          |
|   |  | · ·   | MG2(13)   |  |                      |
| 3b - Do you wish to see any changes made to the Deposit Plan  | as a result of your representation? Y  | es (II  | f "No" or "Unanswered"  | - go to 3d)  |                      |
| 3c - What changes would like to see made to the Deposit Plan?   | New Policy: Amended Policy Unanswered Unanswered   | y: New Paragraph:<br>Unanswered   | Amended Paragraph<br>Unanswered   | n: New Or Amended Site: Other (see Note of the Note of |                      |
|   | Notes:   |   |   |  |                      |
| 3d - If your representation relates to a new, deleted or amende   | d site, did you submit the site as a Cand<br>Site Name: Land to west of St Athan F   |   | ` '   | se give the Candidate Site Name and ref<br>Site Reference: 2446/CS1, 244   | ,                    |
| 3e - Please set out your representation below:  |  |   | <del>y</del>  |  |                      |
| <ol> <li>Impact on landscape will be very detrimental and this is income from tourism, it is madness to turn the tourist asset.</li> <li>There are currently more houses of all kinds for sale in those on sale at present, (some of which are smaller properties). I understand there is already a lack of sewerage capact.</li> <li>There are 3 access points possible on the plan:         <ul> <li>Windmill lane leading to the Broadway- This is too narrely by Via the gap in the Brookfield Park development also lead their way to school on foot.</li> <li>Via the St Athan Road which is already narrow and darely 100 houses means more children for local schools which is already narrow and contact the golden eggs.</li> </ul> </li> </ol> | of Cowbridge into just another suburb Cowbridge and Llanblethian than has berties), as inevitably they will rise to the ty. This needs to be addressed first before and enters the Broadway at the top of adding to the Broadway-This would place gerous to pedestrians-I speak from expension of the product of t | een the case for over 20 price level of the surrous ore any building plans.  of a hill on a bend where a heavy burden on these perience and as a pedes ribed. | years! Why then do we nding area.  visibility is poor and the se small roads and increations. | need 100 more? In what way will they be road is narrow. ase the likelihood of traffic accidents to the henever possible. This would make it let  | the many children on |
| 3f - Please outline the changes you wish to see made to the D Have candidate site removed and include as a green wed  | ,  |   |   |  |                      |
| 4b - If you wish to speak, please confirm which part of your rep  | resentation you wish to speak to the ins   | pector about and why th   | ney consider it be necess   | sary to speak at the hearing -   |                      |

| Representor               | ID and d               | etails:    | 4088/D          | P1 Mr G.T Jones                               |   |  |                                |                                      |                                 |  |  |
|---------------------------|------------------------|------------|-----------------|---|---|--|--------------------------------|--------------------------------------|---------------------------------|--|--|
| Date Lodged<br>30/03/2012 |                        | Petitio    | on and No.<br>0 | Supporting Evidence                           | Additional SA SEA                             |  | Rep format:<br>Comment for     | ·                                    | ,                               | be consiered by 'writte<br>sion of Public examinat | n representations' or do ion? Written        |
| 2a - Do you co            | onsider th             | ne LDP     | is Sound?       |   | 2b - If you think that the Procedural Tests - | ne Plan is unsound and P1 - Unanswered           | d does not not me<br>P2 - Unan | ,                                    | ) of soundness, pleas           | se indicate which test(s                           | s) that it fails.                            |
|                           |                        |            |                 |   | Consistency Tests -                           | C1 - Unanswered                                  | C2 - Unan                      | swered C3 - Un                       | answered C4 -                   | Unanswered   |  |
|                           |                        |            |                 |   | Coherence and Effect                          | iveness Tests - CE1                              | - Unanswered                   | CE2 - Yes                            | CE3 - Unanswe                   | red CE4 - Unansw                                   | ered   |
| 3a - Which pa             | rt of the              | Deposit    | Plan are y      | ou commenting on?                             | Policy Number:                                | Paragrap   | oh Number:                     | Proposal Map:                        |                                 | Constraints Map                                    | Appendices:                                  |
|                           |                        |            |                 |   |   |  |                                | The Saint Jo<br>housing) site, Sully |                                 |  |  |
| 3b - Do you w             | ish to se              | e any ch   | nanges ma       | de to the Deposit Plan                        | as a result of your rep                       | resentation? Yes                                 | (                              | (If "No" or "Unanswe                 | red" - go to 3d)                |  |  |
| 3c - What cha             | nges wo                | uld like   | to see mad      | de to the Deposit Plan?                       | New Policy:<br>Unanswered                     | Amended Policy:<br>Unanswered                    | New Paragraph:<br>Unanswered   | Amended Parag<br>Unanswered          | graph: New Or Amer<br>Yes       | nded Site: Other (see<br>Unanswere                 | <del></del>                                  |
|                           |                        |            |                 |   | Notes:  |  |                                |                                      |                                 |  |  |
| 3d - If your re           | presenta               | ition rela | ates to a ne    | ew, deleted or amende                         |   | the site as a Candidat<br>oh's School, Sully Roa |                                | (If "Yes", p                         | please give the Cand<br>Site Re | idate Site Name and re<br>ference:                 | eference if known)                           |
| country                   | oosal to be<br>ane and | uild sev   | enty hous       | es on the site adjoining                      | raffic. Its junction with                     | Redlands Road is alre                            | ady extremely con              |                                      |                                 | should not be accepted<br>to St. Cyres' School a   | I. Sully Road is a narrow re carried out the |
|                           |                        | •          | •               | n to see made to the Den the access to them s | •   | ,  | d through to Redla             | ands Road.                           |                                 |  |  |
| 4b - If you wi            | sh to spe              | ak plea    | se confirm      | which part of your ren                        | resentation you wish t                        | o speak to the inspect                           | or about and why t             | they consider it be ne               | cessary to speak at             | the hearing -                                      |  |

| Representor ID and details: 4089/DP1 Christine Lyn Hur  | t   |  |                                      |                       |                    |   |                |
|---|---|--|--------------------------------------|-----------------------|--------------------|---|----------------|
| Date Lodged     Status     Petition and No.     Supporting Evidence       30/03/2012     M     0  | Additional SA SEA                                 |  | Rep format:<br>Comment form          |                       |                    | be consiered by 'written<br>ion of Public examination |                |
| 2a - Do you consider the LDP is Sound? Unsound  | 2b - If you think that the Procedural Tests -     | e Plan is unsound and<br>P1 - Unanswered | does not not meet or<br>P2 - Unanswe | ` '                   | soundness, pleas   | e indicate which test(s)                              | that it fails. |
|   | Consistency Tests -                               | C1 - Unanswered                          | C2 - Unanswe                         | red C3 - Unansw       | vered C4 - I       | Unanswered  |                |
|   | Coherence and Effective                           | veness Tests - CE1 -                     | Unanswered CE                        | E2 - Yes              | CE3 - Unanswer     | ed CE4 - Unanswe                                      | ered           |
| 3a - Which part of the Deposit Plan are you commenting on?  | Policy Number:                                    | Paragraph                                | Number: Pr                           | roposal Map:          |                    | Constraints Map                                       | Appendices:    |
|   |   |  |                                      | MG2(13)               |                    |   |                |
| 3b - Do you wish to see any changes made to the Deposit Plan  | as a result of your repr                          | esentation? Yes                          | (If "N                               | lo" or "Unanswered"   | - go to 3d)        |   |                |
| 3c - What changes would like to see made to the Deposit Plan?   | New Policy:                                       | Amended Policy:                          | New Paragraph:                       | Amended Paragraph     | n: New Or Amen     | nded Site: Other (see N                               | Notes):        |
|   | Unanswered  | Unanswered                               | Unanswered                           | Unanswered            | Yes                | Unanswered  | İ              |
|   | Notes:  |  |                                      |                       |                    |   |                |
| 3d - If your representation relates to a new, deleted or amende   | d site, did you submit the Site Name: Land to w   |  |                                      | ` '                   | J                  | date Site Name and ref<br>erence: 2446/CS.1, 24       | ,              |
| 3e - Please set out your representation below:  |   |  |                                      |                       |                    |   |                |
| I wish you to consider my objections for this proposed dev  | velopment.  |  |                                      |                       |                    |   |                |
| 1) Landscape impact 2) It is a special landscape area ref:- to policy MD1, "New 3) Access issue 4) Destruction of the natural habitat of the local wildlife an 5) Impact of 100 houses, how can Cowbridge cope with a 6) The sewage works cannot copy with demand of the po | d loss of public right of pprox an extra 200 cars | way footpath<br>, 400 people- schools,   | doctors surgery, park                |                       |                    |   |                |
| 3f - Please outline the changes you wish to see made to the D<br>Have candidate site removed and include as a green wed   |   | ,  | ons.                                 |                       |                    |   |                |
| 4h - If you wish to speak please confirm which part of your rer   | presentation you wish to                          | sneak to the inspector                   | ahout and why they                   | consider it he necess | sary to speak at t | he hearing -  |                |

| Representor ID and details: 4090/DP1 Mr John Parker   |  |  |   |                    |  |  |  |
|---|--|--|---|--------------------|--|--|--|
| Date Lodged     Status     Petition and No.     Supporting Evidence       30/03/2012     M     □     0     □  | Additional SA SEA  |  | our comments to be consiered by 'written represe<br>at a hearing session of Public examination? Wr        |                    |  |  |  |
| 2a - Do you consider the LDP is Sound? Unsound  | 2b - If you think that the Plan is unsound and of Procedural Tests - P1 - Unanswered  Consistency Tests - C1 - Unanswered  Coherence and Effectiveness Tests - CE1 - | P2 - Unanswered C2 - Unanswered C3 - Unans               | soundness, please indicate which test(s) that it followered  C4 - Unanswered  CE3 - Yes  CE4 - Unanswered | ails.<br>          |  |  |  |
| 3a - Which part of the Deposit Plan are you commenting on?  | Policy Number: Paragraph MG2(11). MG12(11). MG15   | Number: Proposal Map:MG2(11)                             |   | endices:           |  |  |  |
| 3b - Do you wish to see any changes made to the Deposit Plan  |  | (If "No" or "Unanswered                                  | - go to 3d)   |                    |  |  |  |
| 3c - What changes would like to see made to the Deposit Plan  |  | New Paragraph: Amended Paragrap<br>Unanswered Unanswered | h: New Or Amended Site: Other (see Notes): Yes Unanswered   |                    |  |  |  |
| 3d - If your representation relates to a new, deleted or amende   | ed site, did you submit the site as a Candidate S<br>Site Name: Cowbridge Cattle Market Land w   |  | se give the Candidate Site Name and reference i<br>Site Reference: 178/CS1 2440/CS2                       | f known)           |  |  |  |
| 3e - Please set out your representation below: Policy MG2 (11) states that Cowbridge Cattle Market has The Cowbridge Cattle Market, which sells on average over   |  |  |   | e closed.          |  |  |  |
| On non market days the site is used for car and coach parking for up to 200 cars. Apart from an allocation of a small site adjacent to the town wall which would hold approximately 25 cars, no provision has been made within the LDP for the lost car and coach parking spaces. The loss of car parking spaces would have an adverse effect on the trading community in Cowbridge and the attractiveness of Cowbridge as a market town. |  |  |   |                    |  |  |  |
| Policies MG12 (11) and MG15 refer to a proposed site for the replacement cattle market. This is a greenfield site and proposals are made within the LDP for its purchase and development as a market. The policy is objected to as being unsound.   |  |  |   |                    |  |  |  |
| 3f - Please outline the changes you wish to see made to the D Delete Policies MG2 (11), MG12(11) and MG15.  An additional policy should be included upholding the con on the site to support the attractiveness of Cowbridge as   | tinuation of the Cowbridge Cattle Market in supp   |  | ale of Glamorgan and the provision of improved إ  | parking facilities |  |  |  |
| 4b - If you wish to speak, please confirm which part of your re   | presentation you wish to speak to the inspector  | about and why they consider it be neces                  | sary to speak at the hearing -  |                    |  |  |  |

(ordered by Representation ID No.)

| Representor ID and details: 4091/DP1 Mr John Wilkinson           | 1  |                          |                              |                                |   |                                 |                 |
|--|--|--------------------------|------------------------------|--------------------------------|---|---------------------------------|-----------------|
| Date LodgedStatusPetition and No.Supporting Evidence30/03/2012M0 | Additional SA SEA                              |                          | Rep format:<br>Letter        |                                | our comments to be con<br>at a hearing session of l | •                               | •               |
| •  | •  | e Plan is unsound and o  | does not not meet o          | ` '                            | soundness, please indic                             | cate which test(s)              | that it fails.  |
|  | Consistency Tests -<br>Coherence and Effective |                          |                              |                                | wered C4 - Unans<br>CE3 - Unanswered                |                                 | ed              |
| , , ,  | Policy Number:<br>MG2(19). MG2(20)             | <u>Paragraph</u>         |                              | Proposal Map:                  | <u>Con:</u>   | straints Map                    | Appendices:     |
| 3b - Do you wish to see any changes made to the Deposit Plan     | as a result of your repr                       | esentation? Unansw       | ered (If "                   | No" or "Unanswered"            | " - go to 3d)                                       |                                 |                 |
| 3c - What changes would like to see made to the Deposit Plan?    | New Policy: Unanswered Notes:                  |                          | New Paragraph:<br>Unanswered | Amended Paragrap<br>Unanswered | h: New Or Amended Si<br>Unanswered                  | ite: Other (see N<br>Unanswered | <u>otes):</u>   |
| 3d - If your representation relates to a new, deleted or amende  | d site, did you submit the Site Name:          | ne site as a Candidate S | Site? Unanswere              | d (If "Yes", plea              | ase give the Candidate S<br>Site Reference          |                                 | rence if known) |

3e - Please set out your representation below:

As a resident of Dinas Powys I wish to express my concerns re. the implications of the effect that the proposed additional housing would have on the local highways network.

In Dinas Powys it is proposed that a minimum of 400 addition houses will be built on the St Cyres annexe and Caerleon Road, Both sites are on the Murch side of the community which is served by only two access points to the main road [A4055]. Both these junctions, namely the Infants School traffic lights at Murch Bridge and Cross Common Road at its junction with the A4055 are either at capacity or structurally suspect.

The 400 houses would generate between 600 to 800 additional cars in both directions, particularly at peak times. The additional traffic would have a profound and adverse impact on the community as the existing roads are under great pressure now.

Further, I am concerned that there have not been any proposed extra community facilities of substance. A local church is in desperate need of a permanent base, the local sporting facilities are not adequate for the present demand and medical services are restricted due to the limitations of space at the Dinas Powys Surgery premises on Cardiff Road.

There appears to be no serious consideration having been given to other views as to the future possible use of St Cyres Annexe, Murch Road. It is worth noting that the school buildings are in good condition although in need of a little investment. To simply seek to tear down the school without any reference to the community needs would be a shameful waste. I also have concerns regarding the capacity of the local schools to accommodate the extra pupils due to the additional houses.

Then there is the wider consideration of the Plan. Up to 10,000 additional houses are planned, many in the south east area of the Vale, e.g. 2,000 units already having been approved at the Waterfront, Barry.

Much of this traffic will be funnelled through Dinas Powys and join the ever lengthening queues leading to and from the Merrie Harrier. The proposals in Sully, Penarth, Lavernock and the land adjacent St Josephs' School, Sully Road will only add to the existing congestion at this junction.

Already the air pollution levels are excessive. The Nitrogen Dioxide [N02] levels are recorded as being 43.8 units with the maximum recommended level being 40 units along Cardiff Road, Eastbrook. An increase in vehicles, particularly standing traffic, would exacerbate the situation. The level of other emissions such as CO (carbon monoxide) and Particulates [PM105] are not available but need clarifying

The Deposit plan does not indicate what measures will be taken to encourage the availability and use of public transport. I understand that there is a serious lack of rolling stock in Wales and providing extra trains will be a major challenge. Additional buses would simply be caught up in the traffic chaos the extra housing would cause.

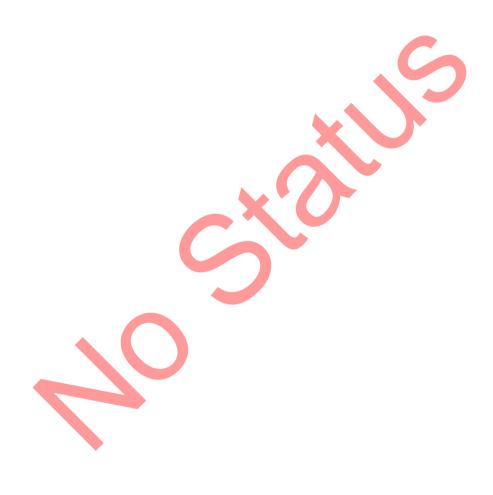
It is essential that major highway infrastructure improvements are made BEFORE hundreds of additional housing could even be considered.

(ordered by Representation ID No.)

Representor ID and details: 4091/DP1 Mr John Wilkinson

3f - Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)

4b - If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -



| Representor ID and details: 4092/DP1 S Browning  |   |
|--|---|
| Date Lodged     Status     Petition and No.     Supporting Evidence       30/03/2012     M     0   | Additional SA SEA Rep format: 4a - do you want your comments to be consiered by 'written representations' or do Comment form you want to speak at a hearing session of Public examination? Written  |
| 2a - Do you consider the LDP is Sound? Unsound   | 2b - If you think that the Plan is unsound and does not not meet one or more test(s) of soundness, please indicate which test(s) that it fails.  Procedural Tests - P1 - Unanswered P2 - Unanswered  Consistency Tests - C1 - Unanswered C2 - Unanswered C3 - Unanswered C4 - Unanswered  Coherence and Effectiveness Tests - CE1 - Unanswered CE2 - Unanswered CE3 - Unanswered CE4 - Unanswered |
| 3a - Which part of the Deposit Plan are you commenting on?   | Policy Number:     Paragraph Number:     Proposal Map:     Constraints Map     Appendices:  |
| 3b - Do you wish to see any changes made to the Deposit Plar   | as a result of your representation? Yes (If "No" or "Unanswered" - go to 3d)  |
| 3c - What changes would like to see made to the Deposit Plan   | ? New Policy: Amended Policy: New Paragraph: Amended Paragraph: New Or Amended Site: Other (see Notes): Unanswered Unanswered Unanswered Unanswered Notes:  |
| 3d - If your representation relates to a new, deleted or amende  | ed site, did you submit the site as a Candidate Site? Yes (If "Yes", please give the Candidate Site Name and reference if known) Site Name: Land to west of St Athan Road Llanblethian, Land to east of St Athan Roa Site Reference: 2446/CS1, 2446/CS2   |
| Additionally the intention to provide affordable housing is I believe that demographics show that there is no require There is considerable volume of 'abandoned' social hous The town of Cowbridge is unable to deal with an increase sustainable transport.  The council should show its commitment to providing an Landscape Impact Access Issues Sewerage Works Special Landscape Area Impact on town of Cowbridge Public Right of Way | ing within the South Wales area including the Vale of Glamorgan.  in local traffic, the Council assessment accepts that any residents of this area are likely to travel to the town by car rather than walk or use of element or affordable housing on all developments which should be on brownfield areas.  |
| 3f - Please outline the changes you wish to see made to the D<br>Have candidate site removed and include as a green wed  |   |
| 4b - If you wish to speak, please confirm which part of your re  | presentation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -   |

| Representor ID and details: 4092/DP2 S Browning  |  |   |
|--|--|---|
| Date Lodged     Status     Petition and No.     Supporting Evidence       18/03/2012     M     □     0     □ | Additional SA SEA Rep format: 4a - do you want your comments to  Email you want to speak at a hearing sess   | be consiered by 'written representations' or do sion of Public examination? |
| F  | o - If you think that the Plan is unsound and does not not meet one or more test(s) of soundness, plear<br>rocedural Tests - P1 - Unanswered P2 - Unanswered   | ``  |
|  | onsistency Tests - C1 - Unanswered C2 - Unanswered C3 - Unanswered C4 -  |   |
|  | oherence and Effectiveness Tests - CE1 - Unanswered CE2 - Unanswered CE3 - Unanswe   | red CE4 - Unanswered  |
| 3a - Which part of the Deposit Plan are you commenting on? <u>F</u>  | olicy Number: Paragraph Number: Proposal Map:  | Constraints Map Appendices:   |
|  |  |   |
| 3b - Do you wish to see any changes made to the Deposit Plan a   | s a result of your representation? Unanswered (If "No" or "Unanswered" - go to 3d)   |   |
| 3c - What changes would like to see made to the Deposit Plan?  | New Policy:         Amended Policy:         New Paragraph:         Amended Paragraph:         New Or Amended Paragraph:           Unanswered         Unanswered         Unanswered         Unanswered  | nded Site: Other (see Notes): Unanswered                                    |
|  | Notes:   |   |
|  | site, did you submit the site as a Candidate Site? Unanswered (If "Yes", please give the Candite Name:   | idate Site Name and reference if known)<br>ference:                         |
| 3e - Please set out your representation below:   |  |   |
| I would like to comment on my objections to the proposed L   | ocal Development Plan with particular emphasis on the building of 100 houses off the St Athan Road.  |   |
|  | ent is outside the settlement boundary of Cowbridge. 35% of these houses are to be affordable housin. The Council should preserve greenfield sites and build on brownfield sites. Why have the Council gran or affordable housing if this is the case. |   |
| Also the infrastructure of Cowbridge is such that it cannot co   | ppe with any more traffic, school intake, emergency service provision is limited and becoming even mo  | re so, the roads.   |
| If this is passed, it is the thin end of the wedge and they will   | build next on the three fields and any other green field sites.  |   |
| 3f - Please outline the changes you wish to see made to the Dep  | osit Plan to make it sound (if relevant)   |   |
| 4b - If you wish to speak, please confirm which part of your representations.                                | sentation you wish to speak to the inspector about and why they consider it be necessary to speak at   | the hearing -   |

(ordered by Representation ID No.)

| Representor ID and details: 4093/DP1 M.Hutcheson                 |  |                          |                                      |                         |   |   |
|--|--|--------------------------|--------------------------------------|-------------------------|---|---|
| Date LodgedStatusPetition and No.Supporting Evidence30/03/2012M0 | Additional SA SEA                      |                          | Rep format:<br>Letter                |                         | comments to be consiere a hearing session of Public | d by 'written representations' or do c examination? |
| 2a - Do you consider the LDP is Sound? Unanswered                | ,                                      |                          | does not not meet or<br>P2 - Unanswe | ` '                     | ındness, please indicate v                          | vhich test(s) that it fails.                        |
|  | Consistency Tests -                    | C1 - Unanswered          | C2 - Unanswe                         | ered C3 - Unanswer      | ed C4 - Unanswered                                  | d   |
|  | Coherence and Effective                | veness Tests - CE1 -     | Unanswered Cl                        | E2 - Unanswered CI      | E3 - Unanswered CE4                                 | 4 - Unanswered                                      |
| 3a - Which part of the Deposit Plan are you commenting on?       | Policy Number:<br>MG2(19). MG2(20)     | Paragraph<br>            |                                      | roposal Map:            | Constrain   | nts Map Appendices:                                 |
| 3b - Do you wish to see any changes made to the Deposit Plan     | as a result of your repre              | esentation? Unanswe      | ered (If "N                          | No" or "Unanswered" - g | o to 3d)  |   |
| 3c - What changes would like to see made to the Deposit Plan     | ? New Policy:<br>Unanswered<br>Notes:  |                          | New Paragraph:<br>Jnanswered         |                         | New Or Amended Site: 0 Unanswered                   | Other (see Notes):<br>Unanswered                    |
| 3d - If your representation relates to a new, deleted or amende  | ed site, did you submit the Site Name: | ne site as a Candidate S | Site? Unanswered                     | (If "Yes", please o     | give the Candidate Site Na<br>Site Reference:       | ame and reference if known)                         |

3e - Please set out your representation below:

As a resident of Dinas Powys I wish to express my concerns re. the implications of the effect that the proposed additional housing would have on the local highways network.

In Dinas Powys it is proposed that a minimum of 400 addition houses will be built on the St Cyres annexe and Caerleon Road, Both sites are on the Murch side of the community which is served by only two access points to the main road [A4055]. Both these junctions, namely the Infants School traffic lights at Murch Bridge and Cross Common Road at its junction with the A4055 are either at capacity or structurally suspect.

The 400 houses would generate between 600 to 800 additional cars in both directions, particularly at peak times. The additional traffic would have a profound and adverse impact on the community as the existing roads are under great pressure now.

Further, I am concerned that there have not been any proposed extra community facilities of substance. A local church is in desperate need of a permanent base, the local sporting facilities are not adequate for the present demand and medical services are restricted due to the limitations of space at the Dinas Powys Surgery premises on Cardiff Road.

There appears to be no serious consideration having been given to other views as to the future possible use of St Cyres Annexe, Murch Road. It is worth noting that the school buildings are in good condition although in need of a little investment. To simply seek to tear down the school without any reference to the community needs would be a shameful waste. I also have concerns regarding the capacity of the local schools to accommodate the extra pupils due to the additional houses.

Then there is the wider consideration of the Plan. Up to 10,000 additional houses are planned, many in the south east area of the Vale, e.g. 2,000 units already having been approved at the Waterfront, Barry.

Much of this traffic will be funnelled through Dinas Powys and join the ever lengthening queues leading to and from the Merrie Harrier. The proposals in Sully, Penarth, Lavernock and the land adjacent St Josephs' School, Sully Road will only add to the existing congestion at this junction.

Already the air pollution levels are excessive. The Nitrogen Dioxide [N02] levels are recorded as being 43.8 units with the maximum recommended level being 40 units along Cardiff Road, Eastbrook. An increase in vehicles, particularly standing traffic, would exacerbate the situation. The level of other emissions such as CO (carbon monoxide) and Particulates [PM105] are not available but need clarifying

The Deposit plan does not indicate what measures will be taken to encourage the availability and use of public transport. I understand that there is a serious lack of rolling stock in Wales and providing extra trains will be a major challenge. Additional buses would simply be caught up in the traffic chaos the extra housing would cause.

It is essential that major highway infrastructure improvements are made BEFORE hundreds of additional housing could even be considered.

(ordered by Representation ID No.)

Representor ID and details: 4093/DP1 M.Hutcheson

I can corroborate all the information in the letter as I live on Cardiff Road. I really do question the integrity of the people who draw up plans for all this housing- they obviously do not live here and they should be more forward thinking and realistic. More thought should be given to the health and safety of the residents in the Vale. Why not try renovating empty properties- there are plenty to be had all over the Vale!

3f - Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)

4b - If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -



(ordered by Representation ID No.)

| Representor ID and details: 4094/DP1 Mr & Mrs Truran   |  |                          |                              |                                |  |                                 |                  |
|--|--|--------------------------|------------------------------|--------------------------------|--|---------------------------------|------------------|
| Date Lodged     Status     Petition and No.     Supporting Evidence       30/03/2012     M     0 | Additional SA SEA                      |                          | Rep format:<br>Letter        | , ,                            | our comments to be con at a hearing session of F | ,                               | •                |
| 2a - Do you consider the LDP is Sound? Unanswered  | Procedural Tests -                     | P1 - Unanswered          | P2 - Unansv                  | vered                          | soundness, please indic                          |                                 | that it fails.   |
|  | Coherence and Effecti                  | veness Tests - CE1 -     | Unanswered                   | CE2 - Unanswered               | CE3 - Unanswered                                 | CE4 - Unanswer                  | ed               |
| 3a - Which part of the Deposit Plan are you commenting on?                                       | Policy Number:<br>MG2(33)              | <u>Paragraph</u><br>     |                              | Proposal Map:                  | <u>Cons</u><br>                                  | straints Map                    | Appendices:      |
| 3b - Do you wish to see any changes made to the Deposit Plan                                     | as a result of your repr               | esentation? Unansw       | ered (If                     | "No" or "Unanswered            | " - go to 3d)                                    |                                 |                  |
| 3c - What changes would like to see made to the Deposit Plan?                                    | ? New Policy:<br>Unanswered<br>Notes:  |                          | New Paragraph:<br>Unanswered | Amended Paragrap<br>Unanswered | h: New Or Amended Si<br>Unanswered               | te: Other (see No<br>Unanswered | otes):           |
| 3d - If your representation relates to a new, deleted or amende                                  | ed site, did you submit the Site Name: | ne site as a Candidate S | Site? Unanswere              | ed (If "Yes", plea             | se give the Candidate Si<br>Site Reference       |                                 | erence if known) |
| 3a - Please set out your representation below:   |  |                          |                              |                                |  |                                 |                  |

Re LDP 2011 - 2026. The St. Nicholas Site Number MG2 (33).

As a residents of the village for the past 35 years. We would like to make a representation against the suitability of the proposed inclusion of the site MG2 (33) in the LDP.

Since 1976 the A48 which serves as a main arterial route to Cardiff from Cowbridge and outlying villages has seen an enormous increase in traffic. The developments at Culverhouse Cross have added to the A48 problems causing serious congestion on the A48 and bottlenecks at Culverhouse/Tesco lights and roundabout.

Duffryn House and gardens which is accessed via St. Nicholas has recently come into the National Trust Portfolio. Their declared projected aim is to increase Annual visitors to 250,000. If this were to be achieved this would itself put a great strain on the A48 without the further effect of site MG2(33).

The Council's Highway Engineers have advised that access from inside the village via Ger-y-llan is not appropriate to accommodate development. Planning permission was turned down by the Council in 1988 and 1991 on part of the proposed plot.

Any development on this site would necessitate a new junction onto and off the A48. This together with an increased volume of cars from the development going to Cardiff or Cowbridge would have a considerable effect on the traffic flow especially at peak times. The A48 is still recognised as the main artery West if the M4 needs to have traffic diverted. When this occurs, as it has, near gridlock ensues.

The proposed development conflicts with the Council's policy (MG7) for residential development within Minor Rural Settlements.

Any proposed development on this relative scale would overwhelm the North side of the village. It currently has 48 houses of mixed types and styles. This would be increased by over 50% with a total 33% addition to the village as a whole. The dense development of at least 8 houses per acre, including roads and pavements is totally out of character with a Conservation Area village. The Council acknowledge that a major enhancement of Utilities will probably have to be undertaken to accommodate a

development on this scale relative to the existing village. If this is so then the two lane A48 would have considerable disruption to traffic flow.

It is an old rural village with few or no modern amenities. Those we have are often stretched to service the current inhabitants. High Speed Broadband promised by Central Government is presently a dream as we are served by the small Peterston exchange which is not due for an upgrade in the near future. BT advertise a download speed of 20 mbs and with Infinity a speed of 40mbs. We currently receive a maximum of 2 mbs.

Objective 3 in the Vale's Local Development Plan- "To reduce the need for the Vale of Glamorgan residents to travel to meet their daily needs and enabling greater access to sustainable forms of transport". The

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Representor ID and details: 4094/DP1 Mr & Mrs Truran

village has no shop, post office, doctor's surgery, nursery, restaurant. All of these will require frequent short car journeys contrary to councils stated policy. There is no rail link the closest being in Cardiff. It is served by an expensive half hourly bus service to Cardiff and Cowbridge. The two mile journey to Culverhouse Cross Tesco our nearest shop is currently £5.60 return per adult.

St Nicholas is an area of architectural and historic interest which would be visually altered it its farmland approach from Cardiff was developed. This is a Greenfield site which is currently stopping the encroachment into the open countryside. It protects the rural character of the Vale and could start the process of the erosion of the green belt separating the Vale from Cardiff.

Objective 4 in the Vale's Local Development Plan. "To protect and enhance the Vale of Glamorgan's historic, built and natural environment."

The inclusion of MG2 (33) in the LDP does not adhere to these principles. The taking of farmland to extend is an intrusion into the natural environment when there are 'brown land sites' ready for regeneration available. Over countless years the sympathetic and responsible planning granted by previous Committees has ensured that Objective 4 is available for the current committee to uphold and pass to future generations.

The heritage and history within St. Nicholas has been handed down from generation to generation. Who are we in the 21st Century to take it upon ourselves to make such a drastic decision to implement MG2(33) for future generations, to visit, look and say why?

- 3f Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
- 4b If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -

| Representor ID and details: 4095/DP1 E R Jones  |   |  |  |
|---|---|--|--|
| Date Lodged     Status     Petition and No.     Supporting Evidence       30/03/2012     M     0  | Additional SA SEA   |  | be consiered by 'written representations' or do sion of Public examination? Written  |
| •   | 2b - If you think that the Plan is unsound and d<br>Procedural Tests - P1 - Unanswered  | oes not not meet one or more test(s) of soundness, plea P2 - Unanswered  | se indicate which test(s) that it fails.   |
|   | Consistency Tests - C1 - Unanswered   | C2 - Unanswered C3 - Unanswered C4 -   | Unanswered   |
|   | Coherence and Effectiveness Tests - CE1 - U   | Jnanswered CE2 - Yes CE3 - Unanswe   | red CE4 - Unanswered   |
| 3a - Which part of the Deposit Plan are you commenting on?  | Policy Number: Paragraph I  | Number: Proposal Map:  | Constraints Map Appendices:  |
|   |   | MG2(13)  |  |
| 3b - Do you wish to see any changes made to the Deposit Plan  | as a result of your representation? Yes   | (If "No" or "Unanswered" - go to 3d)   |  |
| 3c - What changes would like to see made to the Deposit Plan?   |   | lew Paragraph: Amended Paragraph: New Or Ame   | <del></del>  |
|   |   | Jnanswered Yes   | Unanswered   |
|   | Notes:  |  |  |
| 3d - If your representation relates to a new, deleted or amended  | d site, did you submit the site as a Candidate S<br>Site Name: Land to the west of St Athan Roac  |  | idate Site Name and reference if known) ference: 2446/CS1, 2446/CS2  |
| 3e - Please set out your representation below:  |   |  |  |
| 1) Landscape Impact- This is a Greenfield site outside the Cowbridge and in particular from the Thaw Valley. 2) Access Issues- There are access issues, if a secondary too narrow to cope with more traffic including just slightly for 3) Sewerage Works- There is a lack of capacity at these we 4) Special landscape area- This site is part of a Special La 5) Impact on Cowbridge- 100 more houses mean 150 more exit) in Cowbridge such as the traffic lights on St Athan Ro 6) Cowbridge is unique- more houses will ruin the character 7) Public right of way footpath- This footpath is used and v | emergency access is required as Windmill Laurther up the hill by St Mary Church. There are orks and currently there are periodic smells, windscape Area which in the council's own words a cars which will add more pressure on local sead. | ne is too narrow. St Athan Road is also too narrow and emany accidents along this road without the increase in traich will only get worst if more houses are built.  Is in Policy MD1, "new development should not have an upervices, including chools, parking, medical services and controls." | ven if is realigned other sections of the road are affic.  nacceptable impact on special landscape areas" congestion- including at key entry points (and |
| 3f - Please outline the changes you wish to see made to the De<br>Have candidate site removed and include as a green wedge  |   | us.  |  |
| 4b - If you wish to speak, please confirm which part of your repr   | ······································  |  | the hearing -  |

| Representor ID and details: 4096/DP1 Mrs Pamela Evan  | IS   |  |  |  |  |  |   |
|---|--|--|--|--|--|--|---|
| Date Lodged     Status     Petition and No.     Supporting Evidence       30/03/2012     M     0  | Additional SA SEA  |  | Rep format:<br>Comment form                                | · · · · · · · · · · · · · · · · · · ·                                      | your comments to be at a hearing session                                 | •  | representations' or do on? Written                    |
| 2a - Do you consider the LDP is Sound? Unsound  | 2b - If you think that th<br>Procedural Tests -                                  | e Plan is unsound and d<br>P1 - Unanswered   | oes not not meet<br>P2 - Unansv                            | ` '  | f soundness, please ir   | ndicate which test(s)  | that it fails.  |
|   | Consistency Tests -  | C1 - Unanswered  | C2 - Unansv  | wered C3 - Unans   | swered C4 - Una  | answered   |   |
|   | Coherence and Effecti  | veness Tests - CE1 - l   | Jnanswered   | CE2 - Yes  | CE3 - Unanswered   | CE4 - Unanswe  | red   |
| 3a - Which part of the Deposit Plan are you commenting on?  | Policy Number:   | Paragraph I  | Number:  | Proposal Map:  | <u>C</u>   | Constraints Map  | Appendices:   |
|   |  |  |  | MG2(13)  |  |  |   |
| 3b - Do you wish to see any changes made to the Deposit Plan  | as a result of your repr   | resentation? Yes   | (If  | "No" or "Unanswered  | " - go to 3d)  |  |   |
| 3c - What changes would like to see made to the Deposit Plan?   | ? New Policy:<br>Unanswered  |  | lew Paragraph:<br>Inanswered                               | Amended Paragra<br>Unanswered  | ph: New Or Amender<br>Yes  | d Site: Other (see N<br>Unanswered                                   | <del></del>   |
|   | Notes:   |  |  |  |  |  |   |
| 3d - If your representation relates to a new, deleted or amende   |  | he site as a Candidate S<br>rest of St Athan Road Lla                              |  | ` '  | ase give the Candidat<br>a Site Refere                                   | e Site Name and refe<br>nce: 2446/CS1, 244                           | ,   |
| 3e - Please set out your representation below:  |  |  |  |  |  |  |   |
| I wish to object to the proposals to build on the land to the Cowbridge, parking in the centre is a problem now and if a longer come into Cowbridge to shop because of the difficult quite hazardous due to inconsiderate parking. Traffic in Burth With all the extra development planned for Cowbridge it is sprawl of houses on this beautiful green site. | and when the cattle mai<br>ulty with parking. Parkin<br>rookfield Park Road is t | rket is developed and we<br>ng is also a problem durir<br>bound to increase as car | lose the parking<br>ng term time whe<br>s will cut through | there, it is hard to see<br>n parents park on the<br>to access the St Atha | e where all the cars wi<br>Broadway, Brookfield<br>n Road or from the St | Il park. I already kno<br>Park Road and St Jo<br>Athan Road to the E | w of people who no ohns Close and it can be Broadway. |
| 3f - Please outline the changes you wish to see made to the D   | eposit Plan to make it s   | sound (if relevant)  |  |  |  |  |   |
| To have candidate site removed and include as a green w   | redge to prevent further   | development considerat   | tions.   |  |  |  |   |
| 4b - If you wish to speak, please confirm which part of your rep  | presentation you wish to   | speak to the inspector a   | about and why th   | ey consider it be nece   | ssary to speak at the  | hearing -  |   |

| Representor ID and details: 4097/DP1 Mr and Mrs Wakel   | у  |
|---|--|
| Date Lodged     Status     Petition and No.     Supporting Evidence       30/03/2012     M     0  | Additional SA SEA Rep format: 4a - do you want your comments to be consiered by 'written representations' or do you want to speak at a hearing session of Public examination?  |
|   | 2b - If you think that the Plan is unsound and does not not meet one or more test(s) of soundness, please indicate which test(s) that it fails.  Procedural Tests - P1 - Unanswered P2 - Unanswered  Consistency Tests - C1 - Unanswered C2 - Unanswered C3 - Unanswered C4 - Unanswered  Coherence and Effectiveness Tests - CE1 - Unanswered CE2 - Unanswered CE3 - Unanswered CE4 - Unanswered  |
| · · · · · ·   | Policy Number:     Paragraph Number:     Proposal Map:     Constraints Map     Appendices:       MG2(19).     MG2(20).   |
| 3b - Do you wish to see any changes made to the Deposit Plan  |  |
| 3c - What changes would like to see made to the Deposit Plan?   |  |
| •   | d site, did you submit the site as a Candidate Site? Unanswered (If "Yes", please give the Candidate Site Name and reference if known) Site Name:  |
| In Dinas Powys it is proposed that a minimum of 400 addit directions, particularly at peak times. The additional traffic  To add to that there are already 2000 houses approved at drive through Dinas Powys, using both the main road and is Dinas Powys expected to take?  As it is, residents within the older part of the Village are already Pen-y-Turnpike. Theses roads are subjected to strean particularly standing traffic, would exacerbate the potential Further, I am concerned that there have not been any properticularly standing and medical services are restricted duting the present demand and medical services are restricted duting will be a major challenge. Additional buses would sirtly is essential that major highway infrastructure improvements. | Ins regarding the implications of the effect that the proposed additional housing would have on the local highways network.  It is inevitable that many of the additional vehicles arising from that development will also through the village centre, down Mill Road and up Pen-y-turnpike. St. Andrews Road and Britway Road will also be affected. How much more traffic eady affected at present by the amount of traffic coming from the Barry direction that travels on the alternative route through Station Road, Mill Road as of cars, particularly at peak times. Michaelston-le-Pit would also be affected at its junction with the Pen-y-Turnpike Road. An increase in vehicles, |
| 3f - Please outline the changes you wish to see made to the De  | posit Plan to make it sound (if relevant)  |
| 4b - If you wish to speak, please confirm which part of your rep  | resentation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -   |

(ordered by Representation ID No.)

| Representor ID and details: 4098/DP1 Mr David Brook C            | BE                                    |                         |                                 |                             |   |                                 |                  |
|--|---------------------------------------|-------------------------|---------------------------------|-----------------------------|---|---------------------------------|------------------|
| Date LodgedStatusPetition and No.Supporting Evidence30/03/2012M0 | Additional SA SEA                     |                         | Rep format:<br>Letter           |                             | your comments to be con at a hearing session of I |                                 |                  |
| 2a - Do you consider the LDP is Sound? Unanswered                | •                                     |                         | does not not meet<br>P2 - Unans | ` '                         | f soundness, please indic                         | cate which test(s)              | that it fails.   |
|  | Consistency Tests -                   | C1 - Unanswered         | C2 - Unans                      | wered C3 - Unans            | swered C4 - Unansv                                | wered                           |                  |
|  | Coherence and Effect                  | tiveness Tests - CE1 -  | Unanswered                      | CE2 - Unanswered            | CE3 - Unanswered                                  | CE4 - Unanswei                  | red              |
| 3a - Which part of the Deposit Plan are you commenting on?       | Policy Number:                        | <u>Paragraph</u>        | Number:                         | Proposal Map:               | Cons  | straints Map                    | Appendices:      |
|  | MG2(27)                               |                         |                                 |                             |   |                                 |                  |
| 3b - Do you wish to see any changes made to the Deposit Plan     | as a result of your rep               | resentation? Unansw     | rered (If                       | "No" or "Unanswered         | " - go to 3d)                                     |                                 |                  |
| 3c - What changes would like to see made to the Deposit Plan     | ? <u>New Policy:</u><br>Unanswered    |                         | New Paragraph:<br>Unanswered    | Amended Paragray Unanswered | ph: New Or Amended Si<br>Unanswered               | ite: Other (see N<br>Unanswered | otes):           |
|  | Notes:                                |                         |                                 |                             |   |                                 |                  |
| 3d - If your representation relates to a new, deleted or amende  | ed site, did you submit of Site Name: | the site as a Candidate | Site? Unanswer                  | ed (If "Yes", plea          | ase give the Candidate Si<br>Site Reference       |                                 | erence if known) |
|  |                                       |                         | <del></del>                     | <del>-</del>                |   |                                 |                  |

3e - Please set out your representation below:

Objection to the inclusion in the LDP of Site MG2(27) - Land adjacent to Court Close Aberthin

Objections are

1. Greenfield site outside the natural boundaries of Aberthin

Existing housing on this side of Aberthin is contained within a line running from Court Farm to Skaife House. The proposed development would form an unsightly extension rather than blending in with existing housing. This would detract from the appearance of the village when viewed from Stalling Down.

#### 2. Road Access

The LDP refers to "Potential access from Court Close"

This would involve construction and eventually, residential traffic coming from the A4222 along Whitefields Farm Lane then into Court Close. Although the LDP refers to "Highways improvements at the junction of the Whitefields Farm Lane and Court Close" this totally ignores the fact that Whitefield Farm Lane is only 3.6 metres wide between the The Orchard and Downs View and 3.7 metres between The Orchard and Court Close.

Access to the proposed site from Whitefields Farm Lane itself is impossible as it is even narrower between Great House and Court farm. This would mean that any traffic involved in construction, materials and removal of spoil (the site is sloping and would involve significant landscaping) would have to use Court Close which is also below the minimum standard for such traffic.

#### 3. Road Safety and the A4222

The junction with the A4222 by the hare and Hounds is very busy, particularly at morning and evening rush hours. Traffic from the direction of Ystradowen heading for Cowbridge or using Penylan Hill as a shortcut to the A48 is heavy at these time and turning out from Whitefields Farm Land is difficult due to the fact that many drivers exceed the speed limit. Efforts by SW Police have caught a few drivers but this remains a problem. Warning speed indicators signs are proposed but unlikely to solve the problem.

The proposed development would increase the number of houses where residents would have to use this junction by 35%. The volume of construction traffic would also mean an unacceptable risk of serious accidents.

(ordered by Representation ID No.)

Representor ID and details: 4098/DP1 Mr David Brook OBE

It must be remembered that a highways inspector has looked at the road adjacent to this junction with the past year and deemed it was too dangerous to install a pedestrian crossing near the bus stop adjacent to Maes Lloi.

#### 4. Drainage

Water from the fields behind the proposed site and from the site itself runs down Whitefields Farm Lane and Court Close and has caused flooding by the Hare and Hounds at the junction with A4222. This will increase if agricultural land is built on. This is surface water at times of heavy rain, which we experience regularly and it usually mare that normal roadside drains can cope with.

#### 5. Previous Planning Applications

It is worth remembering that in 1981 and application for 10 houses on this site was refused. Application 1981/00660 refers. In an appeal against refusal the Welsh Office Inspector cited (i) the sloping site outside of the natural line of the village, (ii) the view of the village from Stalling Down; and (iii) the junction with the A4222 among reasons for upholding the refusal.

The Inspector described the A4222 junction as "comparatively dangerous". This was 28 years ago and traffic has increased very significantly in the interval.

- 3f Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
- 4b If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -

| Representor ID and details: 4099/DP1 E D Coombs   |   |  |   |   |
|---|---|--|---|---|
| Date Lodged     Status     Petition and No.     Supporting Evidence       29/04/2012     M     □     0     □          | Additional SA SEA   |  | comments to be consiered by 'written representations' or do hearing session of Public examination? Unanswered |   |
| 2a - Do you consider the LDP is Sound? Unsound  | 2b - If you think that the Plan is unsound and Procedural Tests - P1 - Unanswered Consistency Tests - C1 - Unanswered Coherence and Effectiveness Tests - CE1 - | P2 - Unanswered C2 - Unanswered C3 - Unanswer  | ndness, please indicate which test(s) that it fails.  ed C4 - Unanswered  =3 - Unanswered CE4 - Unanswered    | - |
| 3a - Which part of the Deposit Plan are you commenting on?  | Policy Number: Paragraph MG2(16)  | Number: Proposal Map:  | Constraints Map Appendices:   |   |
| 3b - Do you wish to see any changes made to the Deposit Plan  | as a result of your representation? Unansw  | rered (If "No" or "Unanswered" - g   | o to 3d)  |   |
| 3c - What changes would like to see made to the Deposit Plan'   | Unanswered Unanswered   | New Paragraph: Amended Paragraph: Unanswered Unanswered                                    | New Or Amended Site: Other (see Notes): Unanswered Unanswered   |   |
|   | Notes:  |  |   |   |
| 3d - If your representation relates to a new, deleted or amende   | ed site, did you submit the site as a Candidate<br>Site Name:   | Site? Unanswered (If "Yes", please of  | give the Candidate Site Name and reference if known)<br>Site Reference:                                       |   |
| 3e - Please set out your representation below:  |   |  |   |   |
| We feel the Cosmeston site is very unsound for very man   | y reasons.  |  |   |   |
| The traffic on Lavernock Road is at saturation point, atten standstill from Cosmeston Drive right up to Westbourne F  |   |  |   |   |
| Penarth and its services are already stretched to the limit   | Parking in the town is virtually impossible. T  | he town cannot sustain the influx of population  | n.  |   |
| The Cosmeston site is an area of outstanding beauty with stables should be incorporated into the Cosmeston Count      | a coastal path. It is <mark>al</mark> so a nature reserve givi<br>ry Park. Many rare birds have been seen here  | ng a home to foxes, bats, voles etc. – this are this year which has brought very many bird | ea should be preserved at all costs and along with the riding watchers to the area.                           |   |
| The view from Cosmeston Country Park is spectacular ar  | d looks over <mark>farmland, this shoul</mark> d be maintain  | ed – a housing development would not enha  | nce the beauty of the lakes.  |   |
| Cosmeston has seen over the last two weeks a huge num   | ber of visitors – this is good, however it has be   | een a traffic nightmare for the locals – this m  | ust not be made any worse.  |   |
| There are very many houses for sale in the Penarth area very poor effect on local residents, the town as a whole, the |   | ng is needed so badly an area should be four   | d that does not desecrate the countryside, which will have a  |   |
| 3f - Please outline the changes you wish to see made to the D   | eposit Plan to make it sound (if relevant)  |  |   |   |
| We wish to see the Cosmeston site abandoned, so an are Cosmeston Park/Nature Reserve.                                 | ea of great natural beauty and a wildlife haven   | plus a holiday area is left undisturbed. This  | area including the coastal park should be included in the   |   |
| 4b - If you wish to speak, please confirm which part of your rep  | presentation you wish to speak to the inspector   | about and why they consider it be necessar   | y to speak at the hearing -   |   |

| Representor               | D and d               | letails:             | 4100/D          | P1 Mrs K.B.Dwek                                      |   |  |                                  |  |                |  |                   |
|---------------------------|-----------------------|----------------------|-----------------|--|---|--|----------------------------------|--|----------------|--|-------------------|
| Date Lodged<br>30/03/2012 | Status<br>M           | Petitio              | on and No.<br>0 | Supporting Evidence                                  | Additional SA SEA                                 |  | Rep format:<br>Comment forn      | ·  |                | s to be consiered by 'writte<br>session of Public examinat |                   |
| 2a - Do you co            | nsider tl             | he LDP               | s Sound?        |  | 2b - If you think that the Procedural Tests -     | ne Plan is unsound and P1 - Unanswered | d does not not mee<br>P2 - Unans | ( )                                      | f soundness, p | please indicate which test(s                               | s) that it fails. |
|                           |                       |                      |                 |  | Consistency Tests -                               | C1 - Unanswered                        | C2 - Unans                       | swered C3 - Unan                         | swered C       | 4 - Unanswered   |                   |
|                           |                       |                      |                 |  | Coherence and Effecti                             | iveness Tests - CE1                    | - Unanswered                     | CE2 - Yes                                | CE3 - Unan     | swered CE4 - Unansw  | ered              |
| 3a - Which pa             | rt of the             | Deposit              | Plan are y      | ou commenting on?                                    | Policy Number:                                    | Paragrap                               | h Number:                        | Proposal Map:                            |                | Constraints Map  | Appendices:       |
|                           |                       |                      |                 |  | MG2(13)   |  |                                  | MG2(13)                                  |                |  |                   |
| 3b - Do you wi            | sh to se              | e any ch             | anges ma        | de to the Deposit Plan                               | as a result of your rep                           | resentation? Yes                       | (I                               | f "No" or "Unanswered                    | d" - go to 3d) |  |                   |
| 3c - What cha             | nges wo               | uld like             | o see mad       | de to the Deposit Plan?                              | New Policy:<br>Unanswered                         | Amended Policy:<br>Unanswered          | New Paragraph:<br>Unanswered     | Amended Paragra Unanswered               | ph: New Or A   | mended Site: Other (see<br>Unanswere                       | <del></del>       |
|                           |                       |                      |                 |  | Notes:  |  |                                  |  |                |  |                   |
| 3d - If your re           | presenta              | ation rela           | ates to a no    | ew, deleted or amende                                | ed site, did you submit t<br>Site Name: Land to w |  |                                  | (If "Yes", ple<br>to east of St Athan Ro | J              | andidate Site Name and re<br>Reference: 2446/CS1, 24       | ,                 |
|                           | ard to ar             | ea MG2               | (13)- a "Gı     | eenfield site"- the plan                             |   |  |                                  |  |                | lready very dangerous roa<br>ere to shop-which is bad ne   |                   |
| Regardin                  | g the ab<br>for the e | ove pla<br>Iderly (o | n MG(13) d      | on the LDP if elderly pe<br>or the elderly) e.g. sma |   | e" the site would be co                |                                  |  |                | t into Cowbridge. What Co                                  |                   |
| 4b - If you wis           | sh to spe             | ak, plea             | se confirm      | which part of your rec                               | presentation you wish to                          | speak to the inspecto                  | or about and why th              | hev consider it be nece                  | ssarv to speal | c at the hearing -   |                   |

| Representor ID and details: 4101/DP1 Jan Stephenson   |  |  |   |
|---|--|--|---|
| Date Lodged Status Petition and No. Supporting Evidence 29/03/2012 M 0  | Additional SA SEA  | <del></del>  | to be consiered by 'written representations' or do ession of Public examination? Unanswered |
| 2a - Do you consider the LDP is Sound? Unsound  | 2b - If you think that the Plan is unsound and do Procedural Tests - P1 - Unanswered | pes not not meet one or more test(s) of soundness, pl<br>P2 - Unanswered     |   |
|   | Consistency Tests - C1 - Unanswered  | C2 - Unanswered C3 - Unanswered C4   | - Unanswered  |
|   | Coherence and Effectiveness Tests - CE1 - U  | Inanswered CE2 - Unanswered CE3 - Unans                                      | wered CE4 - Unanswered  |
| 3a - Which part of the Deposit Plan are you commenting on?  | Policy Number: Paragraph N   | Number: Proposal Map:  | Constraints Map Appendices:   |
|   | MG2(16)  |  |   |
| 3b - Do you wish to see any changes made to the Deposit Plan  | as a result of your representation? Unanswer   | red (If "No" or "Unanswered" - go to 3d)                                     |   |
| 3c - What changes would like to see made to the Deposit Plan?   |  | ew Paragraph: Amended Paragraph: New Or Ar<br>nanswered Unanswered Unanswere |   |
|   | Notes:   |  |   |
| 3d - If your representation relates to a new, deleted or amende   | d site, did you submit the site as a Candidate Si<br>Site Name:                      | ` ' '  | ndidate Site Name and reference if known)<br>Reference:                                     |
| 3e - Please set out your representation below:  |  |  |   |
| We feel the Cosmeston site is very unsound for very man   | y reasons.   |  |   |
| The traffic on Lavernock Road is at saturation point, atten standstill from Cosmeston Drive right up to Westbourne R  |  |  |   |
| Penarth and its services are already stretched to the limit. The Cosmeston site is an area of outstanding beauty with stables should be incorporated into the Cosmeston Count | a coastal path. It is also a nature reserve giving                                   | g a home to foxes, bats, voles etc this area should                          |   |
| The view from Cosmeston Country Park is spectacular ar  | d looks ov <mark>er farmland,</mark> this sho <mark>ul</mark> d be maintained        | d – a housing development would not enhance the be                           | auty of the lakes.  |
| Cosmeston has seen over the last two weeks a huge num   | ber of visitors - this is good, however it has bee                                   | n a traffic nightmare for the locals – this must not be                      | made any worse.   |
| There are very many houses for sale in the Penarth area very poor effect on local residents, the town as a whole, the   |  | is needed so badly an area should be found that does                         | s not desecrate the countryside, which will have a  |
| 3f - Please outline the changes you wish to see made to the D We wish to see the Cosmeston site abandoned, so an are Cosmeston Park/Nature Reserve.                           | •  | us a holiday area is left undisturbed. This area includ                      | ing the coastal park should be included in the  |
| 4b - If you wish to speak, please confirm which part of your rep  | resentation you wish to speak to the inspector a                                     | about and why they consider it be necessary to speak                         | at the hearing -  |

| Representor ID and details: 4102/DP1 Diana Pike  |  |   |   |
|--|--|---|---|
| Date LodgedStatusPetition and No.Supporting Evidence29/03/2012M0   | Additional SA SEA  |   | nts to be consiered by 'written representations' or do session of Public examination? |
| 2a - Do you consider the LDP is Sound? Unsound   | 2b - If you think that the Plan is unsound and of Procedural Tests - P1 - Unanswered | does not not meet one or more test(s) of soundness, P2 - Unanswered   |   |
|  | Consistency Tests - C1 - Unanswered  | C2 - Unanswered C3 - Unanswered                                       | C4 - Unanswered   |
|  | Coherence and Effectiveness Tests - CE1 -  | Unanswered CE2 - Unanswered CE3 - Una                                 | nswered CE4 - Unanswered  |
| 3a - Which part of the Deposit Plan are you commenting on?   | Policy Number: Paragraph   | Number: Proposal Map:   | Constraints Map Appendices:   |
|  | MG2(16)  |   |   |
| 3b - Do you wish to see any changes made to the Deposit Plan   | as a result of your representation? Unanswe  | ered (If "No" or "Unanswered" - go to 3d)                             |   |
| 3c - What changes would like to see made to the Deposit Plan'  |  | New Paragraph: Amended Paragraph: New Or Unanswered Unanswered Unansw | Amended Site: Other (see Notes): ered Unanswered                                      |
|  | Notes:   |   |   |
| 3d - If your representation relates to a new, deleted or amende  | ed site, did you submit the site as a Candidate S<br>Site Name:                      |   | Candidate Site Name and reference if known) e Reference:                              |
| 3e - Please set out your representation below: We feel the Cosmeston site is very unsound for very man   | y reasons.   |   |   |
| The traffic on Lavernock Road is at saturation point, atten standstill from Cosmeston Drive right up to Westbourne F   |  |   |   |
| Penarth and its services are already stretched to the limit<br>The Cosmeston site is an area of outstanding beauty with<br>stables should be incorporated into the Cosmeston Count | a coastal path. It is also a nature reserve givir                                    | ng a home to foxes, bats, voles etc. – this area shoul                |   |
| The view from Cosmeston Country Park is spectacular ar   | nd looks over farmland, this should be maintaine                                     | ed – a housing development would not enhance the                      | beauty of the lakes.  |
| Cosmeston has seen over the last two weeks a huge num  | nber of visitors – this is good, however it has be                                   | een a traffic nightmare for the locals – this must not b              | e made any worse.   |
| There are very many houses for sale in the Penarth area very poor effect on local residents, the town as a whole, the  |  | g is needed so badly an area should be found that do                  | pes not desecrate the countryside, which will have a                                  |
| 3f - Please outline the changes you wish to see made to the D<br>We wish to see the Cosmeston site abandoned, so an are<br>Cosmeston Park/Nature reserve.                          | · · · · · · · · · · · · · · · · · · ·  | olus a holiday area is left undisturbed. This area incl               | uding the coastal park should be included in the                                      |
| 4b - If you wish to speak, please confirm which part of your rep   | presentation you wish to speak to the inspector                                      | about and why they consider it be necessary to spea                   | ak at the hearing -   |

(ordered by Representation ID No.)

| Representor ID and details: 4103/DP1 C & E Waite   |   |                               |                              |                               |   |                      |                            |
|--|---|-------------------------------|------------------------------|-------------------------------|---|----------------------|----------------------------|
| Date Lodged     Status     Petition and No.     Supporting Evidence       30/03/2012     M     0 | Additional SA SEA                             |                               | Rep format:<br>Letter        |                               | your comments to be or<br>at a hearing session of | •                    | representations' or do on? |
| 2a - Do you consider the LDP is Sound? Unanswered  | 2b - If you think that the Procedural Tests - |                               | does not not meet            | ` '                           | f soundness, please inc                           | dicate which test(s) | that it fails.             |
|  | Consistency Tests -                           | C1 - Unanswered               | C2 - Unansw                  | vered C3 - Unan               | swered C4 - Unar                                  | nswered              |                            |
|  | Coherence and Effective                       | veness Tests - CE1            | - Unanswered (               | CE2 - Unanswered              | CE3 - Unanswered                                  | CE4 - Unanswe        | ered                       |
| 3a - Which part of the Deposit Plan are you commenting on?                                       | Policy Number:<br>MG2(19). MG2(20)            |                               |                              | Proposal Map:                 | <u>Cc</u>   | onstraints Map       | Appendices:                |
| 3b - Do you wish to see any changes made to the Deposit Plan                                     | as a result of your repr                      | resentation? Unansv           | vered (If '                  | "No" or "Unanswered           | l" - go to 3d)                                    |                      |                            |
| 3c - What changes would like to see made to the Deposit Plan?                                    | New Policy:<br>Unanswered                     | Amended Policy:<br>Unanswered | New Paragraph:<br>Unanswered | Amended Paragra<br>Unanswered | ph: New Or Amended Unanswered                     | Site: Other (see N   | <del></del>                |
|  | Notes:  |                               |                              |                               |   |                      |                            |
| 3d - If your representation relates to a new, deleted or amende                                  | ed site, did you submit th<br>Site Name:      | he site as a Candidate        | Site? Unanswere              | ed (If "Yes", plea            | ase give the Candidate<br>Site Referen            |                      | erence if known)           |
|  |   |                               |                              |                               |   |                      |                            |

3e - Please set out your representation below:

As a resident of Dinas Powys I wish to express my concerns re, the implications of the effect that the proposed additional housing would have on the local highways network.

In Dinas Powys it is proposed that a minimum of 400 addition houses will be built on the St Cyres annexe and Caerleon Road, Both sites are on the Murch side of the community which is served by only two access points to the main road [A4055]. Both these junctions, namely the Infants School traffic lights at Murch Bridge and Cross Common Road at its junction with the A4055 are either at capacity or structurally suspect.

The 400 houses would generate between 600 to 800 additional cars in both directions, particularly at peak times. The additional traffic would have a profound and adverse impact on the community as the existing roads are under great pressure now.

Further, I am concerned that there have not been any proposed extra community facilities of substance. A local church is in desperate need of a permanent base, the local sporting facilities are not adequate for the present demand and medical services are restricted due to the limitations of space at the Dinas Powys Surgery premises on Cardiff Road.

There appears to be no serious consideration having been given to other views as to the future possible use of St Cyres Annexe, Murch Road. It is worth noting that the school buildings are in good condition although in need of a little investment. To simply seek to tear down the school without any reference to the community needs would be a shameful waste. I also have concerns regarding the capacity of the local schools to accommodate the extra pupils due to the additional houses.

Then there is the wider consideration of the Plan. Up to 10,000 additional houses are planned, many in the south east area of the Vale, e.g. 2,000 units already having been approved at the Waterfront, Barry.

Much of this traffic will be funnelled through Dinas Powys and join the ever lengthening queues leading to and from the Merrie Harrier. The proposals in Sully, Penarth, Lavernock and the land adjacent St Josephs' School, Sully Road will only add to the existing congestion at this junction.

Already the air pollution levels are excessive. The Nitrogen Dioxide [N02] levels are recorded as being 43.8 units with the maximum recommended level being 40 units along Cardiff Road, Eastbrook. An increase in vehicles, particularly standing traffic, would exacerbate the situation. The level of other emissions such as CO (carbon monoxide) and Particulates [PM105] are not available but need clarifying

The Deposit plan does not indicate what measures will be taken to encourage the availability and use of public transport. I understand that there is a serious lack of rolling stock in Wales and providing extra trains will be a major challenge. Additional buses would simply be caught up in the traffic chaos the extra housing would cause.

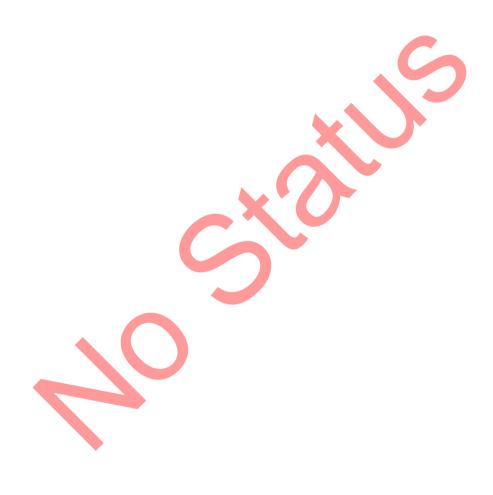
It is essential that major highway infrastructure improvements are made BEFORE hundreds of additional housing could even be considered.

(ordered by Representation ID No.)

Representor ID and details: 4103/DP1 C & E Waite

3f - Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)

4b - If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -



| Representor ID and details: 4104/DP1 D & S Davies   |   |  |                                  |
|---|---|--|----------------------------------|
| Date Lodged     Status     Petition and No.     Supporting Evidence       30/03/2012     M     □     0     □  | Additional SA SEA   | Rep format: 4a - do you want your comments to be consiere you want to speak at a hearing session of Publ | ,                                |
| 2a - Do you consider the LDP is Sound? Unsound  | 2b - If you think that the Plan is unsound and do Procedural Tests - P1 - Unanswered              | pes not not meet one or more test(s) of soundness, please indicate P2 - Unanswered                       | which test(s) that it fails.     |
|   | Consistency Tests - C1 - Unanswered   | C2 - Unanswered C3 - Unanswered C4 - Unanswere   | ed                               |
|   | Coherence and Effectiveness Tests - CE1 - U   | Inanswered CE2 - Unanswered CE3 - Unanswered CE  | 4 - Yes                          |
| 3a - Which part of the Deposit Plan are you commenting on?  | Policy Number: Paragraph N  | lumber: Proposal Map: Constrain  | nts Map Appendices:              |
|   | Other - Not Listed  |  | ••••                             |
| 3b - Do you wish to see any changes made to the Deposit Plan  | as a result of your representation? Yes   | (If "No" or "Unanswered" - go to 3d)   |                                  |
| 3c - What changes would like to see made to the Deposit Plan?   |   | ew Paragraph: Amended Paragraph: New Or Amended Site: nanswered Yes                                      | Other (see Notes):<br>Unanswered |
|   | Notes:  |  |                                  |
| 3d - If your representation relates to a new, deleted or amende   | d site, did you submit the site as a Candidate Sit<br>Site Name:                                  | (If "Yes", please give the Candidate Site N<br>Site Reference:   | lame and reference if known)     |
| 3e - Please set out your representation below:  |   |  |                                  |
| Land opposite St David's C/W School for development for The field is located on strategic highway with good access It does not have an unacceptable impact of the green were There is access to all amenities and within walking distantant | s, with boundary within the settlement of Colwinst<br>Ige and it is not in the Conservation Area. | ton.<br>Is or room for enlarging school. It also has no impact on character o                            | or setting of village.           |
| 3f - Please outline the changes you wish to see made to the D   | eposit Plan to make it sound (if relevant)  | ,  |                                  |
| 4b - If you wish to speak, please confirm which part of your rep  | resentation you wish to speak to the inspector a  | bout and why they consider it be necessary to speak at the hearing                                       | -<br> -                          |

| Representor ID and details: 4105/DP1 John Brian Davie  | S  |                                    |                                    |                                |                              |  |                          |
|--|--|------------------------------------|------------------------------------|--------------------------------|------------------------------|--|--------------------------|
| Date Lodged Status Petition and No. Supporting Evidence 30/03/2012 M 0   | Additional SA SEA  |                                    | Rep format:<br>Comment form        | ,                              |                              | be consiered by 'written ion of Public examination   |                          |
| 2a - Do you consider the LDP is Sound? Unsound   | 2b - If you think that the<br>Procedural Tests -<br>Consistency Tests -<br>Coherence and Effective | P1 - Unanswered<br>C1 - Unanswered | P2 - Unans<br>C2 - Unans           | ` '                            |                              | se indicate which test(s) Unanswered CE4 - Unanswere   |                          |
| 3a - Which part of the Deposit Plan are you commenting on?   | Policy Number:<br>MG2(11). MG12(11).   |                                    | n Number:                          | Proposal Map:<br>MG2(11)       | )                            | Constraints Map  | Appendices:              |
| 3b - Do you wish to see any changes made to the Deposit Plan   | as a result of your repre  | esentation? Yes                    | (If                                | "No" or "Unanswered            | - go to 3d)                  |  |                          |
| 3c - What changes would like to see made to the Deposit Plan   | ? New Policy:<br>Unanswered<br>Notes:  | Amended Policy:<br>Yes             | New Paragraph:<br>Unanswered       | Amended Paragrap<br>Unanswered | h: <u>New Or Amer</u><br>Yes | nded Site: Other (see Note of the Control of the Co | otes):                   |
| 3d - If your representation relates to a new, deleted or amende  | ed site, did you submit th<br>Site Name: Cowbridge   |                                    |                                    | · ' '                          | J                            | date Site Name and reference: 178/CS1 244  | ,                        |
| 3e - Please set out your representation below:<br>Policy MG2 (11) states that Cowbridge Cattle Market has                      | been allocated for resid   | ential development. T              | his is unsound and                 | l objected to on the gro       | unds that-                   |  |                          |
| The Cowbridge Cattle Market, which sells on average over   | er 500 head of sheep per   | r week, is trading succ            | ces <mark>sfu</mark> lly and suppo | orting the farming comr        | nunity of the Vale           | of Glamorgan and shoul   | d not be closed.         |
| On non market days the site is used for car and coach paramade within the LDP for the lost car and coach parking smarket town. |  |                                    |                                    |                                |                              |  |                          |
| Policies MG12 (11) and MG15 refer to a proposed site fo policy is objected to as being unsound.                                | r the replacement cattle   | market. This is a gree             | nfield site and prop               | posals are made within         | the LDP for its pu           | rchase and developmen  | t as a market. The       |
| 3f - Please outline the changes you wish to see made to the D Delete Policies MG2 (11), MG12(11) and MG15.                     | Peposit Plan to make it se   | ound (if relevant)                 |                                    |                                |                              |  |                          |
| An additional policy should be includiedupholding the con on the site to support the attractiveness of Cowbridge as            |  |                                    |                                    | Itural economy of the V        | ale of Glamorgan             | and the provision of imp   | roved parking facilities |
| 4b - If you wish to speak, please confirm which part of your re  | presentation you wish to   | speak to the inspecto              | r about and why th                 | ney consider it be neces       | ssary to speak at t          | the hearing -  |                          |

| Representor ID and details: 4106/DP1 Emma & Mark Ha   | all   |                           |                                 |                               |                        |   |   |
|---|---|---------------------------|---------------------------------|-------------------------------|------------------------|---|---|
| Date LodgedStatusPetition and No.Supporting Evidence30/03/2012M0  | Additional SA SEA   |                           | Rep format:<br>Comment form     | *                             |                        | be consiered by 'written<br>ion of Public examination | •                                       |
| 2a - Do you consider the LDP is Sound? Sound  | 2b - If you think that the Plan is unsound and does not not meet one or more test(s) of soundness, please indicate which test(s) that it fails.  Procedural Tests - P1 - Yes P2 - Yes |                           |                                 |                               |                        |   |   |
|   | Consistency Tests -   | C1 - Yes                  | C2 - Yes                        | C3 - Yes                      | C4 -                   | Unanswered  |   |
|   | Coherence and Effective   | veness Tests - CE1 -      | Yes                             | CE2 - Yes                     | CE3 - Yes              | CE4 - Yes   |   |
| 3a - Which part of the Deposit Plan are you commenting on?  | Policy Number:  | Paragraph                 | Number:                         | Proposal Map:                 |                        | Constraints Map                                       | Appendices:                             |
|   | MG2(28)   |                           |                                 | Land rear of So               | chool Colwinston       |   | Appendix 9 -<br>Supporting<br>Documents |
| 3b - Do you wish to see any changes made to the Deposit Plan  | as a result of your repre   | esentation? Yes           | (I                              | f "No" or "Unanswered         | l" - go to 3d)         |   |   |
| 3c - What changes would like to see made to the Deposit Plan  | ? New Policy:<br>Unanswered<br>Notes:   |                           | New Paragraph:<br>Unanswered    | Amended Paragra<br>Unanswered | ph: New Or Amer<br>Yes | nded Site: Other (see N<br>Unanswered                 | <del></del>                             |
| 3d - If your representation relates to a new, deleted or amende   | ed site, did you submit th<br>Site Name: Land rear  |                           | Site? Yes                       | (If "Yes", plea               | J                      | date Site Name and reference: 2513/CS1                | erence if known)                        |
| 3e - Please set out your representation below:  The village is not able to support that amount of extra traf                  | fic, sewerage and buildir   | ng. The area is also a fl | lo <mark>od</mark> zone. Loss o | of greenfields & country      | rside.                 |   |   |
| 3f - Please outline the changes you wish to see made to the D<br>Alternative sites should be considered. It will also have an |   |                           |                                 |                               |                        |   |   |
| 4b - If you wish to speak, please confirm which part of your re   | presentation you wish to  | speak to the inspector    | about and why th                | ney consider it be nece       | ssary to speak at t    | he hearing -  |   |

| Representor ID and details: 4106/DP2 Emma & Mark H   | all  |                           |                              |                            |                      |  |                   |
|--|--|---------------------------|------------------------------|----------------------------|----------------------|--|-------------------|
| Date Lodged     Status     Petition and No.     Supporting Evidence       30/03/2012     M     □     0     □             | Additional SA SEA  |                           | Rep format:<br>Comment form  |                            |                      | o be consiered by 'writte<br>ssion of Public examinati |                   |
| 2a - Do you consider the LDP is Sound? Unsound   | 2b - If you think that the Plan is unsound and does not not meet one or more test(s) of soundness, please indicate which test(s) that it fails.  Procedural Tests - P1 - Unanswered P2 - Yes |                           |                              |                            |                      |  |                   |
|  | Consistency Tests -  | C1 - Yes                  | C2 - Yes                     | C3 - Yes                   | C4                   | - Unanswered   |                   |
|  | Coherence and Effect   | tiveness Tests - CE1 -    | Yes                          | CE2 - Unanswered           | CE3 - Yes            | CE4 - Yes  |                   |
| 3a - Which part of the Deposit Plan are you commenting on?   | Policy Number:   | <u>Paragraph</u>          | Number:                      | Proposal Map:              |                      | Constraints Map  | Appendices:       |
|  | 49   | 7.11. 7.12                |                              |                            |                      |  |                   |
| 3b - Do you wish to see any changes made to the Deposit Pla  | n as a result of your rep  | oresentation? Yes         | (1                           | f "No" or "Unanswered      | d" - go to 3d)       |  |                   |
| 3c - What changes would like to see made to the Deposit Plan   | ? New Policy:<br>Unanswered  |                           | New Paragraph:<br>Unanswered | Amended Paragra Unanswered | ph: New Or Am<br>Yes | ended Site: Other (see Unanswere                       |                   |
|  | Notes:   |                           |                              |                            |                      |  |                   |
| 3d - If your representation relates to a new, deleted or amend   | ed site, did you submit<br>Site Name:  | the site as a Candidate S | Site? No                     | (If "Yes", ple             | ū                    | didate Site Name and re eference:                      | ference if known) |
| 3e - Please set out your representation below: Proposed use for residential land at Chapel Road, Broug                   | hton.  |                           |                              | <b>,</b>                   |                      |  |                   |
| Suitable site and within the settlement of the village.  |  |                           |                              |                            |                      |  |                   |
| Easy access for all vehicles.  |  |                           |                              |                            |                      |  |                   |
| Within walking distance of shops and bus stops.  |  |                           |                              |                            |                      |  |                   |
| Would provide housing for families without the loss of co  | mmunity facilities.  |                           |                              |                            |                      |  |                   |
| 3f - Please outline the changes you wish to see made to the I<br>There are a variation of houses on Chapel Road in sizes |  |                           | planning was on              | ce accepted.               |                      |  |                   |
| 4b - If you wish to speak, please confirm which part of your re  | presentation you wish  | to speak to the inspector | about and why the            | hev consider it be nece    | ssarv to speak a     | t the hearing -  |                   |

| Representor ID and details: 4106/DP3 Emma & Mark Ha  | II  |  |  |  |  |  |
|--|---|--|--|--|--|--|
| Date Lodged     Status     Petition and No.     Supporting Evidence       30/03/2012     M     □     0     □ |   | ormat: 4a - do you want your comments to be consiered by 'written representations' or do nent form you want to speak at a hearing session of Public examination? Written |  |  |  |  |
| 2a - Do you consider the LDP is Sound? Unsound   | 2b - If you think that the Plan is unsound and does not not meet one or more test(s) of soundness, please indicate which test(s) that it fails.  Procedural Tests - P1 - Unanswered P2 - Unanswered |  |  |  |  |  |
|  | Consistency Tests - C1 - Unanswered C2 - Coherence and Effectiveness Tests - CE1 - Unanswe  |  |  |  |  |  |
| 3a - Which part of the Deposit Plan are you commenting on?   | Policy Number: Paragraph Number: Other - Not Listed   | Proposal Map: Constraints Map Appendices:  |  |  |  |  |
| 3b - Do you wish to see any changes made to the Deposit Plan   | as a result of your representation? Yes   | (If "No" or "Unanswered" - go to 3d)   |  |  |  |  |
| 3c - What changes would like to see made to the Deposit Plan   | New Policy: Amended Policy: New Parace Unanswered Unanswered Unanswere Notes:   |  |  |  |  |  |
| 3d - If your representation relates to a new, deleted or amende  |   | (If "Yes", please give the Candidate Site Name and reference if known) Site Reference:   |  |  |  |  |
| 3e - Please set out your representation below: Land opposite school for development for houses 2076/C        | S1. Good access, within boundaries of village. Not in Co  | onservation Area. School does not have to alter field. No impact on character of village.  |  |  |  |  |
| 3f - Please outline the changes you wish to see made to the D  | eposit Plan to make it sound (if relevant)  |  |  |  |  |  |
| 4b - If you wish to speak, please confirm which part of your re  | presentation you wish to speak to the inspector about and   | d why they consider it be necessary to speak at the hearing -  |  |  |  |  |

| Representor ID and details: 4107/DP2 L & D Wilson  |  |   |   |                               |                                    |  |                  |
|--|--|---|---|-------------------------------|------------------------------------|--|------------------|
| Date Lodged     Status     Petition and No.     Supporting Evidence       30/03/2012     M     0   | Additional SA SEA  |   | Rep format:<br>Letter                       | ,                             | ,                                  | e consiered by 'written<br>on of Public examinatio | •                |
| 2a - Do you consider the LDP is Sound? Unanswered  | 2b - If you think that the<br>Procedural Tests -<br>Consistency Tests -<br>Coherence and Effective | P1 - Unanswered<br>C1 - Unanswered  | P2 - Unans<br>C2 - Unans                    | ` '                           |                                    | nanswered  |                  |
| 3a - Which part of the Deposit Plan are you commenting on?   | Policy Number:<br>MG2(19). MG2(20)   | Paragraph   | Number:                                     | Proposal Map:                 | )                                  | Constraints Map                                    | Appendices:      |
| 3b - Do you wish to see any changes made to the Deposit Plan   | as a result of your repr   | esentation? Unansw  | vered (II                                   | f "No" or "Unanswered         | d" - go to 3d)                     |  |                  |
| 3c - What changes would like to see made to the Deposit Plan?  | New Policy:<br>Unanswered<br>Notes:  |   | New Paragraph:<br>Unanswered                | Amended Paragra<br>Unanswered | nph: New Or Amend Unanswered       | ded Site: Other (see N<br>Unanswered               |                  |
| 3d - If your representation relates to a new, deleted or amende  | ed site, did you submit the Site Name:   | ne site as a Candidate  | Site? Unanswe                               | red (If "Yes", plea           | ase give the Candida<br>Site Refer | ate Site Name and reference:                       | erence if known) |
| 3e - Please set out your representation below: VALE OF GLAMORGAN DEPOSIT LOCAL DEVELOPME We refer to the above plan and our comments are as follows. As residents of Dinas Powys we are extremely concerned. | ows.   | sed plans to build 400  | houses on the St                            | Cyres Annex and Cae           | rleon Rd sites.                    |  |                  |
| The prospect of an additional 600 - 800 cars in the village adversely impacts on the quality of life for village resident traffic, causing even longer tailbacks and idling engines, in                      | fills us with horror. The<br>s. We have to contend on<br>the village will push the                 | village is gridlocked fo<br>with a high leves of air<br>em up even further. | or significant period<br>pollution. Current | ds of the day. Not just a     | at peak times but oft              |  |                  |
| It seems to us that the land could be better used to provide Without major improvements in the highway infrastructure  |  |   |   | with this plan.               |                                    |  |                  |
| 3f - Please outline the changes you wish to see made to the D  | eposit Plan to make it s   | ound (if relevant)  |   |                               |                                    |  |                  |
| 4h - If you wish to speak please confirm which part of your rer  | resentation you wish to  | speak to the inspecto   | r about and why th                          | nev consider it be nece       | essary to speak at the             | e hearing -  |                  |

| Representor               | ID and             | details:              | 4108/D                    | P1 Ms Leyann Davie      | S  |                             |               |                           |  |                        |  |   |
|---------------------------|--------------------|-----------------------|---------------------------|-------------------------|--|-----------------------------|---------------|---------------------------|--|------------------------|--|---|
| Date Lodged<br>30/03/2012 |                    | Petiti                | on and No.<br>0           | Supporting Evidence     | Additional SA SEA                                |                             | _             | ep format:<br>omment fori | <b>*.</b> .                                      | ,                      | be consiered by 'writte<br>sion of Public examinat | n representations' or do ion? Written   |
| 2a - Do you c             | onsider            | the LDP               | is Sound?                 | Unsound                 | 2b - If you think that the Procedural Tests -    | he Plan is unso<br>P1 - Yes |               | not not mee<br>P2 - Yes   | et one or more test(s) o                         | of soundness, plea     | se indicate which test(s                           | s) that it fails.                       |
|                           |                    |                       |                           |                         | Consistency Tests -                              | C1 - Yes                    |               | C2 - Yes                  | C3 - Yes   | C4 -                   | Yes  |   |
|                           |                    |                       |                           |                         | Coherence and Effect                             | tiveness Tests              | - CE1 - Yes   |                           | CE2 - Yes  | CE3 - Yes              | CE4 - Yes  |   |
| 3a - Which pa             | art of the         | Deposit               | Plan are y                | ou commenting on?       | Policy Number:                                   | <u>P</u>                    | aragraph Nur  | nber:                     | Proposal Map:                                    |                        | Constraints Map                                    | Appendices:                             |
|                           |                    |                       |                           |                         | MG2(28)  |                             |               |                           | Land rear of C                                   | olwinston School       |  | Appendix 9 -<br>Supporting<br>Documents |
| 3b - Do you v             | vish to se         | ee any cl             | hanges ma                 | de to the Deposit Plan  | as a result of your rep                          | oresentation?               | Yes           |                           | If "No" or "Unanswered                           | d" - go to 3d)         |  |   |
| 3c - What cha             | anges w            | ould like             | to see mad                | de to the Deposit Plan? | New Policy: Unanswered Notes:                    | Amended Po<br>Unanswered    |               | Paragraph:                | Amended Paragra Unanswered                       | nph: New Or Ame<br>Yes | nded Site: Other (see<br>Unanswere                 |   |
| 3d - If your re           | epresent           | ation rel             | ates to a ne              | ew, deleted or amende   | ed site, did you submit<br>Site Name: Land to t  |                             |               |                           | (If "Yes", ple                                   | J                      | lidate Site Name and reference: 2513/CS1           | eference if known)                      |
| Plus the                  | ds are n<br>sewera | ot wide e<br>ge syste | enough as i<br>m at prese | it is to accommodate a  |  |                             |               |                           | g children about then, vso in a flood zone, whic |                        | problems. That amoun                               | t of houses will lose a lot             |
|                           |                    | •                     | •                         |                         | eposit Plan to make it<br>would keep in with vil |                             | ,             |                           |  |                        |  |   |
| 4b - If you w             | ish to sp          | eak, plea             | ase confirm               | which part of your rep  | presentation you wish t                          | to speak to the             | inspector abo | ut and why t              | they consider it be nece                         | essary to speak at     | the hearing -                                      |   |

| Representor ID and details: 4108/DP2 Ms Leyann Davie   | S   |  |                                |                             |                       |  |                  |
|--|---|--|--------------------------------|-----------------------------|-----------------------|--|------------------|
| Date Lodged     Status     Petition and No.     Supporting Evidence       30/03/2012     M     0 | Additional SA SEA                             |  | Rep format:<br>Comment forn    | *                           |                       | be consiered by 'written<br>sion of Public examination |                  |
| 2a - Do you consider the LDP is Sound? Unsound   | 2b - If you think that the Procedural Tests - | ne Plan is unsound and P1 - Unanswered | d does not not mee<br>P2 - Yes | et one or more test(s) of   | f soundness, plea     | ase indicate which test(s)                             | that it fails.   |
|  | Consistency Tests -                           | C1 - Yes                               | C2 - Yes                       | C3 - Yes                    | C4 -                  | Yes  |                  |
|  | Coherence and Effect                          | iveness Tests - CE1                    | - Yes                          | CE2 - Unanswered            | CE3 - Yes             | CE4 - Yes  |                  |
| 3a - Which part of the Deposit Plan are you commenting on?                                       | Policy Number:                                | Paragrap                               | h Number:                      | Proposal Map:               |                       | Constraints Map  | Appendices:      |
|  | MG2   | 7.11. 7.1                              | 2                              |                             |                       |  |                  |
| 3b - Do you wish to see any changes made to the Deposit Plan                                     | as a result of your rep                       | resentation? Yes                       | (l                             | f "No" or "Unanswered       | " - go to 3d)         |  |                  |
| 3c - What changes would like to see made to the Deposit Plan                                     | ? <u>New Policy:</u><br>Unanswered            | Amended Policy:<br>Unanswered          | New Paragraph:<br>Unanswered   | Amended Paragray Unanswered | oh: New Or Ame<br>Yes | ended Site: Other (see N<br>Unanswered                 | <del></del>      |
|  | Notes:  |  |                                |                             |                       |  |                  |
| 3d - If your representation relates to a new, deleted or amende                                  | ed site, did you submit t<br>Site Name:       | he site as a Candidate                 | e Site? No                     | (If "Yes", plea             | J                     | didate Site Name and reference:                        | erence if known) |
| 3e - Please set out your representation below:   |   |  |                                | <del>y</del>                |                       |  |                  |
| Residential land at Chapel Road, Broughton.  |   |  |                                |                             |                       |  |                  |
| Suitable site within settlement of the village with good acc                                     | ess for all vehicles.                         |  |                                |                             |                       |  |                  |
| Good location for shops and bus service.   |   |  |                                |                             |                       |  |                  |
| 3f - Please outline the changes you wish to see made to the D                                    | eposit Plan to make it                        | sound (if relevant)                    |                                |                             |                       |  |                  |
| The houses would not change the character of village and   | l it is not taking anythin                    | g from countryside.                    |                                |                             |                       |  |                  |
| The area is not in a flood zone and planning was once ac   | cepted.                                       |  |                                |                             |                       |  |                  |
| 4b - If you wish to speak, please confirm which part of your re                                  | presentation you wish to                      | speak to the inspecto                  | or about and why th            | hey consider it be nece     | ssary to speak at     | the hearing -  |                  |

| Representor ID and details: 4108/DP3 Ms Leyann Davies  | ,   |
|--|---|
| Date Lodged     Status     Petition and No.     Supporting Evidence       30/03/2012     M     0 | Additional SA SEA Rep format: 4a - do you want your comments to be consiered by 'written representations' or do you want to speak at a hearing session of Public examination? Written   |
| 2a - Do you consider the LDP is Sound? Unsound   | 2b - If you think that the Plan is unsound and does not not meet one or more test(s) of soundness, please indicate which test(s) that it fails.  Procedural Tests - P1 - Unanswered P2 - Unanswered   |
|  | Consistency Tests - C1 - Unanswered C2 - Unanswered C3 - Unanswered C4 - Unanswered   |
|  | Coherence and Effectiveness Tests - CE1 - Unanswered CE2 - Unanswered CE3 - Unanswered CE4 - Yes  |
| 3a - Which part of the Deposit Plan are you commenting on?                                       | Policy Number: Paragraph Number: Proposal Map: Constraints Map Appendices:  |
|  | Other - Not Listed  |
| 3b - Do you wish to see any changes made to the Deposit Plan                                     | as a result of your representation? Yes (If "No" or "Unanswered" - go to 3d)  |
| 3c - What changes would like to see made to the Deposit Plan?                                    | New Policy: Amended Policy: New Paragraph: Amended Paragraph: New Or Amended Site: Other (see Notes): Unanswered Unanswered Unanswered Yes Unanswered   |
|  | Notes:  |
| 3d - If your representation relates to a new, deleted or amende                                  | d site, did you submit the site as a Candidate Site? No (If "Yes", please give the Candidate Site Name and reference if known) Site Name:   |
| 3e - Please set out your representation below:   |   |
|  | ses 2076/CS1. The site is not in a conservation area and within the boundaries of the village. the vehicles passing on the road, which can be a problem, especially at school times with the road being too narrow. Will also have no impact on the |
| 3f - Please outline the changes you wish to see made to the De                                   | eposit Plan to make it sound (if relevant)  |
| 4b - If you wish to speak, please confirm which part of your rep                                 | resentation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -  |

| Representor               | ID and d   | etails:    | 4109/D                    | P1 Julia Dewey  |  |   |                                  |                            |                      |   |                       |
|---------------------------|------------|------------|---------------------------|---|--|---|----------------------------------|----------------------------|----------------------|---|-----------------------|
| Date Lodged<br>02/04/2012 |            | Petitio    | on and No.<br>0           | Supporting Evidence                                   | Additional SA SEA                                |   | Rep format:<br>Comment forn      |                            |                      | be consiered by 'written<br>ion of Public examination |                       |
| 2a - Do you co            | onsider th | ne LDP     | is Sound?                 | Unsound   | 2b - If you think that the Procedural Tests -    | ne Plan is unsound and<br>P1 - Unanswered | l does not not mee<br>P2 - Unans | ` '                        | of soundness, please | e indicate which test(s)                              | ) that it fails.      |
|                           |            |            |                           |   | Consistency Tests -                              | C1 - Yes                                  | C2 - Unans                       | wered C3 - Unan            | swered C4 - \        | Ýes   |                       |
|                           |            |            |                           |   | Coherence and Effect                             | iveness Tests - CE1                       | - Unanswered                     | CE2 - Yes                  | CE3 - Unanswere      | ed CE4 - Unanswe                                      | ered                  |
| 3a - Which pa             | rt of the  | Deposit    | Plan are y                | ou commenting on?                                     | Policy Number:                                   | <u>Paragrap</u>                           | h Number:                        | Proposal Map:              |                      | Constraints Map                                       | Appendices:           |
|                           |            |            |                           |   |  |   |                                  | MG2(33)                    | 7                    |   |                       |
| 3b - Do you w             | ish to se  | e any ch   | nanges ma                 | de to the Deposit Plan                                | as a result of your rep                          | resentation? Yes                          | (l                               | f "No" or "Unanswered      | d" - go to 3d)       |   |                       |
| 3c - What cha             | nges wo    | uld like   | to see mad                | de to the Deposit Plan?                               | New Policy:<br>Unanswered                        | Amended Policy:<br>Yes                    | New Paragraph:<br>Unanswered     | Amended Paragra Unanswered | New Or Amend<br>Yes  | ded Site: Other (see N<br>Unanswered                  |                       |
|                           |            |            |                           |   | Notes:   |   |                                  |                            |                      |   |                       |
| 3d - If your re           | presenta   | ition rela | ates to a ne              | ew, deleted or amende                                 | d site, did you submit t<br>Site Name: St Nichol |   | Site? Yes                        | (If "Yes", ple             | •                    | date Site Name and reference: MG2 (33)                | ference if known)     |
| 3e - Please s             | et out yo  | ur repre   | sentation I               | below:  |  |   |                                  |                            |                      |   |                       |
|                           |            |            |                           | nated at Stage 2 - sure<br>policy (MG 7) for resident |  |   |                                  | date sites rejected at th  | nis stage) (Why was  | s a further site added by                             | y Council). Proposed  |
|                           |            |            |                           | village is overwhelmin<br>Inadequate infrastruc       |  |   | ne argument for aff              | ordable housing is not     | relevant, since the  | re is no net demand in                                | St. Nicholas and East |
|                           |            | _          | es you wish<br>n the Depo | n to see made to the Dosit Plan.                      | eposit Plan to make it                           | sound (if relevant)                       |                                  |                            |                      |   |                       |
| 4b - If you wis           | sh to sna  | ak nlas    | se confirm                | which part of your ren                                | resentation you wish t                           | n speak to the inspect                    | or about and why th              | nev consider it he nece    | to eneak at tl       | he hearing -  |                       |

| Representor ID and details: 4110/DP1 Mrs Eleanor Phillip   | ips   |                                      |                                   |                                |                                     |   |                        |
|--|---|--------------------------------------|-----------------------------------|--------------------------------|-------------------------------------|---|------------------------|
| Date Lodged     Status     Petition and No.     Supporting Evidence       30/03/2012     M     □     0     □             | Additional SA SEA                             |                                      | Rep format:<br>Comment form       |                                |                                     | consiered by 'written re<br>of Public examination |                        |
| 2a - Do you consider the LDP is Sound? Unsound   | 2b - If you think that the Procedural Tests - | e Plan is unsound and do<br>P1 - Yes | pes not not meet o<br>P2 - Unansw | ` '                            | soundness, please in                | ndicate which test(s) th                          | nat it fails.          |
|  | Consistency Tests -                           | C1 - Yes                             | C2 - Unansw                       | ered C3 - Unans                | wered C4 - Yes                      | S   |                        |
|  | Coherence and Effecti                         | veness Tests - CE1 - L               | Jnanswered C                      | CE2 - Unanswered               | CE3 - Unanswered                    | CE4 - Yes   |                        |
| 3a - Which part of the Deposit Plan are you commenting on?   | Policy Number:<br>MG2(18)                     | Paragraph N                          |                                   | Proposal Map:                  |                                     | Constraints Map                                   | Appendices:            |
| 3b - Do you wish to see any changes made to the Deposit Plan   | as a result of your rep                       | resentation? Yes                     | (If "                             | No" or "Unanswered             | " - go to 3d)                       |   |                        |
| 3c - What changes would like to see made to the Deposit Plan   | ? New Policy:<br>Yes                          |                                      | ew Paragraph:<br>nanswered        | Amended Paragrap<br>Unanswered | h: New Or Amende<br>Unanswered      | d Site: Other (see No<br>Unanswered               | tes):                  |
|  | Notes:  |                                      |                                   |                                |                                     |   |                        |
| 3d - If your representation relates to a new, deleted or amende  | ed site, did you submit t<br>Site Name:       | he site as a Candidate Si            | te? No                            | (If "Yes", plea                | se give the Candidat<br>Site Refere | te Site Name and reference:                       | ence if known)         |
| 3e - Please set out your representation below:   |   |                                      |                                   |                                |                                     |   |                        |
| 80 dwellings in 2026 excessive for the amount of space a a great problem as the roads cannot cope with the traffic       |   | should be given to comm              | munity feelings reg               | garding this site as the       | ey wish for it to rema              | in green. Additional tra                          | affic created would be |
| At the moment some of the trees have preservation order undertaken before official planning was granted.                 | rs on them, these would                       | be swept away to create              | this development                  | t. The last developme          | ent at this site receive            | ed retrospective planni                           | ng as most of it was   |
| 3f - Please outline the changes you wish to see made to the D  | eposit Plan to make it s                      | sound (if relevant)                  |                                   |                                |                                     |   |                        |
| This site should remain as it is for the foreseeable future. agree to it at their peril, because the community is deeply |   | the benefit of the people            | of the area, merel                | y for the developers.          | Our councillors shou                | uld be made aware that                            | they proceed and       |
| 4b - If you wish to speak, please confirm which part of your rel   | oresentation you wish to                      | speak to the inspector a             | about and why the                 | y consider it be neces         | ssary to speak at the               | hearing -   |                        |

| Representor ID and details: 4111/DP1 John Matheson  |  |  |  |  |                   |
|---|--|--|--|--|-------------------|
| Date Lodged     Status     Petition and No.     Supporting Evidence       30/03/2012     M     □     0     □  | Additional SA SEA  | Rep format:<br>Comment form  | 4a - do you want your commen<br>you want to speak at a hearing                       |  |                   |
| 2a - Do you consider the LDP is Sound? Unsound  | 2b - If you think that the Plan is uns<br>Procedural Tests - P1 - Unan   | swered P2 - Unansw   | vered  | `  | hat it fails.     |
|   | Consistency Tests - C1 - Unan<br>Coherence and Effectiveness Tests   |  | vered C3 - Unanswered C<br>CE2 - Yes CE3 - Unar                                      |  | ed                |
| 3a - Which part of the Deposit Plan are you commenting on?  | Policy Number:   |  | Proposal Map:<br>MG2(13)   | Constraints Map  | Appendices:       |
| 3b - Do you wish to see any changes made to the Deposit Plan  | as a result of your representation?  | Yes (If "  | 'No" or "Unanswered" - go to 3d)   |  |                   |
| 3c - What changes would like to see made to the Deposit Plan  |  | olicy: New Paragraph:  | Amended Paragraph: New Or A<br>Unanswered Yes  | Amended Site: Other (see No Unanswered                         | <u>otes):</u>     |
|   | Notes:   |  |  |  |                   |
| 3d - If your representation relates to a new, deleted or amende   | d site, did you submit the site as a C<br>Site Name: Land to west of St Atha   |  | ` ' '  | Candidate Site Name and refe<br>e Reference: 2446/CS1, 2446    | ,                 |
| 3e - Please set out your representation below:  |  |  |  |  |                   |
| The Council have already accepted that these sites are p significant impact, which would render it no longer being. The proposed development is outside the existing settlen and Llanblethian will be eroded.  I have concerns that the schools will not be able to copy. The road structure would have to be significantly changed concerns about coming down a steep hill into a complex repeat the mistake on St Athan Road? | SLA. ent boundary of Cowbridge. If this by with further influxes of children, also of to accommodate access onto St At | uilding goes ahead sooner or<br>doctors etc will be under adde<br>han Road from both sites. Th | later further development will be a ed pressure. is will completely change the 'coun | pproved so all the green field  otry feel' as you approach Cov | between Cowbridge |
| ·   |  |  |  |  |                   |
| 3f - Please outline the changes you wish to see made to the D<br>Have candidate site removed and include as a green wed   |  | ,  |  |  |                   |
| 4b - If you wish to speak, please confirm which part of your re-  | resentation you wish to speak to the   | inspector about and why the  | ev consider it be necessary to spea  | k at the hearing -   |                   |

| Representor ID and details: 4112/DP1 Mr & Mrs Pearce  |  |   |   |   |                       |
|---|--|---|---|---|-----------------------|
| Date Lodged Status Petition and No. Supporting Evidence 30/03/2012 M 0  | Additional SA SEA                              | Rep format:<br>Letter                                 | 4a - do you want your comme<br>you want to speak at a hearing |   |                       |
| 2a - Do you consider the LDP is Sound? Unanswered   | •  | n is unsound and does not not me Unanswered P2 - Unar | et one or more test(s) of soundness                           | , please indicate which test(s)           | that it fails.        |
|   | Consistency Tests - C1 -                       | - Unanswered C2 - Unar                                | swered C3 - Unanswered  | C4 - Unanswered                           |                       |
|   | Coherence and Effectivenes                     | ss Tests - CE1 - Unanswered                           | CE2 - Unanswered CE3 - Una                                    | answered CE4 - Unanswe                    | ered                  |
| 3a - Which part of the Deposit Plan are you commenting on?  | Policy Number:<br>MG2(19). MG2(20)             | Paragraph Number:                                     | Proposal Map:   | Constraints Map                           | Appendices:           |
| 3b - Do you wish to see any changes made to the Deposit Plan  | as a result of your represent                  | tation? Unanswered                                    | (If "No" or "Unanswered" - go to 3d)                          |   |                       |
| 3c - What changes would like to see made to the Deposit Plan  |  | ended Policy: New Paragraph:<br>answered Unanswered   | Amended Paragraph: New Or<br>Unanswered Unansw                |   | <del></del>           |
|   | Notes:   |   |   |   |                       |
| 3d - If your representation relates to a new, deleted or amende   | ed site, did you submit the site<br>Site Name: | e as a Candidate Site? Unansw                         |   | Candidate Site Name and refete Reference: | erence if known)      |
| 3e - Please set out your representation below: The Vale of Glamorgan Development Plan 2011 - 2026                     |  |   | <b>y</b>  |   |                       |
| As a resident of Dinas Powys I wish to express my conce   | rns at the above plan for hou                  | ses at St Cyres and Caerleon Roa                      | ad.   |   |                       |
| The Murch cannot cope with the traffic as it is. You don't  | ravel through or you would u                   | nderstand. Also the Merry Harrier                     | is a night mare.  |   |                       |
| Further the facilities we have are over stretched as it is. T yeasr ago when there were half a dozen cars and one but |  |   |   | a where will they be schooled             | d. I was born here 68 |
| PS sorry and Murch Bridge.  |  |   |   |   |                       |
| 3f - Please outline the changes you wish to see made to the D   | eposit Plan to make it sound                   | (if relevant)   |   |   |                       |
| 4h - If you wish to speak, please confirm which part of your re-  | presentation you wish to spea                  | ak to the inspector about and why                     | they consider it be necessary to spe                          | ak at the hearing -                       |                       |

(ordered by Representation ID No.)

| Representor I             | D and d     | letails:   | 4113/DI         | <b>P1</b> S.E. & K.H. Edwa | rds   |         |                        |                             |         |   |                              |                          |                             |                        |
|---------------------------|-------------|------------|-----------------|----------------------------|---|---------|------------------------|-----------------------------|---------|---|------------------------------|--------------------------|-----------------------------|------------------------|
| Date Lodged<br>30/03/2012 | Status<br>M | Petitio    | on and No.<br>0 | Supporting Evidence        | Additional SA SEA   |         |                        | Rep format:<br>Letter       |         | 4a - do you want y<br>you want to speak |                              |                          | •                           | representations' or do |
| 2a - Do you co            | nsider th   | ne LDP     | is Sound?       |                            | 2b - If you think that the Procedural Tests - Consistency Tests - | P1 -    | Unanswered             | l P2 - Unai                 | nswere  | ed<br>                                  |                              | se indicate              |                             | that it fails.         |
|                           |             |            |                 |                            | Coherence and Effect  |         |                        |                             |         |   |                              | ered C                   | E4 - Unanswer               | ed                     |
| 3a - Which par            | t of the    | Deposit    | Plan are y      | 3 -                        | Policy Number:<br>MG2(27). MG2(35).                               | •       | <u>Paragra</u>         | aph Number:                 | Pro     | posal Map:                              | )                            | Constra                  | aints Map                   | Appendices:            |
| 3b - Do you wi            | sh to se    | e any ch   | nanges ma       | de to the Deposit Plan     | as a result of your rep   | resenta | tion? Unar             | swered                      | (If "No | or "Unanswered                          | " - go to 3d)                |                          |                             |                        |
| 3c - What char            | nges wo     | uld like   | to see mad      | le to the Deposit Plan?    | New Policy:<br>Unanswered<br>Notes:                               |         | nded Policy:<br>swered | New Paragraph<br>Unanswered |         | Amended Paragrap<br>Jnanswered          | oh: New Or Ame<br>Unanswered |                          | Other (see No<br>Unanswered | otes):                 |
| 3d - If your rep          | oresenta    | ation rela | ates to a ne    | ew, deleted or amende      | d site, did you submit t<br>Site Name:                            | he site | as a Candida           | ite Site? Unansw            | wered   | (If "Yes", plea                         | ase give the Cano<br>Site Re | didate Site<br>eference: | Name and refe               | rence if known)        |

- 3e Please set out your representation below:
  - 1. Court Close, Aberthin and;
  - 2. Land at Sandy Lane, Ystradowen

Our representation relates to both the above proposals and to assist you we therefore enclose a spare print of this letter so you have one for each file.

Court Close: This proposal is certainly an intrusion into the countryside and access through the existing close will be inadequate. Even if these and the other concerns of the nearby residents can be overcome it would seem that work would have to be carried out to Whitefield Farm Lane both on the length running from Court Close to The Hare & Hounds and at the junction with the A4222.

The widening of the lane down to the main road and the provision of pavements would change the character of the village and be to the detriment of the Aberthin Conservation Area.

The junction of the lane with the A4222 is already a dangerous one and the additional traffic that the development would create will increase this. To overcome this, a substantial splay would have to be constructed which would involve the acquisition of neighbouring property to the serious detriment of that property and the centre of the village.

The increase in traffic will also affect the wider village and in particular Penylan Road. In 2008 concerns about the increased use of this road were expressed by a number of residents. We enclose a copy of our letter of 30 March that year to Mr Robert Thomas of your council.

We mentioned in our letter to Mr Thomas how over the years the road has been widened by the passing traffic. The fears we anticipated in that letter following the move of the Lower school of the Comprehensive School to Aberthin Road site have been borne out. More cars going to or from the school now use Penylan Road (some even using Aberthin Lane to Primrose Hill) as a short cut so as to avoid the Cowbridge traffic lights. In one twenty minute period in a morning in the last week we counted sixty cars travelling up the road.

Any further development in the village can only increase the use of the road and thus make a bad situation worse

Ystradowen: As we told Mr Thomas in our letter of 30 March 2008, mentioned in our section on the Aberthin proposal, it has been the development of houses in Ystradowen that seems to have speeded up the increase of traffic on Penylan Road.

Any further housing development at Ystradowen including that at Sandy Lane will make the Whitefield Farm Lane and A4222 junction even more of a traffic hazard and will increase even further the number of vehicles using Penylan Road which was never meant to carry even the volume of traffic using it now.

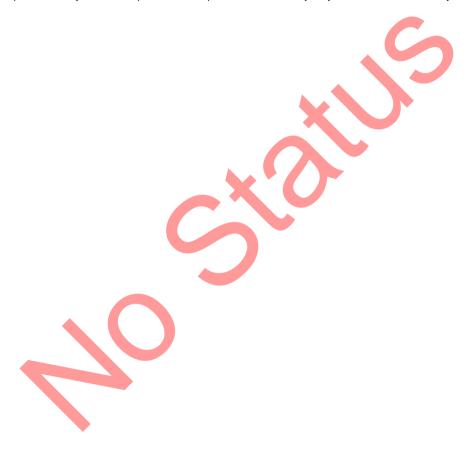
(ordered by Representation ID No.)

Representor ID and details: 4113/DP1 S.E. & K.H. Edwards

We feel very strongly that for the reasons mentioned above neither of the areas should be considered for development.

One of us would be happy to appear as a witness at any inquiry.

- 3f Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
- 4b If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -



| Representor ID     | and de                 | tails:             | 4114/D                  | P1 Mr & Mrs Davies      |  |   |                              |                                       |                  |   |                           |
|--------------------|------------------------|--------------------|-------------------------|-------------------------|--|---|------------------------------|---------------------------------------|------------------|---|---------------------------|
|                    | Status<br>M            | Petitio            | n and No.<br>0          | Supporting Evidence     | Additional SA SEA                              |   | Rep format:<br>Comment form  | · · · · · · · · · · · · · · · · · · · |                  | to be consiered by 'writte<br>ession of Public examinat   |                           |
| 2a - Do you cons   | sider the              | DP i               | s Sound?                | Unsound                 | 2b - If you think that the Procedural Tests -  | ne Plan is unsound and<br>P1 - Unanswered | I does not not mee           | t one or more test(s) of              | soundness, ple   | ease indicate which test(s                                | s) that it fails.         |
|                    |                        |                    |                         |                         | Consistency Tests -                            | C1 - Yes                                  | C2 - Yes                     | C3 - Yes                              | C4               | - Yes   |                           |
|                    |                        |                    |                         |                         | Coherence and Effect                           | iveness Tests - CE1                       | - Yes                        | CE2 - Unanswered                      | CE3 - Yes        | CE4 - Yes   |                           |
| 3a - Which part of | of the D               | eposit             | Plan are y              | ou commenting on?       | Policy Number:                                 | Paragrap                                  | h Number:                    | Proposal Map:                         |                  | Constraints Map   | Appendices:               |
|                    |                        |                    |                         |                         | MG2  | 7.11. 7.1                                 | 2                            |                                       |                  |   |                           |
| 3b - Do you wish   | to see                 | any ch             | anges ma                | de to the Deposit Plan  | as a result of your rep                        | resentation? Yes                          | (If                          | f "No" or "Unanswered                 | " - go to 3d)    |   |                           |
| 3c - What chang    | jes wou                | d like t           | o see mad               | de to the Deposit Plan? | New Policy:<br>Unanswered                      | Amended Policy:<br>Unanswered             | New Paragraph:<br>Unanswered | Amended Paragra<br>Unanswered         | New Or Am<br>Yes | nended Site: Other (see<br>Unanswere                      |                           |
|                    |                        |                    |                         |                         | Notes:   |   |                              |                                       |                  |   |                           |
| 3d - If your repre | esentati               | on rela            | tes to a ne             | ew, deleted or amende   | ed site, did you submit<br>Site Name: Chapel R | the site as a Candidate                   | Site? Yes                    | (If "Yes", plea                       | ū                | ndidate Site Name and re<br>Reference: 2690/CS1           | eference if known)        |
| It is a suital     | apel Ro                | ad Bro<br>and wi   | ughton W<br>thin the se | ick- 0.2 Hectares of ag | . Easily accessible with                       | n sufficient width acces                  | s for larger vehicles        | s. Within walking distar              | nce to shops, fa | cilities, bus stop. It would                              | d provide the opportunity |
| I should wis       | sh if it w<br>e and th | as incl<br>ere are | uded in the             |                         | ounded by Chapel Roa                           | nd to the south, West S                   |                              |                                       |                  | undary to the north. It is r<br>s here would take anythir |                           |
| 4h - If you wish   | to snea                | k nlea             | se confirm              | which part of your ren  | resentation you wish t                         | o speak to the inspecto                   | or about and why th          | nev consider it he nece               | ssary to speak a | at the hearing -  |                           |

| Representor ID and details: 4114/DP2 Mr & Mrs Davies   |   |                              |                                     |                               |                          |   |   |
|--|---|------------------------------|-------------------------------------|-------------------------------|--------------------------|---|---|
| Date Lodged     Status     Petition and No.     Supporting Evidence       30/03/2012     M     □     0     □   | Additional SA SEA                               |                              | Rep format:<br>Comment forn         | ·                             | ,                        | e consiered by 'written<br>on of Public examinati | n representations' or do on? Written    |
| 2a - Do you consider the LDP is Sound? Unsound   | 2b - If you think that the Procedural Tests -   | he Plan is unsou<br>P1 - Yes | nd and does not not mee<br>P2 - Yes | et one or more test(s) of     | of soundness, please     | indicate which test(s                             | ) that it fails.                        |
|  | Consistency Tests -                             | C1 - Yes                     | C2 - Yes                            | C3 - Yes                      | C4 - Y                   | es  |   |
|  | Coherence and Effect                            | tiveness Tests -             | CE1 - Yes                           | CE2 - Yes                     | CE3 - Yes                | CE4 - Yes   |   |
| 3a - Which part of the Deposit Plan are you commenting on?   | Policy Number:                                  | <u>Pa</u>                    | ragraph Number:                     | Proposal Map:                 |                          | Constraints Map                                   | Appendices:                             |
|  | MG2(28)   | 0.0                          | ) - Other                           | Land rear of S                | chool Colwinston         |   | Appendix 9 -<br>Supporting<br>Documents |
| 3b - Do you wish to see any changes made to the Deposit Plan   | n as a result of your rep                       | oresentation? \              | Yes (I                              | f "No" or "Unanswere          | d" - go to 3d)           |   |   |
| 3c - What changes would like to see made to the Deposit Plan   | ? New Policy: Unanswered Notes:                 | Amended Poli<br>Unanswered   | cy: New Paragraph: Unanswered       | Amended Paragra<br>Unanswered | aph: New Or Amend<br>Yes | led Site: Other (see I                            | <del></del>                             |
| 3d - If your representation relates to a new, deleted or amend   | ed site, did you submit<br>Site Name: Land to r |                              |                                     | (If "Yes", ple                | J                        | ate Site Name and re                              | ference if known)                       |
| 3e - Please set out your representation below: I do not think that the development of land to the rear of the village is not able to have that amount of building. So It is also in a flood zone with people having problems with built there. | ewerage system, schoo                           | ol, roads, a lot of          | improvements would hav              |                               | ation not in consister   | nt with settlement plar                           | n if 60 houses were to be               |
| 3f - Please outline the changes you wish to see made to the E<br>It should be relooked at with regards to as per 3E. Contra  |   | ***                          | ,                                   | red. It is not sound - to     | open country develo      | ppment will have an in                            | npact of environment etc.               |
| 4b - If you wish to speak, please confirm which part of your re  | presentation you wish t                         | to speak to the in           | spector about and why the           | nev consider it be nec        | essary to speak at th    | e hearing -                                       |   |

| Representor ID and details: 4115/DP1 Jacqueline Hurley  | y  |   |                             |                            |                                    |   |                                      |
|---|--|---|-----------------------------|----------------------------|------------------------------------|---|--------------------------------------|
| Date Lodged     Status     Petition and No.     Supporting Evidence       30/03/2012     M     0  | Additional SA SEA                        |   | Rep format:<br>Comment form |                            |                                    | e consiered by 'written<br>n of Public examinatio | representations' or do n? Unanswered |
| 2a - Do you consider the LDP is Sound? Unsound  | •  | Plan is unsound and do<br>P1 - Unanswered | pes not not meet o          | ` '                        | f soundness, please                | indicate which test(s)                            | that it fails.                       |
|   | Consistency Tests -                      | C1 - Unanswered                           | C2 - Unansw                 | vered C3 - Unan            | swered C4 - Ur                     | nanswered   |                                      |
|   | Coherence and Effective                  | reness Tests - CE1 - L                    | Jnanswered (                | CE2 - Yes                  | CE3 - Unanswered                   | d CE4 - Unanswe                                   | red                                  |
| 3a - Which part of the Deposit Plan are you commenting on?  | Policy Number:                           | Paragraph N                               | Number: <u>F</u>            | Proposal Map:              |                                    | Constraints Map                                   | Appendices:                          |
|   | MG2(19)                                  |   |                             |                            |                                    |   |                                      |
| 3b - Do you wish to see any changes made to the Deposit Plan  | as a result of your repr                 | esentation? Yes                           | (If "                       | "No" or "Unanswered        | d" - go to 3d)                     |   |                                      |
| 3c - What changes would like to see made to the Deposit Plan  | ? New Policy:<br>Unanswered              |   | ew Paragraph:<br>Inanswered | Amended Paragra Unanswered | <u>New Or Amend</u><br>Unanswered  | ed Site: Other (see N<br>Unanswered               | <del></del>                          |
|   | Notes:                                   |   |                             |                            |                                    |   |                                      |
| 3d - If your representation relates to a new, deleted or amende   | ed site, did you submit th<br>Site Name: | e site as a Candidate Si                  | ite? Unanswere              | ed (If "Yes", ple          | ase give the Candida<br>Site Refer | ate Site Name and reference:                      | erence if known)                     |
| 3e - Please set out your representation below: The plan to allow the site of the St Cyres Annexe, Murch   | Rd, D.P. to be sold by the               | ne Coun <mark>cil</mark> with a view to   | building 3 - 400 h          | nouses.                    |                                    |   |                                      |
| This is to object to the current proposal for the land on the contractors and builders lorries and plant b) the extra veh schools, doctors etc. would be unable to serve and according to the contract of the | icles from 3 - 400 new h                 | ouses, plus visiting cars                 | , delivery lorries e        | tc. They would be da       | ingerous, cause dam                | age and horrendous o                              | jueues. Local amenities,             |
| 3f - Please outline the changes you wish to see made to the D   | •  |   |                             |                            |                                    |   |                                      |
| Cancel the proposed plan entirely. Use the land for comm  |  |   |                             |                            |                                    |   |                                      |
| 4h - If you wish to speak please confirm which part of your re-   | presentation you wish to                 | sneak to the inspector a                  | shout and why the           | y consider it he nece      | secary to enpak at the             | hearing -   |                                      |

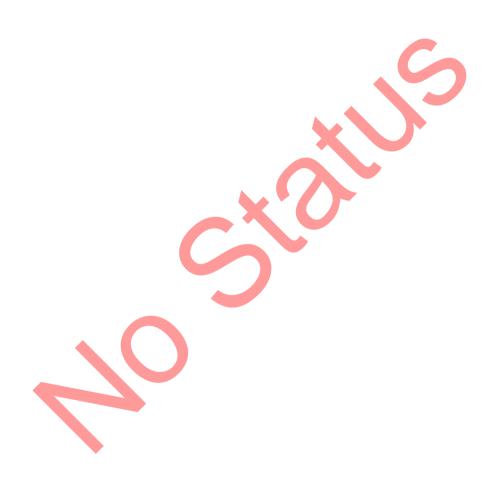
| Representor ID and details: 4116/DP1 Sarah Butler   |   |   |                                 |                                |   |                                    |                           |
|---|---|---|---------------------------------|--------------------------------|---|------------------------------------|---------------------------|
| Date Lodged     Status     Petition and No.     Supporting Evidence       30/03/2012     M     0  | Additional SA SEA                               |   | Rep format:<br>Letter           |                                | our comments to be a at a hearing session |                                    | representations' or do n? |
| 2a - Do you consider the LDP is Sound? Unanswered   | 2b - If you think that th<br>Procedural Tests - | ne Plan is unsound and<br>P1 - Unanswered | does not not meet<br>P2 - Unans | ` '                            | f soundness, please ir                    | ndicate which test(s)              | that it fails.            |
|   | Consistency Tests -                             | C1 - Unanswered                           | C2 - Unans                      | wered C3 - Unans               | swered C4 - Una                           | answered                           |                           |
|   | Coherence and Effecti                           | iveness Tests - CE1                       | - Unanswered                    | CE2 - Unanswered               | CE3 - Unanswered                          | CE4 - Unanswe                      | red                       |
| 3a - Which part of the Deposit Plan are you commenting on?  | Policy Number:                                  | <u>Paragrap</u>                           | h Number:                       | Proposal Map:                  | <u>C</u>                                  | Constraints Map                    | Appendices:               |
|   |   |   |                                 |                                |   |                                    |                           |
| 3b - Do you wish to see any changes made to the Deposit Plan  | as a result of your rep                         | resentation? Unansv                       | vered (If                       | "No" or "Unanswered            | " - go to 3d)                             |                                    |                           |
| 3c - What changes would like to see made to the Deposit Plan'   | New Policy: Unanswered                          | Amended Policy:<br>Unanswered             | New Paragraph:<br>Unanswered    | Amended Paragrap<br>Unanswered | oh: New Or Amended Unanswered             | d Site: Other (see N<br>Unanswered | <del></del>               |
|   | Notes:  |   |                                 |                                |   |                                    |                           |
| 3d - If your representation relates to a new, deleted or amende   | ed site, did you submit t<br>Site Name:         | he site as a Candidate                    | Site? Unanswer                  | red (If "Yes", plea            | ase give the Candidate<br>Site Refere     |                                    | erence if known)          |
| 3e - Please set out your representation below:  Deposit LDP I'm writing to show my support for the Deposit LDP recenther residential settlement boundary for Barry and the Vale protected at all costs wherever possible. |   |   |                                 |                                |   |                                    |                           |
| 3f - Please outline the changes you wish to see made to the D   | eposit Plan to make it s                        | sound (if relevant)                       |                                 |                                |   |                                    |                           |
| 4h - If you wish to speak please confirm which part of your rer   | oresentation you wish to                        | sneak to the inspecto                     | or about and why th             | ev consider it he neces        | ssary to speak at the                     | <br>hearing -                      |                           |

| Representor   | ID and d   | etails:  | 4117/D   | P1 Mrs C D Ashmore  | )   |  |  |   |  |   |  |  |
|---|--|--|--|---|---|--|--|---|--|---|--|--|
| Date Lodged   | Status<br>M  | Petitio  | on and No.<br>0  | Supporting Evidence   | Additional SA SEA   |  | Rep format:<br>Comment form                                    | 4a - do you w<br>n you want to s  |  |   |  | epresentations' or do<br>? Written             |
| 2a - Do you c                                       | onsider th   | e LDP  | is Sound?  | Unanswered  | Procedural Tests - Consistency Tests -  | he Plan is unsound an P1 - Unanswered C1 - Unanswered tiveness Tests - CE1 | P2 - Unans   |   | nanswered  | C4 - Unanswere  |  |  |
| 3a - Which pa                                       | art of the [   | Deposit  | Plan are y   | ou commenting on?   | Policy Number:  | <u>Paragrar</u>  | oh Number:   | Proposal Map: MG2 (19)  |  | <u>Constrair</u>  | nts Map  | Appendices:                                    |
| 3b - Do you w                                       | ish to see   | any ch   | anges ma   | de to the Deposit Plar  | as a result of your rep   | presentation? Yes  | (1   | f "No" or "Unansw   | ered" - go to 3d                                     |   |  |  |
| 3c - What cha                                       | anges wou  | uld like t   | o see mad  | le to the Deposit Plan  | P New Policy: Yes Notes:  | Amended Policy:<br>Unanswered  | New Paragraph:<br>Unanswered                                   | Amended Para<br>Unanswered  | agraph: New O<br>Unansv                              | r Amended Site: ()<br>wered                                     | Other (see No<br>Unanswered                      | tes):  |
| 3d - If your re                                     | epresenta  | tion rela  |  | •   | ed site, did you submit<br>Site Name:   | the site as a Candidat   | e Site? Unanswe  | red (If "Yes",  |  | e Candidate Site Na<br>Site Reference:                          | ame and refer                                    | rence if known)                                |
| outset o I am 93 intolerat There a Centre i Here at | y the Mur<br>f decision<br>years of a<br>ble. The lil<br>re not end<br>s too sma | rch St C<br>is on St<br>age and<br>kelihood<br>bugh lei:<br>all with p | sentation by yres site working of the control of th | pelow:  yas only ever designat yrch).  In a resident of Dinas F will get worse which is es for young people, t ar so difficult in that ar | ed for educational and<br>Powys all my life. For m<br>very worrying for future<br>ne railway stations are<br>ea. I would never oper<br>and at weekends. Nea | recreational purposes  | ave lived here at Wi<br>someone of my ag<br>ss I was expecting | ndyridge. In the cage as they would be a visitor- I wish poles - it would just ge | se of Dinas Pover for aryone livin icemen still wall | vys generally, the t<br>g on the proposed<br>ked around on foot | raffic congest<br>development<br>t it was so rea | ion has become<br>site. Our Health<br>ssuring. |
| Until the<br>Howeve<br>1. Move                      | road infrar<br>r in order<br>the Dinas   | astructu<br>to try a   | re is vastly<br>nd be cons<br>Infants So   | r improved there shou<br>structive I suggest two  | alternatives:   | sound (if relevant) evelopment in Dinas P h St Cyres. Build hous           |  |   | ove Dinas Powy                                       | ys Health Centre a  | nd Library to [                                  | Dinas Powys Health                             |
| 2. Move<br>Powys I                                  | Dinas Po<br>nfants Sc  | wys He   | alth Centre<br>building 2  | e and Library to Murch<br>0-30 affordable flats/a   | St Cyres. Keep part o   | f the Murch St Cyres for   | or the Murch Junior  | School - bring Din  | as Powys Infan                                       | ts School to the Mi   | urch Junior Sc                                   | chool. Utilise Dinas                           |
| PS. I My  | self taugl   | nt at the  | Murch Ju   | niour School for more   | than 14 years.  |  |  |   |  |   |  |  |
|   |  |  |  |   |   |  |  |   |  |   |  |  |

Representation ID No.)

Representor ID and details: 4117/DP1 Mrs C D Ashmore

4b - If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -



(ordered by Representation ID No.)

| Representor ID and details: 4118/DP1 Pauline and Paul  | Spencer                                       |                         |                               |                                       |   |  |
|--|---|-------------------------|-------------------------------|---------------------------------------|---|--|
| Date Lodged     Status     Petition and No.     Supporting Evidence       30/03/2012     M     0     ✓ | Additional SA SEA                             |                         | Rep format:<br>Comment form   | · · · · · · · · · · · · · · · · · · · |   | ered by 'written representations' or do<br>blic examination? Written |
| 2a - Do you consider the LDP is Sound? Unanswered  | 2b - If you think that the Procedural Tests - |                         | does not not meet<br>P2 - Yes | one or more test(s) of s              | soundness, please indicate                    | which test(s) that it fails.   |
|  | Consistency Tests -                           | C1 - Yes                | C2 - Yes                      | C3 - Yes                              | C4 - Yes                                      |  |
|  | Coherence and Effecti                         | iveness Tests - CE1     | - Yes                         | CE2 - Yes                             | CE3 - Yes C                                   | E4 - Yes   |
| 3a - Which part of the Deposit Plan are you commenting on?   | Policy Number:                                | Paragraph               | Number:                       | Proposal Map:                         | Constra                                       | aints Map Appendices:  |
|  |   |                         |                               | MG2 (19)                              |   |  |
| 3b - Do you wish to see any changes made to the Deposit Plan   | as a result of your rep                       | resentation? Yes        | (If                           | "No" or "Unanswered"                  | - go to 3d)                                   |  |
| 3c - What changes would like to see made to the Deposit Plan   | ? New Policy:<br>Yes                          |                         | New Paragraph:<br>Unanswered  | Amended Paragraph<br>Unanswered       | n: New Or Amended Site:<br>Unanswered         | Other (see Notes): Unanswered  |
|  | Notes:  |                         |                               |                                       |   |  |
| 3d - If your representation relates to a new, deleted or amende  | ed site, did you submit t<br>Site Name:       | the site as a Candidate | Site? Unanswere               | ed (If "Yes", pleas                   | se give the Candidate Site<br>Site Reference: | Name and reference if known)   |
|  |   |                         |                               |                                       |   |  |

3e - Please set out your representation below:

All boxes in 2b have been ticked as unsound because it is impossible for the average "lay-person" to take in and understand all the ramifications of the reports and plans. It is like being given an A level exam on a subject you have never been taught.

As far as the Dinas Powys MG2(19) proposals are concerned - inadequate road infrastructure, ever increasing volumes of traffic, increased air pollution from traffic, non-existent cycling tracks, dangerous pavements (Eastbrook), poor location of MG2(19) in terms of accessibility of a range of travel modes (nearest railway station is 20 minute walk away - only train car park at Eastbrook is already full), non existent visibility of police "on the beat" particularly at night, inadequate health centre re size and parking, an infants school potentially forever more on a dangerous junction with regard to both air pollution and potential for traffic accidents. All are reasons why the MG2(19) proposals are unsound and a new policy should be considered.

With specific reference to MG2(19) - possible secondary access through Windyridge. Our observations and objections are again based on the sustainability appraisal reports "Objectives and Aims" If the proposals were to proceed.

Currently Windyridge is a quiet, well maintained cul-de-sac containing detached properties with many elderly residents who have lived here for many years. For many of us it is our final "lifetime" home- see later references.

However all that could alter if Windyridge became a secondary access, "short cut" thoroughfare on a narrow winding road with dangerous bends (on a steepish hill). For the VGBC highways or developer to try and alter the road/pavements would contravene the S.A.R objective to "enhance access for cyclists and pedestrians" also increased traffic, increased air pollution would automatically occur if the possible secondary access took place.

As for the S.A.R. objective and aim to "promote a sense of community pride" the opposite would occur in as much that a feeling of resentment towards both the VGBC and residents of the MG2 (19) site would be inevitable. It would just be seen as a bullying imposition by many and would probably only lead to bitterness and ill feeling.

We have lived here in Windyridge for 24 years- and along with more long standing neighbours - we have all made vast contributions in terms of rates paid. Therefore at the very least please look for an alternative plan or solution.

Finally to reiterate once again that we both feel strongly that 3f changes are the common sense solution providing the Murch St Cyres school to be demolished in the meantime. The latter points needs immediate clarification.

"References"- used from SA report as follows (affecting all our 3e comments)

(ordered by Representation ID No.)

Representor ID and details: 4118/DP1 Pauline and Paul Spencer

- 1. Page 134/S LDP
- 2. MG2 Housing Allocation- Objective and Aims

Heading 3 Para D- Promote Lifetime Homes

Heading 5 Para A- Reduce the fear of crime

Heading 6 Para A- Reduce Air Pollution

Heading 10 Para B- promote a sense of community pride

Heading 10 Para D- enhance access for cyclists and pedestrians

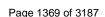
Heading 12 Para A- Ensure new development is located in accessible locations for range of travel modes

Heading 12 Para D- provide effective transport infrastructure to meet the needs of the community

- 3f Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant) A realistic development based on common sense and, as importantly, for sound moral reasons as follows
  - Dinas Powys Infants, Murch Junior School pupils to Murch St Cyres (MG2 (19) site)
  - Dinas Powys Infants school to be utilised for doctors health centre and library
  - The Murch Junior School, library site, Dinas Powys FC ground to be used for housing. Two access roads already available. Potentially 60-80 houses could be built.
  - Dinas Powys FC to Bryn-y-Don. VGBC to provide upgrade pitch. Developer of Murch J.S./FC ground to provide basic clubhouse/dressing room structure-mini spectator stand.

NB- The moral issue affecting 3 to 7 year olds being subjected evermore to increasing air pollution, potential traffic accidents from increased traffic would no longer exist if this new policy was considered. At the very least the parents should decide not the VGBC or the Welsh Assembly.

4b - If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -Changes to the deposit plan as stated in para. 3f. Also attachment 1, Part 2 i.e. possible secondary access through Windyridge.



| Representor ID and details: 4119/DP1 Nicola and Mark   | Wilkins  |   |   |
|--|--|---|---|
| Date Lodged     Status     Petition and No.     Supporting Evidence       30/03/2012     M     □     0     □           | <u>Additional SA SEA</u>   |   | omments to be consiered by 'written representations' or do hearing session of Public examination?         |
| 2a - Do you consider the LDP is Sound? Unanswered  | 2b - If you think that the Plan is unsound and d<br>Procedural Tests - P1 - Unanswered                         | oes not not meet one or more test(s) of sour<br>P2 - Unanswered                               | dness, please indicate which test(s) that it fails.   |
|  | Consistency Tests - C1 - Unanswered  | C2 - Unanswered C3 - Unanswere  | d C4 - Unanswered   |
|  | Coherence and Effectiveness Tests - CE1 - U  | Jnanswered CE2 - Unanswered CE  | 3 - Unanswered CE4 - Unanswered   |
| 3a - Which part of the Deposit Plan are you commenting on?   | Policy Number: Paragraph I   | Number: Proposal Map:   | Constraints Map Appendices:   |
|  | MG2(19)  |   |   |
| 3b - Do you wish to see any changes made to the Deposit Plan   | n as a result of your representation? Unanswe  | red (If "No" or "Unanswered" - go   | to 3d)  |
| 3c - What changes would like to see made to the Deposit Plan   |  |   | New Or Amended Site: Other (see Notes): Unanswered Unanswered   |
|  | Notes:   |   |   |
| 3d - If your representation relates to a new, deleted or amend   | ed site, did you submit the site as a Candidate S<br>Site Name:  | ite? Unanswered (If "Yes", please gi  | ve the Candidate Site Name and reference if known) Site Reference:  |
| 3e - Please set out your representation below:   |  |   |   |
| On behalf of ourselves and our four daughters we would   | like to strongly object to any prop <mark>os</mark> ed developm  | ent at the Murch St Cyres site, Dinas Powys   |   |
| We regularly worry about all our daughters if crossing roato supposedly ease traffic congestion for buses/coaches      | lds or walking along pavements i <mark>n any part</mark> of Di<br>also Murch Road and Murch Crescent regularly | nas Powys as the traffic has reached almost<br>sees seedy motorists and it is often difficult | saturation point (see bus lane, Eastbrook to Merrie Harriers to exit Windyridge due to traffic build ups. |
| In particular we worry about our 7 year old daughter when suffers with asthma and we are sure the air pollution in the |  | orner/Fairoaks area due to the huge build up  | of traffic at school starting and finishing times. She also   |
| To compound all other problems, the possibility of Windy cars during the evenings and weekends, let alone the be       |  |   | d belief. The road is already heavily congested with parked   |
| We bought this house because of the peace and quiet no   | ot to be subjected to a busy traffic highway, pleas  | se look for an alternative location to this deve  | elopment.   |
| 3f - Please outline the changes you wish to see made to the [  | Deposit Plan to make it sound (if relevant)  |   |   |
| 4b - If you wish to speak, please confirm which part of your re  | presentation you wish to speak to the inspector  | about and why they consider it be necessary   | to speak at the hearing -   |

| Representor ID and details: 4120/DP1 Maureen Jones  |  |  |  |
|---|--|--|--|
| Date Lodged     Status     Petition and No.     Supporting Evidence       30/03/2012     M     □     0     □  | Additional SA SEA  |  | comments to be consiered by 'written representations' or do hearing session of Public examination?                       |
| 2a - Do you consider the LDP is Sound? Unanswered   | 2b - If you think that the Plan is unsound and d<br>Procedural Tests - P1 - Unanswered<br>Consistency Tests - C1 - Unanswered<br>Coherence and Effectiveness Tests - CE1 - | P2 - Unanswered C2 - Unanswered C3 - Unanswere | ndness, please indicate which test(s) that it fails.  ed C4 - Unanswered  E3 - Unanswered CE4 - Unanswered               |
| 3a - Which part of the Deposit Plan are you commenting on?  | Policy Number: Paragraph MG2(4)  | Number: Proposal Map:                          | Constraints Map Appendices:  |
| 3b - Do you wish to see any changes made to the Deposit Plan  |  |  | o to 3d)   |
| 3c - What changes would like to see made to the Deposit Plan  |  | New Paragraph: Amended Paragraph:              | New Or Amended Site: Other (see Notes): Unanswered Unanswered  |
| 3d - If your representation relates to a new, deleted or amende   | ed site, did you submit the site as a Candidate S<br>Site Name:  | Site? Unanswered (If "Yes", please g           | give the Candidate Site Name and reference if known) Site Reference:   |
| 3e - Please set out your representation below: I am writing in support of the decision to exclude Brynhill between Highlight Park and Weycock Cross. I fail to see how the housing plan would enhance the area beyond is already heavily congested at peak times, week Road have contributed extra strain on the road infrastruct | or benefit the existing residents in any way. Poends and during holiday periods and developme  | ort Road which is on the main thoroughfare fr  | -  |
|   |  |  | placed have been lost forever and coupled with the poor retail y own more than one car which again increases the traffic |
| Further erosion of the green belt surrounding the town wo   | uld also impact greatly on the flora and fauna to  | be found there at present.                     |  |
| Barry suffers from an inferior road system, a desperate shall the townadd to this the proposed decimation of the cou  |  |  | t, Culverhouse Cross being the nearest shopping complex to   |
| 3f - Please outline the changes you wish to see made to the D   | eposit Plan to make it sound (if relevant)   |  |  |
| 4h - If you wish to speak please confirm which part of your rel   | presentation you wish to speak to the inspector  | about and why they consider it he necessary    | v to speak at the hearing -  |

(ordered by Representation ID No.)

| Representor ID and details: 4121/DP1 Rachel Vaughan  | Jones  |                        |                              |                                       |                           |  | _   |
|--|--|------------------------|------------------------------|---------------------------------------|---------------------------|--|---|
| Date Lodged Status Petition and No. Supporting Evidence 30/03/2012 M 0                     | Additional SA SEA                                |                        | Rep format:<br>Comment forr  | · · · · · · · · · · · · · · · · · · · |                           | be consiered by 'written<br>sion of Public examination | •   |
| 2a - Do you consider the LDP is Sound? Unsound   | Procedural Tests -                               | P1 - Yes               | P2 - Yes                     | ` ` `                                 | soundness, pleas          | se indicate which test(s)                              | that it fails.                            |
|  | Consistency Tests -<br>Coherence and Effecti     |                        |                              | C3 - Yes                              | C4 -<br>CE3 - Yes         | Yes<br>CE4 - Yes                                       |   |
| 3a - Which part of the Deposit Plan are you commenting on?                                 | Policy Number:<br>MG9. MD12. MG2                 |                        | raph Number:<br>7.41         | Proposal Map:<br>MG9                  | )                         | Constraints Map  | Appendices: Other - Not Listed            |
| 3b - Do you wish to see any changes made to the Deposit Plan                               | as a result of your repr                         | resentation? Yes       | ; (I                         | f "No" or "Unanswered                 | " - go to 3d)             |  |   |
| 3c - What changes would like to see made to the Deposit Plan                               | New Policy:<br>Unanswered<br>Notes:              | Amended Policy:<br>Yes | New Paragraph:<br>Unanswered | Amended Paragrap<br>Unanswered        | <u>New Or Amer</u><br>Yes | nded Site: Other (see N<br>Unanswered                  | <del></del>                               |
| 3d - If your representation relates to a new, deleted or amende                            | ed site, did you submit t<br>Site Name: Land Eas |                        | late Site? Yes               | (If "Yes", plea                       | · ·                       | idate Site Name and reference: Site Reference          | erence if known)<br>MG9/ ID 22 Appendix 1 |
| 3e - Please set out your representation below:  REPRESENTATIONS AGAINST ALLOCATION OF GYP. | SY & TRAVELLER SIT                               | F AT LAND FAST         | OF LL ANGAN                  | <del>y</del>                          |                           |  |   |

TEST P1

The LDP has not been prepared in accordance with the Community Involvement Scheme, see below key points:

- The Emergency Services and Local Primary school have all confirmed that they have NOT been consulted on the proposed site MG9. The LEA confirmed they had not been consulted about the Gypsy site.
- Registered consultees have not been informed of the consultation stages.
- According to the Welsh Government's document 'Travelling to a better future' there is an onus on the LA to consult with its strategic partners in delivering Gypsy & Traveller sites. No consultation has taken place.
- Good practice (Welsh Government document 'Good Practice Design in designing Gypsy & Traveller sites') suggests that where Gypsy & Traveller sites are concerned the local community should be engaged as early as possible — we believe that the Council has undertaken the minimum consultation in terms of the LDP and insufficient consultation with respect to the Gypsy & Traveller site in accordance with best practice.

TEST P2

- 1. The Sustainability Appraisal is flawed and contradictory the proposed sites do not meet with national policy in respect of sustainability. The allocation of Llangan is not consistent with previous Planning Rejections by the Council which considered sustainability (Bonvilston Sept 2011) and with similar determinations by the Planning Inspectorate (Pembroke Sept 2011).
- 2. The allocation of MG9 is not consistent with the proposed LDP policies.

TEST C1

The Land Use Plan (with regards to Gypsy & Traveller sites) does not relate to any strategy - The Housing Strategy is out dated and does not provide any structure for assessing Gypsy & Traveller needs or site location.

TESTC2

(ordered by Representation ID No.)

Representor ID and details: 4121/DP1 Rachel Vaughan Jones

- 1. The Site allocation does not have regard to the following National Policy:
- -Welsh Government Circular (30/2007):
- The site is RURAL and is "UNSUSTAINABLE" as there are no local services (no shops, food and drink outlets, doctor, dentist, Library, rail services or any main settlement within 5km etc). Llangan and Fferm Goch both score 0 points for local services in the evidence based assessment 'Sustainable Settlements Appraisal'
- The site would not comply with a RURAL EXCEPTION POLICY as it advocates that all pitches are accommodated on a RURAL site including transient pitches which would not comply with TAN 2.
- Any business operated from the site would be in contradiction of RURAL EXCEPTION guidance.
- The site allocation does not take into account the "SCALE" of the resident community. Llangan has a population of less than 100 with 35 homes and this proposal nearly doubles the size of the Hamlet.
- Example of similar site. In 2007 an application of the Sustainability issue was applied by the Planning inspector in Pembroke where an appleal was refused solely on this basis.
- The VOG Council has refused an application recently in Bonvilston on the basis of Sustainability and services in this case were closer to the site than in the case of Llangan proposal.
- Designing Gypsy and Traveller Sites Good Practice Guide The site is too small; therefore cannot meet the needs identified in the LDP.
- -The site measures 7400 m2 and could only accommodate 14 pitches without infrastructure (quidance is 500m2 per pitch plus refuse area; office; play area; infrastructure (roads etc)
- The access road to the site does not meet the minimum requirements for emergency vehicles (3.7m it is actually 15m)
- The site access is poor and "unsafe" having extended walks (in excess of 800m to bus stop) along an unlit lane with no public footpath or street lighting.
- The proposal of 21 units on the site would restrict the ability of emergency vehicles to manoeuvre around the site.
- New sites grants are available (and cost should not be a material planning consideration).
- -The guidance requires that sites are:
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- based on WAG guidance of Design of Gypsy traveller sites the maximum number of pitches is 14, and the proposal at Llangan exceeds this number.
- Travelling to a Better Future
- Recommends that LA's engage with their Housing Association Partners to bring sites forward. The VOG Council has not done this.
- "Situating transit provision on residential Gypsy sites is not an option preferred by the Gypsy and Traveller community as this can lead to tensions among different family groups and make site management and maintenance very difficult." This creates a sense of "fear" within the settled Gypsy & Traveller community. The proposal is recommending that transient and permanent sites are co-located.
- Planning Policy Wales 2011
- The proposed site at Llangan is greenfield land, according to the definition of brownfield land set out in Figure 4 1 of PPW;
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- offers very limited access to public transport facilities:
- is not large enough to provide ancillary facilities required to support a sustainable development as set out in paragraph 3.30 in accordance with Designing Gypsy and Travellers Sites Good Practice Guide;
- is located within a Special Landscape Area (SLA) and in close proximity to a Conservation Area. The assessment of the Llangan site incorrectly states that it is not within an SLA, so makes no reference to the sites proximity to the conservation area of Llangan. The location can be clearly seen from the conservation area.
- does not meet the identified needs of Gypsies and Travellers, in the Vale of Glamorgan (Fordham report 2008 evidence);
- does not promote sustainable access to employment, shopping, education, health, community, leisure and sports facilities;
- does not maximise opportunities for community development and social welfare;
- does not foster social inclusion due to the isolated location of the site; and
- does not contribute to improvements in health due to the isolation from services and facilities.

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2. MG2. The draft policy MG 2 actively discriminates the Gypsy community by excluding them from the wider housing programme and potentially abuses their human rights. Policy MG 2 should be revised to allow the VOG to identify appropriate sites in the same way as Affordable Housing.

#### TESTC3

- 1. The policy does not have due regard to the Wales Spatial Plan.
- The key theme of the Wales Spatial Plan is achieving sustainable development through focusing new development in areas which have good access to key services and facilities. As there are no services surrounding the site the allocation of MG9 is not consistent with the objectives of the Wales Spatial Plan. The Gypsy site proposal fails Soundness test Consistency C3 because the policy does not have due regard to the Wales Spatial Plan.

#### TESTC4

- 1. The allocation of this site does not have regard to the relevant Community Strategy in the following respects:
- "The diverse needs of local people are met through the provision of customer focused, accessible services and information" This cannot be achieved by the allocation of a non-accessible rural allocation.
- "Vale of Glamorgan residents and organisations respect the local environment and work together to meet the challenge of climate change". The allocation of MG9 places heavy emphasis on the use of the car to access the most basic facilities shops, health, education etc.
- "Older people are valued and empowered to remain independent, healthy and active. They have equality of opportunity and receive high quality services to meet their diverse needs"— All services are miles away and inaccessible to

the older community. The VERY POOR public transport system is located

1050m from the site and is in excess of the maximum distances as defined in

the proposed LDP and "Manual for Streets".

- "People of all ages are able to access coordinated learning opportunities and have the necessary skills to reach their full potential helping to remove barriers to employment"—There is no employment opportunity near to the site.
- The local primary school has confirmed that it is full and that its projections suggest that it doesn't have the capacity for such a large development (also consider the existing approval of 12 dwellings at Fferm Goch).
- The small local industrial unit has raised concerns in relation to the scale of the proposal.

#### TEST CE1

The Plan does not set out a coherent strategy in the following respects

- The Strategy makes the following statements:

The LDP will seek to provide a policy framework which: Manages the housing supply effectively in order to provide a range of good quality, affordable homes in sustainable locations

Reduces out commuting by providing opportunities for new housing, retail and employment development in accessible locations in the Vale of Glamorgan

The allocation of this rural site in open countryside does not meet this objective.

- The LDP also states its vision as being:
- "Our Vision for the Vale of Glamorgan is a place:

That is safe, clean and attractive, where individuals and communities have sustainable opportunities to improve their health, learning and skills, prosperity and wellbeing 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 sustainability of the area." The allocation of this site in policy MG9 does not meet these objectives being in a rural location with inadequate facilities and transport links.

- The Allocation of this site in policy MG9 does not comply with the following objectives of the LDP:
- -Objective 1: To sustain and further the development of sustainable communities within the Vale of Glamorgan, providing opportunities for living, learning, working and socialising for all. The site's location would clearly not meet this objective.
- Objective 2: To ensure that development within the Vale of Glamorgan makes a positive contribution towards reducing the impact of and mitigating the adverse effects of climate change. The allocation of this

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site will have entirely the opposite effect to this objective.

- Objective 3: To reduce the need for Vale of Glamorgan residents to travel to meet their daily needs and enabling them greater access to sustainable forms of transport. The allocation of this site will have entirely the opposite effect to this objective.
- Objective 4: To protect and enhance the Vale of Glamorgan's historic, built, and natural environment, The development of this site would not meet this objective; a planning refusal on an adjacent site in May 2002 stated "It is a proposal that would adversely affect the undeveloped rural character of the area"
- Objective 5: To maintain, enhance and promote community facilities and services in the Vale of Glamorgan The local primary school has not been consulted, had they been it would have been recognised that the school does not have capacity, nor is it projected to have the capacity.
- Objective 7: To provide the opportunity for people in the Vale of Glamorgan to meet their housing needs- States that development of housing should be in sustainable locations This is not. Furthermore, it brings into question POLICY MD12 which is discriminatory in that Gypsy & Traveller sites are treated differently from other housing allocations. An inclusive policy would see Gypsy & Traveller sites being assessed on the same basis as AFFORDABLE HOUSING and considered for ALL candidate residential sites in the LDP
- Objective 10: To ensure that development within the Vale of Glamorgan uses land effectively and efficiently and to promote the sustainable use and management of natural resources. The inappropriate use of finite resources can impact on the ability of future generations to fulfil their needs. The LDP through favouring the use of previously developed land and the sustainable use of natural resources of whatever kind and wherever they are located, will contribute to preserving their availability for future generations. - This is agricultural land in the Special Landscaped Area.

#### TEST CE2

The strategies, policies and allocations are not realistic and appropriate having considered relevant alternatives and are not founded on robust evidence:

- 1. The allocation of Llangan is purely on the basis of site ownership by the Vale and does not meet the requirement of Policy MD12.
- 2. The Gypsy & Traveller site assessment (anecdotal) conflicts with other evidence based background papers; specifically the Sustainable Settlement Appraisal. The SSA states 0 points for public transport but the Gypsy & Traveller site assessment states that public transport facilities are good.
- 3. The Gypsy Traveller site assessment states "good highway access", yet the access falls considerably short of the minimum requirement for vehicle access the access lane is 2.5m wide, against a minimum requirement of 3.7m plus footpath of 1.2m.
- 4. The Gypsy Traveller site assessment does not reflect the current legal obligations of the VOG in respect of this site, yet the other site assessments highlight legal issues.
- 5. Several privately-owned sites were put forward as candidate sites for Gypsy & Traveller sites but were dismissed as they were not in Council ownership. Not being in council ownership should not be a reason to reject privately owned sites.
- 6. The key issue is that the site allocation does not reflect the identified need of the Gypsy & Traveller community as highlighted in the 2008 Fordham report.
- 7. The Gypsy Traveller site assessment suggests that Fferm Goch is the local settlement when Llangan is recognised in this and historic documents as the local settlement being only 150m from the proposed site. It appears that the council has also linking the site at Llangan to the Hamlet of Fferm Goch in order to increase the site assessment positive score.
- 8. The assessment makes no reference that the site is in a Special Landscape Area (SLA).
- 9. The assessment makes no reference that the site is adjacent to a Conservation Area, within the Conservation Management Plan for this area there is a specific requirement to protect the view from the edge of the conservation area over the proposed site. The proposed site is clearly visible form the conservation area.
- 10. The allocation of Fferm Goch as a Minor Rural Settlement is incorrect. The appraisal scored 9 points, 3 are for employment which puts this site on par with the major settlements such as Barry. This is on the basis of 4 light industrial buildings. A survey of these employers has confirmed that zero new jobs have become available in the last 9 years and that the units collectively employ fewer than 15 people with no intention to expand. Furthermore, one of the units has been empty and the development is not a popular industrial site.
- 11. Fferm Goch has a population of less than 100 (98)— of the 5 sites in the Vale of Glamorgan with a population of 98 only Fferm Goch is classified as a Minor Rural site (probably based on the 9 points). The remainder are classified as Hamlets and there is a presumption against development in Hamlets (or as a minimum the scale would need to be appropriate and tied to a Rural Exception policy). The guidance requires ALL sites of a population below 100 to be classified as a Hamlet Fferm Goch should be recategorised as a Hamlet.
- 12. The Council has undertaken a study (Fordham report 2008) where the message was extremely strong that the Gypsy & Traveller community wanted smaller sites located on the fringes of larger communities. The report confirmed that isolated, rural sites restricted access to Health, Education and welfare facilities that disadvantaged them and needs to be seen in the light of the above objectives. The following is a quote from the Fordham report:
- "Participants living on Shirenewton had three main criticisms: the site was too big, the distance from local amenities along with the lack of local transport,"

"This created many problems for the residents, especially the poorest: 'for a person like me on the bread line it's very tough. I can't afford to use the car', 'everything is a mile away, including the bus stop. It takes a long walk on a busy road to get to the shops and schools".

"The tables demonstrate that access to services such as local shops, health centres and education facilities from both sites is difficult by foot and by local transport systems. This difficulty was eased when participants used their cars, however the level of ease was lower for Roverway due to the difficult entry onto the main road".

"Participants reported that access to local amenities, health services and education was low for both sites by foot or by public transport; "Everything is a mile away, including the bus stop. It takes a long walk on a busy road to get to the shops and schools".

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"It was thought that smaller sites would reduce the problem of on-site conflicts: 'they need smaller sites and not too many different families, otherwise when you have a row the whole site becomes a war zone"

"This affected the ability of the households interviewed to access local services such as shops, health centres and education facilities. It was reported that this problem mainly affected the women: men take the vehicles that the household own to work during the day, leaving the women without their own transport and often away from public transport routes"

"Participants did not specify where in Cardiff or the Vale of Glamorgan sites should be located. It was noted that sites should be on the outskirts of towns to enable access by foot to local services such as shops, the Launderette and health centres"

"While the focus of the survey was on accommodation requirements, the questionnaire also collected information on access to services, including health and education. Research has found that poor accommodation can prevent access to services and so cannot be seen in isolation."

"Participants living on sites felt that there were site restrictions that limited their work options. These were mainly associated with the location of the sites and lack of access to public transport rather than site regulations: 'no buses, no local transport. Bad access"

"Participants living on local authority sites reported that the lack of local public transport provision in the area affected their ability to send their children to school, access health services and work opportunities, and limited their ability to attend training and education courses"

"Participants were asked about where they would like future sites to be, but were not specific about locations within the County Boroughs, instead emphasising the importance of public transport to any new sites. Government draft guidance on site design stresses the importance of access to services and the promotion of integrated co-existence' between the site and surrounding community."

"The precise location, design and facilities of any new sites should be drawn up in consultation with Gypsies and Travellers to ensure that the additional provision meets their needs. The health and safety implications of a new site's location should be considered in finding a balance between offering sites in good locations and the additional land costs this would entail. The settled community neighbouring the sites should also be involved in the consultation from an early stage."

13. An independent highway study recently undertaken by Capita Symonds, surrounding the proposed site has concluded that:

"The 1km long lane itself is of poor horizontal alignment, with poor forward visibility and unsuitable for regular vehicular traffic. If the site is developed the lane itself would need major upgrading, which would certainly change its appearance within this rural environment."

"The village school is approximately 1km from the village and 900 metres from the proposed site. It is noted that the route does not offer any facilities for pedestrians, such that the only safe way for children to travel between the site and the school safely would be by vehicle. This route would also be potentially hazardous for cycle use for children, the elderly or infirm and could be potentially hazardous for all users other than by car."

"With regard to the appropriateness of the location for a traveller's site development in relation to transportation, it is difficult to refer to standard guidelines, as few relate to "rural highways", most highway design standards for residential development relate to urban areas. Hence, the advice contained within this report is based on best available information, acceptable highway standards for developments of similar size and transport needs of small communities. Welsh Government guidelines state sites should be situated in close proximity to transport links. The Llangan site would not appear to meet that criteria, being situated away from the main transport infrastructure, sites should also have ready access to schools, doctors and shops, against which requirements Llangan again appears to fail."

"With regards to the existing lane, it is generally considered that where there is direct access to dwellings, the previous standard for developments, Design Bulletin 32 offers guidance where it states that a desirable minimum carriageway width of 5.5 metres is appropriate, together with 2.0 metre wide footways on both sides. This will allow two way traffic at all times, and safe movement of pedestrians."

"Thus the lane itself should be widened to this minimum standard, which will require the removal of the existing hedge line on one or both sides of the lane and probable acquisition of land from the adjoining fields. This will of course change the environmental character of the area substantially, but is considered essential to cater for increased vehicle and pedestrian traffic"

14. There is complete inconsistency with the allocation of MG9 against the proposed policies.

#### TEST CE3

- 1. The VOG council make no reference as to how they are going to manage such a large site. The 21 unit site in Rover Way Cardiff has 3 full time Council staff allocated to it.
- 2. The current Housing Strategy expires April 2012 and makes no relevant reference as to how the Gypsy & Travelling Community will be monitored in terms of growth or need. Indeed, there is no strategy that underpins the Gypsy & Traveller community or housing at all.

TEST CE4

(ordered by Representation ID No.)

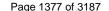
Representor ID and details: 4121/DP1 Rachel Vaughan Jones

- 1. Policy MD12 (Gypsy & Traveller) is discriminatory. It offers no flexibility for the Council to bring forward sites that are sustainable / suitable for Gypsies & Travellers through the policies derived within the plan. 2. MD12 should be redrafted to enable smaller, sustainable sites to be included within the Affordable Housing requirements and delivered through the Registered Social Landlord sector.
- 3. To argue that the Private Sector has been consulted to offer sites is not accepted. The private sector were not likely to volunteer sites for such a contentious use. The LDP should set clear strategies / policies to deliver sustainable sites for all members of the community; private; social and travelling. The current allocation does not meet this and could strongly be argued breeches the Human Rights of the Gypsy traveller community as it does not provide a suitable, sustainable site that meets the quidelines in the 2008 Fordham report.
- 3f Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)

The proposed Gypsy traveller site at Llangan (Policy MG9) should be removed from the LDP draft plan. The VOG should identify an alternative site that has been assessed according to a relative sustainability appraisal and meets the requirements of the Gypsy community as listed in the 2008 Fordham report.

Policy MD12 should be amended so that it does not discriminate against the Gypsy and Traveller community. All sites during the plan should be assessed on a similar basis as Affordable Housing.

4b - If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -



(ordered by Representation ID No.)

| Representor ID and details: 4122/DP1 Deryl Vaughan-Jo                                     | ones   |                        |                                  |                                       |                          |  | -                  |
|---|--|------------------------|----------------------------------|---------------------------------------|--------------------------|--|--------------------|
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- does not promote sustainable access to employment, shopping, education, health, community, leisure and sports facilities;
- does not maximise opportunities for community development and social welfare:
- does not foster social inclusion due to the isolated location of the site; and
- does not contribute to improvements in health due to the isolation from services and facilities.

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Representor ID and details: 4122/DP1 Deryl Vaughan-Jones

2. MG2. The draft policy MG 2 actively discriminates the Gypsy community by excluding them from the wider housing programme and potentially abuses their human rights. Policy MG 2 should be revised to allow the VOG to identify appropriate sites in the same way as Affordable Housing.

#### TESTC3

- 1. The policy does not have due regard to the Wales Spatial Plan.
- The key theme of the Wales Spatial Plan is achieving sustainable development through focusing new development in areas which have good access to key services and facilities. As there are no services surrounding the site the allocation of MG9 is not consistent with the objectives of the Wales Spatial Plan. The Gypsy site proposal fails Soundness test Consistency C3 because the policy does not have due regard to the Wales Spatial Plan.

#### TESTC4

- 1. The allocation of this site does not have regard to the relevant Community Strategy in the following respects:
- "The diverse needs of local people are met through the provision of customer focused, accessible services and information". This cannot be achieved by the allocation of a non-accessible rural allocation.
- "Vale of Glamorgan residents and organisations respect the local environment and work together to meet the challenge of climate change". The allocation of MG9 places heavy emphasis on the use of the car to access the most basic facilities shops, health, education etc.
- "Older people are valued and empowered to remain independent, healthy and active. They have equality of opportunity and receive high quality services to meet their diverse needs"— All services are miles away and inaccessible to

the older community. The VERY POOR public transport system is located

1050m from the site and is in excess of the maximum distances as defined in

the proposed LDP and "Manual for Streets".

- "People of all ages are able to access coordinated learning opportunities and have the necessary skills to reach their full potential helping to remove barriers to employment"—There is no employment opportunity near to the site.
- The local primary school has confirmed that it is full and that its projections suggest that it doesn't have the capacity for such a large development (also consider the existing approval of 12 dwellings at Fferm Goch).
- The small local industrial unit has raised concerns in relation to the scale of the proposal.

#### TEST CE1

The Plan does not set out a coherent strategy in the following respects

- The Strategy makes the following statements:

The LDP will seek to provide a policy framework which: Manages the housing supply effectively in order to provide a range of good quality, affordable homes in sustainable locations

Reduces out commuting by providing opportunities for new housing, retail and employment development in accessible locations in the Vale of Glamorgan

The allocation of this rural site in open countryside does not meet this objective.

- The LDP also states its vision as being:
- "Our Vision for the Vale of Glamorgan is a place:

That is safe, clean and attractive, where individuals and communities have sustainable opportunities to improve their health, learning and skills, prosperity and wellbeing 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 sustainability of the area." The allocation of this site in policy MG9 does not meet these objectives being in a rural location with inadequate facilities and transport links.

- The Allocation of this site in policy MG9 does not comply with the following objectives of the LDP:
- -Objective 1: To sustain and further the development of sustainable communities within the Vale of Glamorgan, providing opportunities for living, learning, working and socialising for all. The site's location would clearly not meet this objective.
- Objective 2: To ensure that development within the Vale of Glamorgan makes a positive contribution towards reducing the impact of and mitigating the adverse effects of climate change. The allocation of this

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site will have entirely the opposite effect to this objective.

- Objective 3: To reduce the need for Vale of Glamorgan residents to travel to meet their daily needs and enabling them greater access to sustainable forms of transport. The allocation of this site will have entirely the opposite effect to this objective.
- Objective 4: To protect and enhance the Vale of Glamorgan's historic, built, and natural environment, The development of this site would not meet this objective; a planning refusal on an adjacent site in May 2002 stated "It is a proposal that would adversely affect the undeveloped rural character of the area"
- Objective 5: To maintain, enhance and promote community facilities and services in the Vale of Glamorgan The local primary school has not been consulted, had they been it would have been recognised that the school does not have capacity, nor is it projected to have the capacity.
- Objective 7: To provide the opportunity for people in the Vale of Glamorgan to meet their housing needs- States that development of housing should be in sustainable locations This is not. Furthermore, it brings into question POLICY MD12 which is discriminatory in that Gypsy & Traveller sites are treated differently from other housing allocations. An inclusive policy would see Gypsy & Traveller sites being assessed on the same basis as AFFORDABLE HOUSING and considered for ALL candidate residential sites in the LDP
- Objective 10: To ensure that development within the Vale of Glamorgan uses land effectively and efficiently and to promote the sustainable use and management of natural resources. The inappropriate use of finite resources can impact on the ability of future generations to fulfil their needs. The LDP through favouring the use of previously developed land and the sustainable use of natural resources of whatever kind and wherever they are located, will contribute to preserving their availability for future generations. - This is agricultural land in the Special Landscaped Area.

#### TEST CE2

The strategies, policies and allocations are not realistic and appropriate having considered relevant alternatives and are not founded on robust evidence:

- 1. The allocation of Llangan is purely on the basis of site ownership by the Vale and does not meet the requirement of Policy MD12.
- 2. The Gypsy & Traveller site assessment (anecdotal) conflicts with other evidence based background papers; specifically the Sustainable Settlement Appraisal. The SSA states 0 points for public transport but the Gypsy & Traveller site assessment states that public transport facilities are good.
- 3. The Gypsy Traveller site assessment states "good highway access", yet the access falls considerably short of the minimum requirement for vehicle access the access lane is 2.5m wide, against a minimum requirement of 3.7m plus footpath of 1.2m.
- 4. The Gypsy Traveller site assessment does not reflect the current legal obligations of the VOG in respect of this site, yet the other site assessments highlight legal issues.
- 5. Several privately-owned sites were put forward as candidate sites for Gypsy & Traveller sites but were dismissed as they were not in Council ownership. Not being in council ownership should not be a reason to reject privately owned sites.
- 6. The key issue is that the site allocation does not reflect the identified need of the Gypsy & Traveller community as highlighted in the 2008 Fordham report.
- 7. The Gypsy Traveller site assessment suggests that Fferm Goch is the local settlement when Llangan is recognised in this and historic documents as the local settlement being only 150m from the proposed site. It appears that the council has also linking the site at Llangan to the Hamlet of Fferm Goch in order to increase the site assessment positive score.
- 8. The assessment makes no reference that the site is in a Special Landscape Area (SLA).
- 9. The assessment makes no reference that the site is adjacent to a Conservation Area, within the Conservation Management Plan for this area there is a specific requirement to protect the view from the edge of the conservation area over the proposed site. The proposed site is clearly visible form the conservation area.
- 10. The allocation of Fferm Goch as a Minor Rural Settlement is incorrect. The appraisal scored 9 points, 3 are for employment which puts this site on par with the major settlements such as Barry. This is on the basis of 4 light industrial buildings. A survey of these employers has confirmed that zero new jobs have become available in the last 9 years and that the units collectively employ fewer than 15 people with no intention to expand. Furthermore, one of the units has been empty and the development is not a popular industrial site.
- 11. Fferm Goch has a population of less than 100 (98)— of the 5 sites in the Vale of Glamorgan with a population of 98 only Fferm Goch is classified as a Minor Rural site (probably based on the 9 points). The remainder are classified as Hamlets and there is a presumption against development in Hamlets (or as a minimum the scale would need to be appropriate and tied to a Rural Exception policy). The guidance requires ALL sites of a population below 100 to be classified as a Hamlet Fferm Goch should be recategorised as a Hamlet.
- 12. The Council has undertaken a study (Fordham report 2008) where the message was extremely strong that the Gypsy & Traveller community wanted smaller sites located on the fringes of larger communities. The report confirmed that isolated, rural sites restricted access to Health, Education and welfare facilities that disadvantaged them and needs to be seen in the light of the above objectives. The following is a quote from the Fordham report:
- "Participants living on Shirenewton had three main criticisms: the site was too big, the distance from local amenities along with the lack of local transport,"

"This created many problems for the residents, especially the poorest: 'for a person like me on the bread line it's very tough. I can't afford to use the car', 'everything is a mile away, including the bus stop. It takes a long walk on a busy road to get to the shops and schools".

"The tables demonstrate that access to services such as local shops, health centres and education facilities from both sites is difficult by foot and by local transport systems. This difficulty was eased when participants used their cars, however the level of ease was lower for Roverway due to the difficult entry onto the main road".

"Participants reported that access to local amenities, health services and education was low for both sites by foot or by public transport; 'Everything is a mile away, including the bus stop. It takes a long walk on a busy road to get to the shops and schools".

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"It was thought that smaller sites would reduce the problem of on-site conflicts: 'they need smaller sites and not too many different families, otherwise when you have a row the whole site becomes a war zone"

"This affected the ability of the households interviewed to access local services such as shops, health centres and education facilities. It was reported that this problem mainly affected the women: men take the vehicles that the household own to work during the day, leaving the women without their own transport and often away from public transport routes"

"Participants did not specify where in Cardiff or the Vale of Glamorgan sites should be located. It was noted that sites should be on the outskirts of towns to enable access by foot to local services such as shops, the Launderette and health centres"

"While the focus of the survey was on accommodation requirements, the questionnaire also collected information on access to services, including health and education. Research has found that poor accommodation can prevent access to services and so cannot be seen in isolation."

"Participants living on sites felt that there were site restrictions that limited their work options. These were mainly associated with the location of the sites and lack of access to public transport rather than site regulations: 'no buses, no local transport. Bad access"

"Participants living on local authority sites reported that the lack of local public transport provision in the area affected their ability to send their children to school, access health services and work opportunities, and limited their ability to attend training and education courses"

"Participants were asked about where they would like future sites to be, but were not specific about locations within the County Boroughs, instead emphasising the importance of public transport to any new sites. Government draft guidance on site design stresses the importance of access to services and the promotion of integrated co-existence' between the site and surrounding community."

"The precise location, design and facilities of any new sites should be drawn up in consultation with Gypsies and Travellers to ensure that the additional provision meets their needs. The health and safety implications of a new site's location should be considered in finding a balance between offering sites in good locations and the additional land costs this would entail. The settled community neighbouring the sites should also be involved in the consultation from an early stage."

13. An independent highway study recently undertaken by Capita Symonds, surrounding the proposed site has concluded that:

"The 1km long lane itself is of poor horizontal alignment, with poor forward visibility and unsuitable for regular vehicular traffic. If the site is developed the lane itself would need major upgrading, which would certainly change its appearance within this rural environment."

"The village school is approximately 1km from the village and 900 metres from the proposed site. It is noted that the route does not offer any facilities for pedestrians, such that the only safe way for children to travel between the site and the school safely would be by vehicle. This route would also be potentially hazardous for cycle use for children, the elderly or infirm and could be potentially hazardous for all users other than by car."

"With regard to the appropriateness of the location for a traveller's site development in relation to transportation, it is difficult to refer to standard guidelines, as few relate to "rural highways", most highway design standards for residential development relate to urban areas. Hence, the advice contained within this report is based on best available information, acceptable highway standards for developments of similar size and transport needs of small communities. Welsh Government guidelines state sites should be situated in close proximity to transport links. The Llangan site would not appear to meet that criteria, being situated away from the main transport infrastructure, sites should also have ready access to schools, doctors and shops, against which requirements Llangan again appears to fail."

"With regards to the existing lane, it is generally considered that where there is direct access to dwellings, the previous standard for developments, Design Bulletin 32 offers guidance where it states that a desirable minimum carriageway width of 5.5 metres is appropriate, together with 2.0 metre wide footways on both sides. This will allow two way traffic at all times, and safe movement of pedestrians."

"Thus the lane itself should be widened to this minimum standard, which will require the removal of the existing hedge line on one or both sides of the lane and probable acquisition of land from the adjoining fields. This will of course change the environmental character of the area substantially, but is considered essential to cater for increased vehicle and pedestrian traffic"

14. There is complete inconsistency with the allocation of MG9 against the proposed policies.

#### TEST CE3

- 1. The VOG council make no reference as to how they are going to manage such a large site. The 21 unit site in Rover Way Cardiff has 3 full time Council staff allocated to it.
- 2. The current Housing Strategy expires April 2012 and makes no relevant reference as to how the Gypsy & Travelling Community will be monitored in terms of growth or need. Indeed, there is no strategy that underpins the Gypsy & Traveller community or housing at all.

TEST CE4

(ordered by Representation ID No.)

Representor ID and details: 4122/DP1 Deryl Vaughan-Jones

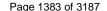
- 1. Policy MD12 (Gypsy & Traveller) is discriminatory. It offers no flexibility for the Council to bring forward sites that are sustainable / suitable for Gypsies & Travellers through the policies derived within the plan.

  2. MD12 should be redrafted to enable smaller, sustainable sites to be included within the Affordable Housing requirements and delivered through the Registered Social Landlord sector.
- 3. To argue that the Private Sector has been consulted to offer sites is not accepted. The private sector were not likely to volunteer sites for such a contentious use. The LDP should set clear strategies / policies to deliver sustainable sites for all members of the community; private; social and travelling. The current allocation does not meet this and could strongly be argued breeches the Human Rights of the Gypsy traveller community as it does not provide a suitable, sustainable site that meets the guidelines in the 2008 Fordham report.
- 3f Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)

The proposed Gypsy traveller site at Llangan (Policy MG9) should be removed from the LDP draft plan. The VOG should identify an alternative site that has been assessed according to a relative sustainability appraisal and meets the requirements of the Gypsy community as listed in the 2008 Fordham report.

Policy MD12 should be amended so that it does not discriminate against the Gypsy and Traveller community. All sites during the plan should be assessed on a similar basis as Affordable Housing.

4b - If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -



| Representor ID and details: 4123/DP1 Kathleen Bloodwo   | orth  |
|---|---|
| Date Lodged     Status     Petition and No.     Supporting Evidence       30/03/2012     M     0        | Additional SA SEA Rep format: 4a - do you want your comments to be consiered by 'written representations' or do Comment form you want to speak at a hearing session of Public examination? Unanswered   |
| 2a - Do you consider the LDP is Sound? Unanswered   | 2b - If you think that the Plan is unsound and does not not meet one or more test(s) of soundness, please indicate which test(s) that it fails.  Procedural Tests - P1 - Unanswered P2 - Unanswered  Consistency Tests - C1 - Unanswered C2 - Unanswered C3 - Unanswered C4 - Unanswered          |
|   | Coherence and Effectiveness Tests - CE1 - Unanswered CE2 - Unanswered CE3 - Unanswered CE4 - Unanswered   |
| 3a - Which part of the Deposit Plan are you commenting on?  | Policy Number:     Paragraph Number:     Proposal Map:     Constraints Map     Appendices:  |
| 3b - Do you wish to see any changes made to the Deposit Plan  | as a result of your representation? Unanswered (If "No" or "Unanswered" - go to 3d)   |
| 3c - What changes would like to see made to the Deposit Plan?   | <ul> <li>New Policy: Amended Policy: New Paragraph: Amended Paragraph: New Or Amended Site: Other (see Notes):</li> <li>Unanswered Unanswered Unanswered</li> </ul>   |
|   | Notes:  |
| 3d - If your representation relates to a new, deleted or amende   | ed site, did you submit the site as a Candidate Site? Unanswered (If "Yes", please give the Candidate Site Name and reference if known) Site Name:  |
| 3e - Please set out your representation below:  Local Development Plan 6 months late. Please explain th | is should be looked into.   |
|   | ent at Llandough, and my reason being, we have a massive traffic problem now. The Vale planning have already given consent to massively enlarge arding hugely extra traffic, we cannot cross Penlan Road now. We have a problem with near misses at the Merrie Harrier traffic.                   |
|   | Powys to Llandough, on different days. We have no infrastructure. The Vale has not spent a penny on Llandough, all the money being spent on Barry. king etc. because there is nowhere for them to go. Llandough is forgotten by the Vale Councl. until now when they see a way of making money by |
| This is to say NO to more houses. I will follow this up with  | n a letter.   |
| 3f - Please outline the changes you wish to see made to the D   | eposit Plan to make it sound (if relevant)  |
| 4b - If you wish to speak, please confirm which part of your reg  | presentation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -   |

| Representor ID and details: 4124/DP1 Malcolm Green   |   |   |                              |   |                                     |                     |                   |
|--|---|---|------------------------------|---|-------------------------------------|---------------------|-------------------|
| Date Lodged     Status     Petition and No.     Supporting Evidence       30/03/2012     M     0 | Additional SA SEA                             |   | Rep format:<br>Comment form  | 4a - do you want your o<br>you want to speak at a |                                     | •                   | •                 |
| 2a - Do you consider the LDP is Sound? Unanswered  | 2b - If you think that the Procedural Tests - | he Plan is unsound and<br>P1 - Unanswered | d does not not meet o        | one or more test(s) of soulered                   | ndness, please ind                  | licate which test(s | ) that it fails.  |
|  | Consistency Tests -                           | C1 - Unanswered                           | C2 - Unanswe                 | ered C3 - Unanswere                               | ed C4 - Unan                        | swered              |                   |
|  | Coherence and Effect                          | tiveness Tests - CE1                      | - Unanswered C               | E2 - Yes CE                                       | 3 - Unanswered                      | CE4 - Yes           |                   |
| 3a - Which part of the Deposit Plan are you commenting on?                                       | Policy Number:                                | Paragrap                                  | h Number: P                  | roposal Map:                                      | Co                                  | nstraints Map       | Appendices:       |
|  |   |   |                              | MG2(19)   |                                     |                     |                   |
| 3b - Do you wish to see any changes made to the Deposit Plan                                     | as a result of your rep                       | presentation? Yes                         | (If "I                       | No" or "Unanswered" - go                          | to 3d)                              |                     |                   |
| 3c - What changes would like to see made to the Deposit Plan                                     | New Policy: Unanswered                        | Amended Policy:<br>Unanswered             | New Paragraph:<br>Unanswered |   | New Or Amended<br>Yes               | Site: Other (see I  |                   |
|  | Notes:  |   |                              |   |                                     |                     |                   |
| 3d - If your representation relates to a new, deleted or amende                                  | ed site, did you submit<br>Site Name:         | the site as a Candidate                   | e Site? Unanswered           | d (If "Yes", please g                             | ive the Candidate<br>Site Reference |                     | ference if known) |
| 3e - Please set out your representation below: Full open enquiry.                                |   |   |                              |   |                                     |                     |                   |
| 3f - Please outline the changes you wish to see made to the D                                    | eposit Plan to make it                        | sound (if relevant)                       |                              |   |                                     |                     |                   |
| 4b - If you wish to speak, please confirm which part of your rep                                 | oresentation you wish t                       | to speak to the inspector                 | or about and why they        | y consider it be necessary                        | to speak at the he                  | <br>earing -        |                   |

| Representor ID and details: 4125/DP1 Mr & Mrs David E   | vans   |  |                                 |                                       |                         |                            |                                       |
|---|--|--|---------------------------------|---------------------------------------|-------------------------|----------------------------|---------------------------------------|
| Date Lodged     Status     Petition and No.     Supporting Evidence       30/03/2012     M     0  | Additional SA SEA  |  | Rep format:<br>Comment form     | · · · · · · · · · · · · · · · · · · · |                         | ,                          | representations' or do n? Examination |
| 2a - Do you consider the LDP is Sound? Unsound  | •  | Plan is unsound and o                            | does not not meet<br>P2 - Unans | one or more test(s) of so<br>wered    | undness, please indi    | cate which test(s)         | that it fails.                        |
|   | Consistency Tests -  | C1 - Unanswered                                  | C2 - Yes                        | C3 - Unanswe                          | red C4 - Unans          | swered                     |                                       |
|   | Coherence and Effective  | eness Tests - CE1 -                              | Yes                             | CE2 - Yes C                           | CE3 - Unanswered        | CE4 - Yes                  |                                       |
| 3a - Which part of the Deposit Plan are you commenting on?  | Policy Number:   | <u>Paragraph</u>                                 | Number:                         | Proposal Map:                         | Cor                     | nstraints Map              | Appendices:                           |
|   | 82   |  |                                 | MG2(33)                               |                         |                            |                                       |
| 3b - Do you wish to see any changes made to the Deposit Plan  | as a result of your repre  | sentation? Yes                                   | (If                             | "No" or "Unanswered" -                | go to 3d)               |                            |                                       |
| 3c - What changes would like to see made to the Deposit Plan?   | · ·  |  | New Paragraph:<br>Unanswered    | Amended Paragraph:<br>Unanswered      | New Or Amended S<br>Yes | Other (see N<br>Unanswered |                                       |
|   | Notes:   |  |                                 |                                       |                         |                            |                                       |
| 3d - If your representation relates to a new, deleted or amende   | ed site, did you submit the<br>Site Name: Land to the  |  | Site? Yes                       | (If "Yes", please                     | give the Candidate S    |                            | erence if known)                      |
| 3e - Please set out your representation below:  -This is a green field site, in an urban countryside.  -This will lead to further planning applications being forwa -The infrastructure is not capable in the village  -Absence of services to cope with demand e.g., shop, pos -This will expand the village by a third and change the who -No demand for affordable housing in this quiet part of the -Access in and out of the development onto a very busy A -How has the extra (3rd) field been included in Stage 3? | st office, sizeable school.<br>ble approach to the Vale<br>Vale.<br>48 is not feasible. Peak | of Glamorgan from the time traffic is heavy from |                                 |                                       |                         |                            |                                       |
| Deletion of the allocation MG2 (33) in respect of land Ea     Also deletion of paragraphs 147 and 148 in the LDP writing  | st of St. Nicholas.  | una (il leievant)                                |                                 |                                       |                         |                            |                                       |
| 4b - If you wish to speak, please confirm which part of your rep It is in the public's (locals) interest that we are able to spe  |  |  | -                               | ey consider it be necessa             | ry to speak at the he   | aring -                    |                                       |

| 30/03/2012 M   | Additional SA SEA                     |                             | Rep format:<br>Comment form  |                                 | ur comments to be consiered but a hearing session of Public e   | by 'written representations' or do examination? Examination |
|--|---------------------------------------|-----------------------------|------------------------------|---------------------------------|---|---|
| 2a - Do you consider the LDP is Sound? Unsound   | •                                     | P1 - Yes<br>C1 - Unanswered | P2 - Unans                   | wered C3 - Yes                  | oundness, please indicate whi  C4 - Yes  CE3 - Unanswered CE4 - | `   |
| 3a - Which part of the Deposit Plan are you commenting on?   | Policy Number:                        | Paragraph                   | n Number:                    | Proposal Map:                   | Ces - Orianswered Ce4 -   |   |
| 3b - Do you wish to see any changes made to the Deposit Plan   | as a result of your repres            | sentation? Yes              | (If                          | "No" or "Unanswered"            | go to 3d)   |   |
| 3c - What changes would like to see made to the Deposit Plan'  |                                       |                             | New Paragraph:<br>Unanswered | Amended Paragraph<br>Unanswered | : New Or Amended Site: Oth<br>Yes Uni                           | ner (see Notes):<br>answered                                |
| 3d - If your representation relates to a new, deleted or amende  | d site, did you submit the Site Name: | e site as a Candidate       | Site? No                     | (If "Yes", pleas                | e give the Candidate Site Nam<br>Site Reference:                | e and reference if known)                                   |
|  | Site Name.                            |                             |                              |                                 |   |   |
| 3e - Please set out your representation below: Please see the attached report entitled - Representation of |                                       | on                          |                              | <b>/</b>                        |   |   |
| , ,  | on behalf of Llangan Action           | und (if relevant)           | alternative suitable         | site should be allocated        |   | dness. Possible alternatives                                |

(ordered by Representation ID No.)

| Representor ID and details: 4127/DP1 Mrs Margaret Hop   | owood   |   |  |  |
|---|---|---|--|--|
| Date Lodged     Status     Petition and No.     Supporting Evidence       30/03/2012     M     □     0     □  | Additional SA SEA   | Rep format: 4a - do you wa<br>Comment form you want to spo  | nt your comments to be consiered by 'writte<br>eak at a hearing session of Public examinat   | n representations' or do ion? Unanswered           |
| 2a - Do you consider the LDP is Sound? Unsound  | 2b - If you think that the Plan is unsound<br>Procedural Tests - P1 - Unanswer  | •   | ) of soundness, please indicate which test(s   | s) that it fails.                                  |
|   | Consistency Tests - C1 - Unanswer   | ed C2 - Unanswered C3 - Un  | answered C4 - Unanswered   |  |
|   | Coherence and Effectiveness Tests - C   | CE1 - Unanswered CE2 - Yes  | CE3 - Unanswered CE4 - Unansw  | ered   |
| 3a - Which part of the Deposit Plan are you commenting on?  | Policy Number: Parag  | raph Number: Proposal Map:  | Constraints Map  | Appendices:  |
|   |   |   |  |  |
| 3b - Do you wish to see any changes made to the Deposit Plan  | as a result of your representation? Una   | answered (If "No" or "Unanswe   | red" - go to 3d)   |  |
| 3c - What changes would like to see made to the Deposit Plan  | New Policy: Amended Policy: Unanswered Unanswered   | New Paragraph: Amended Paragraph: Unanswered Unanswered   | <u>graph: New Or Amended Site: Other (see</u> Unanswered Unanswere   | <del></del>  |
|   | Notes:  |   |  |  |
| 3d - If your representation relates to a new, deleted or amende   | d site, did you submit the site as a Candid<br>Site Name:   | date Site? Unanswered (If "Yes", p  | olease give the Candidate Site Name and re<br>Site Reference:  | eference if known)                                 |
| 3e - Please set out your representation below:  |   |   |  |  |
| Proposed Housing Development off Windmill Lane MG2(   | 3)  |   |  |  |
| I object to the above on the following grounds-   |   |   |  |  |
| 1) Impact on Cowbridge  |   |   |  |  |
| 100 houses will mean 200 cars (on average 2 per househ to go to work- I have to wait an age in very long queues o queue along St Athan Road is already very long between houses=42 cars) also the development on the Cattle Marl Cowbridge) and the impact on Cowbridge of the extra traf | traffic to exit either up the High Street an<br>8am and 9am. The extra commuters wou<br>set means large increases in cars WITHO | d through the lights, or from Broadway on<br>ld bring Cowbridge to gridlock. Given the o<br>UT the Windmill Lane development. There | to St Athan Road and through the lights at the developments already to take place on the control of the control | the top of Eastgate. The old Lower School site (21 |
| <ol> <li>Public Right of Way Footpath</li> <li>My husband and I regularly walk that field path as part of<br/>used as such for a very long time.</li> </ol>   | a circular walk up through the back of St.  | Hilary and return via the Common. The lar   | nd is crucial to the amenity value of this pub   | lic footpath and has been                          |
| 3f - Please outline the changes you wish to see made to the D   | ·   |   |  |  |
| Turn down the planning application and remove Windmill  | Lane lield from the LDP.  |   |  |  |
| 4b - If you wish to speak, please confirm which part of your rep  | resentation you wish to speak to the insp   | ector about and why they consider it be ne  | ecessary to speak at the hearing -   |  |

(ordered by Representation ID No.)

| Representor ID and details: 4127/DP2 Mrs Margaret Hop   | pwood  |   |  |
|---|--|---|--|
| Date Lodged     Status     Petition and No.     Supporting Evidence       27/03/2012     M     0  | Additional SA SEA  |   | rour comments to be consiered by 'written representations' or do at a hearing session of Public examination? |
| 2a - Do you consider the LDP is Sound? Unanswered   | 2b - If you think that the Plan is unsound and d<br>Procedural Tests - P1 - Unanswered | oes not not meet one or more test(s) of P2 - Unanswered | soundness, please indicate which test(s) that it fails.  |
|   | Consistency Tests - C1 - Unanswered  | C2 - Unanswered C3 - Unans                              | swered C4 - Unanswered   |
|   | Coherence and Effectiveness Tests - CE1 - I  | Unanswered CE2 - Unanswered                             | CE3 - Unanswered CE4 - Unanswered  |
| 3a - Which part of the Deposit Plan are you commenting on?  | Policy Number: Paragraph   | Number: Proposal Map:                                   | Constraints Map Appendices:  |
|   | MG2(11)  |   |  |
| 3b - Do you wish to see any changes made to the Deposit Plan  | as a result of your representation? Unanswe  | ered (If "No" or "Unanswered                            | " - go to 3d)  |
| 3c - What changes would like to see made to the Deposit Plan'   |  | lew Paragraph: Amended Paragra<br>Unanswered Unanswered | h: New Or Amended Site: Other (see Notes): Unanswered Unanswered   |
|   | Notes:   |   |  |
| 3d - If your representation relates to a new, deleted or amende   | ed site, did you submit the site as a Candidate S<br>Site Name:                        | Unanswered (If "Yes", plea                              | ase give the Candidate Site Name and reference if known) Site Reference:                                     |
| 3e - Please set out your representation below:<br>Dear Sirs,  |  |   |  |
| I wish to express my dismay, as a resident of Cowbridge,  | regarding the Vale Council's stated intention to                                       | sell the Cowbridge Livestock Market fo                  | r development.   |
| I hold this view on a number of counts:   |  |   |  |
| <ol> <li>With the Vale a significantly rural county borough and 0<br/>supporting the farming industry. It is a key feature of the \u20a3</li> </ol> |  |   | n our area. In terms of economic regeneration, the Vale should be eds our support.                           |
| <ol><li>Livestock should not have to be transported the distant<br/>Cowbridge have a great and growing local food tradition -</li></ol>             |  | ny, (which itself is threatened with closu              | re) but should be sold locally. Don't forget, the Vale and   |
| 3. If the market were further developed and itself markete  | d, it could be a great draw for tourism - I believe                                    | e the council's policy makers have a lam                | nentable lack of vision.   |
| 4. Once the livestock market is gone, that will be the end  | FOREVER of Cowbridge as a rural market town  | n. There will be no going back and Cowl                 | oridge become up just like everywhere else.  |
| Vale Council, I am disappointed in you.   |  |   |  |
| 3f - Please outline the changes you wish to see made to the D   | eposit Plan to make it sound (if relevant)   |   |  |
| 4b - If you wish to speak, please confirm which part of your rep  | presentation you wish to speak to the inspector  | about and why they consider it be nece                  | ssary to speak at the hearing -  |

(ordered by Representation ID No.)

| Representor ID and details:            | 4128/DP                 | 1 Mr D T Jones  |   |  |                              |                                |                                   |  |                |
|--|-------------------------|---|---|--|------------------------------|--------------------------------|-----------------------------------|--|----------------|
| Date Lodged Status Petiti 30/03/2012 M | on and No.              | Supporting Evidence   | Additional SA SEA                       |  | Rep format:<br>Letter        | , ,                            |                                   | e consiered by 'written ren<br>of Public examination | •              |
| 2a - Do you consider the LDP           | is Sound?               |   | Procedural Tests -                      | ne Plan is unsound and<br>P1 - Unanswered<br>C1 - Unanswered | P2 - Unansw                  | vered                          |                                   | `,   | nat it fails.  |
|  |                         |   | Coherence and Effecti                   | iveness Tests - CE1 -  | Unanswered (                 | CE2 - Unanswered               | CE3 - Unanswered                  | d CE4 - Unanswere                                    | d              |
| 3a - Which part of the Deposit         |                         |   | Policy Number:<br>MG2(19). MG2(20)      |  |                              | Proposal Map:                  |                                   | Constraints Map                                      | Appendices:    |
| 3b - Do you wish to see any c          | hanges made             | e to the Deposit Plan   | as a result of your repr                | resentation? Unansw  | ered (If '                   | 'No" or "Unanswered"           | go to 3d)                         |  |                |
| 3c - What changes would like           | to see made             | to the Deposit Plan?  | New Policy:<br>Unanswered<br>Notes:     |  | New Paragraph:<br>Unanswered | Amended Paragrap<br>Unanswered | h: New Or Amende<br>Unanswered    | ed Site: Other (see No<br>Unanswered                 | tes):          |
| 3d - If your representation rel        | ates to a nev           | ·   | d site, did you submit tl<br>Site Name: | he site as a Candidate                                       | Site? Unanswere              | ed (If "Yes", plea             | se give the Candida<br>Site Refer | ate Site Name and refer<br>ence:                     | ence if known) |
| O- Di                                  | and a contract contract | Laure Control of the |   |  |                              |                                |                                   |  |                |

3e - Please set out your representation below:

As a resident of Dinas Powys I wish to express my concerns re. the implications of the effect that the proposed additional housing would have on the local highways network.

In Dinas Powys it is proposed that a minimum of 400 addition houses will be built on the St Cyres annexe and Caerleon Road, Both sites are on the Murch side of the community which is served by only two access points to the main road [A4055]. Both these junctions, namely the Infants School traffic lights at Murch Bridge and Cross Common Road at its junction with the A4055 are either at capacity or structurally suspect.

The 400 houses would generate between 600 to 800 additional cars in both directions, particularly at peak times. The additional traffic would have a profound and adverse impact on the community as the existing roads are under great pressure now.

Further, I am concerned that there have not been any proposed extra community facilities of substance. A local church is in desperate need of a permanent base, the local sporting facilities are not adequate for the present demand and medical services are restricted due to the limitations of space at the Dinas Powys Surgery premises on Cardiff Road.

There appears to be no serious consideration having been given to other views as to the future possible use of St Cyres Annexe, Murch Road. It is worth noting that the school buildings are in good condition although in need of a little investment. To simply seek to tear down the school without any reference to the community needs would be a shameful waste. I also have concerns regarding the capacity of the local schools to accommodate the extra pupils due to the additional houses.

Then there is the wider consideration of the Plan. Up to 10,000 additional houses are planned, many in the south east area of the Vale, e.g. 2,000 units already having been approved at the Waterfront, Barry.

Much of this traffic will be funnelled through Dinas Powys and join the ever lengthening queues leading to and from the Merrie Harrier. The proposals in Sully, Penarth, Lavernock and the land adjacent St Josephs' School, Sully Road will only add to the existing congestion at this junction.

Already the air pollution levels are excessive. The Nitrogen Dioxide [N02] levels are recorded as being 43.8 units with the maximum recommended level being 40 units along Cardiff Road, Eastbrook. An increase in vehicles, particularly standing traffic, would exacerbate the situation. The level of other emissions such as CO (carbon monoxide) and Particulates [PM105] are not available but need clarifying

The Deposit plan does not indicate what measures will be taken to encourage the availability and use of public transport. I understand that there is a serious lack of rolling stock in Wales and providing extra trains will be a major challenge. Additional buses would simply be caught up in the traffic chaos the extra housing would cause.

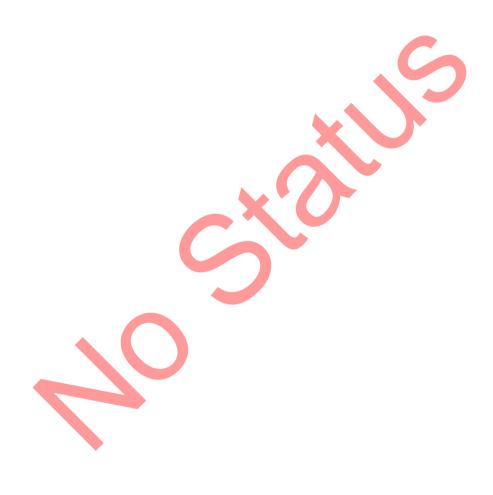
It is essential that major highway infrastructure improvements are made BEFORE hundreds of additional housing could even be considered.

(ordered by Representation ID No.)

Representor ID and details: 4128/DP1 Mr D T Jones

3f - Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)

4b - If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -



(ordered by Representation ID No.)

| Representor ID and details: 4129/DP1 Mr & Mrs Flye   |  |   |   |
|--|--|---|---|
| Date Lodged     Status     Petition and No.     Supporting Evidence       30/03/2012     M     0                                     | Additional SA SEA  |   | comments to be consiered by 'written representations' or do hearing session of Public examination?        |
|  | Procedural Tests - P1 - Unanswered  Consistency Tests - C1 - Unanswered  Coherence and Effectiveness Tests - CE1 - | P2 - Unanswered C2 - Unanswered C3 - Unanswere Unanswered CE2 - Unanswered CE | ndness, please indicate which test(s) that it fails.  ed C4 - Unanswered  3 - Unanswered CE4 - Unanswered |
| 3a - Which part of the Deposit Plan are you commenting on?   | Policy Number: Paragraph MG2(19)   |   | Constraints Map Appendices:   |
| 3b - Do you wish to see any changes made to the Deposit Plan   | as a result of your representation? Unanswe  | ered (If "No" or "Unanswered" - g   | o to 3d)  |
| 3c - What changes would like to see made to the Deposit Plan?  | New Policy: Amended Policy: 1  | New Paragraph: Amended Paragraph:   | New Or Amended Site: Other (see Notes): Unanswered Unanswered   |
| 3d - If your representation relates to a new, deleted or amende  | d site, did you submit the site as a Candidate Site Name:  | Site? Unanswered (If "Yes", please o  | jive the Candidate Site Name and reference if known) Site Reference:                                      |
| 3e - Please set out your representation below: WE WISH TO LODGE OUR OBJECTION TO THIS DEVE   |  | NIE DESOLVED NO FUDILIED  |   |
| 1/ UNTIL THE ALREADY MAJOR BOTTLENECK OF TRA<br>DEVELOPMENT OF HOUSING (WITH THE CONSEQUE  |  |   |   |
| 2/ THE VOLUME OF TRAFFIC WHICH ALREADY GENE<br>THE BUILD UP ON THE CARDIFF RD WHICH STEMS F  |  | AIN PEAK TIMES MEANS TRAFFIC IS UNA   | ABLE TO JOIN THE A4055 FROM MURCH RD BECAUSE OF   |
| 3/ THE USE OF MURCH RD /CRES AS THE ONLY MEA ADDITIONAL VIABLE ROUTE IS CONSIDERED.  | NS OF ACCESS/E <mark>G</mark> RESS ONTO THE PROP   | OSED ST CYRES SCHOOL BUILDING SIT   | E IS BEYOND COMPREHENSION UNLESS AN   |
| 4/ WE HAVE TWO SCHOOLS DINAS POWYS INFANTS<br>RECOMMENDED LEVEL. THERE IS INCREASED CONC<br>HAVE CONCERNS REGARDING THE SCHOOLS ACCO | CERN THE EFFECT ADDITIONAL TRAFFIC V   | VILL HAVE. WE ALSO UNDERSTAND BOT   | OF NITROGEN DIOXIDE ALREADY BEING ABOVE THE<br>H SCHOOLS ARE ALREADY AT FULL CAPACITY AND WE              |
| 5/ WE HAVE A HEALTH CENTRE THAT IS NEITHER SU  | IITABLE OR ADEQUATE IN SPACE/RESOUR  | RCES/PARKING TO CATER FOR ANY INC   | REASE IN MEDICAL PROVSION.  |
| IT IS THEREFORE ESSENTIAL THAT MAJOR HIGHWA CONSIDERED.  | Y INFRASTRUCTURE IMPROVEMENTS ARI  | E MADE BEFORE THE DEVELOPMENT OF  | F HUNDREDS OF ADDITIONAL HOUSES SHOULD BE   |
| 3f - Please outline the changes you wish to see made to the De   | eposit Plan to make it sound (if relevant)   |   |   |
| 4b - If you wish to speak, please confirm which part of your rep   | resentation you wish to speak to the inspector   | about and why they consider it be necessary                                   | / to speak at the hearing -   |

(ordered by Representation ID No.)

| Representor ID and details: 4130/DP1 Mrs S Hughes-Le   | wis   |                                       |                              |                               |   |                                |                 |
|--|---|---------------------------------------|------------------------------|-------------------------------|---|--------------------------------|-----------------|
| Date Lodged     Status     Petition and No.     Supporting Evidence       30/03/2012     M     0 | Additional SA SEA                             |                                       | Rep format:<br>Letter        |                               | our comments to be consicated a hearing session of Po | •                              | •               |
| 2a - Do you consider the LDP is Sound? Unanswered  | 2b - If you think that the Procedural Tests - |                                       |                              | ` '                           | f soundness, please indica                            | te which test(s) t             | hat it fails.   |
|  | Consistency Tests -                           | C1 - Unanswered                       | C2 - Unansv                  | wered C3 - Unans              | swered C4 - Unansw                                    | ered                           |                 |
|  | Coherence and Effective                       | veness Tests - CE1                    | - Unanswered                 | CE2 - Unanswered              | CE3 - Unanswered                                      | CE4 - Unanswer                 | ed              |
| 3a - Which part of the Deposit Plan are you commenting on?                                       | Policy Number:<br>MG2(19). MG2(20)            | · · · · · · · · · · · · · · · · · · · |                              | Proposal Map:                 | <u>Const</u>  | raints Map                     | Appendices:     |
| 3b - Do you wish to see any changes made to the Deposit Plan                                     | as a result of your repr                      | esentation? Unans                     | wered (If                    | "No" or "Unanswered           | " - go to 3d)   |                                |                 |
| 3c - What changes would like to see made to the Deposit Plan                                     | ? <u>New Policy:</u><br>Unanswered            | Amended Policy:<br>Unanswered         | New Paragraph:<br>Unanswered | Amended Paragra<br>Unanswered | oh: New Or Amended Site Unanswered                    | e: Other (see No<br>Unanswered | otes):          |
|  | Notes:  |                                       |                              |                               |   |                                |                 |
| 3d - If your representation relates to a new, deleted or amende                                  | ed site, did you submit the Site Name:        | he site as a Candidate                | e Site? Unanswer             | ed (If "Yes", plea            | ase give the Candidate Site<br>Site Reference:        | e Name and refe                | rence if known) |
|  |   |                                       |                              | ·                             |   |                                |                 |

3e - Please set out your representation below:

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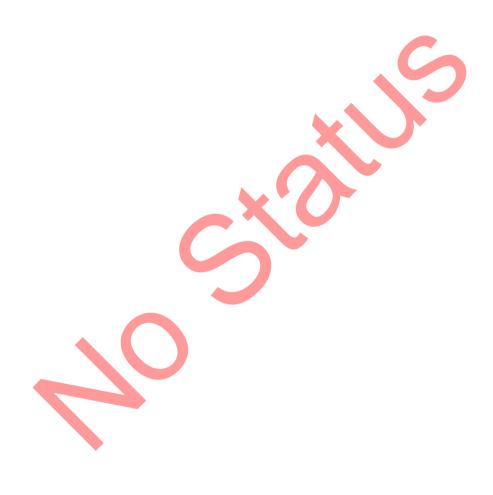
It is essential that major highway infrastructure improvements are made BEFORE hundreds of additional housing could even be considered

(ordered by Representation ID No.)

Representor ID and details: 4130/DP1 Mrs S Hughes-Lewis

3f - Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)

4b - If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -



(ordered by Representation ID No.)

| Representor ID and details: 4131/DP1 Paul Thomas   | N Pedersen                         |  |                              |  |  |                                     |                                |
|--|------------------------------------|--|------------------------------|--|--|-------------------------------------|--------------------------------|
| Date Lodged     Status     Petition and No.     Supporting Evide       M     □     0     ✓ | nce Additional SA SEA              |  | Rep format:<br>Comment form  | 1  | our comments to be cons<br>at a hearing session of P | ,                                   | •                              |
| 2a - Do you consider the LDP is Sound? Unsound   | Procedural Tests -                 | the Plan is unsound and<br>P1 - Yes<br>C1 - Unanswered | P2 - Yes                     | one or more test(s) of s   |  | ate which test(s) th                | nat it fails.                  |
|  |                                    | ctiveness Tests - CE1 -                                |                              |  |  | CE4 - Unanswere                     |                                |
| 3a - Which part of the Deposit Plan are you commenting or                                  | Policy Number:                     | Paragraph<br>5.11                                      |                              | Proposal Map: MG2 (ID 30); Resallocations table (page Supply Background Page 2011) | sidential<br>145); Housing                           | straints Map                        | Appendices: Other - Not Listed |
| 3b - Do you wish to see any changes made to the Deposit                                    | Plan as a result of your re        | epresentation? Yes                                     | (If                          | "No" or "Unanswered"   | - go to 3d)  |                                     |                                |
| 3c - What changes would like to see made to the Deposit F                                  | lan? New Policy: Unanswered Notes: |  | New Paragraph:<br>Unanswered | Amended Paragraph<br>Yes   | New Or Amended Sit                                   | te: Other (see No<br>Unanswered     | tes):                          |
| 3d - If your representation relates to a new, deleted or ame                               | • •                                | t the site as a Candidate<br>rden Emporium, Fferm G    |                              | (If "Yes", pleas   | e give the Candidate Sit<br>Site Reference:          | te Name and refer ID30 in the draft | ,                              |

REPRESENTATIONS ON VALE OF GLAMORGAN DRAFT DEPOSIT LDP RELATING TO THE ALLOCATION OF 40 HOUSES AT THE GARDEN EMPORIUM SITE. FFERM GOCH AND THE DESIGNATION OF FFERM GOCH AS A 'MINOR RURAL SETTLEMENT'.

#### Summary

- 1) The Garden Emporium site at Fferm Goch is a site with extant planning permission for 12 houses. The rationale for granting this planning permission on this site was overwhelmingly because it is a previouslydeveloped site, with derelict garden centre buildings on the site.
- 2) However, the proposed increase in draft LDP allocation, from 12 to 40 houses, is unacceptable. The principal justification for this increase appears to be the proposed new designation of Fferm Goch as a "Minor Rural Settlement". This designation is incorrect and totally inappropriate, for reasons set out below. Higher densities of development on this site (i.e. above the 12 houses permitted) - in particular for 42 and (after revisions) 24 houses - have been considered and rejected by the Council in the past. The issues that led to those rejections in particular that the site is unsustainable and a portion of the site is needed to protect a rare plant - have not changed. If this allocation is allowed there is a very real prospect that this level of housing is built - we are aware that the owners are already in pre-application discussions with the Council for 40 houses on this site, even though such discussions are inappropriately premature.
- 3) The extant planning permission includes conditions requiring the private houses to be livework units and a large portion of the site (approx 30%) to be set aside as a nature conservation area. If 40 houses were permitted on this site the developer would no doubt argue that neither of these conditions could be sustained. Other issues such as lack of public transport and lack of places at the local primary school cannot be satisfactorily resolved through condition or planning agreement.
- 4) For all these reasons, which are expanded on below, the allocation of the Garden Emporium site for 40 houses should not go forward in the draft LDP. The site should be allocated for 12 houses, in line with the extant planning permission and preserving the conditions on that planning permission requiring 1) 30% affordable housing and 2) the back portion of the site (approx 300/0 - edged in green on the attached approved plan) to be a habitat conservation area and excluded from this site altogether 3) the 8 private houses to be live-work units.
- 5) In addition, Fferm Goch should not be designated as a "Minor Rural Settlement". This was due to an incorrect "settlement scoring" of 9 which included 3 points allocated for "employment opportunities within settlement" on the basis of the nearby Westwinds industrial estate. These points should not have been allocated. 3 points puts this site on a par with towns in the Vale like Barry, which is entirely inappropriate. There are only 4 light industrial buildings on this site. A survey of these employers has confirmed that no new jobs have become available in the last 9 years and that the units collectively employ fewer than 15

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people with no intention to expand. Furthermore, one of the units has been empty and the development is not a popular industrial site.

Our representations in relation to each of the tests of 'soundness' are as follows:

TEST PI - It has not been prepared in accordance with the Delivery Agreement including the Community Involvement Scheme

The local community have not been involved in the decision to allocate this site for 40 houses. We understand that neither the school nor the LEA were consulted. We do not believe that Llangan Community Council was consulted at any previous stage in the draft LDP process.

TEST P2 - The plan and its policies have not been subjected to Sustainability Appraisal including Strategic Environmental Assessment

The Sustainability Appraisal of the Garden Emporium site is wrong in its assessment of the Garden Emporium site's ability to meet the Sustainability Appraisal's objectives because:

- 1. The site is incorrectly rated '++' (strongly contributes) as regards objective 1, which is "To provide the opportunity for people to meet their housing needs." Although this site falls within the Rural Vale, the Rural Vale is a very large area and there is no particular local specific need for this housing. As far as affordable housing is concerned, it is only proposed that the site provides the standard 35% affordable housing which means it is no different to better than any other site. The '++' rating should be reduced to '+' (contributes).
- 2. The site is incorrectly rated '+' (contributes) as regards objective 2, which is "To maintain, promote and enhance the range of local facilities". There is no suggestion that the proposed development will in any way enhance the local facilities. In fact it will place increased pressure on the following existing local facilities: the primary school, which has no spaces; the playground/open space at Fferm Goch, as we note there is no suggestion of on-site open space being provided on the Garden Emporium site (particularly given the high density of housing which 40 homes would involve and in fact on-site provision was not offered even for the extant planning permission for 12 houses); and the community hall, which already serves a large number of houses and is of a limited capacity. This' +' rating should be changed to a '--' ( strongly detracts) rating.
- 3. The site is incorrectly rated '++' (strongly contributes) as regards objective 8, which is "To use land effectively and efficiently". Although part of the site is 'brownfield' and has been previously developed as a garden centre, a large section at the rear of the site (approximately 30% of the entire site) has never been developed. It was this area which was identified as a habitat management area in the extant planning permission for 12 houses. The requirement for a habitat management area was in part due to the presence of a very rare species of plant on the site (Bithynian vetch). This rating should be reduced to a '+' (contributes) rating, to acknowledge the fact that while the development would reuse the developed part of the site, it would also use a currently undeveloped, greenfield, area.
- 4. The site is incorrectly rated '++' (strongly contributes) as regards objective 9, which is "To protect and enhance the built environment and natural environment". This is wrong for the reasons given in point 3 above. If the site was developed for 40 houses there would be no room whatsoever for any habitat management or other effective biodiversity area as has been required by the extant planning permission. This will mean the loss of a very rare plant species which has only been found in two other locations in the whole of Wales. This rating should therefore be reduced altogether to a '--' (strongly detracts) rating.
- 5. The site is incorrectly rated '0' (neutral) as regards objective 11, which is "To protect, enhance and promote the quality and character of the Vale of Glamorgan's culture and heritage." This is wrong for the same reasons as at points 3 and 4 above. The Council has resolved to protect the very rare plant species which has been added to its local biodiversity action plan. This resolution by the Council (which was made specifically in response to the survey which identified this plant on this site) indicates its recognition of the species' importance to the culture and heritage of the Vale of Glamorgan. This rating should therefore be reduced to a '--' (strongly detracts) rating.
- 6. The site is incorrectly rated '+' (contributes) rating as regards objective 12, which is, "To reduce the need to travel and enable the use of more sustainable modes of transport". This rating is wrong because although it will be possible to travel by foot or bicycle to the primary school and the community hall, every other service and local amenity including employment can only be accessed by private car. The bus service to the site is so poor that it does not even merit a rating on the Council's sustainable settlements score. This rating should therefore be reduced to a '- -' (strongly detracts) rating.

TEST C2 - It does not have regard to National Policy

- A) The proposed allocation of the Garden Emporium site for 40 houses fails to meet Planning Policy Wales (February 2011) ("PPW") in the following respects:
- 1. The Garden Emporium site is totally unsustainable. It is located in the Rural Vale, surrounded by open countryside and 7 miles from Cowbridge and 8 miles from Bridgend. Realistically anyone living in this location will rely on private cars to get to and from the site for work, shops, everything except the primary school, which, as stated below, is full.
- 2. The nearest corner shop is in Pencoed to which there is no public transport; otherwise it is necessary to drive to Cowbridge or Bridgend or one of the large supermarkets on the edge of Bridgend.

The current planning permission for the site is for 12 houses, of which at least 30% (i.e. 4) are to be affordable. There is a condition forming part of the planning permission (condition 10) which requires each of the 8 private units to be live-work units and requires that the business floor space of the live/work unit shall be finished ready for occupation before the residential floor space is occupied. The reason given for

(ordered by Representation ID No.)

Representor ID and details: 4131/DP1 Paul Thomas N Pedersen

this condition is "In order to ensure a satisfactory and sustainable form of development which will support and enhance the local rural community and in order for the development to comply with policies ENV27, ENV29 and EMP2 of the UDP." It is apparent from reading documents associated with the planning permission that although the application originally proposed the live-work units and made much of them improving the sustainability of the site, at a later date the applicant asked the LP A not to impose this condition. However, the LP A insisted it was required.

There is no suggestion that the 40 houses now proposed for the site would be live-work units. Even if this condition was imposed this site would still be unsustainable as the residents would need to drive for everything except work. It also seems likely that they would need to make business-related journeys and of course, depending upon their business, additional car journeys could in fact be created by these businesses (for example, a hairdressers).

This is contrary to PPW (paragraph 4.6.2) which states, 'Development plans ... should secure a sustainable settlement pattern which meets the needs of the economy, the environment and health, while respecting local diversity and protecting the character and cultural identity of communities.'

2. The Garden Emporium site is very poorly served by public transport - there is only a very limited bus service to and from Fferm Goch (5 buses per day to Bridgend; 4 per day from Bridgend which go on to Cowbridge). There is no bus service to the nearest train station at Pencoed (3 miles away, along roads with no pedestrian footway). This is contrary to PPW (paragraph 4.6.4), which states, 'Local planning authorities should assess the extent to which their development plan settlement strategies and new development are consistent with minimising the need to travel and increasing accessibility by modes other than the private car. "Higher density development, including residential development, should be encouraged near public transport nodes or near corridors well served by public transport (or with the potential to be so served).'

This is added to by paragraph 4.6.7 PPW which stresses that, 'In rural areas the majority of new development should be located in those settlements which have relatively good accessibility by non-car modes.' This is emphasized again in paragraph 8.7.3 PPW which states, 'It is also expected that the proposed access to a development will reflect the likely travel patterns involved. It should ensure that people can reach the development, as far as practicable, by walking, cycling and public transport, as well as by car.'

3. The existing local infrastructure will not be able to serve a further 40 houses at the Garden Emporium site. There is very little local infrastructure available at this site, but two issues are relevant - the local primary school (Llangan primary school) and highways issues:

#### Llangan primary school

Llangan primary school is within walking distance of the site. However, this school is very small and is full. The Local Education Authority has told us that Llangan primary school's maximum capacity is 111 pupils, and the number on the roll as at September 2011 was 108 pupils. The admission number of new pupils each year is no more than 15. This is because several year groups are combined (i. e. two year groups being taught as a single class, in one classroom) and the LEA needs to comply with the requirement in its education plan to have no more than 30 children in each classroom. Although in some circumstances it might be appropriate to deal with this by seeking a s 1 06 contribution from the developers to increase the capacity of the school, in this case the school has neither the space nor the land to expand to take on more pupils.

Two classes are already being taught in terrapins located in the playground and the school only has a relatively small area of grass which has already been diminished as a result of building a new school hall and two classrooms a few years ago. It is noted that in the planning officer's report for the current 12-house planning permission the education authority thought that there was enough space in local primary school~ (it did not specify any in particular) to accommodate the children from 12 houses- 40 houses is very different. From speaking to the LEA, we understand that according to their formula for calculating the number of primary school places generated by new houses, 40 new houses would result in 15 primary age children needing places. There is therefore currently no possibility for the school to provide places for the primary-age children from this development who would have to be driven to other schools some distance away.

#### Highway safety issues

When Council considered the current planning permission the highways department was originally concerned about there being more than one exit from the site, when there were only 12 houses. The extant planning permission includes a condition (condition 20) that the site shall be served by no more than two means of access onto Ruthin Road - with the primary access to serve no more than 8 dwellings and the secondary access to serve no more than 4 dwellings. How many exits would be proposed for 40? This road is used heavily by traffic, particularly during peak times - many drivers, including a significant number of large lorries, use it as a short cut from the A48 to the M4. It is also the main pedestrian cycleway to Llangan primary school from Fferm Goch Heol Llidiard/St Mary Hill and is used on a daily basis by those residents for that purpose. Currently only a few single houses have driveways onto this road. Having an additional 40 houses here will increase the traffic considerably, at increased safety risk to existing drivers and pedestrians and cyclists.

This is therefore contrary to paragraph 4.6.8 of PPW which states, 'Development in the countryside should be located within and adjoining those settlements where it can be best accommodated in terms of infrastructure, access and habitat and landscape conservation.' It is also contrary to paragraph 9.2.9 of PPW which states, 'Local planning authorities should consider the following criteria in deciding which sites to allocate for housing in their development plans: ...

• the location of potential development sites and their accessibility to jobs, shops and services by modes other than the car, and the potential for improving such accessibility

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- the capacity of existing and potential infrastructure including public transport ... and social infrastructure (such as schools ... ), to absorb further development and the cost of adding further infrastructure ... "
- 4. The development of the Garden Emporium site cannot be described as infilling or a minor extension to Fferm Goch. It is located adjacent to Fferm Goch, but the proposed 40 houses are more than Fferm Goch and Heol Llidiard combined (which amount to 33 houses). It is totally out of scale for this area.

It also cannot be claimed to meet any "local need" for affordable housing. The Council's own background documents recognise that the need for affordable housing is greater in the larger settlements in the Vale, such as Barry. Section 3.9 of the draft LDP states that, 'The findings of the [Local Housing Market Assessment 2010] make clear that the area of greatest need is Barry followed by the coastal settlements of Rhoose, Llantwit Major and Penarth as well as the Rural and Eastern Vale." This statement is supported by the Council's 'Affordable Housing' background paper (November 2011), in which Table 2 in paragraph 3.7 specifies an identified need of 3 5 units of affordable housing per year in the Rural Vale. This is a very low number of units to be accommodated within a large area of land and there is no need for such a high concentration of units to be accommodated on the Garden Emporium site. In fact, the existing houses at Fferm Goch are sold at considerably less than the average house price in this area (i.e. the Rural Vale). No.3 Fferm Goch was sold in June 2011 for £180.000 and No.8 has been on the market for £185.000.

Notwithstanding these prices, these houses often remain on the market for some time – at least a year. Fferm Goch is private market housing which was originally Agricultural Settlement Houses (a form of Council housing) developed by the Welsh Land Society in 1939. Why do we need more houses at affordable prices in this location? There is no identified local need to be met.

We understand from speaking to a Council officer that the main reason the Council are prepared to consider 40 houses on this site is the need for more affordable housing in the Vale. While we have no problem with the principle of 35% of new housing being affordable, we do not think that this policy should be used to 'reverse engineer' such a huge increase in the total number of houses being proposed on this site. With the original planning permission 12 houses, 30% would have resulted in an entirely sensible allocation of 4 affordable houses. To invert this reasoning and specify a total of 40 houses in the hopes of raising the number of affordable houses from the existing planning permission - at the cost of an increase of 18 private houses (from 8 to 26). The detrimental impact this development will have on the local community is a disproportionate sacrifice to make for an additional 10 affordable houses.

The proposal for 40 houses on this site is therefore contrary to paragraph 4.6.8 of PPW which states, "Infilling or minor extensions to existing settlements may be acceptable, in particular where it meets a local need for affordable housing, but new building in the open countryside away from existing settlements or areas allocated for development in development plans must continue to be strictly controlled. All new development should respect the character of the surrounding area and should be of appropriate scale and design.

If 40 houses are built on the Garden Emporium site this will be significant overdevelopment of this site at a density which should not be permitted in this location. The following points are relevant:

- a) It is acknowledged and accepted that the site has existing planning permission for 12 houses; this is a brownfield site where there has been a number of failed garden centres and it was perhaps inevitable that it would eventually be developed for housing. The development of the site with 12 houses is accepted, although even with 12 houses there are still concerns about the impact these will have on the local school and highways.
- b) However, 40 houses will make the site crowded and out of keeping with the rural area. Fferm Goch has a particular and special history it was built by the Welsh Land Society in 1939 to promote employment in rural areas and in this case to provide social housing and a community for farm workers at the large farm across the road and the houses at Fferm Goch form 3 sides of a square with a large grass pitch and play area in the middle. There is no suggestion that the proposal for the Garden Emporium site would be designed in a similar way. Fferm Goch should not in any event be used as an excuse to set a "precedent" for this locality, where other housing consists of isolated dwellings.
- c) The previous planning history of the site is relevant the Council previously considered proposals for 42 and 24 houses and rejected both on grounds of over-development, of this site.

This is contrary to paragraph 9.2.12 ofPPW which states, 'Strong pressure for development may give rise to inappropriately high densities if not carefully controlled.' In paragraph 9.2.22 it states, 'In order to safeguard the character and appearance of the countryside, to reduce the need to travel by car and to economise on the provision of services, new houses in the countryside away from existing settlements recognised in development plans or from other areas allocated for development must be strictly controlled. Many parts of the countryside have isolated groups of dwellings. Sensitive filling-in of small gaps or minor extensions to such groups, in particular for affordable housing to meet local need, may be acceptable but much depends on the character of the surroundings, the pattern of development in the area and the accessibility to main towns and villages.' In paragraph 9.3.4 PPW states, 'In determining applications for new housing, local planning authorities should ensure that the proposed development does not damage an area's character and amenity.' The proposed development of this site with 40 houses would significantly damage the character of this area.

6. If 40 houses are built on the Garden Emporium Site, it will result in the loss of a rare plant species, Bithynian Vetch, which has been identified by the Council in its Local Biodiversity Action Plan.

The extant planning permission for the Garden Emporium site includes:

a) a condition (condition 9) that a significant proportion of the site (approx. 30% - being the whole of the back strip of the site edged green on the approved plan) shall have no buildings located on it and all

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properties shall be located at least 10 metres from this boundary within the development site; and

b) another condition (condition 12) that this area shall be designated as a habitat management area to be supported by a comprehensive habitat management plan. The plan is to pay particular regard to the areas where Bithynian vetch has been found and seek to maintain and conserve this species.

These conditions were imposed in particular to preserve the species Bithynian vetch. It is apparent from the planning officer's report associated with the current planning permission that Bithynian vetch was found on the site during the course of an ecological survey being carried out, at the request of the Countryside Council for Wales. The report states that Bithynian vetch is a rare species, included as vulnerable on the UK vascular plant red data list and endangered on the Welsh list. The report says that this species was previously unknown to occur in the Vale of Glamorgan and is known to occur on only 2 other sites in the whole of Wales. As a result, the Council held a special meeting to decide to protect this plant by placing it on the Council's 2002 Local Biodiversity Action Plan.

There is no suggestion in the draft LDP that this large part of the site - which the planning officer's report recognises is open land rather than previously-developed land - would not be open to development and it would seem difficult/impossible for a planning permission for 40 houses on this site to protect the same area as a "no-build" zone. The Proposals map includes this part of the site within the area proposed to be allocated for 40 houses. The fact that this open area of land at the back of the site would not be built on under the terms of the current planning permission was a material consideration for the planning officer in recommending approval of the planning application for 12 houses (see the planning officer's report, page 12).

The allocation of 40 houses is therefore contrary to PPW paragraph 5.2.8 which states, 'Local planning authorities must address biodiversity issues, in so far as they relate to land use planning in both development plans and development control decisions. Paragraph 5.2.2 of PPW recognises that, 'The Natural Environment and Rural Communities Act 2006 places a duty on every public authority, in exercising its functions, to have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity.' The extant planning permission allowed for the preservation of this rare plant by allocating a significant portion of the site to be a no-build zone - a habitat conservation area. This area will not be possible if 40 houses are built.

B) The proposed designation of Fferm Goch as a "Minor Rural Settlement" also fails to meet PPW because it is plainly not a sustainable settlement and has been incorrectly assessed by the Council. This incorrect designation (which is considered in detail in Test CE2 below) infringes the following paragraphs of PPW: 4,6.2, 4.6.4, 4.6.7, 4.6.8, 8.7.3, 9.2.9, 9.2.12, 9.2.22 and 9.3.4 (all as cited above). If it were identified as a Minor Rural Settlement, Fferm Goch would be at risk of future residential development being allowed in this location through policy MG7 of the draft LDP. Fferm Goch is not a location where new development should routinely be permitted since it would infringe all the sustainability principles for development in rural locations.

TEST C3 - It does not have regard to the Wales Spatial Plan (wSP)

The Wales Spatial Plan update 2008 states at paragraph 1.4 that, 'It is a principle of the Wales Spatial Plan that development should be sustainable. Sustainable development is about improving wellbeing and quality of life by integrating social, economic and environmental objectives in the context of more efficient use of natural resources.' The Garden Emporium Site is a totally unsustainable site for reasons given above (Test C2).

TEST C4 - It does not have regard to the relevant Community Strategy

The Community Strategy for the Vale 2011-21 sets out 10 priority outcomes. The allocation of the Garden Emporium for 40 houses fails to have regard to the following of these priorities:

- "2. The diverse needs of local people are met through the provision of customer focused, accessible services and information." This priority is not met because the Garden Emporium site is so far from shops, health services, local amenities and workplaces as well as having poor public transport.
- "3. Vale residents and organisations respect the local environment and work together to meet the challenge of climate change." This priority is not met because the Garden Emporium site will require all its residents to travel by car to access every local service save the primary school (which does not have sufficient space for the children of 40 families, so primary school pupils will have to travel by car to other schools) "4. Older people are valued and empowered to remain independent, healthy and active.

They have equality of opportunity and receive high quality services to meet their diverse needs." This priority is not met because public transport to this site is very poor both in terms of timetabling and route, which greatly inhibits their chance of remaining independent.

Also, there are no local services available to them such as healthcare, library or other local amenities.

- "5. Children and Young people in the Vale are well informed and supported to access a broad range of quality services that enable them to take full advantage of the life opportunities available in their local communities and beyond." This priority is not met because the local primary school is unable to accommodate the projected increase in pupil numbers from 40 new homes. Children will need to travel to other primary schools. Public transport from this site is very poor. Children will need to travel by car to primary school and to all other activities and services including leisure activities.
- "6. People of all ages are able to access coordinated learning opportunities and have the necessary skills to reach their full potential, helping to remove barriers to employment." This priority is not met because

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there are no learning opportunities present near the site nor, more importantly, are there any employment opportunities near the site either.

"7. The underlying causes of deprivation are tackled and the regeneration of the Vale continues, opportunities for individuals. and businesses are developed and the quality of the built and natural environment is protected and enhanced." This priority is not met because the proposed allocation of 40 houses on the Garden Emporium will not protect and enhance the natural environment of the Vale: in order to develop 40 houses the entirety of the site will have to be developed, whereas the current planning permission requires the back third of the site to be allocated as a habitat management area. A key reason for this habitat management area was to preserve a very rare plant species growing on the site.

"10. Health inequalities are reduced and residents are able to access the necessary services, information and advice to improve their wellbeing and quality of life." This priority is not met because there are no local health services near the site. Such services can only be accessed by driving to one of the nearby towns.

TEST C5 - The Plan does not set out a coherent strategy from which its policies and allocations logically flow and, where cross boundary issues are relevant, it is not compatible with the development plans prepared by neighbouring authorities.

The draft LDP Strategy is stated (page 23) to comprise four key elements - one of these is 'Other sustainable settlements to accommodate further housing and associated development'.

This element of the draft LDP strategy is based on the designation of certain towns and villages within the Vale as "sustainable settlements". However, Fferm Goch is wrongly identified in the strategy as a "Minor Rural Settlement", for reasons set out under Test CE2 below.

The draft LDP at Section 5. 10 (page 25) states that minor rural settlements are those 'considered to have sufficient population, services and facilities to assimilate growth without it having a detrimental impact on their existing character and local environment.' Also, at Section 5.16 of the draft LDP (page 27), 'The types of services and facilities typically found within the minor rural settlements include places of worship, community halls, small-scale retail uses and formal recreational facilities. A number of the smaller rural settlements also provide small-scale local employment opportunities, either within or in close proximity to the settlements.'

Neither of these descriptions fit Fferm Goch - for reasons set out under Test CE2. The strategy base for the rest of the LDP policies is therefore wrong in this respect.

The draft LDP Strategy is stated to follow on from the Vision and Objectives set out in the draft LDP. The Vision is stated to be for the Vale of Glamorgan to be "a place:

- That is safe, clean and attractive, where individuals and communities have sustainable opportunities to improve their health, learning and skills, prosperity and wellbeing ... "

The proposed allocation of the Garden Emporium site will be contrary to this Vision, being unsustainable development in an area with very poor public transport where there are no employment prospects and allieaming, health and other facilities can only be accessed using the car.

The allocation of this site will also be contrary to the following Objectives set out in the draft LDP:

"Objective 1: To sustain and further the development of sustainable communities within the Vale of Glamorgan, providing opportunities for living, learning, working and socialising for all" - The proposed Garden Emporium site is in a wholly unsustainable location, as is the adjacent Fferm Goch.

"Objective 2: To ensure that development within the Vale of Glamorgan makes a positive contribution towards reducing the impact of and mitigating the adverse effects of climate change." - The effects of climate change will be increased if a further 40 houses are built in this location where people will have to use cars to meet their daily needs.

"Objective 3: To reduce the need for Vale of Glamorgan residents to travel to meet their daily needs and enabling them greater access to sustainable forms of transport" - Public transport at this site is very poor.

"Objective 4: To protect and enhance the Vale of Glamorgan's historic, built and natural environment" - The proposed development of the Garden Emporium site represents overdevelopment of this site, which is out of keeping with the rural area. It will also fail to preserve the back third of the site as a habitat conservation area, as proposed by the extant planning permission for 12 houses on the site.

"Objective 5: To maintain, enhance and promote community facilities and services in the Vale of Glamorgan" - The proposed development at the Garden Emporium site will place increased pressure on resources - in particular Llangan primary school which is full.

"Objective 7: To provide the opportunity for people in the Vale of Glamorgan to meet their housing !leeds." - There is no need for this housing at this location.

"Objective 10: To ensure that development within the Vale of Glamorgan uses land effectively and efficiently and to promote the sustainable use and management of natural resources." – If 40 houses are allowed to be built at the Garden Emporium site then the rear part of the Garden Emporium site, which is greenfield and has not previously been built on, will be.

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TEST 2 - The strategy, policies and allocations are not realistic and appropriate having considered the relevant alternatives and/or are not founded on a robust and credible evidence base.

1. Incorrect classification of Fferm Goch as a Minor Rural Settlement (Section 5.11 of the draft LDP):

Fferm Goch has been wrongly classified by the Council as a "Minor Rural Settlement" for the following reasons:

- a) In the Council's 'Sustainable Settlements Appraisal Review' Background paper (November 2011) ('the SSAR') -Fferm Goch should have been classified as being one of the rural, hamlets and isolated areas of the Vale of Glamorgan with an 'Anomaly Settlement' score. In paragraph 5.15 of the SSAR, the Council recognises that there are a number of settlements with relatively high scores which have been identified with anomaly scores because, for example, the settlement is located within walking distance of a one-off, high-scoring facility. Paragraph 5.15 says anomaly settlements have been identified by 'overriding' or 'limiting' factors such as:
- (i) a general limited range of services and facilities within the settlement,
- (ii) a low population (generally below 100), and/or
- (iv) the settlement being in an otherwise isolated or sensitive location.

All of these factors apply to Fferm Goch. Fferm Goch is a classic example of an anomaly settlement since it receives a full 3' score due to its proximity to a primary school. The employment score is wrong (see below), so its overall score should have been 6. It has a population of 98 (i.e. below 100). It is in an isolated location.

- b) It is the smallest of the "Minor Rural Settlements" with only 98 residents (nb Council say should have over 100) there are several other settlements with higher populations which are not classified as Minor Rural Settlements.
- c) Unlike all the other "Minor Rural Settlements" it is not recognised locally as a village it has no place sign of its own, only a street sign.
- d) it was not originally classified as a "Minor Rural Settlement" it seems to have been reclassified during the development plan process probably due to representations by the property developers who own the Garden Emporium (we note representations made by Winchester Properties on the draft preferred strategy in March 2009).
- e) The settlement scoring criteria for Fferm Goch is wrong in the SSAR Fferm Goch scores 3 for employment which is defined as meaning that there are employment opportunities on site. The only employment opportunity near Fferm Goch is Westwinds industrial estate.

This is a very small estate with only 4 light industrial buildings. A survey of these employers has confirmed that no new jobs have become available in the last 9 years and that the units collectively employ fewer than 15 people with no intention to expand.

Furthermore, one of the units has been empty and the development is not a popular industrial site. It cannot be right that this small industrial estate is classified as the same employment opportunity as those available in towns in the Vale, such as Barry, Penarth and Cowbridge. We believe Fferm Goch should score 0 for employment.

- f) Fferm Goch rightly does not have any designation as a settlement in the current UDP it is correctly classified along with other small hamlets as "open countryside". In the planning officer's report which considered the current planning permission it was "concluded that the development of the site for no more than 12 residential units, when taking into account the other material considerations would be sufficient to outweigh the local policy presumption against such development found in the Unitary Development Plan, subject to conditions and a Section 106 Legal Agreement requiring contributions to mitigate the impacts of the development" (page 22). The planning officer's report also noted, at page 12, that, "Categorising the site as brown field or previously developed land is a material consideration that does not, on its own, justify its suitability for residential development, however, the proposed amendments to the scheme concentrating development into the previously built up part of the site does have a bearing on the consequent policy position",
- g) If the list of other Minor Rural Settlements is considered, together with those which the Council decided were Anomaly Settlements or simply HamletslRural Areas, Fferm Goch stands out as an odd allocation we would strongly suggest it cannot be considered equal to any of the other Minor Rural Settlements, including nearby Graig Penllyn and Treoes, which are both substantial villages. It is much more similar to The Herberts, which the Council considered to be an Anomaly Settlement inspite of it having a primary school like Fferm Goch, although The Herberts scores for having a bus service and being much nearer to Cowbridge, whereas Fferm Goch does not. There are also villages which again are much more substantial than Fferm Goch which are not recognised as Minor Rural Settlements, including nearby Llangan and Welsh St Donats.
- h) The draft LDP at Section 5.19 (page 33) sets out the following 'common objectives' for the Minor Rural Settlements:
- Favour proposals which seek to protect and enhance the viability, accessibility or community value of existing village facilities and transport services.

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- Provide for an appropriate level, range and choice of housing, including affordable rural housing to meet local need.
- Encourage the diversification of the rural economy by favouring appropriate employment and tourism related developments.

Further, these objects are supported by Policy MG7 which at section 7.34 (page 83) states,

'New development however must always be of an appropriate scale, form and design that is sympathetic to and respects the existing character of the village and the range of services and facilities that are available. This will generally comprise infilling or limited small scale extensions to the minor rural settlements, in particular where they meet the need for local affordable housing.' Considering these statements as a whole it is apparent that Fferm Goch does not fit comfortably as a Minor Rural Settlement.

- i) If it were identified as a Minor Rural Settlement, Fferm Goch would be at risk of future residential development being allowed in this location through policy MG7 of the draft LDP. Fferm Goch is not a location where new development should routinely be permitted since it would infringe all the sustainability principles for development in rural locations. The only reason housing development has been permitted at the Garden Emporium site is because it is a brownfield site this is an exceptional site in this location.
- 2. Inappropriate allocation of 40 houses at the Garden Emporium site at Fferm Goch (policy MG2):

The allocation of 40 houses at the Garden Emporium site is inappropriate for the following reasons:

- a) A large part of the argument for allowing a huge increase in the number of houses proposed at the Garden Emporium site appears to be the classification of fferm Goch as a minor rural settlement, which is incorrect for the reasons stated above.
- b) The number of houses to be allocated at the Garden Emporium should reflect the extant planning permission for 12 houses. The draft LDP, Section 7.11 (page 75) states that, 'The number of units proposed for each identified site [which includes the Garden Emporium] is based on a density range between 25 and 30 units net per hectare or where they are available, planning application or pre-application details. Where site densities differ from these levels, this reflects local site circumstances or sensitivities.' In this case there is an existing planning permission for 12 units which should therefore have been the starting point for this site and there are good reasons why a higher density of units should not be permitted and has been consistently refused by the Council on planning applications considered to date (unsustainability, lack of local infrastructure and employment, very poor public transport and preservation of a rare plant).
- c) Policy MG8 (page 84) states 'In Minor Rural Settlements, a net residential density of 25 net dwellings per hectare will be required.' It then continues 'Lower density levels will be permitted where it can be demonstrated that:
- 1. Development at the prescribed densities would have an unacceptable impact on the character of the surrounding area;
- 2. Reduced densities are required ... to preserve a feature that would contribute to existing or future local amenity. '-

In relation to point 1, above, development of 40 houses would have an unacceptable impact on this area which with the exception of Fferm Goch consists of isolated and dispersed rural houses.

In relation to point 2. above, there is an identified rare plant on this site which would be preserved by the extant planning permission.

- 3f Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
  - a) Section 5.11 (page 26) delete Fferm Goch from the list of Minor Rural Settlements
  - b) Policy MG2 (page 74) amend the number of houses allocated to The Garden Emporium, Fferm Goch from 40 to 12
  - c) Residential allocations table (page 145) amend number of dwellings at The Garden Empoorium, Fferm Goch from 40 to 12
  - d) Proposals map amend to exclude back area of site MG2(30) identified as habitat area edged green on attached plan
  - e) Housing Supply Background Paper (November 2011) error in table 1 site no.30 The Garden Empoorium, Fferm Goch number of units should be 12, not 220
- 4b If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -

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|--|--|--|-------------------------------|-----------------------|---|---|
| Date Lodged Status Petition and No. Supporting Eviden 30/03/2012 M 0 | ce Additional SA SEA   | Rep format:<br>Comment form                  | ·                             | ,                     | o be consiered by 'writter<br>ssion of Public examinati | •   |
| 2a - Do you consider the LDP is Sound? Unsound                       | Procedural Tests - P1 -  | Unanswered C2 - Yes                          | ` '                           |                       | Yes  CE4 - Yes  | ) that it fails.                              |
|  | Policy Number:<br>MG9. MD12. MG2                                 | Paragraph Number:<br>6.49. 6.52. 7.41. 7.44. | Proposal Map:<br>MG9          | )                     | Constraints MapFeb 2012                                 | Appendices: Appendix 9 - Supporting Documents |
| 3b - Do you wish to see any changes made to the Deposit Pl           | an as a result of your representa                                | tion? Yes                                    | f "No" or "Unanswered         | d" - go to 3d)        |   |   |
| 3c - What changes would like to see made to the Deposit Pla          | nn? New Policy: Amer Unanswered Yes Notes:                       | nded Policy: New Paragraph: Unanswered       | Amended Paragra<br>Unanswered | ph: New Or Ame<br>Yes | ended Site: Other (see I<br>Unanswered                  | <del></del>                                   |
| 3d - If your representation relates to a new, deleted or amen        | ded site, did you submit the site<br>Site Name: Land East of Lla |  | (If "Yes", ple                | ū                     | didate Site Name and rei                                | ference if known)<br>MG 9 / ID 22 Appendix 1  |
| 3e - Please set out your representation below:                       |  |  |                               |                       |   |   |

The proposed Gypsy traveller site would be situated on a greenfield area close to the Hamlet of Llangan and would place an unacceptable pressure on the local infrastructure and services.

This proposal is against both local and national policy, in terms of development and does not meet the identified needs of the gypsy and traveller community (listed in the Council's own report – Fordham report)

I do not support this unfair proposal, the Council should seek to find smaller, more suitable, sustainable sites where transient and permanent pitches are not co-located. The new sites should meet the needs of the gypsy traveller community and take into consideration Special Landscape Area (SLA) and Conservation Areas and the local environment.

REPRESENTATIONS AGAINST ALLOCATION OF GYPSY & TRAVELLER SITE AT LAND EAST OF LLANGAN

#### TEST P1

The LDP has not been prepared in accordance with the Community Involvement Scheme, see below key points:

- The Emergency Services and Local Primary school have all confirmed that they have NOT been consulted on the proposed site MG9. The LEA confirmed they had not been consulted about the Gypsy site.
- Registered consultees have not been informed of the consultation stages.
- According to the Welsh Government's document 'Travelling to a better future' there is an onus on the LA to consult with its strategic partners in delivering Gypsy & Traveller sites. No consultation has taken place.
- Good practice (Welsh Government document 'Good Practice Design in designing Gypsy & Traveller sites') suggests that where Gypsy & Traveller sites are concerned the local community should be engaged as early as possible — we believe that the Council has undertaken the minimum consultation in terms of the LDP and insufficient consultation with respect to the Gypsy & Traveller site in accordance with best practice.

#### TEST P2

1. The Sustainability Appraisal is flawed and contradictory — the proposed sites do not meet with national policy in respect of sustainability. The allocation of Llangan is not consistent with previous Planning Rejections by the Council which considered sustainability (Bonvilston Sept 2011) and with similar determinations by the Planning Inspectorate (Pembroke Sept 2011).

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2. The allocation of MG9 is not consistent with the proposed LDP policies.

#### TEST C1

The Land Use Plan (with regards to Gypsy & Traveller sites) does not relate to any strategy - The Housing Strategy is out dated and does not provide any structure for assessing Gypsy & Traveller needs or site location.

#### TESTC2

- 1. The Site allocation does not have regard to the following National Policy:
- -Welsh Government Circular (30/2007):
- The site is RURAL and is "UNSUSTAINABLE" as there are no local services (no shops, food and drink outlets, doctor, dentist, Library, rail services or any main settlement within 5km etc). Llangan and Fferm Goch both score 0 points for local services in the evidence based assessment 'Sustainable Settlements Appraisal'
- The site would not comply with a RURAL EXCEPTION POLICY as it advocates that all pitches are accommodated on a RURAL site including transient pitches which would not comply with TAN 2.
- Any business operated from the site would be in contradiction of RURAL EXCEPTION guidance.
- The site allocation does not take into account the "SCALE" of the resident community. Llangan has a population of less than 100 with 35 homes and this proposal nearly doubles the size of the Hamlet.
- Example of similar site. In 2007 an application of the Sustainability issue was applied by the Planning inspector in Pembroke where an appeal was refused solely on this basis.
- The VOG Council has refused an application recently in Bonvilston on the basis of Sustainability and services in this case were closer to the site than in the case of Llangan proposal.
- Designing Gypsy and Traveller Sites Good Practice Guide The site is too small; therefore cannot meet the needs identified in the LDP.
- -The site measures 7400 m2 and could only accommodate 14 pitches without infrastructure (guidance is 500m2 per pitch plus refuse area; office; play area; infrastructure (roads etc)
- The access road to the site does not meet the minimum requirements for emergency vehicles (3.7m it is actually 15m)
- The site access is poor and "unsafe" having extended walks (in excess of 800m to bus stop) along an unlit lane with no public footpath or street lighting.
- The proposal of 21 units on the site would restrict the ability of emergency vehicles to manoeuvre around the site.
- New sites grants are available (and cost should not be a material planning consideration).
- -The guidance requires that sites are:
- sustainable the Llangan site proposal is not
- equivalent to standards that would be expected for social housing in the settled community This would not meet the standards and this site would not have been considered appropriate for development for residential in either the current or proposed plans
- have the effect of encouraging and developing good relations between
- Gypsies & Travellers and the settled community the large scale of this proposal could mean that establishing good relations with the local community of Llangan would be unlikely and could also result in increased tensions in the community.
- based on WAG guidance of Design of Gypsy traveller sites the maximum number of pitches is 14, and the proposal at Llangan exceeds this number.
- Travelling to a Better Future
- Recommends that LA's engage with their Housing Association Partners to bring sites forward. The VOG Council has not done this.
- "Situating transit provision on residential Gypsy sites is not an option preferred by the Gypsy and Traveller community as this can lead to tensions among different family groups and make site management and maintenance very difficult." This creates a sense of "fear" within the settled Gypsy & Traveller community. The proposal is recommending that transient and permanent sites are co-located.
- Planning Policy Wales 2011
- The proposed site at Llangan is greenfield land, according to the definition of brownfield land set out in Figure 4 1 of PPW;
- it will not reduce the need to travel, due to the limited local service provision in close proximity to the site;

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- offers very limited access to public transport facilities;
- is not large enough to provide ancillary facilities required to support a sustainable development as set out in paragraph 3.30 in accordance with Designing Gypsy and Travellers Sites Good Practice Guide;
- is located within a Special Landscape Area (SLA) and in close proximity to a Conservation Area. The assessment of the Llangan site incorrectly states that it is not within an SLA, so makes no reference to the sites proximity to the conservation area of Llangan. The location can be clearly seen from the conservation area.
- does not meet the identified needs of Gypsies and Travellers, in the Vale of Glamorgan (Fordham report 2008 evidence);
- does not promote sustainable access to employment, shopping, education, health, community, leisure and sports facilities;
- does not maximise opportunities for community development and social welfare;
- does not foster social inclusion due to the isolated location of the site: and
- does not contribute to improvements in health due to the isolation from services and facilities.
- 2. MG2. The draft policy MG 2 actively discriminates the Gypsy community by excluding them from the wider housing programme and potentially abuses their human rights. Policy MG 2 should be revised to allow the VOG to identify appropriate sites in the same way as Affordable Housing.

#### TESTC3

- 1. The policy does not have due regard to the Wales Spatial Plan.
- The key theme of the Wales Spatial Plan is achieving sustainable development through focusing new development in areas which have good access to key services and facilities. As there are no services surrounding the site the allocation of MG9 is not consistent with the objectives of the Wales Spatial Plan. The Gypsy site proposal fails Soundness test Consistency C3 because the policy does not have due regard to the Wales Spatial Plan.

#### TESTC4

- 1. The allocation of this site does not have regard to the relevant Community Strategy in the following respects:
- "The diverse needs of local people are met through the provision of customer focused, accessible services and information"- This cannot be achieved by the allocation of a non-accessible rural allocation.
- "Vale of Glamorgan residents and organisations respect the local environment and work together to meet the challenge of climate change"- The allocation of MG9 places heavy emphasis on the use of the car to access the most basic facilities shops, health, education etc.
- "Older people are valued and empowered to remain independent, healthy and active. They have equality of opportunity and receive high quality services to meet their diverse needs"— All services are miles away and inaccessible to

the older community. The VERY POOR public transport system is located

1050m from the site and is in excess of the maximum distances as defined in

the proposed LDP and "Manual for Streets".

- "People of all ages are able to access coordinated learning opportunities and have the necessary skills to reach their full potential helping to remove barriers to employment"—There is no employment opportunity near to the site.

The local primary school has confirmed that it is full and that its projections suggest that it doesn't have the capacity for such a large development (also consider the existing approval of 12 dwellings at Fferm Goch).

- The small local industrial unit has raised concerns in relation to the scale of the proposal.

#### TEST CE1

The Plan does not set out a coherent strategy in the following respects

- The Strategy makes the following statements:

The LDP will seek to provide a policy framework which: Manages the housing supply effectively in order to provide a range of good quality, affordable homes in sustainable locations

Reduces out commuting by providing opportunities for new housing, retail and employment development in accessible locations in the Vale of Glamorgan

The allocation of this rural site in open countryside does not meet this objective.

- The LDP also states its vision as being:

"Our Vision for the Vale of Glamorgan is a place:

That is safe, clean and attractive, where individuals and communities have sustainable opportunities to improve their health, learning and skills, prosperity and wellbeing and

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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 sustainability of the area." The allocation of this site in policy MG9 does not meet these objectives being in a rural location with inadequate facilities and transport links.

- The Allocation of this site in policy MG9 does not comply with the following objectives of the LDP:
- -Objective 1: To sustain and further the development of sustainable communities within the Vale of Glamorgan, providing opportunities for living, learning, working and socialising for all. The site's location would clearly not meet this objective.
- Objective 2: To ensure that development within the Vale of Glamorgan makes a positive contribution towards reducing the impact of and mitigating the adverse effects of climate change. The allocation of this site will have entirely the opposite effect to this objective.
- Objective 3: To reduce the need for Vale of Glamorgan residents to travel to meet their daily needs and enabling them greater access to sustainable forms of transport. The allocation of this site will have entirely the opposite effect to this objective.
- Objective 4: To protect and enhance the Vale of Glamorgan's historic, built, and natural environment. The development of this site would not meet this objective: a planning refusal on an adjacent site in May 2002 stated "It is a proposal that would adversely affect the undeveloped rural character of the area"
- Objective 5: To maintain, enhance and promote community facilities and services in the Vale of Glamorgan The local primary school has not been consulted, had they been it would have been recognised that the school does not have capacity, nor is it projected to have the capacity.
- Objective 7: To provide the opportunity for people in the Vale of Glamorgan to meet their housing needs- States that development of housing should be in sustainable locations This is not. Furthermore, it brings into question POLICY MD12 which is discriminatory in that Gypsy & Traveller sites are treated differently from other housing allocations. An inclusive policy would see Gypsy & Traveller sites being assessed on the same basis as AFFORDABLE HOUSING and considered for ALL candidate residential sites in the LDP
- Objective 10: To ensure that development within the Vale of Glamorgan uses land effectively and efficiently and to promote the sustainable use and management of natural resources. The inappropriate use of finite resources can impact on the ability of future generations to fulfil their needs. The LDP through favouring the use of previously developed land and the sustainable use of natural resources of whatever kind and wherever they are located, will contribute to preserving their availability for future generations. This is agricultural land in the Special Landscaped Area.

#### TEST CE2

The strategies, policies and allocations are not realistic and appropriate having considered relevant alternatives and are not founded on robust evidence:

- 1. The allocation of Llangan is purely on the basis of site ownership by the Vale and does not meet the requirement of Policy MD12.
- 2. The Gypsy & Traveller site assessment (anecdotal) conflicts with other evidence based background papers; specifically the Sustainable Settlement Appraisal. The SSA states 0 points for public transport but the Gypsy & Traveller site assessment states that public transport facilities are good.
- 3. The Gypsy Traveller site assessment states "good highway access", yet the access falls considerably short of the minimum requirement for vehicle access the access lane is 2.5m wide, against a minimum requirement of 3.7m plus footpath of 1.2m.
- 4. The Gypsy Traveller site assessment does not reflect the current legal obligations of the VOG in respect of this site, yet the other site assessments highlight legal issues.
- 5. Several privately-owned sites were put forward as candidate sites for Gypsy & Traveller sites but were dismissed as they were not in Council ownership. Not being in council ownership should not be a reason to reject privately owned sites.
- 6. The key issue is that the site allocation does not reflect the identified need of the Gyosy & Traveller community as highlighted in the 2008 Fordham report.
- 7. The Gypsy Traveller site assessment suggests that Fferm Goch is the local settlement when Llangan is recognised in this and historic documents as the local settlement being only 150m from the proposed site. It appears that the council has also linking the site at Llangan to the Hamlet of Fferm Goch in order to increase the site assessment positive score.
- 8. The assessment makes no reference that the site is in a Special Landscape Area (SLA).
- 9. The assessment makes no reference that the site is adjacent to a Conservation Area, within the Conservation Management Plan for this area there is a specific requirement to protect the view from the edge of the conservation area over the proposed site. The proposed site is clearly visible form the conservation area.
- 10. The allocation of Fferm Goch as a Minor Rural Settlement is incorrect. The appraisal scored 9 points. 3 are for employment which puts this site on par with the major settlements such as Barry. This is on the basis of 4 light industrial buildings. A survey of these employers has confirmed that zero new jobs have become available in the last 9 years and that the units collectively employ fewer than 15 people with no intention to expand. Furthermore, one of the units has been empty and the development is not a popular industrial site.
- 11. Fferm Goch has a population of less than 100 (98)— of the 5 sites in the Vale of Glamorgan with a population of 98 only Fferm Goch is classified as a Minor Rural site (probably based on the 9 points). The remainder are classified as Hamlets and there is a presumption against development in Hamlets (or as a minimum the scale would need to be appropriate and tied to a Rural Exception policy). The guidance requires ALL sites of a population below 100 to be classified as a Hamlet Fferm Goch should be recategorised as a Hamlet.
- 12. The Council has undertaken a study (Fordham report 2008) where the message was extremely strong that the Gypsy & Traveller community wanted smaller sites located on the fringes of larger communities. The report confirmed that isolated, rural sites restricted access to Health, Education and welfare facilities that disadvantaged them and needs to be seen in the light of the above objectives. The following is a quote from the Fordham report:
- "Participants living on Shirenewton had three main criticisms: the site was too big, the distance from local amenities along with the lack of local transport,"

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"This created many problems for the residents, especially the poorest: 'for a person like me on the bread line it's very tough. I can't afford to use the car', 'everything is a mile away, including the bus stop. It takes a long walk on a busy road to get to the shops and schools".

"The tables demonstrate that access to services such as local shops, health centres and education facilities from both sites is difficult by foot and by local transport systems. This difficulty was eased when participants used their cars, however the level of ease was lower for Roverway due to the difficult entry onto the main road".

"Participants reported that access to local amenities, health services and education was low for both sites by foot or by public transport: 'Everything is a mile away, including the bus stop. It takes a long walk on a busy road to get to the shops and schools".

"It was thought that smaller sites would reduce the problem of on-site conflicts: 'they need smaller sites and not too many different families, otherwise when you have a row the whole site becomes a war zone"

"This affected the ability of the households interviewed to access local services such as shops, health centres and education facilities. It was reported that this problem mainly affected the women: men take the vehicles that the household own to work during the day, leaving the women without their own transport and often away from public transport routes"

"Participants did not specify where in Cardiff or the Vale of Glamorgan sites should be located. It was noted that sites should be on the outskirts of towns to enable access by foot to local services such as shops, the Launderette and health centres"

"While the focus of the survey was on accommodation requirements, the questionnaire also collected information on access to services, including health and education. Research has found that poor accommodation can prevent access to services and so cannot be seen in isolation."

"Participants living on sites felt that there were site restrictions that limited their work options. These were mainly associated with the location of the sites and lack of access to public transport rather than site regulations: 'no buses, no local transport. Bad access"

"Participants living on local authority sites reported that the lack of local public transport provision in the area affected their ability to send their children to school, access health services and work opportunities, and limited their ability to attend training and education courses"

"Participants were asked about where they would like future sites to be, but were not specific about locations within the County Boroughs, instead emphasising the importance of public transport to any new sites. Government draft guidance on site design stresses the importance of access to services and the promotion of integrated co-existence' between the site and surrounding community."

"The precise location, design and facilities of any new sites should be drawn up in consultation with Gypsies and Travellers to ensure that the additional provision meets their needs. The health and safety implications of a new site's location should be considered in finding a balance between offering sites in good locations and the additional land costs this would entail. The settled community neighbouring the sites should also be involved in the consultation from an early stage."

13. An independent highway study recently undertaken by Capita Symonds, surrounding the proposed site has concluded that:

"The 1km long lane itself is of poor horizontal alignment, with poor forward visibility and unsuitable for regular vehicular traffic. If the site is developed the lane itself would need major upgrading, which would certainly change its appearance within this rural environment."

"The village school is approximately 1km from the village and 900 metres from the proposed site. It is noted that the route does not offer any facilities for pedestrians, such that the only safe way for children to travel between the site and the school safely would be by vehicle. This route would also be potentially hazardous for cycle use for children, the elderly or infirm and could be potentially hazardous for all users other than by car."

"With regard to the appropriateness of the location for a traveller's site development in relation to transportation, it is difficult to refer to standard guidelines, as few relate to "rural highways", most highway design standards for residential development relate to urban areas. Hence, the advice contained within this report is based on best available information, acceptable highway standards for developments of similar size and transport needs of small communities. Welsh Government guidelines state sites should be situated in close proximity to transport links. The Llangan site would not appear to meet that criteria, being situated away from the main transport infrastructure, sites should also have ready access to schools, doctors and shops, against which requirements Llangan again appears to fail."

"With regards to the existing lane, it is generally considered that where there is direct access to dwellings, the previous standard for developments, Design Bulletin 32 offers guidance where it states that a desirable minimum carriageway width of 5.5 metres is appropriate, together with 2.0 metre wide footways on both sides. This will allow two way traffic at all times, and safe movement of pedestrians."

"Thus the lane itself should be widened to this minimum standard, which will require the removal of the existing hedge line on one or both sides of the lane and probable acquisition of land from the adjoining fields. This will of course change the environmental character of the area substantially, but is considered essential to cater for increased vehicle and pedestrian traffic"

14. There is complete inconsistency with the allocation of MG9 against the proposed policies.

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#### TEST CE3

- 1. The VOG council make no reference as to how they are going to manage such a large site. The 21 unit site in Rover Way Cardiff has 3 full time Council staff allocated to it.
- 2. The current Housing Strategy expires April 2012 and makes no relevant reference as to how the Gypsy & Travelling Community will be monitored in terms of growth or need. Indeed, there is no strategy that underpins the Gypsy & Traveller community or housing at all.

#### TEST CE4

- 1. Policy MD12 (Gypsy & Traveller) is discriminatory. It offers no flexibility for the Council to bring forward sites that are sustainable / suitable for Gypsies & Travellers through the policies derived within the plan.
- 2. MD12 should be redrafted to enable smaller, sustainable sites to be included within the Affordable Housing requirements and delivered through the Registered Social Landlord sector.
- 3. To argue that the Private Sector has been consulted to offer sites is not accepted. The private sector were not likely to volunteer sites for such a contentious use. The LDP should set clear strategies / policies to deliver sustainable sites for all members of the community; private; social and travelling. The current allocation does not meet this and could strongly be argued breeches the Human Rights of the Gypsy traveller community as it does not provide a suitable, sustainable site that meets the guidelines in the 2008 Fordham report.
- 3f Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)

The proposed Gypsy traveller site at Llangan (Policy MG9) should be removed from the LDP draft plan. The VOG should identify an alternative site that has been assessed according to a relative sustainability appraisal that considers the real situation in the local area and meets the requirements of the Gypsy community as listed in the 2008 Fordham report.

Policy MD12 should be amended so that it does not discriminate against the Gypsy and Traveller community. All sites during the plan should be assessed on a similar basis as Affordable Housing.

4b - If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -

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| Representor     | ID and d    | etails:     | 4132/DI        | P1 Debra Pedersen      |   |            |             |       |                              |        |                        |  |           |   |                    |
|-----------------|-------------|-------------|----------------|------------------------|---|------------|-------------|-------|------------------------------|--------|------------------------|--|-----------|---|--------------------|
| Date Lodged     | Status<br>M | Petition    | n and No.<br>0 | Supporting Evidence    | Additional SA SEA                             |            |             |       | Rep format:<br>Comment for   |        |                        | your comments to b<br>k at a hearing session |           |   |                    |
| 2a - Do you co  | onsider th  | ne LDP is   | Sound?         |                        | 2b - If you think that the Procedural Tests - |            |             | d and | does not not mee             | et one | or more test(s) o      | of soundness, please                         | indicate  | which test(s) tha                       | t it fails.        |
|                 |             |             |                |                        | Consistency Tests -                           | C1 -       | Unanswe     | red   | C2 - Yes                     |        | C3 - Yes               | C4 - Y                                       | es        |   |                    |
|                 |             |             |                |                        | Coherence and Effect                          | tivenes    | s Tests -   | CE1 - | ·Yes                         | CE2    | 2 - Yes                | CE3 - Unanswere                              | ed CI     | E4 - Unanswered                         |                    |
| 3a - Which pa   | rt of the [ | Deposit F   | Plan are y     | ou commenting on?      | Policy Number:                                |            | <u>Para</u> | graph | Number:                      | Pro    | posal Map:             |  | Constra   | ints Map                                | Appendices:        |
|                 |             |             |                |                        | 49  |            | 5.11        |       |                              | allo   | • •                    |  |           |   | Other - Not Listed |
| 3b - Do you w   | ish to see  | e any cha   | anges mad      | de to the Deposit Plan | as a result of your rep                       | resenta    | ation? Ye   | es    |                              | lf "No | or "Unanswered         | d" - go to 3d)                               |           |   |                    |
| 3c - What cha   | nges wou    | uld like to | see mad        | e to the Deposit Plan? | New Policy:<br>Unanswered<br>Notes:           | Ame<br>Yes | nded Polic  | _     | New Paragraph:<br>Unanswered | 7      | Amended Paragra<br>Yes | nph: New Or Amend<br>Yes                     | ded Site: | Other (see Note<br>Unanswered           | s) <u>:</u>        |
| 3d - If your re | presenta    | tion relat  | es to a ne     | w, deleted or amende   | d site, did you submit<br>Site Name: The Gard |            |             |       |                              |        | (If "Yes", ple         | ase give the Candid<br>Site Refe             |           | Name and referer<br>D30 in the draft LI | ,                  |
| 3e - Please s   | et out voi  | ur renres   | entation h     | elow.                  |   |            |             |       |                              |        |                        |  |           |   |                    |

REPRESENTATIONS ON VALE OF GLAMORGAN DRAFT DEPOSIT LDP RELATING TO THE ALLOCATION OF 40 HOUSES AT THE GARDEN EMPORIUM SITE. FFERM GOCH AND THE DESIGNATION OF FFERM GOCH AS A 'MINOR RURAL SETTLEMENT'.

#### Summary

- 1) The Garden Emporium site at Fferm Goch is a site with extant planning permission for 12 houses. The rationale for granting this planning permission on this site was overwhelmingly because it is a previouslydeveloped site, with derelict garden centre buildings on the site.
- 2) However, the proposed increase in draft LDP allocation, from 12 to 40 houses, is unacceptable. The principal justification for this increase appears to be the proposed new designation of Fferm Goch as a "Minor Rural Settlement". This designation is incorrect and totally inappropriate, for reasons set out below. Higher densities of development on this site (i.e. above the 12 houses permitted) - in particular for 42 and (after revisions) 24 houses - havebeen considered and rejected by the Council in the past. The issues that led to those rejections in particular that the site is unsustainable and a portion of the site is needed to protect a rare plant - have not changed. If this allocation is allowed there is a very real prospect that this level of housing is built - we are aware that the owners are already in pre-application discussions with the Council for 40 houses on this site, even though such discussions are inappropriately premature.
- 3) The extant planning permission includes conditions requiring the private houses to be livework units and a large portion of the site (approx 30%) to be set aside as a nature conservation area. If 40 houses were permitted on this site the developer would no doubt argue that neither of these conditions could be sustained. Other issues such as lack of public transport and lack of places at the local primary school cannot be satisfactorily resolved through condition or planning agreement.
- 4) For all these reasons, which are expanded on below, the allocation of the Garden Emporium site for 40 houses should not go forward in the draft LDP. The site should be allocated for 12 houses, in line with the extant planning permission and preserving the conditions on that planning permission requiring 1) 30% affordable housing and 2) the back portion of the site (approx 300/0 - edged in green on the attached approved plan) to be a habitat conservation area and excluded from this site altogether 3) the 8 private houses to be live-work units.
- 5) In addition, Fferm Goch should not be designated as a "Minor Rural Settlement". This was due to an incorrect "settlement scoring" of 9 which included 3 points allocated for "employment opportunities within settlement" on the basis of the nearby Westwinds industrial estate. These points should not have been allocated. 3 points puts this site on a par with towns in the Vale like Barry, which is entirely inappropriate. There are only 4 light industrial buildings on this site. A survey of these employers has confirmed that no new jobs have become available in the last 9 years and that the units collectively employ fewer than 15

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people with no intention to expand. Furthermore, one of the units has been empty and the development is not a popular industrial site.

Our representations in relation to each of the tests of 'soundness' are as follows:

TEST PI - It has not been prepared in accordance with the Delivery Agreement including the Community Involvement Scheme

The local community have not been involved in the decision to allocate this site for 40 houses. We understand that neither the school nor the LEA were consulted. We do not believe that Llangan Community Council was consulted at any previous stage in the draft LDP process.

TEST P2 - The plan and its policies have not been subjected to Sustainability Appraisal including Strategic Environmental Assessment,

The Sustainability Appraisal of the Garden Emporium site is wrong in its assessment of the Garden Emporium site's ability to meet the Sustainability Appraisal's objectives because:

- 1. The site is incorrectly rated '++' (strongly contributes) as regards objective 1, which is "To provide the opportunity for people to meet their housing needs." Although this site falls within the Rural Vale, the Rural Vale is a very large area and there is no particular local specific need for this housing. As far as affordable housing is concerned, it is only proposed that the site provides the standard 35% affordable housing which means it is no different to better than any other site. The '++' rating should be reduced to '+' (contributes).
- 2. The site is incorrectly rated '+' (contributes) as regards objective 2, which is "To maintain, promote and enhance the range of local facilities". There is no suggestion that the proposed development will in any way enhance the local facilities. In fact it will place increased pressure on the following existing local facilities: the primary school, which has no spaces; the playground/open space at Fferm Goch, as we note there is no suggestion of on-site open space being provided on the Garden Emporium site (particularly given the high density of housing which 40 homes would involve and in fact on-site provision was not offered even for the extant planning permission for 12 houses); and the community hall, which already serves a large number of houses and is of a limited capacity. This' +' rating should be changed to a '--' ( strongly detracts) rating.
- 3. The site is incorrectly rated '++' (strongly contributes) as regards objective 8, which is "To use land effectively and efficiently". Although part of the site is 'brownfield' and has been previously developed as a garden centre, a large section at the rear of the site (approximately 30% of the entire site) has never been developed. It was this area which was identified as a habitat management area in the extant planning permission for 12 houses. The requirement for a habitat management area was in part due to the presence of a very rare species of plant on the site (Bithynian vetch). This rating should be reduced to a '+' (contributes) rating, to acknowledge the fact that while the development would reuse the developed part of the site, it would also use a currently undeveloped, greenfield, area.
- 4. The site is incorrectly rated '++' (strongly contributes) as regards objective 9, which is "To protect and enhance the built environment and natural environment". This is wrong for the reasons given in point 3 above. If the site was developed for 40 houses there would be no room whatsoever for any habitat management or other effective biodiversity area as has been required by the extant planning permission. This will mean the loss of a very rare plant species which has only been found in two other locations in the whole of Wales. This rating should therefore be reduced altogether to a '--' (strongly detracts) rating.
- 5. The site is incorrectly rated '0' (neutral) as regards objective 11, which is "To protect, enhance and promote the quality and character of the Vale of Glamorgan's culture and heritage." This is wrong for the same reasons as at points 3 and 4 above. The Council has resolved to protect the very rare plant species which has been added to its local biodiversity action plan. This resolution by the Council (which was made specifically in response to the survey which identified this plant on this site) indicates its recognition of the species' importance to the culture and heritage of the Vale of Glamorgan. This rating should therefore be reduced to a '--' (strongly detracts) rating.
- 6. The site is incorrectly rated '+' (contributes) rating as regards objective 12, which is, "To reduce the need to travel and enable the use of more sustainable modes of transport". This rating is wrong because although it will be possible to travel by foot or bicycle to the primary school and the community hall, every other service and local amenity including employment can only be accessed by private car. The bus service to the site is so poor that it does not even merit a rating on the Council's sustainable settlements score. This rating should therefore be reduced to a '- -' (strongly detracts) rating.

TEST C2 - It does not have regard to National Policy

- A) The proposed allocation of the Garden Emporium site for 40 houses fails to meet Planning Policy Wales (February 2011) ("PPW") in the following respects:
- 1. The Garden Emporium site is totally unsustainable. It is located in the Rural Vale, surrounded by open countryside and 7 miles from Cowbridge and 8 miles from Bridgend. Realistically anyone living in this location will rely on private cars to get to and from the site for work, shops, everything except the primary school, which, as stated below, is full.
- 2. The nearest corner shop is in Pencoed to which there is no public transport; otherwise it is necessary to drive to Cowbridge or Bridgend or one of the large supermarkets on the edge of Bridgend.

The current planning permission for the site is for 12 houses, of which at least 30% (i.e. 4) are to be affordable. There is a condition forming part of the planning permission (condition 10) which requires each of the 8 private units to be live-work units and requires that the business floor space of the live/work unit shall be finished ready for occupation before the residential floor space is occupied. The reason given for

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this condition is "In order to ensure a satisfactory and sustainable form of development which will support and enhance the local rural community and in order for the development to comply with policies ENV27, ENV29 and EMP2 of the UDP." It is apparent from reading documents associated with the planning permission that although the application originally proposed the live-work units and made much of them improving the sustainability of the site, at a later date the applicant asked the LP A not to impose this condition. However, the LP A insisted it was required.

There is no suggestion that the 40 houses now proposed for the site would be live-work units. Even if this condition was imposed this site would still be unsustainable as the residents would need to drive for everything except work. It also seems likely that they would need to make business-related journeys and of course, depending upon their business, additional car journeys could in fact be created by these businesses (for example, a hairdressers).

This is contrary to PPW (paragraph 4.6.2) which states, 'Development plans ... should secure a sustainable settlement pattern which meets the needs of the economy, the environment and health, while respecting local diversity and protecting the character and cultural identity of communities.'

2. The Garden Emporium site is very poorly served by public transport - there is only a very limited bus service to and from Fferm Goch (5 buses per day to Bridgend; 4 per day from Bridgend which go on to Cowbridge). There is no bus service to the nearest train station at Pencoed (3 miles away, along roads with no pedestrian footway). This is contrary to PPW (paragraph 4.6.4), which states, 'Local planning authorities should assess the extent to which their development plan settlement strategies and new development are consistent with minimising the need to travel and increasing accessibility by modes other than the private car. "Higher density development, including residential development, should be encouraged near public transport nodes or near corridors well served by public transport (or with the potential to be so served).'

This is added to by paragraph 4.6.7 PPW which stresses that, 'In rural areas the majority of new development should be located in those settlements which have relatively good accessibility by non-car modes.' This is emphasized again in paragraph 8.7.3 PPW which states, 'It is also expected that the proposed access to a development will reflect the likely travel patterns involved. It should ensure that people can reach the development, as far as practicable, by walking, cycling and public transport, as well as by car.'

3. The existing local infrastructure will not be able to serve a further 40 houses at the Garden Emporium site. There is very little local infrastructure available at this site, but two issues are relevant - the local primary school (Llangan primary school) and highways issues:

Llangan primary school

Llangan primary school is within walking distance of the site. However, this school is very small and is full. The Local Education Authority has told us that Llangan primary school's maximum capacity is 111 pupils, and the number on the roll as at September 2011 was 108 pupils. The admission number of new pupils each year is no more than 15. This is because several year groups are combined (i. e. two year groups being taught as a single class, in one classroom) and the LEA needs to comply with the requirement in its education plan to have no more than 30 children in each classroom. Although in some circumstances it might be appropriate to deal with this by seeking a s 1 06 contribution from the developers to increase the capacity of the school, in this case the school has neither the space nor the land to expand to take on more pupils.

Two classes are already being taught in terrapins located in the playground and the school only has a relatively small area of grass which has already been diminished as a result of building a new school hall and two classrooms a few years ago. It is noted that in the planning officer's report for the current 12-house planning permission the education authority thought that there was enough space in local primary school~ (it did not specify any in particular) to accommodate the children from 12 houses- 40 houses is very different. From speaking to the LEA, we understand that according to their formula for calculating the number of primary school places generated by new houses, 40 new houses would result in 15 primary age children needing places. There is therefore currently no possibility for the school to provide places for the primary-age children from this development who would have to be driven to other schools some distance away.

Highway safety issues

When Council considered the current planning permission the highways department was originally concerned about there being more than one exit from the site, when there were only 12 houses. The extant planning permission includes a condition (condition 20) that the site shall be served by no more than two means of access onto Ruthin Road - with the primary access to serve no more than 8 dwellings and the secondary access to serve no more than 4 dwellings. How many exits would be proposed for 40? This road is used heavily by traffic, particularly during peak times - many drivers, including a significant number of large lorries, use it as a short cut from the A48 to the M4. It is also the main pedestrian cycleway to Llangan primary school from Fferm Goch Heol Llidiard/St Mary Hill and is used on a daily basis by those residents for that purpose. Currently only a few single houses have driveways onto this road. Having an additional 40 houses here will increase the traffic considerably, at increased safety risk to existing drivers and pedestrians and cyclists.

This is therefore contrary to paragraph 4.6.8 of PPW which states, 'Development in the countryside should be located within and adjoining those settlements where it can be best accommodated in terms of infrastructure, access and habitat and landscape conservation.' It is also contrary to paragraph 9.2.9 of PPW which states, 'Local planning authorities should consider the following criteria in deciding which sites to allocate for housing in their development plans: ...

• the location of potential development sites and their accessibility to jobs, shops and services by modes other than the car, and the potential for improving such accessibility

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- the capacity of existing and potential infrastructure including public transport ... and social infrastructure (such as schools ... ), to absorb further development and the cost of adding further infrastructure ... "
- 4. The development of the Garden Emporium site cannot be described as infilling or a minor extension to Fferm Goch. It is located adjacent to Fferm Goch, but the proposed 40 houses are more than Fferm Goch and Heol Llidiard combined (which amount to 33 houses). It is totally out of scale for this area.

It also cannot be claimed to meet any "local need" for affordable housing. The Council's own background documents recognise that the need for affordable housing is greater in the larger settlements in the Vale, such as Barry. Section 3.9 of the draft LDP states that, 'The findings of the [Local Housing Market Assessment 2010] make clear that the area of greatest need is Barry followed by the coastal settlements of Rhoose, Llantwit Major and Penarth as well as the Rural and Eastern Vale." This statement is supported by the Council's 'Affordable Housing' background paper (November 2011), in which Table 2 in paragraph 3.7 specifies an identified need of 3 5 units of affordable housing per year in the Rural Vale. This is a very low number of units to be accommodated within a large area of land and there is no need for such a high concentration of units to be accommodated on the Garden Emporium site. In fact, the existing houses at Fferm Goch are sold at considerably less than the average house price in this area (i.e. the Rural Vale). No.3 Fferm Goch was sold in June 2011 for £180,000 and No.8 has been on the market for £185,000.

Notwithstanding these prices, these houses often remain on the market for some time – at least a year. Fferm Goch is private market housing which was originally Agricultural Settlement Houses (a form of Council housing) developed by the Welsh Land Society in 1939. Why do we need more houses at affordable prices in this location? There is no identified local need to be met.

We understand from speaking to a Council officer that the main reason the Council are prepared to consider 40 houses on this site is the need for more affordable housing in the Vale. While we have no problem with the principle of 35% of new housing being affordable, we do not think that this policy should be used to 'reverse engineer' such a huge increase in the total number of houses being proposed on this site. With the original planning permission 12 houses, 30% would have resulted in an entirely sensible allocation of 4 affordable houses. To invert this reasoning and specify a total of 40 houses in the hopes of raising the number of affordable houses from the existing planning permission - at the cost of an increase of 18 private houses (from 8 to 26). The detrimental impact this development will have on the local community is a disproportionate sacrifice to make for an additional 10 affordable houses.

The proposal for 40 houses on this site is therefore contrary to paragraph 4.6.8 of PPW which states, "Infilling or minor extensions to existing settlements may be acceptable, in particular where it meets a local need for affordable housing, but new building in the open countryside away from existing settlements or areas allocated for development in development plans must continue to be strictly controlled. All new development should respect the character of the surrounding area and should be of appropriate scale and design.

If 40 houses are built on the Garden Emporium site this will be significant overdevelopment of this site at a density which should not be permitted in this location. The following points are relevant:

- a) It is acknowledged and accepted that the site has existing planning permission for 12 houses; this is a brownfield site where there has been a number of failed garden centres and it was perhaps inevitable that it would eventually be developed for housing. The development of the site with 12 houses is accepted, although even with 12 houses there are still concerns about the impact these will have on the local school and highways.
- b) However, 40 houses will make the site crowded and out of keeping with the rural area. Fferm Goch has a particular and special history it was built by the Welsh Land Society in 1939 to promote employment in rural areas and in this case to provide social housing and a community for farm workers at the large farm across the road and the houses at Fferm Goch form 3 sides of a square with a large grass pitch and play area in the middle. There is no suggestion that the proposal for the Garden Emporium site would be designed in a similar way. Fferm Goch should not in any event be used as an excuse to set a "precedent" for this locality, where other housing consists of isolated dwellings.
- c) The previous planning history of the site is relevant the Council previously considered proposals for 42 and 24 houses and rejected both on grounds of over-development, of this site.

This is contrary to paragraph 9.2.12 ofPPW which states, 'Strong pressure for development may give rise to inappropriately high densities if not carefully controlled.' In paragraph 9.2.22 it states, 'In order to safeguard the character and appearance of the countryside, to reduce the need to travel by car and to economise on the provision of services, new houses in the countryside away from existing settlements recognised in development plans or from other areas allocated for development must be strictly controlled. Many parts of the countryside have isolated groups of dwellings. Sensitive filling-in of small gaps or minor extensions to such groups, in particular for affordable housing to meet local need, may be acceptable but much depends on the character of the surroundings, the pattern of development in the area and the accessibility to main towns and villages.' In paragraph 9.3.4 PPW states, 'In determining applications for new housing, local planning authorities should ensure that the proposed development does not damage an area's character and amenity.' The proposed development of this site with 40 houses would significantly damage the character of this area.

6. If 40 houses are built on the Garden Emporium Site, it will result in the loss of a rare plant species, Bithynian Vetch, which has been identified by the Council in its Local Biodiversity Action Plan.

The extant planning permission for the Garden Emporium site includes:

a) a condition (condition 9) that a significant proportion of the site (approx. 30% - being the whole of the back strip of the site edged green on the approved plan) shall have no buildings located on it and all

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properties shall be located at least 10 metres from this boundary within the development site; and

b) another condition (condition 12) that this area shall be designated as a habitat management area to be supported by a comprehensive habitat management plan. The plan is to pay particular regard to the areas where Bithynian vetch has been found and seek to maintain and conserve this species.

These conditions were imposed in particular to preserve the species Bithynian vetch. It is apparent from the planning officer's report associated with the current planning permission that Bithynian vetch was found on the site during the course of an ecological survey being carried out, at the request of the Countryside Council for Wales. The report states that Bithynian vetch is a rare species, included as vulnerable on the UK vascular plant red data list and endangered on the Welsh list. The report says that this species was previously unknown to occur in the Vale of Glamorgan and is known to occur on only 2 other sites in the whole of Wales. As a result, the Council held a special meeting to decide to protect this plant by placing it on the Council's 2002 Local Biodiversity Action Plan.

There is no suggestion in the draft LDP that this large part of the site - which the planning officer's report recognises is open land rather than previously-developed land - would not be open to development and it would seem difficult/impossible for a planning permission for 40 houses on this site to protect the same area as a "no-build" zone. The Proposals map includes this part of the site within the area proposed to be allocated for 40 houses. The fact that this open area of land at the back of the site would not be built on under the terms of the current planning permission was a material consideration for the planning officer in recommending approval of the planning application for 12 houses (see the planning officer's report, page 12).

The allocation of 40 houses is therefore contrary to PPW paragraph 5.2.8 which states, 'Local planning authorities must address biodiversity issues, in so far as they relate to land use planning in both development plans and development control decisions. Paragraph 5.2.2 of PPW recognises that, 'The Natural Environment and Rural Communities Act 2006 places a duty on every public authority, in exercising its functions, to have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity.' The extant planning permission allowed for the preservation of this rare plant by allocating a significant portion of the site to be a no-build zone - a habitat conservation area. This area will not be possible if 40 houses are built.

B) The proposed designation of Fferm Goch as a "Minor Rural Settlement" also fails to meet PPW because it is plainly not a sustainable settlement and has been incorrectly assessed by the Council. This incorrect designation (which is considered in detail in Test CE2 below) infringes the following paragraphs of PPW: 4.6.2, 4.6.4, 4.6.7, 4.6.8, 8.7.3, 9.2.9, 9.2.12, 9.2.22 and 9.3.4 (all as cited above). If it were identified as a Minor Rural Settlement, Fferm Goch would be at risk of future residential development being allowed in this location through policy MG7 of the draft LDP. Fferm Goch is not a location where new development should routinely be permitted since it would infringe all the sustainability principles for development in rural locations.

TEST C3 - It does not have regard to the Wales Spatial Plan (wSP)

The Wales Spatial Plan update 2008 states at paragraph 1.4 that, 'It is a principle of the Wales Spatial Plan that development should be sustainable. Sustainable development is about improving wellbeing and quality of life by integrating social, economic and environmental objectives in the context of more efficient use of natural resources.' The Garden Emporium Site is a totally unsustainable site for reasons given above (Test C2).

TEST C4 - It does not have regard to the relevant Community Strategy

The Community Strategy for the Vale 2011-21 sets out 10 priority outcomes. The allocation of the Garden Emporium for 40 houses fails to have regard to the following of these priorities:

- "2. The diverse needs of local people are met through the provision of customer focused, accessible services and information." This priority is not met because the Garden Emporium site is so far from shops, health services, local amenities and workplaces as well as having poor public transport.
- "3. Vale residents and organisations respect the local environment and work together to meet the challenge of climate change." This priority is not met because the Garden Emporium site will require all its residents to travel by car to access every local service save the primary school (which does not have sufficient space for the children of 40 families, so primary school pupils will have to travel by car to other schools) "4. Older people are valued and empowered to remain independent, healthy and active.

They have equality of opportunity and receive high quality services to meet their diverse needs." This priority is not met because public transport to this site is very poor both in terms of timetabling and route, which greatly inhibits their chance of remaining independent.

Also, there are no local services available to them such as healthcare, library or other local amenities.

- "5. Children and Young people in the Vale are well informed and supported to access a broad range of quality services that enable them to take full advantage of the life opportunities available in their local communities and beyond." This priority is not met because the local primary school is unable to accommodate the projected increase in pupil numbers from 40 new homes. Children will need to travel to other primary schools. Public transport from this site is very poor. Children will need to travel by car to primary school and to all other activities and services including leisure activities.
- "6. People of all ages are able to access coordinated learning opportunities and have the necessary skills to reach their full potential, helping to remove barriers to employment." This priority is not met because

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there are no learning opportunities present near the site nor, more importantly, are there any employment opportunities near the site either.

"7. The underlying causes of deprivation are tackled and the regeneration of the Vale continues, opportunities for individuals. and businesses are developed and the quality of the built and natural environment is protected and enhanced." This priority is not met because the proposed allocation of 40 houses on the Garden Emporium will not protect and enhance the natural environment of the Vale: in order to develop 40 houses the entirety of the site will have to be developed, whereas the current planning permission requires the back third of the site to be allocated as a habitat management area. A key reason for this habitat management area was to preserve a very rare plant species growing on the site.

"10. Health inequalities are reduced and residents are able to access the necessary services, information and advice to improve their wellbeing and quality of life." This priority is not met because there are no local health services near the site. Such services can only be accessed by driving to one of the nearby towns.

TEST C5 - The Plan does not set out a coherent strategy from which its policies and allocations logically flow and, where cross boundary issues are relevant, it is not compatible with the development plans prepared by neighbouring authorities.

The draft LDP Strategy is stated (page 23) to comprise four key elements - one of these is 'Other sustainable settlements to accommodate further housing and associated development'.

This element of the draft LDP strategy is based on the designation of certain towns and villages within the Vale as "sustainable settlements". However, Fferm Goch is wrongly identified in the strategy as a "Minor Rural Settlement", for reasons set out under Test CE2 below.

The draft LDP at Section 5. 10 (page 25) states that minor rural settlements are those 'considered to have sufficient population, services and facilities to assimilate growth without it having a detrimental impact on their existing character and local environment.' Also, at Section 5.16 of the draft LDP (page 27), 'The types of services and facilities typically found within the minor rural settlements include places of worship, community halls, small-scale retail uses and formal recreational facilities. A number of the smaller rural settlements also provide small-scale local employment opportunities, either within or in close proximity to the settlements.'

Neither of these descriptions fit Fferm Goch - for reasons set out under Test CE2. The strategy base for the rest of the LDP policies is therefore wrong in this respect.

The draft LDP Strategy is stated to follow on from the Vision and Objectives set out in the draft LDP. The Vision is stated to be for the Vale of Glamorgan to be "a place:

- That is safe, clean and attractive, where individuals and communities have sustainable opportunities to improve their health, learning and skills, prosperity and wellbeing ... "

The proposed allocation of the Garden Emporium site will be contrary to this Vision, being unsustainable development in an area with very poor public transport where there are no employment prospects and allieaming, health and other facilities can only be accessed using the car.

The allocation of this site will also be contrary to the following Objectives set out in the draft LDP:

"Objective 1: To sustain and further the development of sustainable communities within the Vale of Glamorgan, providing opportunities for living, learning, working and socialising for all" - The proposed Garden Emporium site is in a wholly unsustainable location, as is the adjacent Fferm Goch.

"Objective 2: To ensure that development within the Vale of Glamorgan makes a positive contribution towards reducing the impact of and mitigating the adverse effects of climate change." - The effects of climate change will be increased if a further 40 houses are built in this location where people will have to use cars to meet their daily needs.

"Objective 3: To reduce the need for Vale of Glamorgan residents to travel to meet their daily needs and enabling them greater access to sustainable forms of transport" - Public transport at this site is very poor.

"Objective 4: To protect and enhance the Vale of Glamorgan's historic, built and natural environment" - The proposed development of the Garden Emporium site represents overdevelopment of this site, which is out of keeping with the rural area. It will also fail to preserve the back third of the site as a habitat conservation area, as proposed by the extant planning permission for 12 houses on the site.

"Objective 5: To maintain, enhance and promote community facilities and services in the Vale of Glamorgan" - The proposed development at the Garden Emporium site will place increased pressure on resources - in particular Llangan primary school which is full.

"Objective 7: To provide the opportunity for people in the Vale of Glamorgan to meet their housing !leeds." - There is no need for this housing at this location.

"Objective 10: To ensure that development within the Vale of Glamorgan uses land effectively and efficiently and to promote the sustainable use and management of natural resources." – If 40 houses are allowed to be built at the Garden Emporium site then the rear part of the Garden Emporium site, which is greenfield and has not previously been built on, will be.

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TEST 2 - The strategy, policies and allocations are not realistic and appropriate having considered the relevant alternatives and/or are not founded on a robust and credible evidence base.

1. Incorrect classification of Fferm Goch as a Minor Rural Settlement (Section 5.11 of the draft LDP):

Fferm Goch has been wrongly classified by the Council as a "Minor Rural Settlement" for the following reasons:

- a) In the Council's 'Sustainable Settlements Appraisal Review' Background paper (November 2011) ('the SSAR') -Fferm Goch should have been classified as being one of the rural, hamlets and isolated areas of the Vale of Glamorgan with an 'Anomaly Settlement' score. In paragraph 5.15 of the SSAR, the Council recognises that there are a number of settlements with relatively high scores which have been identified with anomaly scores because, for example, the settlement is located within walking distance of a one-off, high-scoring facility. Paragraph 5.15 says anomaly settlements have been identified by 'overriding' or 'limiting' factors such as:
- (i) a general limited range of services and facilities within the settlement,
- (ii) a low population (generally below 100), and/or
- (iv) the settlement being in an otherwise isolated or sensitive location.

All of these factors apply to Fferm Goch. Fferm Goch is a classic example of an anomaly settlement since it receives a full '3' score due to its proximity to a primary school. The employment score is wrong (see below), so its overall score should have been 6. It has a population of 98 (i.e. below 100). It is in an isolated location.

- b) It is the smallest of the "Minor Rural Settlements" with only 98 residents (nb Council say should have over 100) there are several other settlements with higher populations which are not classified as Minor Rural Settlements.
- c) Unlike all the other "Minor Rural Settlements" it is not recognised locally as a village it has no place sign of its own, only a street sign.
- d) it was not originally classified as a "Minor Rural Settlement" it seems to have been reclassified during the development plan process probably due to representations by the property developers who own the Garden Emporium (we note representations made by Winchester Properties on the draft preferred strategy in March 2009).
- e) The settlement scoring criteria for Fferm Goch is wrong in the SSAR Fferm Goch scores 3 for employment which is defined as meaning that there are employment opportunities on site. The only employment opportunity near Fferm Goch is Westwinds industrial estate.

This is a very small estate with only 4 light industrial buildings. A survey of these employers has confirmed that no new jobs have become available in the last 9 years and that the units collectively employ fewer than 15 people with no intention to expand.

Furthermore, one of the units has been empty and the development is not a popular industrial site. It cannot be right that this small industrial estate is classified as the same employment opportunity as those available in towns in the Vale, such as Barry, Penarth and Cowbridge. We believe Fferm Goch should score 0 for employment.

- f) Fferm Goch rightly does not have any designation as a settlement in the current UDP it is correctly classified along with other small hamlets as "open countryside". In the planning officer's report which considered the current planning permission it was "concluded that the development of the site for no more than 12 residential units, when taking into account the other material considerations would be sufficient to outweigh the local policy presumption against such development found in the Unitary Development Plan, subject to conditions and a Section 106 Legal Agreement requiring contributions to mitigate the impacts of the development" (page 22). The planning officer's report also noted, at page 12, that, "Categorising the site as brown field or previously developed land is a material consideration that does not, on its own, justify its suitability for residential development, however, the proposed amendments to the scheme concentrating development into the previously built up part of the site does have a bearing on the consequent policy position",
- g) If the list of other Minor Rural Settlements is considered, together with those which the Council decided were Anomaly Settlements or simply HamletslRural Areas, Fferm Goch stands out as an odd allocation we would strongly suggest it cannot be considered equal to any of the other Minor Rural Settlements, including nearby Graig Penllyn and Treoes, which are both substantial villages. It is much more similar to The Herberts, which the Council considered to be an Anomaly Settlement inspite of it having a primary school like Fferm Goch, although The Herberts scores for having a bus service and being much nearer to Cowbridge, whereas Fferm Goch does not. There are also villages which again are much more substantial than Fferm Goch which are not recognised as Minor Rural Settlements, including nearby Llangan and Welsh St Donats.
- h) The draft LDP at Section 5.19 (page 33) sets out the following 'common objectives' for the Minor Rural Settlements:
- Favour proposals which seek to protect and enhance the viability, accessibility or community value of existing village facilities and transport services.

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- Provide for an appropriate level, range and choice of housing, including affordable rural housing to meet local need.
- Encourage the diversification of the rural economy by favouring appropriate employment and tourism related developments.

Further, these objects are supported by Policy MG7 which at section 7.34 (page 83) states,

'New development however must always be of an appropriate scale, form and design that is sympathetic to and respects the existing character of the village and the range of services and facilities that are available. This will generally comprise infilling or limited small scale extensions to the minor rural settlements, in particular where they meet the need for local affordable housing.' Considering these statements as a whole it is apparent that Fferm Goch does not fit comfortably as a Minor Rural Settlement.

- i) If it were identified as a Minor Rural Settlement, Fferm Goch would be at risk of future residential development being allowed in this location through policy MG7 of the draft LDP. Fferm Goch is not a location where new development should routinely be permitted since it would infringe all the sustainability principles for development in rural locations. The only reason housing development has been permitted at the Garden Emporium site is because it is a brownfield site this is an exceptional site in this location.
- 2. Inappropriate allocation of 40 houses at the Garden Emporium site at Fferm Goch (policy MG2):

The allocation of 40 houses at the Garden Emporium site is inappropriate for the following reasons:

- a) A large part of the argument for allowing a huge increase in the number of houses proposed at the Garden Emporium site appears to be the classification of fferm Goch as a minor rural settlement, which is incorrect for the reasons stated above.
- b) The number of houses to be allocated at the Garden Emporium should reflect the extant planning permission for 12 houses. The draft LDP, Section 7.11 (page 75) states that, 'The number of units proposed for each identified site [which includes the Garden Emporium] is based on a density range between 25 and 30 units net per hectare or where they are available, planning application or pre-application details. Where site densities differ from these levels, this reflects local site circumstances or sensitivities.' In this case there is an existing planning permission for 12 units which should therefore have been the starting point for this site and there are good reasons why a higher density of units should not be permitted and has been consistently refused by the Council on planning applications considered to date (unsustainability, lack of local infrastructure and employment, very poor public transport and preservation of a rare plant).
- c) Policy MG8 (page 84) states 'In Minor Rural Settlements, a net residential density of 25 net dwellings per hectare will be required.' It then continues 'Lower density levels will be permitted where it can be demonstrated that:
- 1. Development at the prescribed densities would have an unacceptable impact on the character of the surrounding area;
- 2. Reduced densities are required ... to preserve a feature that would contribute to existing or future local amenity. '-

In relation to point 1, above, development of 40 houses would have an unacceptable impact on this area which with the exception of Fferm Goch consists of isolated and dispersed rural houses.

In relation to point 2. above, there is an identified rare plant on this site which would be preserved by the extant planning permission.

- 3f Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
  - a) Section 5.11 (page 26) delete Fferm Goch from the list of Minor Rural Settlements.
  - b) Policy MG2 (page 74) amend the number of houses allocated to The Garden Emporium, Fferm Goch from 40 to 12.
  - c) Residential allocations table (page 145) amend number of dwellings at The Garden Emporium, Fferm Goch from 40 to 12
  - d) Proposals map amend to exclude back area of site MG2(30) identified as habitat management area edged green on attached plan
  - e) Housing Supply Background Paper (November 2011) error in table 1 site no.30 The Garden Emporium, Fferm Goch number of units should be 12, not 220.
- 4b If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -

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|--|---|----------------------|-------------------------------|-------------------------------|--------------------------|---|---|
| Date Lodged     Status     Petition and No.     Supporting Evidence       30/03/2012     M     0 | Additional SA SEA                                       |                      | Rep format:<br>Comment form   | 1                             |                          | o be consiered by 'writter<br>ssion of Public examination | •   |
| 2a - Do you consider the LDP is Sound? Unsound   | 2b - If you think that the P<br>Procedural Tests - P    |                      | does not not meet<br>P2 - Yes | t one or more test(s) of      | f soundness, plea        | ase indicate which test(s)                                | that it fails.                              |
|  | Consistency Tests - C                                   | 1 - Yes              | C2 - Yes                      | C3 - Yes                      | C4 -                     | · Yes   |   |
|  | Coherence and Effectiven                                | ness Tests - CE1     | - Yes                         | CE2 - Yes                     | CE3 - Yes                | CE4 - Yes   |   |
| 3a - Which part of the Deposit Plan are you commenting on?                                       | Policy Number:  | Paragraph            | Number:                       | Proposal Map:                 |                          | Constraints Map   | Appendices:                                 |
|  | MG9. MD12. MG2  | 6.49. 6.52           | 2. 7.41. 7.44.                | MG9                           |                          | Feb 2012  | Appendix 9 -<br>Supporting<br>Documents     |
| 3b - Do you wish to see any changes made to the Deposit Plan                                     | as a result of your represe                             | entation? Yes        | (If                           | "No" or "Unanswered           | l" - go to 3d)           |   |   |
| 3c - What changes would like to see made to the Deposit Plan?                                    |   | mended Policy:<br>es | New Paragraph:<br>Unanswered  | Amended Paragra<br>Unanswered | <u>New Or Amo</u><br>Yes | ended Site: Other (see N<br>Unanswered                    | <del></del>                                 |
| 3d - If your representation relates to a new, deleted or amende                                  | d site, did you submit the s<br>Site Name: Land East of |                      | Site? Yes                     | (If "Yes", plea               | ū                        | didate Site Name and ref<br>eference: Site reference      | erence if known)<br>MG 9 / ID 22 Appendix 1 |
| 3e - Please set out your representation below:   |   |                      |                               |                               |                          |   |   |

The proposed Gypsy traveller site would be situated on a greenfield area close to the Hamlet of Llangan and would place an unacceptable pressure on the local infrastructure and services.

This proposal is against both local and national policy, in terms of development and does not meet the identified needs of the gypsy and traveller community (listed in the Council's own report – Fordham report)

I do not support this unfair proposal, the Council should seek to find smaller, more suitable, sustainable sites where transient and permanent pitches are not co-located. The new sites should meet the needs of the gypsy traveller community and take into consideration Special Landscape Area (SLA) and Conservation Areas and the local environment.

REPRESENTATIONS AGAINST ALLOCATION OF GYPSY & TRAVELLER SITE AT LAND EAST OF LLANGAN

TEST P1

The LDP has not been prepared in accordance with the Community Involvement Scheme, see below key points:

- The Emergency Services and Local Primary school have all confirmed that they have NOT been consulted on the proposed site MG9. The LEA confirmed they had not been consulted about the Gypsy site.
- Registered consultees have not been informed of the consultation stages.
- According to the Welsh Government's document 'Travelling to a better future' there is an onus on the LA to consult with its strategic partners in delivering Gypsy & Traveller sites. No consultation has taken place.
- Good practice (Welsh Government document 'Good Practice Design in designing Gypsy & Traveller sites') suggests that where Gypsy & Traveller sites are concerned the local community should be engaged as early as possible we believe that the Council has undertaken the minimum consultation in terms of the LDP and insufficient consultation with respect to the Gypsy & Traveller site in accordance with best practice.

TEST P2

1. The Sustainability Appraisal is flawed and contradictory — the proposed sites do not meet with national policy in respect of sustainability. The allocation of Llangan is not consistent with previous Planning Rejections by the Council which considered sustainability (Bonvilston Sept 2011) and with similar determinations by the Planning Inspectorate (Pembroke Sept 2011).

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2. The allocation of MG9 is not consistent with the proposed LDP policies.

#### TEST C1

The Land Use Plan (with regards to Gypsy & Traveller sites) does not relate to any strategy - The Housing Strategy is out dated and does not provide any structure for assessing Gypsy & Traveller needs or site location.

#### TESTC2

- 1. The Site allocation does not have regard to the following National Policy:
- -Welsh Government Circular (30/2007):
- The site is RURAL and is "UNSUSTAINABLE" as there are no local services (no shops, food and drink outlets, doctor, dentist, Library, rail services or any main settlement within 5km etc). Llangan and Fferm Goch both score 0 points for local services in the evidence based assessment 'Sustainable Settlements Appraisal'
- The site would not comply with a RURAL EXCEPTION POLICY as it advocates that all pitches are accommodated on a RURAL site including transient pitches which would not comply with TAN 2.
- Any business operated from the site would be in contradiction of RURAL EXCEPTION guidance.
- The site allocation does not take into account the "SCALE" of the resident community. Llangan has a population of less than 100 with 35 homes and this proposal nearly doubles the size of the Hamlet.
- Example of similar site. In 2007 an application of the Sustainability issue was applied by the Planning inspector in Pembroke where an appeal was refused solely on this basis.
- The VOG Council has refused an application recently in Bonvilston on the basis of Sustainability and services in this case were closer to the site than in the case of Llangan proposal.
- Designing Gypsy and Traveller Sites Good Practice Guide The site is too small; therefore cannot meet the needs identified in the LDP.
- -The site measures 7400 m2 and could only accommodate 14 pitches without infrastructure (guidance is 500m2 per pitch plus refuse area; office; play area; infrastructure (roads etc)
- The access road to the site does not meet the minimum requirements for emergency vehicles (3.7m it is actually 15m)
- The site access is poor and "unsafe" having extended walks (in excess of 800m to bus stop) along an unlit lane with no public footpath or street lighting.
- The proposal of 21 units on the site would restrict the ability of emergency vehicles to manoeuvre around the site.
- New sites grants are available (and cost should not be a material planning consideration).
- -The guidance requires that sites are:
- sustainable the Llangan site proposal is not
- equivalent to standards that would be expected for social housing in the settled community This would not meet the standards and this site would not have been considered appropriate for development for residential in either the current or proposed plans
- have the effect of encouraging and developing good relations between
- Gypsies & Travellers and the settled community the large scale of this proposal could mean that establishing good relations with the local community of Llangan would be unlikely and could also result in increased tensions in the community.
- based on WAG guidance of Design of Gypsy traveller sites the maximum number of pitches is 14, and the proposal at Llangan exceeds this number.
- Travelling to a Better Future
- Recommends that LA's engage with their Housing Association Partners to bring sites forward. The VOG Council has not done this.
- "Situating transit provision on residential Gypsy sites is not an option preferred by the Gypsy and Traveller community as this can lead to tensions among different family groups and make site management and maintenance very difficult." This creates a sense of "fear" within the settled Gypsy & Traveller community. The proposal is recommending that transient and permanent sites are co-located.
- Planning Policy Wales 2011
- The proposed site at Llangan is greenfield land, according to the definition of brownfield land set out in Figure 4 1 of PPW;
- it will not reduce the need to travel, due to the limited local service provision in close proximity to the site;

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- offers very limited access to public transport facilities:
- is not large enough to provide ancillary facilities required to support a sustainable development as set out in paragraph 3.30 in accordance with Designing Gypsy and Travellers Sites Good Practice Guide;
- is located within a Special Landscape Area (SLA) and in close proximity to a Conservation Area. The assessment of the Llangan site incorrectly states that it is not within an SLA, so makes no reference to the sites proximity to the conservation area of Llangan. The location can be clearly seen from the conservation area.
- does not meet the identified needs of Gypsies and Travellers, in the Vale of Glamorgan (Fordham report 2008 evidence):
- does not promote sustainable access to employment, shopping, education, health, community, leisure and sports facilities:
- does not maximise opportunities for community development and social welfare:
- does not foster social inclusion due to the isolated location of the site: and
- does not contribute to improvements in health due to the isolation from services and facilities.
- 2. MG2. The draft policy MG 2 actively discriminates the Gypsy community by excluding them from the wider housing programme and potentially abuses their human rights. Policy MG 2 should be revised to allow the VOG to identify appropriate sites in the same way as Affordable Housing.

#### TESTC3

- 1. The policy does not have due regard to the Wales Spatial Plan.
- The key theme of the Wales Spatial Plan is achieving sustainable development through focusing new development in areas which have good access to key services and facilities. As there are no services surrounding the site the allocation of MG9 is not consistent with the objectives of the Wales Spatial Plan. The Gypsy site proposal fails Soundness test Consistency C3 because the policy does not have due regard to the Wales Spatial Plan.

#### TESTC4

- 1. The allocation of this site does not have regard to the relevant Community Strategy in the following respects:
- "The diverse needs of local people are met through the provision of customer focused, accessible services and information"- This cannot be achieved by the allocation of a non-accessible rural allocation.
- "Vale of Glamorgan residents and organisations respect the local environment and work together to meet the challenge of climate change". The allocation of MG9 places heavy emphasis on the use of the car to access the most basic facilities — shops, health, education etc.
- "Older people are valued and empowered to remain independent, healthy and active. They have equality of opportunity and receive high quality services to meet their diverse needs" All services are miles away and inaccessible to

the older community. The VERY POOR public transport system is located

1050m from the site and is in excess of the maximum distances as defined in

the proposed LDP and "Manual for Streets".

- "People of all ages are able to access coordinated learning opportunities and have the necessary skills to reach their full potential helping to remove barriers to employment"—There is no employment opportunity near to the site.

The local primary school has confirmed that it is full and that its projections suggest that it doesn't have the capacity for such a large development (also consider the existing approval of 12 dwellings at Fferm

- The small local industrial unit has raised concerns in relation to the scale of the proposal

#### TEST CE1

The Plan does not set out a coherent strategy in the following respects

- The Strategy makes the following statements:

The LDP will seek to provide a policy framework which: Manages the housing supply effectively in order to provide a range of good quality, affordable homes in sustainable locations

Reduces out commuting by providing opportunities for new housing, retail and employment development in accessible locations in the Vale of Glamorgan

The allocation of this rural site in open countryside does not meet this objective.

- The LDP also states its vision as being:

"Our Vision for the Vale of Glamorgan is a place:

That is safe, clean and attractive, where individuals and communities have sustainable opportunities to improve their health, learning and skills, prosperity and wellbeing and

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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 sustainability of the area." The allocation of this site in policy MG9 does not meet these objectives being in a rural location with inadequate facilities and transport links.

- The Allocation of this site in policy MG9 does not comply with the following objectives of the LDP:
- -Objective 1: To sustain and further the development of sustainable communities within the Vale of Glamorgan, providing opportunities for living, learning, working and socialising for all. The site's location would clearly not meet this objective.
- Objective 2: To ensure that development within the Vale of Glamorgan makes a positive contribution towards reducing the impact of and mitigating the adverse effects of climate change. The allocation of this site will have entirely the opposite effect to this objective.
- Objective 3: To reduce the need for Vale of Glamorgan residents to travel to meet their daily needs and enabling them greater access to sustainable forms of transport. The allocation of this site will have entirely the opposite effect to this objective.
- Objective 4: To protect and enhance the Vale of Glamorgan's historic, built, and natural environment. The development of this site would not meet this objective: a planning refusal on an adjacent site in May 2002 stated "It is a proposal that would adversely affect the undeveloped rural character of the area"
- Objective 5: To maintain, enhance and promote community facilities and services in the Vale of Glamorgan The local primary school has not been consulted, had they been it would have been recognised that the school does not have capacity, nor is it projected to have the capacity.
- Objective 7: To provide the opportunity for people in the Vale of Glamorgan to meet their housing needs- States that development of housing should be in sustainable locations This is not. Furthermore, it brings into question POLICY MD12 which is discriminatory in that Gypsy & Traveller sites are treated differently from other housing allocations. An inclusive policy would see Gypsy & Traveller sites being assessed on the same basis as AFFORDABLE HOUSING and considered for ALL candidate residential sites in the LDP
- Objective 10: To ensure that development within the Vale of Glamorgan uses land effectively and efficiently and to promote the sustainable use and management of natural resources. The inappropriate use of finite resources can impact on the ability of future generations to fulfil their needs. The LDP through favouring the use of previously developed land and the sustainable use of natural resources of whatever kind and wherever they are located, will contribute to preserving their availability for future generations. This is agricultural land in the Special Landscaped Area.

#### TEST CE2

The strategies, policies and allocations are not realistic and appropriate having considered relevant alternatives and are not founded on robust evidence:

- 1. The allocation of Llangan is purely on the basis of site ownership by the Vale and does not meet the requirement of Policy MD12.
- 2. The Gypsy & Traveller site assessment (anecdotal) conflicts with other evidence based background papers; specifically the Sustainable Settlement Appraisal. The SSA states 0 points for public transport but the Gypsy & Traveller site assessment states that public transport facilities are good.
- 3. The Gypsy Traveller site assessment states "good highway access", yet the access falls considerably short of the minimum requirement for vehicle access the access lane is 2.5m wide, against a minimum requirement of 3.7m plus footpath of 1.2m.
- 4. The Gypsy Traveller site assessment does not reflect the current legal obligations of the VOG in respect of this site, yet the other site assessments highlight legal issues.
- 5. Several privately-owned sites were put forward as candidate sites for Gypsy & Traveller sites but were dismissed as they were not in Council ownership. Not being in council ownership should not be a reason to reject privately owned sites.
- 6. The key issue is that the site allocation does not reflect the identified need of the Gyosy & Traveller community as highlighted in the 2008 Fordham report.
- 7. The Gypsy Traveller site assessment suggests that Fferm Goch is the local settlement when Llangan is recognised in this and historic documents as the local settlement being only 150m from the proposed site. It appears that the council has also linking the site at Llangan to the Hamlet of Fferm Goch in order to increase the site assessment positive score.
- 8. The assessment makes no reference that the site is in a Special Landscape Area (SLA).
- 9. The assessment makes no reference that the site is adjacent to a Conservation Area, within the Conservation Management Plan for this area there is a specific requirement to protect the view from the edge of the conservation area over the proposed site. The proposed site is clearly visible form the conservation area.
- 10. The allocation of Fferm Goch as a Minor Rural Settlement is incorrect. The appraisal scored 9 points. 3 are for employment which puts this site on par with the major settlements such as Barry. This is on the basis of 4 light industrial buildings. A survey of these employers has confirmed that zero new jobs have become available in the last 9 years and that the units collectively employ fewer than 15 people with no intention to expand. Furthermore, one of the units has been empty and the development is not a popular industrial site.
- 11. Fferm Goch has a population of less than 100 (98)— of the 5 sites in the Vale of Glamorgan with a population of 98 only Fferm Goch is classified as a Minor Rural site (probably based on the 9 points). The remainder are classified as Hamlets and there is a presumption against development in Hamlets (or as a minimum the scale would need to be appropriate and tied to a Rural Exception policy). The guidance requires ALL sites of a population below 100 to be classified as a Hamlet Fferm Goch should be recategorised as a Hamlet.
- 12. The Council has undertaken a study (Fordham report 2008) where the message was extremely strong that the Gypsy & Traveller community wanted smaller sites located on the fringes of larger communities. The report confirmed that isolated, rural sites restricted access to Health, Education and welfare facilities that disadvantaged them and needs to be seen in the light of the above objectives. The following is a quote from the Fordham report:
- "Participants living on Shirenewton had three main criticisms: the site was too big, the distance from local amenities along with the lack of local transport."

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"This created many problems for the residents, especially the poorest: 'for a person like me on the bread line it's very tough. I can't afford to use the car', 'everything is a mile away, including the bus stop. It takes a long walk on a busy road to get to the shops and schools".

"The tables demonstrate that access to services such as local shops, health centres and education facilities from both sites is difficult by foot and by local transport systems. This difficulty was eased when participants used their cars, however the level of ease was lower for Roverway due to the difficult entry onto the main road".

"Participants reported that access to local amenities, health services and education was low for both sites by foot or by public transport: 'Everything is a mile away, including the bus stop. It takes a long walk on a busy road to get to the shops and schools".

"It was thought that smaller sites would reduce the problem of on-site conflicts: 'they need smaller sites and not too many different families, otherwise when you have a row the whole site becomes a war zone"

"This affected the ability of the households interviewed to access local services such as shops, health centres and education facilities. It was reported that this problem mainly affected the women: men take the vehicles that the household own to work during the day, leaving the women without their own transport and often away from public transport routes"

"Participants did not specify where in Cardiff or the Vale of Glamorgan sites should be located. It was noted that sites should be on the outskirts of towns to enable access by foot to local services such as shops, the Launderette and health centres"

"While the focus of the survey was on accommodation requirements, the questionnaire also collected information on access to services, including health and education. Research has found that poor accommodation can prevent access to services and so cannot be seen in isolation."

"Participants living on sites felt that there were site restrictions that limited their work options. These were mainly associated with the location of the sites and lack of access to public transport rather than site regulations: 'no buses, no local transport. Bad access"

"Participants living on local authority sites reported that the lack of local public transport provision in the area affected their ability to send their children to school, access health services and work opportunities, and limited their ability to attend training and education courses"

"Participants were asked about where they would like future sites to be, but were not specific about locations within the County Boroughs, instead emphasising the importance of public transport to any new sites. Government draft guidance on site design stresses the importance of access to services and the promotion of integrated co-existence' between the site and surrounding community."

"The precise location, design and facilities of any new sites should be drawn up in consultation with Gypsies and Travellers to ensure that the additional provision meets their needs. The health and safety implications of a new site's location should be considered in finding a balance between offering sites in good locations and the additional land costs this would entail. The settled community neighbouring the sites should also be involved in the consultation from an early stage."

13. An independent highway study recently undertaken by Capita Symonds, surrounding the proposed site has concluded that:

"The 1km long lane itself is of poor horizontal alignment, with poor forward visibility and unsuitable for regular vehicular traffic. If the site is developed the lane itself would need major upgrading, which would certainly change its appearance within this rural environment."

"The village school is approximately 1km from the village and 900 metres from the proposed site. It is noted that the route does not offer any facilities for pedestrians, such that the only safe way for children to travel between the site and the school safely would be by vehicle. This route would also be potentially hazardous for cycle use for children, the elderly or infirm and could be potentially hazardous for all users other than by car."

"With regard to the appropriateness of the location for a traveller's site development in relation to transportation, it is difficult to refer to standard guidelines, as few relate to "rural highways", most highway design standards for residential development relate to urban areas. Hence, the advice contained within this report is based on best available information, acceptable highway standards for developments of similar size and transport needs of small communities. Welsh Government guidelines state sites should be situated in close proximity to transport links. The Llangan site would not appear to meet that criteria, being situated away from the main transport infrastructure, sites should also have ready access to schools, doctors and shops, against which requirements Llangan again appears to fail."

"With regards to the existing lane, it is generally considered that where there is direct access to dwellings, the previous standard for developments, Design Bulletin 32 offers guidance where it states that a desirable minimum carriageway width of 5.5 metres is appropriate, together with 2.0 metre wide footways on both sides. This will allow two way traffic at all times, and safe movement of pedestrians."

"Thus the lane itself should be widened to this minimum standard, which will require the removal of the existing hedge line on one or both sides of the lane and probable acquisition of land from the adjoining fields. This will of course change the environmental character of the area substantially, but is considered essential to cater for increased vehicle and pedestrian traffic"

14. There is complete inconsistency with the allocation of MG9 against the proposed policies.

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#### TEST CE3

- 1. The VOG council make no reference as to how they are going to manage such a large site. The 21 unit site in Rover Way Cardiff has 3 full time Council staff allocated to it.
- 2. The current Housing Strategy expires April 2012 and makes no relevant reference as to how the Gypsy & Travelling Community will be monitored in terms of growth or need. Indeed, there is no strategy that underpins the Gypsy & Traveller community or housing at all.

#### TEST CE4

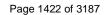
- 1. Policy MD12 (Gypsy & Traveller) is discriminatory. It offers no flexibility for the Council to bring forward sites that are sustainable / suitable for Gypsies & Travellers through the policies derived within the plan.

  2. MD12 should be redrafted to enable smaller, sustainable sites to be included within the Affordable Housing requirements and delivered through the Registered Social Landlord sector.
- 3. To argue that the Private Sector has been consulted to offer sites is not accepted. The private sector were not likely to volunteer sites for such a contentious use. The LDP should set clear strategies / policies to deliver sustainable sites for all members of the community; private; social and travelling. The current allocation does not meet this and could strongly be argued breeches the Human Rights of the Gypsy traveller community as it does not provide a suitable, sustainable site that meets the guidelines in the 2008 Fordham report.
- 3f Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)

The proposed Gypsy traveller site at Llangan (Policy MG9) should be removed from the LDP draft plan. The VOG should identify an alternative site that has been assessed according to a relative sustainability appraisal that considers the real situation in the local area and meets the requirements of the Gypsy community as listed in the 2008 Fordham report.

Policy MD12 should be amended so that it does not discriminate against the Gypsy and Traveller community. All sites during the plan should be assessed on a similar basis as Affordable Housing.

4b - If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -



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|---|-------------------------------------|---|-----------------------------|--|------------------------------|--|--------------------------------|
| Date Lodged       Status       Petition and No.       Supporting Evidence         M       0       ✓ | Additional SA SEA                   |   | Rep format:<br>Comment form |  |                              | onsiered by 'written re of Public examination? |                                |
| ·   | Procedural Tests -                  |   | P2 - Yes                    | ``   |                              |  | at it fails.                   |
|   |                                     | C1 - Unanswered veness Tests - CE1 - \              |                             | C3 - Yes<br>CE2 - Yes  | C4 - Yes<br>CE3 - Unanswered |  | I                              |
| , , ,   | Policy Number:<br>49                | Paragraph N   | a<br>S                      | Proposal Map: MG2 (ID 30); Re<br>illocations table (page<br>Supply Background Pa<br>011) | esidential                   |  | Appendices: Other - Not Listed |
| 3b - Do you wish to see any changes made to the Deposit Plan  | as a result of your repr            | resentation? Yes                                    | (If "I                      | No" or "Unanswered   | ' - go to 3d)                |  |                                |
| 3c - What changes would like to see made to the Deposit Plan?                                       | New Policy:<br>Unanswered<br>Notes: |   | ew Paragraph:<br>nanswered  | Amended Paragrap<br>Yes  | h: New Or Amended<br>Yes     | Site: Other (see Note Unanswered               | <u>es):</u>                    |
| 3d - If your representation relates to a new, deleted or amende                                     | •                                   | he site as a Candidate Si<br>en Emporium, Fferm Goo |                             | (If "Yes", plea  | o .                          | Site Name and reference: ID30 in the draft L   | ,                              |
| 3e - Please set out your representation below:  |                                     |   |                             |  |                              |  |                                |

Please see attached representations below and note as follows:

Fferm Goch as a residential settlement was built to serve the rural community and the nearby quarry. It has no shop or services and the school is some 500m distance along a busy link road between the M4 and A48 at Pentre Meyrick. There is no footpath and the bus service is limited. The school is also at capacity.

A development of 40 houses would more than double the housing in this isolated location and create a village larger than nearby Llangan, but again without services.

A small development would be more appropriate, perhaps with an element of mixed commercial use to reflect both the alleged contamination of the site and the low density industrial uses nearby.

REPRESENTATIONS ON VALE OF GLAMORGAN DRAFT DEPOSIT LDP RELATING TO THE ALLOCATION OF 40 HOUSES AT THE GARDEN EMPORIUM SITE, FFERM GOCH AND THE DESIGNATION OF FFERM GOCH AS A 'MINOR RURAL SETTLEMENT'.

#### Summary

- 1) The Garden Emporium site at Fferm Goch is a site with extant planning permission for 12 houses. The rationale for granting this planning permission on this site was overwhelmingly because it is a previouslydeveloped site, with derelict garden centre buildings on the site.
- 2) However, the proposed increase in draft LDP allocation, from 12 to 40 houses, is unacceptable. The principal justification for this increase appears to be the proposed new designation of Fferm Goch as a "Minor Rural Settlement". This designation is incorrect and totally inappropriate, for reasons set out below. Higher densities of development on this site (i.e. above the 12 houses permitted) - in particular for 42 and (after revisions) 24 houses - havebeen considered and rejected by the Council in the past. The issues that led to those rejections in particular that the site is unsustainable and a portion of the site is needed to protect a rare plant - have not changed. If this allocation is allowed there is a very real prospect that this level of housing is built - we are aware that the owners are already in pre-application discussions with the Council for 40 houses on this site, even though such discussions are inappropriately premature.
- 3) The extant planning permission includes conditions requiring the private houses to be livework units and a large portion of the site (approx 30%) to be set aside as a nature conservation area. If 40 houses

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were permitted on this site the developer would no doubt argue that neither of these conditions could be sustained. Other issues such as lack of public transport and lack of places at the local primary school cannot be satisfactorily resolved through condition or planning agreement.

- 4) For all these reasons, which are expanded on below, the allocation of the Garden Emporium site for 40 houses should not go forward in the draft LDP. The site should be allocated for 12 houses, in line with the extant planning permission and preserving the• conditions on that planning permission requiring 1) 30% affordable housing and 2) the back portion of the site (approx 300/0 edged in green on the attached approved plan) to be a habitat conservation area and excluded from this site altogether 3) the 8 private houses to be live-work units.
- 5) In addition, Fferm Goch should not be designated as a "Minor Rural Settlement". This was due to an incorrect "settlement scoring" of 9 which included 3 points allocated for "employment opportunities within settlement" on the basis of the nearby Westwinds industrial estate. These points should not have been allocated. 3 points puts this site on a par with towns in the Vale like Barry, which is entirely inappropriate. There are only 4 light industrial buildings on this site. A survey of these employers has confirmed that no new jobs have become available in the last 9 years and that the units collectively employ fewer than 15 people with no intention to expand. Furthermore, one of the units has been empty and the development is not a popular industrial site.

Our representations in relation to each of the tests of 'soundness' are as follows:

TEST PI - It has not been prepared in accordance with the Delivery Agreement including the Community Involvement Scheme

The local community have not been involved in the decision to allocate this site for 40 houses. We understand that neither the school nor the LEA were consulted. We do not believe that Llangan Community Council was consulted at any previous stage in the draft LDP process.

TEST P2 - The plan and its policies have not been subjected to Sustainability Appraisal including Strategic Environmental Assessment

The Sustainability Appraisal of the Garden Emporium site is wrong in its assessment of the Garden Emporium site's ability to meet the Sustainability Appraisal's objectives because:

- 1. The site is incorrectly rated '++' (strongly contributes) as regards objective 1, which is "To provide the opportunity for people to meet their housing needs." Although this site falls within the Rural Vale, the Rural Vale is a very large area and there is no particular local specific need for this housing. As far as affordable housing is concerned, it is only proposed that the site provides the standard 35% affordable housing which means it is no different to better than any other site. The '++' rating should be reduced to '+' (contributes).
- 2. The site is incorrectly rated '+' (contributes) as regards objective 2, which is "To maintain, promote and enhance the range of local facilities". There is no suggestion that the proposed development will in any way enhance the local facilities. In fact it will place increased pressure on the following existing local facilities: the primary school, which has no spaces; the playground/open space at Fferm Goch, as we note there is no suggestion of on-site open space being provided on the Garden Emporium site (particularly given the high density of housing which 40 homes would involve and in fact on-site provision was not offered even for the extant planning permission for 12 houses); and the community hall, which already serves a large number of houses and is of a limited capacity. This' +' rating should be changed to a '--' ( strongly detracts) rating.
- 3. The site is incorrectly rated '++' (strongly contributes) as regards objective 8, which is "To use land effectively and efficiently". Although part of the site is 'brownfield' and has been previously developed as a garden centre, a large section at the rear of the site (approximately 30% of the entire site) has never been developed. It was this area which was identified as a habitat management area in the extant planning permission for 12 houses. The requirement for a habitat management area was in part due to the presence of a very rare species of plant on the site (Bithynian vetch). This rating should be reduced to a '+' (contributes) rating, to acknowledge the fact that while the development would reuse the developed part of the site, it would also use a currently undeveloped, greenfield, area.
- 4. The site is incorrectly rated '++' (strongly contributes) as regards objective 9, which is "To protect and enhance the built environment and natural environment". This is wrong for the reasons given in point 3 above. If the site was developed for 40 houses there would be no room whatsoever for any habitat management or other effective biodiversity area as has been required by the extant planning permission. This will mean the loss of a very rare plant species which has only been found in two other locations in the whole of Wales. This rating should therefore be reduced altogether to a '--' (strongly detracts) rating.
- 5. The site is incorrectly rated '0' (neutral) as regards objective 11, which is "To protect, enhance and promote the quality and character of the Vale of Glamorgan's culture and heritage." This is wrong for the same reasons as at points 3 and 4 above. The Council has resolved to protect the very rare plant species which has been added to its local biodiversity action plan. This resolution by the Council (which was made specifically in response to the survey which identified this plant on this site) indicates its recognition of the species' importance to the culture and heritage of the Vale of Glamorgan. This rating should therefore be reduced to a '--' (strongly detracts) rating.
- 6. The site is incorrectly rated '+' (contributes) rating as regards objective 12, which is, "To reduce the need to travel and enable the use of more sustainable modes of transport". This rating is wrong because although it will be possible to travel by foot or bicycle to the primary school and the community hall, every other service and local amenity including employment can only be accessed by private car. The bus service to the site is so poor that it does not even merit a rating on the Council's sustainable settlements score. This rating should therefore be reduced to a '- -' (strongly detracts) rating.

TEST C2 - It does not have regard to National Policy

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- A) The proposed allocation of the Garden Emporium site for 40 houses fails to meet Planning Policy Wales (February 2011) ("PPW") in the following respects:
- 1. The Garden Emporium site is totally unsustainable. It is located in the Rural Vale, surrounded by open countryside and 7 miles from Cowbridge and 8 miles from Bridgend. Realistically anyone living in this location will rely on private cars to get to and from the site for work, shops, everything except the primary school, which, as stated below, is full.
- 2. The nearest corner shop is in Pencoed to which there is no public transport; otherwise it is necessary to drive to Cowbridge or Bridgend or one of the large supermarkets on the edge of Bridgend.

The current planning permission for the site is for 12 houses, of which at least 30% (i.e. 4) are to be affordable. There is a condition forming part of the planning permission (condition 10) which requires each of the 8 private units to be live-work units and requires that the business floor space of the live/work unit shall be finished ready for occupation before the residential floor space is occupied. The reason given for this condition is "In order to ensure a satisfactory and sustainable form of development which will support and enhance the local rural community and in order for the development to comply with policies ENV27, ENV29 and EMP2 of the UDP." It is apparent from reading documents associated with the planning permission that although the application originally proposed the live-work units and made much of them improving the sustainability of the site, at a later date the applicant asked the LP A not to impose this condition. However, the LP A insisted it was required.

There is no suggestion that the 40 houses now proposed for the site would be live-work units. Even if this condition was imposed this site would still be unsustainable as the residents would need to drive for everything except work. It also seems likely that they would need to make business-related journeys and of course, depending upon their business, additional car journeys could in fact be created by these businesses (for example, a hairdressers).

This is contrary to PPW (paragraph 4.6.2) which states, 'Development plans ... should secure a sustainable settlement pattern which meets the needs of the economy, the environment and health, while respecting local diversity and protecting the character and cultural identity of communities.'

2. The Garden Emporium site is very poorly served by public transport - there is only a very limited bus service to and from Fferm Goch (5 buses per day to Bridgend; 4 per day from Bridgend which go on to Cowbridge). There is no bus service to the nearest train station at Pencoed (3 miles away, along roads with no pedestrian footway). This is contrary to PPW (paragraph 4.6.4), which states, 'Local planning authorities should assess the extent to which their development plan settlement strategies and new development are consistent with minimising the need to travel and increasing accessibility by modes other than the private car. "Higher density development, including residential development, should be encouraged near public transport nodes or near corridors well served by public transport (or with the potential to be so served).'

This is added to by paragraph 4.6.7 PPW which stresses that, 'In rural areas the majority of new development should be located in those settlements which have relatively good accessibility by non-car modes.' This is emphasized again in paragraph 8.7.3 PPW which states, 'It is also expected that the proposed access to a development will reflect the likely travel patterns involved. It should ensure that people can reach the development, as far as practicable, by walking, cycling and public transport, as well as by car.'

3. The existing local infrastructure will not be able to serve a further 40 houses at the Garden Emporium site. There is very little local infrastructure available at this site, but two issues are relevant - the local primary school (Llangan primary school) and highways issues:

Llangan primary school

Llangan primary school is within walking distance of the site. However, this school is very small and is full. The Local Education Authority has told us that Llangan primary school's maximum capacity is 111 pupils, and the number on the roll as at September 2011 was 108 pupils. The admission number of new pupils each year is no more than 15. This is because several year groups are combined (i. e. two year groups being taught as a single class, in one classroom) and the LEA needs to comply with the requirement in its education plan to have no more than 30 children in each classroom. Although in some circumstances it might be appropriate to deal with this by seeking as 1 06 contribution from the developers to increase the capacity of the school, in this case the school has neither the space nor the land to expand to take on more pupils.

Two classes are already being taught in terrapins located in the playground and the school only has a relatively small area of grass which has already been diminished as a result of building a new school hall and two classrooms a few years ago. It is noted that in the planning officer's report for the current 12-house planning permission the education authority thought that there was enough space in local primary school~ (it did not specify any in particular) to accommodate the children from 12 houses- 40 houses is very different. From speaking to the LEA, we understand that according to their formula for calculating the number of primary school places generated by new houses, 40 new houses would result in 15 primary age children needing places. There is therefore currently no possibility for the school to provide places for the primary-age children from this development who would have to be driven to other schools some distance away.

Highway safety issues

When Council considered the current planning permission the highways department was originally concerned about there being more than one exit from the site, when there were only 12 houses. The extant planning permission includes a condition (condition 20) that the site shall be served by no more than two means of access onto Ruthin Road - with the primary access to serve no more than 8 dwellings and the

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secondary access to serve no more than 4 dwellings. How many exits would be proposed for 40? This road is used heavily by traffic, particularly during peak times - many drivers, including a significant number of large lorries, use it as a short cut from the A48 to the M4. It is also the main pedestrian cycleway to Llangan primary school from Fferm Goch Heol Llidiard/St Mary Hill and is used on a daily basis by those residents for that purpose. Currently only a few single houses have driveways onto this road. Having an additional 40 houses here will increase the traffic considerably, at increased safety risk to existing drivers and pedestrians and cyclists.

This is therefore contrary to paragraph 4.6.8 of PPW which states, 'Development in the countryside should be located within and adjoining those settlements where it can be best accommodated in terms of infrastructure, access and habitat and landscape conservation.' It is also contrary to paragraph 9.2.9 of PPW which states, 'Local planning authorities should consider the following criteria in deciding which sites to allocate for housing in their development plans: ...

- the location of potential development sites and their accessibility to jobs, shops and services by modes other than the car, and the potential for improving such accessibility
- the capacity of existing and potential infrastructure including public transport ... and social infrastructure (such as schools ... ), to absorb further development and the cost of adding further infrastructure ... "
- 4. The development of the Garden Emporium site cannot be described as infilling or a minor extension to Fferm Goch. It is located adjacent to Fferm Goch, but the proposed 40 houses are more than Fferm Goch and Heol Llidiard combined (which amount to 33 houses). It is totally out of scale for this area.

It also cannot be claimed to meet any "local need" for affordable housing. The Council's own background documents recognise that the need for affordable housing is greater in the larger settlements in the Vale, such as Barry. Section 3.9 of the draft LDP states that, 'The findings of the [Local Housing Market Assessment 2010] make clear that the area of greatest need is Barry followed by the coastal settlements of Rhoose, Llantwit Major and Penarth as well as the Rural and Eastern Vale." This statement is supported by the Council's 'Affordable Housing' background paper (November 2011), in which Table 2 in paragraph 3.7 specifies an identified need of 3.5 units of affordable housing per year in the Rural Vale. This is a very low number of units to be accommodated within a large area of land and there is no need for such a high concentration of units to be accommodated on the Garden Emporium site. In fact, the existing houses at Fferm Goch are sold at considerably less than the average house price in this area (i.e. the Rural Vale). No.3 Fferm Goch was sold in June 2011 for £180,000 and No.8 has been on the market for £185,000.

Notwithstanding these prices, these houses often remain on the market for some time – at least a year. Fferm Goch is private market housing which was originally Agricultural Settlement Houses (a form of Council housing) developed by the Welsh Land Society in 1939. Why do we need more houses at affordable prices in this location? There is no identified local need to be met.

We understand from speaking to a Council officer that the main reason the Council are prepared to consider 40 houses on this site is the need for more affordable housing in the Vale. While we have no problem with the principle of 35% of new housing being affordable, we do not think that this policy should be used to reverse engineer' such a huge increase in the total number of houses being proposed on this site. With the original planning permission 12 houses, 30% would have resulted in an entirely sensible allocation of 4 affordable houses. To invert this reasoning and specify a total of 40 houses in the hopes of raising the number of affordable housing on the site defies logic. At a rate of 3 5% this would only give 14 affordable houses - an increase of only 10 affordable houses from the existing planning permission - at the cost of an increase of 18 private houses (from 8 to 26). The detrimental impact this development will have on the local community is a disproportionate sacrifice to make for an additional 10 affordable houses.

The proposal for 40 houses on this site is therefore contrary to paragraph 4.6.8 of PPW which states, "Infilling or minor extensions to existing settlements may be acceptable, in particular where it meets a local need for affordable housing, but new building in the open countryside away from existing settlements or areas allocated for development in development plans must continue to be strictly controlled. All new development should respect the character of the surrounding area and should be of appropriate scale and design.'

If 40 houses are built on the Garden Emporium site this will be significant overdevelopment of this site at a density which should not be permitted in this location. The following points are relevant:

- a) It is acknowledged and accepted that the site has existing planning permission for 12 houses; this is a brownfield site where there has been a number of failed garden centres and it was perhaps inevitable that it would eventually be developed for housing. The development of the site with 12 houses is accepted, although even with 12 houses there are still concerns about the impact these will have on the local school and highways.
- b) However, 40 houses will make the site crowded and out of keeping with the rural area. Fferm Goch has a particular and special history it was built by the Welsh Land Society in 1939 to promote employment in rural areas and in this case to provide social housing and a community for farm workers at the large farm across the road and the houses at Fferm Goch form 3 sides of a square with a large grass pitch and play area in the middle. There is no suggestion that the proposal for the Garden Emporium site would be designed in a similar way. Fferm Goch should not in any event be used as an excuse to set a "precedent" for this locality, where other housing consists of isolated dwellings.
- c) The previous planning history of the site is relevant the Council previously considered proposals for 42 and 24 houses and rejected both on grounds of over-development, of this site.

This is contrary to paragraph 9.2.12 of PPW which states, 'Strong pressure for development may give rise to inappropriately high densities if not carefully controlled.' In paragraph 9.2.22 it states, 'In order to safeguard the character and appearance of the countryside, to reduce the need to travel by car and to economise on the provision of services, new houses in the countryside away from existing settlements

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recognised in development plans or from other areas allocated for development must be strictly controlled. Many parts of the countryside have isolated groups of dwellings. Sensitive filling-in of small gaps or minor extensions to such groups, in particular for affordable housing to meet local need, may be acceptable but much depends on the character of the surroundings, the pattern of development in the area and the accessibility to main towns and villages.' In paragraph 9.3.4 PPW states, 'In determining applications for new housing, local planning authorities should ensure that the proposed development does not damage an area's character and amenity.' The proposed development of this site with 40 houses would significantly damage the character of this area.

6. If 40 houses are built on the Garden Emporium Site, it will result in the loss of a rare plant species, Bithynian Vetch, which has been identified by the Council in its Local Biodiversity Action Plan.

The extant planning permission for the Garden Emporium site includes:

- a) a condition (condition 9) that a significant proportion of the site (approx. 30% being the whole of the back strip of the site edged green on the approved plan) shall have no buildings located on it and all properties shall be located at least 10 metres from this boundary within the development site; and
- b) another condition (condition 12) that this area shall be designated as a habitat management area to be supported by a comprehensive habitat management plan. The plan is to pay particular regard to the areas where Bithynian yetch has been found and seek to maintain and conserve this species.

These conditions were imposed in particular to preserve the species Bithynian vetch. It is apparent from the planning officer's report associated with the current planning permission that Bithynian vetch was found on the site during the course of an ecological survey being carried out, at the request of the Countryside Council for Wales. The report states that Bithynian vetch is a rare species, included as vulnerable on the UK vascular plant red data list and endangered on the Welsh list. The report says that this species was previously unknown to occur in the Vale of Glamorgan and is known to occur on only 2 other sites in the whole of Wales. As a result, the Council held a special meeting to decide to protect this plant by placing it on the Council's 2002 Local Biodiversity Action Plan.

There is no suggestion in the draft LDP that this large part of the site - which the planning officer's report recognises is open land rather than previously-developed land - would not be open to development and it would seem difficult/impossible for a planning permission for 40 houses on this site to protect the same area as a "no-build" zone. The Proposals map includes this part of the site within the area proposed to be allocated for 40 houses. The fact that this open area of land at the back of the site would not be built on under the terms of the current planning permission was a material consideration for the planning officer in recommending approval of the planning application for 12 houses (see the planning officer's report, page 12).

The allocation of 40 houses is therefore contrary to PPW paragraph 5.2.8 which states, 'Local planning authorities must address biodiversity issues, in so far as they relate to land use planning in both development plans and development control decisions. Paragraph 5.2.2 of PPW recognises that, 'The Natural Environment and Rural Communities Act 2006 places a duty on every public authority, in exercising its functions, to have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity.' The extant planning permission allowed for the preservation of this rare plant by allocating a significant portion of the site to be a no-build zone - a habitat conservation area. This area will not be possible if 40 houses are built.

B) The proposed designation of Fferm Goch as a "Minor Rural Settlement" also fails to meet PPW because it is plainly not a sustainable settlement and has been incorrectly assessed by the Council. This incorrect designation (which is considered in detail in Test CE2 below) infringes the following paragraphs of PPW: 4.6.2, 4.6.4, 4.6.7, 4.6.8, 8.7.3, 9.2.9, 9.2.12, 9.2.22 and 9.3.4 (all as cited above). If it were identified as a Minor Rural Settlement, Fferm Goch would be at risk of future residential development being allowed in this location through policy MG7 of the draft LDP. Fferm Goch is not a location where new development should routinely be permitted since it would infringe all the sustainability principles for development in rural locations.

TEST C3 - It does not have regard to the Wales Spatial Plan (wSP)

The Wales Spatial Plan update 2008 states at paragraph 1.4 that, 'It is a principle of the Wales Spatial Plan that development should be sustainable. Sustainable development is about improving wellbeing and quality of life by integrating social, economic and environmental objectives in the context of more efficient use of natural resources.' The Garden Emporium Site is a totally unsustainable site for reasons given above (Test C2).

TEST C4 - It does not have regard to the relevant Community Strategy

The Community Strategy for the Vale 2011-21 sets out 10 priority outcomes. The allocation of the Garden Emporium for 40 houses fails to have regard to the following of these priorities:

- "2. The diverse needs of local people are met through the provision of customer focused, accessible services and information." This priority is not met because the Garden Emporium site is so far from shops, health services, local amenities and workplaces as well as having poor public transport.
- "3. Vale residents and organisations respect the local environment and work together to meet the challenge of climate change." This priority is not met because the Garden Emporium site will require all its residents to travel by car to access every local service save the primary school (which does not have sufficient space for the children of 40 families, so primary school pupils will have to travel by car to other schools) "4. Older people are valued and empowered to remain independent, healthy and active.

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They have equality of opportunity and receive high quality services to meet their diverse needs." This priority is not met because public transport to this site is very poor both in terms of timetabling and route, which greatly inhibits their chance of remaining independent.

Also, there are no local services available to them such as healthcare, library or other local amenities.

- "5. Children and Young people in the Vale are well informed and supported to access a broad range of quality services that enable them to take full advantage of the life opportunities available in their local communities and beyond." This priority is not met because the local primary school is unable to accommodate the projected increase in pupil numbers from 40 new homes. Children will need to travel to other primary schools. Public transport from this site is very poor. Children will need to travel by car to primary school and to all other activities and services including leisure activities.
- "6. People of all ages are able to access coordinated learning opportunities and have the necessary skills to reach their full potential, helping to remove barriers to employment." This priority is not met because there are no learning opportunities present near the site nor, more importantly, are there any employment opportunities near the site either.
- "7. The underlying causes of deprivation are tackled and the regeneration of the Vale continues, opportunities for individuals. and businesses are developed and the quality of the built and natural environment is protected and enhanced." This priority is not met because the proposed allocation of 40 houses on the Garden Emporium will not protect and enhance the natural environment of the Vale: in order to develop 40 houses the entirety of the site will have to be developed, whereas the current planning permission requires the back third of the site to be allocated as a habitat management area. A key reason for this habitat management area was to preserve a very rare plant species growing on the site.
- "10. Health inequalities are reduced and residents are able to access the necessary services, information and advice to improve their wellbeing and quality of life." This priority is not met because there are no local health services near the site. Such services can only be accessed by driving to one of the nearby towns.
- TEST C5 The Plan does not set out a coherent strategy from which its policies and allocations logically flow and, where cross boundary issues are relevant, it is not compatible with the development plans prepared by neighbouring authorities.

The draft LDP Strategy is stated (page 23) to comprise four key elements - one of these is 'Other sustainable settlements to accommodate further housing and associated development'.

This element of the draft LDP strategy is based on the designation of certain towns and villages within the Vale as "sustainable settlements". However, Fferm Goch is wrongly identified in the strategy as a "Minor Rural Settlement". for reasons set out under Test CE2 below.

The draft LDP at Section 5. 10 (page 25) states that minor rural settlements are those 'considered to have sufficient population, services and facilities to assimilate growth without it having a detrimental impact on their existing character and local environment.' Also, at Section 5.16 of the draft LDP (page 27), 'The types of services and facilities typically found within the minor rural settlements include places of worship, community halls, small-scale retail uses and formal recreational facilities. A number of the smaller rural settlements also provide small-scale local employment opportunities, either within or in close proximity to the settlements.'

Neither of these descriptions fit Fferm Goch - for reasons set out under Test CE2. The strategy base for the rest of the LDP policies is therefore wrong in this respect.

The draft LDP Strategy is stated to follow on from the Vision and Objectives set out in the draft LDP. The Vision is stated to be for the Vale of Glamorgan to be "a place:

- That is safe, clean and attractive, where individuals and communities have sustainable opportunities to improve their health, learning and skills, prosperity and wellbeing ... "

The proposed allocation of the Garden Emporium site will be contrary to this Vision, being unsustainable development in an area with very poor public transport where there are no employment prospects and allieaming, health and other facilities can only be accessed using the car.

The allocation of this site will also be contrary to the following Objectives set out in the draft LDP:

- "Objective 1: To sustain and further the development of sustainable communities within the Vale of Glamorgan, providing opportunities for living, learning, working and socialising for all" The proposed Garden Emporium site is in a wholly unsustainable location, as is the adjacent Fferm Goch.
- "Objective 2: To ensure that development within the Vale of Glamorgan makes a positive contribution towards reducing the impact of and mitigating the adverse effects of climate change." The effects of climate change will be increased if a further 40 houses are built in this location where people will have to use cars to meet their daily needs.
- "Objective 3: To reduce the need for Vale of Glamorgan residents to travel to meet their daily needs and enabling them greater access to sustainable forms of transport" Public transport at this site is very poor.
- "Objective 4: To protect and enhance the Vale of Glamorgan's historic, built and natural environment" The proposed development of the Garden Emporium site represents overdevelopment of this site, which is

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out of keeping with the rural area. It will also fail to preserve the back third of the site as a habitat conservation area, as proposed by the extant planning permission for 12 houses on the site.

"Objective 5: To maintain, enhance and promote community facilities and services in the Vale of Glamorgan" - The proposed development at the Garden Emporium site will place increased pressure on resources - in particular Llangan primary school which is full.

"Objective 7: To provide the opportunity for people in the Vale of Glamorgan to meet their housing !leeds." - There is no need for this housing at this location.

"Objective 10: To ensure that development within the Vale of Glamorgan uses land effectively and efficiently and to promote the sustainable use and management of natural resources." – If 40 houses are allowed to be built at the Garden Emporium site then the rear part of the Garden Emporium site, which is greenfield and has not previously been built on, will be.

TEST 2 - The strategy, policies and allocations are not realistic and appropriate having considered the relevant alternatives and/or are not founded on a robust and credible evidence base.

1. Incorrect classification of Fferm Goch as a Minor Rural Settlement (Section 5.11 of the draft LDP):

Fferm Goch has been wrongly classified by the Council as a "Minor Rural Settlement" for the following reasons:

- a) In the Council's 'Sustainable Settlements Appraisal Review' Background paper (November 2011) ('the SSAR') -Fferm Goch should have been classified as being one of the rural, hamlets and isolated areas of the Vale of Glamorgan with an 'Anomaly Settlement' score. In paragraph 5.15 of the SSAR, the Council recognises that there are a number of settlements with relatively high scores which have been identified with anomaly scores because, for example, the settlement is located within walking distance of a one-off, high-scoring facility. Paragraph 5.15 says anomaly settlements have been identified by 'overriding' or 'limiting' factors such as:
- (i) a general limited range of services and facilities within the settlement,
- (ii) a low population (generally below 100), and/or
- (iv) the settlement being in an otherwise isolated or sensitive location.

All of these factors apply to Fferm Goch. Fferm Goch is a classic example of an anomaly settlement since it receives a full '3' score due to its proximity to a primary school. The employment score is wrong (see below), so its overall score should have been 6. It has a population of 98 (i.e. below 100). It is in an isolated location.

- b) It is the smallest of the "Minor Rural Settlements" with only 98 residents (nb Council say should have over 100) there are several other settlements with higher populations which are not classified as Minor Rural Settlements.
- c) Unlike all the other "Minor Rural Settlements" it is not recognised locally as a village it has no place sign of its own, only a street sign.
- d) it was not originally classified as a "Minor Rural Settlement" it seems to have been reclassified during the development plan process probably due to representations by the property developers who own the Garden Emporium (we note representations made by Winchester Properties on the draft preferred strategy in March 2009).
- e) The settlement scoring criteria for Fferm Goch is wrong in the SSAR Fferm Goch scores 3 for employment which is defined as meaning that there are employment opportunities on site. The only employment opportunity near Fferm Goch is Westwinds industrial estate.

This is a very small estate with only 4 light industrial buildings. A survey of these employers has confirmed that no new jobs have become available in the last 9 years and that the units collectively employ fewer than 15 people with no intention to expand.

Furthermore, one of the units has been empty and the development is not a popular industrial site. It cannot be right that this small industrial estate is classified as the same employment opportunity as those available in towns in the Vale, such as Barry, Penarth and Cowbridge. We believe Fferm Goch should score 0 for employment.

f) Fferm Goch rightly does not have any designation as a settlement in the current UDP – it is correctly classified along with other small hamlets as "open countryside". In the planning officer's report which considered the current planning permission it was "concluded that the development of the site for no more than 12 residential units, when taking into account the other material considerations would be sufficient to outweigh the local policy presumption against such development found in the Unitary Development Plan, subject to conditions and a Section 106 Legal Agreement requiring contributions to mitigate the impacts of the development" (page 22). The planning officer's report also noted, at page 12, that, "Categorising the site as brown field or previously developed land is a material consideration that does not, on its own, justify its suitability for residential development, however, the proposed amendments to the scheme concentrating development into the previously built up part of the site does have a bearing on the consequent policy position",

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g) If the list of other Minor Rural Settlements is considered, together with those which the Council decided were Anomaly Settlements or simply HamletslRural Areas, Fferm Goch stands out as an odd allocation - we would strongly suggest it cannot be considered equal to any of the other Minor Rural Settlements, including nearby Graig Penllyn and Treoes, which are both substantial villages. It is much more similar to The Herberts, which the Council considered to be an Anomaly Settlement inspite of it having a primary school like Fferm Goch, although The Herberts scores for having a bus service and being much nearer to Cowbridge, whereas Fferm Goch does not. There are also villages which again are much more substantial than Fferm Goch which are not recognised as Minor Rural Settlements, including nearby Llangan and Welsh St Donats.

- h) The draft LDP at Section 5.19 (page 33) sets out the following 'common objectives' for the Minor Rural Settlements:
- Favour proposals which seek to protect and enhance the viability, accessibility or community value of existing village facilities and transport services.
- Provide for an appropriate level, range and choice of housing, including affordable rural housing to meet local need.
- Encourage the diversification of the rural economy by favouring appropriate employment and tourism related developments.

Further, these objects are supported by Policy MG7 which at section 7.34 (page 83) states,

'New development however must always be of an appropriate scale, form and design that is sympathetic to and respects the existing character of the village and the range of services and facilities that are available. This will generally comprise infilling or limited small scale extensions to the minor rural settlements, in particular where they meet the need for local affordable housing.' Considering these statements as a whole it is apparent that Fferm Goch does not fit comfortably as a Minor Rural Settlement.

- i) If it were identified as a Minor Rural Settlement, Fferm Goch would be at risk of future residential development being allowed in this location through policy MG7 of the draft LDP. Fferm Goch is not a location where new development should routinely be permitted since it would infringe all the sustainability principles for development in rural locations. The only reason housing development has been permitted at the Garden Emporium site is because it is a brownfield site this is an exceptional site in this location.
- 2. Inappropriate allocation of 40 houses at the Garden Emporium site at Fferm Goch (policy MG2):

The allocation of 40 houses at the Garden Emporium site is inappropriate for the following reasons:

- a) A large part of the argument for allowing a huge increase in the number of houses proposed at the Garden Emporium site appears to be the classification of fferm Goch as a minor rural settlement, which is incorrect for the reasons stated above.
- b) The number of houses to be allocated at the Garden Emporium should reflect the extant planning permission for 12 houses. The draft LDP, Section 7.11 (page 75) states that, 'The number of units proposed for each identified site [which includes the Garden Emporium] is based on a density range between 25 and 30 units net per hectare or where they are available, planning application or pre-application details. Where site densities differ from these levels, this reflects local site circumstances or sensitivities.' In this case there is an existing planning permission for 12 units which should therefore have been the starting point for this site and there are good reasons why a higher density of units should not be permitted and has been consistently refused by the Council on planning applications considered to date (unsustainability, lack of local infrastructure and employment, very poor public transport and preservation of a rare plant).
- c) Policy MG8 (page 84) states 'In Minor Rural Settlements, a net residential density of 25 net dwellings per hectare will be required.' It then continues 'Lower density levels will be permitted where it can be demonstrated that:
- 1. Development at the prescribed densities would have an unacceptable impact on the character of the surrounding area;
- 2. Reduced densities are required ... to preserve a feature that would contribute to existing or future local amenity. ' –

In relation to point 1. above, development of 40 houses would have an unacceptable impact on this area which with the exception of Fferm Goch consists of isolated and dispersed rural houses.

In relation to point 2. above, there is an identified rare plant on this site which would be preserved by the extant planning permission.

- 3f Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
  - a) Section 5.11 (page 26) delete Fferm Goch from the list of Minor Rural Settlements
  - b) Policy MG2 (page 74) amend the number of houses allocated to The Garden Emporium, Fferm Goch from 40 to 12

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- c) Residential allocations table (page 145) amend number of dwellings at The Garden Empoorium, Fferm Goch from 40 to 12
- d) Proposals map- amend to exclude back area of site MG2(30) identified as habitat area edged green on attached plan
- e) Housing Supply Background Paper (November 2011) error in table 1 site no.30 The Garden Empoorium, Fferm Goch number of units should be 12, not 220
- 4b If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -

Paragraph 5.11 (designation of Fferm Goch as a minor rural settlement) Policy MG2 (allocation of the garden Emporium Site, Fferm Goch for 40 houses)

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| Date Lodged Status<br>30/03/2012 M | Petition and No      | o. Supporting Evidence   | Additional SA SEA                             |                   |                                  | ep format:<br>omment form | *                           | •                              | to be consiered by 'written<br>ssion of Public examinati | •  |
| 2a - Do you consider th            | he LDP is Sound      |                          | •   | P1 - Yes          |                                  | P2 - Yes                  | one or more test(s)         |                                | ase indicate which test(s                                | ) that it fails.                               |
|                                    |                      |                          | Coherence and Effect                          |                   |                                  |                           | CE2 - Yes                   | CE3 - Yes                      | CE4 - Yes  |  |
| 3a - Which part of the             | Deposit Plan are     | you commenting on?       | Policy Number:<br>MG9. MD12. MG2.             | _                 | Paragraph Num<br>6.49. 6.52. 7.4 |                           | Proposal Map:<br>MG9        |                                | Constraints MapFeb 2012                                  | Appendices: Appendix 9 - Supporting Documents  |
| 3b - Do you wish to see            | e any changes m      | ade to the Deposit Plan  | as a result of your rep                       | oresentation?     | Yes                              | (lf                       | "No" or "Unanswe            | red" - go to 3d)               |  |  |
| 3c - What changes wo               | uld like to see ma   | nde to the Deposit Plan? | New Policy: Unanswered Notes:                 | Amended Po<br>Yes |                                  | Paragraph:<br>nswered     | Amended Parac<br>Unanswered | <u>ıraph: New Or Am</u><br>Yes | ended Site: Other (see I<br>Unanswered                   |  |
| 3d - If your representa            | ation relates to a i | new, deleted or amende   | d site, did you submit<br>Site Name: Land Eas |                   | andidate Site?                   | Yes                       | (If "Yes", p                | ŭ                              | ndidate Site Name and re<br>deference: Site Reference    | ference if known)<br>e MG 9 / ID 22 Appendix 1 |

3e - Please set out your representation below:

The proposed Gypsy traveller site would be situated on a green field 200 metres only from the Hamlet of Llangan which has only 35 houses and would place an unacceptable pressure on the local infrastructure and services.

This proposal is against both local and national policy, in terms of development and does not meet the identified needs of the gypsy and traveller community (listed in the councils own Fordham report). Specifically proper consultation with statutory undertakers, highways, the emergency services and the Education Authority should have been had before the allocation was made due to the obvious disadvantages of this site for the allocated use in the Draft LDP

I do not support this unreasonable proposal, the council should seek to find smaller, more suitable, sustainable sites where transient and permanent pitches are not co located. The new sites should meet the needs of the gypsy traveller community and take into consideration Special Landscape Area (SLA) and Conservation Areas and the local environment.

Attached additional information:

REPRESENTATIONS AGAINST ALLOCATION OF GYPSY & TRAVELLER SITE AT LAND EAST OF LLANGAN

TEST P1

The LDP has not been prepared in accordance with the Community Involvement Scheme, see below key points:

- The Emergency Services and Local Primary school have all confirmed that they have NOT been consulted on the proposed site MG9. The LEA confirmed they had not been consulted about the Gypsy site.
- Registered consultees have not been informed of the consultation stages.
- According to the Welsh Government's document 'Travelling to a better future' there is an onus on the LA to consult with its strategic partners in delivering Gypsy & Traveller sites. No consultation has taken place.
- Good practice (Welsh Government document 'Good Practice Design in designing Gypsy & Traveller sites') suggests that where Gypsy & Traveller sites are concerned the local community should be engaged as early as possible we believe that the Council has undertaken the minimum consultation in terms of the LDP and insufficient consultation with respect to the Gypsy & Traveller site in accordance with best practice.

(ordered by Representation ID No.)

Representor ID and details: 4133/DP2 JTR Raine

TEST P2

- 1. The Sustainability Appraisal is flawed and contradictory the proposed sites do not meet with national policy in respect of sustainability. The allocation of Llangan is not consistent with previous Planning Rejections by the Council which considered sustainability (Bonvilston Sept 2011) and with similar determinations by the Planning Inspectorate (Pembroke Sept 2011).
- 2. The allocation of MG9 is not consistent with the proposed LDP policies.

TEST C1

The Land Use Plan (with regards to Gypsy & Traveller sites) does not relate to any strategy - The Housing Strategy is out dated and does not provide any structure for assessing Gypsy & Traveller needs or site

TESTC2

- 1. The Site allocation does not have regard to the following National Policy:
- -Welsh Government Circular (30/2007):
- The site is RURAL and is "UNSUSTAINABLE" as there are no local services (no shops, food and drink outlets, doctor, dentist, Library, rail services or any main settlement within 5km etc). Llangan and Fferm Goch both score 0 points for local services in the evidence based assessment 'Sustainable Settlements Appraisal'
- The site would not comply with a RURAL EXCEPTION POLICY as it advocates that all pitches are accommodated on a RURAL site including transient pitches which would not comply with TAN 2.
- Any business operated from the site would be in contradiction of RURAL EXCEPTION guidance.
- The site allocation does not take into account the "SCALE" of the resident community. Llangan has a population of less than 100 with 35 homes and this proposal nearly doubles the size of the Hamlet.
- Example of similar site. In 2007 an application of the Sustainability issue was applied by the Planning inspector in Pembroke where an appeal was refused solely on this basis.
- The VOG Council has refused an application recently in Bonvilston on the basis of Sustainability and services in this case were closer to the site than in the case of Llangan proposal.
- Designing Gypsy and Traveller Sites Good Practice Guide The site is too small; therefore cannot meet the needs identified in the LDP.
- -The site measures 7400 m2 and could only accommodate 14 pitches without infrastructure (guidance is 500m2 per pitch plus refuse area; office; play area; infrastructure (roads etc)
- The access road to the site does not meet the minimum requirements for emergency vehicles (3.7m it is actually 15m)
- The site access is poor and "unsafe" having extended walks (in excess of 800m to bus stop) along an unlit lane with no public footpath or street lighting.
- The proposal of 21 units on the site would restrict the ability of emergency vehicles to manoeuvre around the site.
- New sites grants are available (and cost should not be a material planning consideration).
- -The guidance requires that sites are:
- sustainable the Llangan site proposal is not
- equivalent to standards that would be expected for social housing in the settled community This would not meet the standards and this site would not have been considered appropriate for development for residential in either the current or proposed plans
- have the effect of encouraging and developing good relations between
- Gypsies & Travellers and the settled community the large scale of this proposal could mean that establishing good relations with the local community of Llangan would be unlikely and could also result in increased tensions in the community.
- based on WAG guidance of Design of Gypsy traveller sites the maximum number of pitches is 14, and the proposal at Llangan exceeds this number.
- Travelling to a Better Future
- Recommends that LA's engage with their Housing Association Partners to bring sites forward. The VOG Council has not done this.
- "Situating transit provision on residential Gypsy sites is not an option preferred by the Gypsy and Traveller community as this can lead to tensions among different family groups and make site management and maintenance very difficult." This creates a sense of "fear" within the settled Gypsy & Traveller community. The proposal is recommending that transient and permanent sites are co-located.

(ordered by Representation ID No.)

Representor ID and details: 4133/DP2 JTR Raine

- Planning Policy Wales 2011
- The proposed site at Llangan is greenfield land, according to the definition of brownfield land set out in Figure 4.1 of PPW:
- it will not reduce the need to travel, due to the limited local service provision in close proximity to the site;
- offers very limited access to public transport facilities;
- is not large enough to provide ancillary facilities required to support a sustainable development as set out in paragraph 3.30 in accordance with Designing Gypsy and Travellers Sites Good Practice Guide;
- is located within a Special Landscape Area (SLA) and in close proximity to a Conservation Area. The assessment of the Llangan site incorrectly states that it is not within an SLA, so makes no reference to the sites proximity to the conservation area of Llangan. The location can be clearly seen from the conservation area.
- does not meet the identified needs of Gypsies and Travellers, in the Vale of Glamorgan (Fordham report 2008 evidence);
- does not promote sustainable access to employment, shopping, education, health, community, leisure and sports facilities;
- does not maximise opportunities for community development and social welfare;
- does not foster social inclusion due to the isolated location of the site; and
- does not contribute to improvements in health due to the isolation from services and facilities.
- 2. MG2. The draft policy MG 2 actively discriminates the Gypsy community by excluding them from the wider housing programme and potentially abuses their human rights. Policy MG 2 should be revised to allow the VOG to identify appropriate sites in the same way as Affordable Housing.

#### TESTC3

- 1. The policy does not have due regard to the Wales Spatial Plan.
- The key theme of the Wales Spatial Plan is achieving sustainable development through focusing new development in areas which have good access to key services and facilities. As there are no services surrounding the site the allocation of MG9 is not consistent with the objectives of the Wales Spatial Plan. The Gypsy site proposal fails Soundness test Consistency C3 because the policy does not have due regard to the Wales Spatial Plan.

#### TESTC4

- 1. The allocation of this site does not have regard to the relevant Community Strategy in the following respects:
- "The diverse needs of local people are met through the provision of customer focused, accessible services and information"- This cannot be achieved by the allocation of a non-accessible rural allocation.
- "Vale of Glamorgan residents and organisations respect the local environment and work together to meet the challenge of climate change"- The allocation of MG9 places heavy emphasis on the use of the car to access the most basic facilities shops, health, education etc.
- "Older people are valued and empowered to remain independent, healthy and active. They have equality of opportunity and receive high quality services to meet their diverse needs"— All services are miles away and inaccessible to

the older community. The VERY POOR public transport system is located

1050m from the site and is in excess of the maximum distances as defined in the proposed LDP and "Manual for Streets".

- "People of all ages are able to access coordinated learning opportunities and have the necessary skills to reach their full potential helping to remove barriers to employment"—There is no employment opportunity near to the site.

The local primary school has confirmed that it is full and that its projections suggest that it doesn't have the capacity for such a large development (also consider the existing approval of 12 dwellings at Fferm Goch).

- The small local industrial unit has raised concerns in relation to the scale of the proposal.

#### TEST CE1

The Plan does not set out a coherent strategy in the following respects

- The Strategy makes the following statements:

The LDP will seek to provide a policy framework which: Manages the housing supply effectively in order to provide a range of good guality, affordable homes in sustainable locations

Reduces out commuting by providing opportunities for new housing, retail and employment development in accessible locations in the Vale of Glamorgan

(ordered by Representation ID No.)

Representor ID and details: 4133/DP2 JTR Raine

The allocation of this rural site in open countryside does not meet this objective.

- The LDP also states its vision as being:

"Our Vision for the Vale of Glamorgan is a place:

That is safe, clean and attractive, where individuals and communities have sustainable opportunities to improve their health, learning and skills, prosperity and wellbeing 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 sustainability of the area." The allocation of this site in policy MG9 does not meet these objectives being in a rural location with inadequate facilities and transport links.

- The Allocation of this site in policy MG9 does not comply with the following objectives of the LDP:
- -Objective 1: To sustain and further the development of sustainable communities within the Vale of Glamorgan, providing opportunities for living, learning, working and socialising for all. The site's location would clearly not meet this objective.
- Objective 2: To ensure that development within the Vale of Glamorgan makes a positive contribution towards reducing the impact of and mitigating the adverse effects of climate change. The allocation of this site will have entirely the opposite effect to this objective.
- Objective 3: To reduce the need for Vale of Glamorgan residents to travel to meet their daily needs and enabling them greater access to sustainable forms of transport. The allocation of this site will have entirely the opposite effect to this objective.
- Objective 4: To protect and enhance the Vale of Glamorgan's historic, built, and natural environment. The development of this site would not meet this objective: a planning refusal on an adjacent site in May 2002 stated "It is a proposal that would adversely affect the undeveloped rural character of the area"
- Objective 5: To maintain, enhance and promote community facilities and services in the Vale of Glamorgan The local primary school has not been consulted, had they been it would have been recognised that the school does not have capacity, nor is it projected to have the capacity.
- Objective 7: To provide the opportunity for people in the Vale of Glamorgan to meet their housing needs. States that development of housing should be in sustainable locations This is not. Furthermore, it brings into question POLICY MD12 which is discriminatory in that Gypsy & Traveller sites are treated differently from other housing allocations. An inclusive policy would see Gypsy & Traveller sites being assessed on the same basis as AFFORDABLE HOUSING and considered for ALL candidate residential sites in the LDP
- Objective 10: To ensure that development within the Vale of Glamorgan uses land effectively and efficiently and to promote the sustainable use and management of natural resources. The inappropriate use of finite resources can impact on the ability of future generations to fulfil their needs. The LDP through favouring the use of previously developed land and the sustainable use of natural resources of whatever kind and wherever they are located, will contribute to preserving their availability for future generations. This is agricultural land in the Special Landscaped Area.

#### TEST CE2

The strategies, policies and allocations are not realistic and appropriate having considered relevant alternatives and are not founded on robust evidence:

- 1. The allocation of Llangan is purely on the basis of site ownership by the Vale and does not meet the requirement of Policy MD12.
- 2. The Gypsy & Traveller site assessment (anecdotal) conflicts with other evidence based background papers; specifically the Sustainable Settlement Appraisal. The SSA states 0 points for public transport but the Gypsy & Traveller site assessment states that public transport facilities are good.
- 3. The Gypsy Traveller site assessment states "good highway access", yet the access falls considerably short of the minimum requirement for vehicle access the access lane is 2.5m wide, against a minimum requirement of 3.7m plus footpath of 1.2m.
- 4. The Gypsy Traveller site assessment does not reflect the current legal obligations of the VOG in respect of this site, yet the other site assessments highlight legal issues.
- 5. Several privately-owned sites were put forward as candidate sites for Gypsy & Traveller sites but were dismissed as they were not in Council ownership. Not being in council ownership should not be a reason to reject privately owned sites.
- 6. The key issue is that the site allocation does not reflect the identified need of the Gyosy & Traveller community as highlighted in the 2008 Fordham report.
- 7. The Gypsy Traveller site assessment suggests that Fferm Goch is the local settlement when Llangan is recognised in this and historic documents as the local settlement being only 150m from the proposed site. It appears that the council has also linking the site at Llangan to the Hamlet of Fferm Goch in order to increase the site assessment positive score.
- 8. The assessment makes no reference that the site is in a Special Landscape Area (SLA).
- 9. The assessment makes no reference that the site is adjacent to a Conservation Area, within the Conservation Management Plan for this area there is a specific requirement to protect the view from the edge of the conservation area over the proposed site. The proposed site is clearly visible form the conservation area.
- 10. The allocation of Fferm Goch as a Minor Rural Settlement is incorrect. The appraisal scored 9 points. 3 are for employment which puts this site on par with the major settlements such as Barry. This is on the basis of 4 light industrial buildings. A survey of these employers has confirmed that zero new jobs have become available in the last 9 years and that the units collectively employ fewer than 15 people with no intention to expand. Furthermore, one of the units has been empty and the development is not a popular industrial site.
- 11. Fferm Goch has a population of less than 100 (98)— of the 5 sites in the Vale of Glamorgan with a population of 98 only Fferm Goch is classified as a Minor Rural site (probably based on the 9 points). The remainder are classified as Hamlets and there is a presumption against development in Hamlets (or as a minimum the scale would need to be appropriate and tied to a Rural Exception policy). The guidance requires ALL sites of a population below 100 to be classified as a Hamlet Fferm Goch should be recategorised as a Hamlet.

(ordered by Representation ID No.)

Representor ID and details: 4133/DP2 JTR Raine

12. The Council has undertaken a study (Fordham report 2008) where the message was extremely strong that the Gypsy & Traveller community wanted smaller sites located on the fringes of larger communities. The report confirmed that isolated, rural sites restricted access to Health, Education and welfare facilities that disadvantaged them and needs to be seen in the light of the above objectives. The following is a quote from the Fordham report:

"Participants living on Shirenewton had three main criticisms: the site was too big, the distance from local amenities along with the lack of local transport,"

"This created many problems for the residents, especially the poorest: 'for a person like me on the bread line it's very tough. I can't afford to use the car', 'everything is a mile away, including the bus stop. It takes a long walk on a busy road to get to the shops and schools".

"The tables demonstrate that access to services such as local shops, health centres and education facilities from both sites is difficult by foot and by local transport systems. This difficulty was eased when participants used their cars, however the level of ease was lower for Roverway due to the difficult entry onto the main road".

"Participants reported that access to local amenities, health services and education was low for both sites by foot or by public transport: "Everything is a mile away, including the bus stop. It takes a long walk on a busy road to get to the shops and schools".

"It was thought that smaller sites would reduce the problem of on-site conflicts: 'they need smaller sites and not too many different families, otherwise when you have a row the whole site becomes a war zone"

"This affected the ability of the households interviewed to access local services such as shops, health centres and education facilities. It was reported that this problem mainly affected the women: men take the vehicles that the household own to work during the day, leaving the women without their own transport and often away from public transport routes"

"Participants did not specify where in Cardiff or the Vale of Glamorgan sites should be located. It was noted that sites should be on the outskirts of towns to enable access by foot to local services such as shops, the Launderette and health centres"

"While the focus of the survey was on accommodation requirements, the questionnaire also collected information on access to services, including health and education. Research has found that poor accommodation can prevent access to services and so cannot be seen in isolation."

"Participants living on sites felt that there were site restrictions that limited their work options. These were mainly associated with the location of the sites and lack of access to public transport rather than site regulations: 'no buses, no local transport. Bad access"

"Participants living on local authority sites reported that the lack of local public transport provision in the area affected their ability to send their children to school, access health services and work opportunities, and limited their ability to attend training and education courses"

"Participants were asked about where they would like future sites to be, but were not specific about locations within the County Boroughs, instead emphasising the importance of public transport to any new sites. Government draft guidance on site design stresses the importance of access to services and the promotion of integrated co-existence' between the site and surrounding community."

"The precise location, design and facilities of any new sites should be drawn up in consultation with Gypsies and Travellers to ensure that the additional provision meets their needs. The health and safety implications of a new site's location should be considered in finding a balance between offering sites in good locations and the additional land costs this would entail. The settled community neighbouring the sites should also be involved in the consultation from an early stage."

13. An independent highway study recently undertaken by Capita Symonds, surrounding the proposed site has concluded that:

"The 1km long lane itself is of poor horizontal alignment, with poor forward visibility and unsuitable for regular vehicular traffic. If the site is developed the lane itself would need major upgrading, which would certainly change its appearance within this rural environment."

"The village school is approximately 1km from the village and 900 metres from the proposed site. It is noted that the route does not offer any facilities for pedestrians, such that the only safe way for children to travel between the site and the school safely would be by vehicle. This route would also be potentially hazardous for cycle use for children, the elderly or infirm and could be potentially hazardous for all users other than by car."

"With regard to the appropriateness of the location for a traveller's site development in relation to transportation, it is difficult to refer to standard guidelines, as few relate to "rural highways", most highway design standards for residential development relate to urban areas. Hence, the advice contained within this report is based on best available information, acceptable highway standards for developments of similar size and transport needs of small communities. Welsh Government guidelines state sites should be situated in close proximity to transport links. The Llangan site would not appear to meet that criteria, being situated away from the main transport infrastructure, sites should also have ready access to schools, doctors and shops, against which requirements Llangan again appears to fail."

"With regards to the existing lane, it is generally considered that where there is direct access to dwellings, the previous standard for developments, Design Bulletin 32 offers guidance where it states that a desirable minimum carriageway width of 5.5 metres is appropriate, together with 2.0 metre wide footways on both sides. This will allow two way traffic at all times, and safe movement of pedestrians."

(ordered by Representation ID No.)

Representor ID and details: 4133/DP2 JTR Raine

"Thus the lane itself should be widened to this minimum standard, which will require the removal of the existing hedge line on one or both sides of the lane and probable acquisition of land from the adjoining fields. This will of course change the environmental character of the area substantially, but is considered essential to cater for increased vehicle and pedestrian traffic"

14. There is complete inconsistency with the allocation of MG9 against the proposed policies.

#### TEST CE3

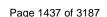
- 1. The VOG council make no reference as to how they are going to manage such a large site. The 21 unit site in Rover Way Cardiff has 3 full time Council staff allocated to it.
- 2. The current Housing Strategy expires April 2012 and makes no relevant reference as to how the Gypsy & Travelling Community will be monitored in terms of growth or need. Indeed, there is no strategy that underpins the Gypsy & Traveller community or housing at all.

#### TEST CE4

- 1. Policy MD12 (Gypsy & Traveller) is discriminatory. It offers no flexibility for the Council to bring forward sites that are sustainable / suitable for Gypsies & Travellers through the policies derived within the plan.
- 2. MD12 should be redrafted to enable smaller, sustainable sites to be included within the Affordable Housing requirements and delivered through the Registered Social Landlord sector.
- 3. To argue that the Private Sector has been consulted to offer sites is not accepted. The private sector were not likely to volunteer sites for such a contentious use. The LDP should set clear strategies / policies to deliver sustainable sites for all members of the community; private; social and travelling. The current allocation does not meet this and could strongly be argued breeches the Human Rights of the Gypsy traveller community as it does not provide a suitable, sustainable site that meets the guidelines in the 2008 Fordham report.
- 3f Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)

The proposed Gypsy traveller site at Llangan (Policy MG9) should be removed from the LDP draft plan. The VOG should identify an alternative site(s) that has been assessed according to a relative sustainability appraisal that considers the real situation in the Plan area and meets the requirements of the Gypsy community as listed in the 2008 Fordham report the recommendations of which appear to have been ignored in preparing the LDP.

4b - If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -



(ordered by Representation ID No.)

| Representor ID and details: 4134/DP1 Mr & Mrs V  | Vinter                                      |   |                        |   |   |                 |
|--|---|---|------------------------|---|---|-----------------|
| Date Lodged     Status     Petition and No.     Supporting Ev       30/03/2012     M     □     0     □ | idence Additional SA SEA                    | Rep forma<br>Letter   |                        | t your comments to be cor<br>ak at a hearing session of | nsiered by 'written represer<br>Public examination? | ntations' or do |
| 2a - Do you consider the LDP is Sound? Unanswered  | Procedural Tests -                          | ne Plan is unsound and does not not<br>P1 - Unanswered P2 - U<br>C1 - Unanswered C2 - U | nanswered              |   | ` '   | ils.            |
|  | Coherence and Effect                        | tiveness Tests - CE1 - Unanswered   | d CE2 - Unanswered     | CE3 - Unanswered  | CE4 - Unanswered                                    |                 |
| 3a - Which part of the Deposit Plan are you commenting   | on? Policy Number: MG2(19)                  | Paragraph Number:   | Proposal Map:          | <u>Con</u><br>  | nstraints Map Appe                                  | endices:        |
| 3b - Do you wish to see any changes made to the Depos  | sit Plan as a result of your rep            | presentation? Unanswered  | (If "No" or "Unanswere | d" - go to 3d)  |   |                 |
| 3c - What changes would like to see made to the Depos  | it Plan? New Policy: Unanswered Notes:      | Amended Policy: New Paragra Unanswered Unanswered                                       |                        | aph: New Or Amended S<br>Unanswered                     | Site: Other (see Notes):<br>Unanswered              |                 |
| 3d - If your representation relates to a new, deleted or a   | mended site, did you submit t<br>Site Name: | the site as a Candidate Site? Unar  | swered (If "Yes", ple  | ease give the Candidate S<br>Site Reference             | Site Name and reference if e:                       | known)          |
| 0 5  |   |   |                        |   |   |                 |

3e - Please set out your representation below:

Submission to the Vale of Glamorgan LDP Deposit Plan

My objection is primarily to the St Cyres School site at Dinas Powys though other sites will also have some resonance.

As the inclusion of the site in the LDP is predicated on the site becoming available for development should the proposed new Penarth school gain planning approval, the objection is based upon that premature assumption.

There are two principal objections - one for the change of use for the site and the other for the effects that a large housing development on the site will have.

Objection to change of use

The site is situated almost centrally to the highest population density in the Vale of Glamorgan, so is thus ideal for community facilities; the obvious being the present use as a school. It is within easy walking distance to all of Dinas Powys and much of Penarth, with reasonable vehicular access from Barry. There are at least five primary schools within the immediate catchment area, two of them being faith schools (both Christian).

The case for the new school at St Cyres Penarth site awaits to be fully examined, with as yet no alternatives being proposed. One alternative, for example, is that the Dinas Powys site should be used as a combined Roman Catholic/Church in Wales secondary school (in line with their stated aims for greater integration). The resultant vacant site at St Richard Gwyn RC School at Barry, with its good communications to the Vale, could then be developed into a Welsh Language secondary school. Taken together this would drastically reduce the number of pupils available for the proposed development at St Cyres Penarth, allowing for that development to be considerably scaled down. The saving in money (at £60 million must be the most costly UK school ever) would not be only direct, put also indirect, by averting the expensive traffic congestion that the St Cyres development will inevitably cause.

Objection to the Housing Development:

This objection is road traffic related and must be seen in the context that the site would only become available if the proposed new school goes ahead, so the objection is dependant upon both developments happening. Account is also taken of other LDP proposals (many of which are unreasonably based in the Penarth, Dinas Powys and Barry triangle) that will make the situation worse.

The access roads to the Dinas Powys site would not be adequate to meet the needs of the traffic generated. Murch Road, Murch Crescent and Windyridge are too narrow and would have to be adapted - to the detriment of the present inhabitants. Informal proposals for links to either Sully Road, Cross Common Road or Sunnycroft lane may be preferable, but in themselves would not alleviate the main concern which is traffic at the Merrie Harriers junction.

(ordered by Representation ID No.)

Representor ID and details: 4134/DP1 Mr & Mrs Winter

It is a predictable certainty that should the new school development at St Cyres Penarth go ahead then there will be a significant increase in the already heavy traffic congestion at the Merrie Harriers junction. The expectation is that there will be permanent peak hour, stationary or slow-moving, traffic queues extending though Penarth to Lavemock Road, along much of the length of Sully Road and through Dinas Powys past the Dinas Powys Railway Station. There will have to be special traffic control measures just to allow traffic from the Murch to join the queue. The traffic congestion is certain to spill over to other areas so daily queues of stationary traffic can be expected through Dinas Powys village centre and along Pen-y-Turnpike Road. Also there will be added pressure to the already congested junctions at Culverhouse Cross and the Elizabethan.

A new housing estate at St Cyres lower school site (along with olher proposed LDP sites) would only add to the problem.

Such traffic congestion will lead to substantially increased costs of time and money to commuters and businesses, precursing a resultant drop in property values, especially in Barry - where most of the adverse effects will be felt. The commercial development of the area, again especially in Barry, is likely to be depressed with many more enterprises looking to relocate (much of the plant at Dow Corning is ageing for example).

Finally the increase of slow moving or stationary traffic around the infant school can only exacerbate the already worrying, life threatening, levels of air borne pollution.

- 3f Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
- 4b If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -



(ordered by Representation ID No.)

| Representor ID and details: 4135/DP1 Mr Bruce Gilbreth   | Architects Limited   |   |   |
|--|--|---|---|
| Date Lodged     Status     Petition and No.     Supporting Evidence       30/03/2012     M     0 | Additional SA SEA  |   | ant your comments to be consiered by 'written representations' or do beak at a hearing session of Public examination? Written |
| •  | 2b - If you think that the Plan is unsound and do Procedural Tests - P1 - Unanswered           |   | s) of soundness, please indicate which test(s) that it fails.   |
|  | Consistency Tests - C1 - Unanswered  | C2 - Unanswered C3 - U                      | nanswered C4 - Unanswered   |
|  | Coherence and Effectiveness Tests - CE1 - Y  | es CE2 - Unanswere                          | d CE3 - Unanswered CE4 - Yes  |
| 3a - Which part of the Deposit Plan are you commenting on?                                       | Policy Number: Paragraph N   | umber: Proposal Map:                        | Constraints Map Appendices:   |
|  | Delivery and Implementation. 7.53. 7.110   |   |   |
| 3b - Do you wish to see any changes made to the Deposit Plan                                     | as a result of your representation? Yes  | (If "No" or "Unansw                         | ered" - go to 3d)   |
| 3c - What changes would like to see made to the Deposit Plan?                                    | <del></del>  | ew Paragraph: Amended Para<br>nanswered Yes | agraph: New Or Amended Site: Other (see Notes): Unanswered Unanswered   |
| 3d - If your representation relates to a new, deleted or amende                                  | d site, did you submit the site as a Candidate Sit<br>Site Name: Model Farm, Port Road, Rhoose | e? Yes (If "Yes",                           | please give the Candidate Site Name and reference if known) Site Reference: 2501/CS1  |

3e - Please set out your representation below:

Deposit Plan Response

Model Farm, Port Road, Rhoose Proposed Employment Allocation (77.4 ha) Business Park near Cardiff Airport

Q. 3e The following representation is made in support of the employment allocation of 77.4 ha of Land Adjacent to Cardiff Airport.

This land is divided into Land South of Port Road (Model Farm) and land to the east of Cardiff Airport.

In the Deposit LOP the whole site is allocated for employment use (Policy SP5). Paragraph

7.53 refers to Model Farm, Port Road as not being brought forward within Phase 1 of the development. During Phase 1 the plan outlines the intention to bring forward the employment land to the east of the airport and the new direct rail link and transport hub. We fully support the employment allocation; however seek to bring forward the development at Model Farm, Port Road at the earliest opportunity. The site represents just over 30% of the overall LOP employment land allocation. Bringing forward the land at Model Farm will enhance and support the development of the whole Gateway Wales strategic site as part of the wider South East Zone.

The recent decision to extend the Enterprise Zone to include not only the Airport, but also the surrounding allocated land including Model Farm further enhances the offer of the area and reinforces the need to allow for all the allocated land to progress in an unfettered manner. In support of this, Policy SP2 identifies the whole site as a strategic employment allocation, which presents a fundamental investment opportunity that will be beneficial to both the South East Zone and the Vale of Glamorgan. Realising this potential will demonstrate the soundness of the plan. Paragraph 5.33 of the Deposit Plan, states the main focus of the development will be employment and transport uses. The aerospace sector as well as other sectors will deliver employment opportunities associated with a business park of their high calibre. Key to achieving such a high quality business environment, attractive to a range of sectors, are ancillary uses for instance higher education hotel and conference facilities as well as amenities such as retail, café and childcare facilities as per paragraph 5.33. The key elements of the proposal include the provision of a new rail link to Cardiff Airport and an associated transport hub, which will serve existing communities as well as the airport and the business park.

At paragraph 7.82 the Plan maintains that the development of Cardiff Airport and the Adjoining

Business Park has the potential to deliver substantial and long term economic growth to the Vale and the South East Zone. It is considered "This potential however has been constrained (to date) by inadequate surface access that has limited growth and delayed investment." The land being provided for the rail line will facilitate a new direct rail line to the airport from the existing Vale of Glamorgan Line that will improve

(ordered by Representation ID No.)

Representor ID and details: 4135/DP1 Mr Bruce Gilbreth, Architects Limited

public transport access, reduce the reliance upon the private car and enable substantial economic benefits to be achieved (Policy MG20 refers). The rail access provides a means for the population of Barry to access the employment opportunities that will be available at Gateway Wales.

There is no formal relationship between the land owned by the Vale of Glamorgan (that is land to the east of Cardiff airport) and the Model Farm site. Whilst forming part of the larger strategic site the two can come forward independently of each other and / or at the same time. To ensure a collaborative approach for the Strategic Site as a whole the two should be master planned as one. At Model Farm the key funder and developer is in place. Legal & General Property (LGP) is a top 5 UK Institutional Property owner and developer with over £11 bn of assets under management. The technical team that has been put in place by Legal & General to progress the Business Park have worked with Network Rail in particular to ensure the proposals are feasible. The team have also engaged with Cardiff Council, Welsh Government, SEWTA and Cardiff Airport.

The station and railway link has the potential to greatly enhance the sustainability of the Aerospace

Enterprise Zone as well as the proposed residential allocations in the South East Zone. In particular, development of the site will be beneficial to the housing allocations at Rhoose (Policy MG 2 (23) and (24) which are allocated for 680 and 50 dwellings, respectively and land to the north and south west of Waycock Cross, Barry (Policy MG 2 (4&7)) allocated for 550 and 210 dwellings. As part of the Enterprise Zone the business park would help to achieve a sustainable jobs/home balance. Planning obligations from the residential allocations should be used to part fund the line/station. Policy MD4 seeks to ensure that all new development in the Vale of Glamorgan is supported by appropriate services and facilities to meet their needs by the implementation of Planning Obligations.

Legal &General cannot deliver the station/railway link alone. A project of this nature needs the Welsh Government to take the lead supported by and working closely with all the stakeholders including the Vale of Glamorgan, Legal & General's team, Cardiff Council Network Rail and Cardiff Airport to bring the new infrastructure to fruition. The landowners and developers can assist by securing the route for the line. This way development at the site will be implemented during the plan period, therefore fulfilling Section 8 of the Deposit Plan.

Accordingly, delivery of this site will fulfil the following Deposit Plan policies:

Policy SP1 The Strategy;

Policy SP5 Employment Requirements;

Policy SP7 Transportation;

Policy MD1 Location of New Development; and

Policy MG 12 Employment Allocations.

In summary, we find the Vale of Glamorgan LDP sound; it has provided realistic employment allocations to meet the demonstrable need within the area and sets out a clear vision for the future of the Vale. We however wish to be able to utilise the land at Model Farm at the earliest opportunity to fulfil this vision. For the reasons set out above, it is clear that the early delivery of this site is achievable and deliverable within the short to medium term.

3f - Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)

The following changes to the Deposit LDP are sought as drafted below:

- 1. Deletion of the following sentence at paragraph 7.53; "No development on the second phase to the south of Port Road will take place until such time as the railway line extension is operational."
- 2. Page 117 SP (3) Amend bullet 2 in column 'Infrastructure and Implementation Requirements' to read (between 36 42 ha depending on boundary considerations).
- 3. Pages 117-118, delete 'See commentary on phasing below' in column 'Phasing Requirements'.
- 4. Page 118 Site and Development Description make the following changes;

Delete "".associated with research, development and the aerospace industry."

Delete "prior to" and amend sentence to read; "Development of this site will allow the land adjacent to and east of the airport to be developed in parallel [emphasis for amendment] to the development of land to the South of Port Road.

Insert between 36 - 42 ha depending on boundary considerations

- 5. Paragraph 7.110 (Page 107) delete 'of the first phase' and the sentence to read "The extension to Porthkerry Country Park will take place on the commencement of the development of land for employment purposes with an appropriate buffer set aside for construction of the rail link.
- 4b If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -

(ordered by Representation ID No.)

| Representor ID and details: 4136/DP1 Mr & Ms Munro               |  |                          |                                      |                         |  |   |
|--|--|--------------------------|--------------------------------------|-------------------------|--|---|
| Date LodgedStatusPetition and No.Supporting Evidence30/03/2012M0 | Additional SA SEA                        |                          | Rep format:<br>Letter                |                         | comments to be consier hearing session of Publ | ed by 'written representations' or do<br>lic examination? |
| 2a - Do you consider the LDP is Sound? Unanswered                | •  |                          | does not not meet or<br>P2 - Unanswe | ` '                     | ndness, please indicate                        | which test(s) that it fails.                              |
|  | Consistency Tests -                      | C1 - Unanswered          | C2 - Unanswe                         | ered C3 - Unanswer      | ed C4 - Unanswere                              | ed  |
|  | Coherence and Effective                  | veness Tests - CE1 -     | Unanswered Cl                        | E2 - Unanswered CE      | 3 - Unanswered CE                              | E4 - Unanswered   |
| 3a - Which part of the Deposit Plan are you commenting on?       | Policy Number:<br>MG2(19). MG2(20)       | Paragraph<br>            |                                      | roposal Map:            | Constrai                                       | ints Map Appendices:                                      |
| 3b - Do you wish to see any changes made to the Deposit Plan     | as a result of your repre                | esentation? Unanswe      | ered (If "N                          | No" or "Unanswered" - g | o to 3d)                                       |   |
| 3c - What changes would like to see made to the Deposit Plan?    | New Policy: Unanswered Notes:            |                          | New Paragraph:<br>Jnanswered         |                         | New Or Amended Site:<br>Unanswered             | Other (see Notes):<br>Unanswered                          |
| 3d - If your representation relates to a new, deleted or amende  | ed site, did you submit th<br>Site Name: | ne site as a Candidate S | Site? Unanswered                     | (If "Yes", please g     | give the Candidate Site N                      | Name and reference if known)                              |

3e - Please set out your representation below:

As a resident of Dinas Powys I wish to express my concerns re. the implications of the effect that the proposed additional housing would have on the local highways network.

In Dinas Powys it is proposed that a minimum of 400 addition houses will be built on the St Cyres annexe and Caerleon Road, Both sites are on the Murch side of the community which is served by only two access points to the main road [A4055]. Both these junctions, namely the Infants School traffic lights at Murch Bridge and Cross Common Road at its junction with the A4055 are either at capacity or structurally suspect.

The 400 houses would generate between 600 to 800 additional cars in both directions, particularly at peak times. The additional traffic would have a profound and adverse impact on the community as the existing roads are under great pressure now.

Further, I am concerned that there have not been any proposed extra community facilities of substance. A local church is in desperate need of a permanent base, the local sporting facilities are not adequate for the present demand and medical services are restricted due to the limitations of space at the Dinas Powys Surgery premises on Cardiff Road.

There appears to be no serious consideration having been given to other views as to the future possible use of St Cyres Annexe, Murch Road. It is worth noting that the school buildings are in good condition although in need of a little investment. To simply seek to tear down the school without any reference to the community needs would be a shameful waste. I also have concerns regarding the capacity of the local schools to accommodate the extra pupils due to the additional houses.

Then there is the wider consideration of the Plan. Up to 10,000 additional houses are planned, many in the south east area of the Vale, e.g. 2,000 units already having been approved at the Waterfront, Barry.

Much of this traffic will be funnelled through Dinas Powys and join the ever lengthening queues leading to and from the Merrie Harrier. The proposals in Sully, Penarth, Lavernock and the land adjacent St Josephs' School, Sully Road will only add to the existing congestion at this junction.

Already the air pollution levels are excessive. The Nitrogen Dioxide [N02] levels are recorded as being 43.8 units with the maximum recommended level being 40 units along Cardiff Road, Eastbrook. An increase in vehicles, particularly standing traffic, would exacerbate the situation. The level of other emissions such as CO (carbon monoxide) and Particulates [PM105] are not available but need clarifying.

From somebody who suffers from asthma, I find this very disgturb ing and am greatly concerned for my health and wellbeing.

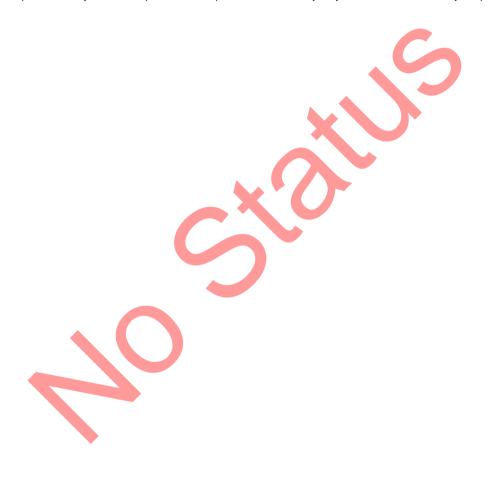
The Deposit plan does not indicate what measures will be taken to encourage the availability and use of public transport. I understand that there is a serious lack of rolling stock in Wales and providing extra trains will be a major challenge. Additional buses would simply be caught up in the traffic chaos the extra housing would cause.

Representation ID No.)

Representor ID and details: 4136/DP1 Mr & Ms Munro

It is essential that major highway infrastructure improvements are made BEFORE hundreds of additional housing could even be considered

- 3f Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
- 4b If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -



| Representor ID and details: 4137/DP1 Ms Jane Dauncey   | 1  |                                     |                                     |  |   |                                   |                     |
|--|--|-------------------------------------|-------------------------------------|--|---|-----------------------------------|---------------------|
| Date Lodged     Status     Petition and No.     Supporting Evidence       30/03/2012     M     0   | Additional SA SEA                                  |                                     | Rep format:<br>Comment form         | 4a - do you want you<br>you want to speak at |   | ,                                 | •                   |
| 2a - Do you consider the LDP is Sound? Unsound   | •  | e Plan is unsound and o<br>P1 - Yes | does not not meet o<br>P2 - Unanswe | one or more test(s) of so<br>ered            | undness, please indic                   | cate which test(s) th             | nat it fails.       |
|  | Consistency Tests -                                | C1 - Unanswered                     | C2 - Unanswe                        | ered C3 - Unanswe                            | red C4 - Yes                            |                                   |                     |
|  | Coherence and Effective                            | veness Tests - CE1 -                | Unanswered C                        | CE2 - Unanswered C                           | E3 - Unanswered                         | CE4 - Unanswere                   | ed                  |
| 3a - Which part of the Deposit Plan are you commenting on?   | Policy Number:                                     | <u>Paragraph</u>                    | Number: P                           | Proposal Map:                                | Cons                                    | straints Map                      | Appendices:         |
|  |  |                                     |                                     | MG2(29)                                      |   | •                                 |                     |
| 3b - Do you wish to see any changes made to the Deposit Plan   | as a result of your repre                          | esentation? Yes                     | "l" l)                              | No" or "Unanswered" - g                      | go to 3d)                               |                                   |                     |
| 3c - What changes would like to see made to the Deposit Plan?  | New Policy: Unanswered                             |                                     | New Paragraph:<br>Unanswered        | Amended Paragraph:<br>Unanswered             | New Or Amended Si<br>Yes                | ite: Other (see Not<br>Unanswered | <u>tes):</u>        |
|  | Notes:   |                                     |                                     |  |   |                                   |                     |
| 3d - If your representation relates to a new, deleted or amende  | ed site, did you submit th<br>Site Name: ITV Wales |                                     | Site? Yes                           | (If "Yes", please                            | give the Candidate Si<br>Site Reference |                                   | ence if known)      |
| 3e - Please set out your representation below:  I regret the loss of jobs. If HTV retreats to Bristol the cultu community pool (obesity). The traffic queues to Culver rou |  |                                     |                                     |  | If housing is to be bui                 | ilt, request good pla             | ayspace and, ideal, |
| 3f - Please outline the changes you wish to see made to the D<br>See attached letter (Note no letter attached but assumed  | •  | ` '                                 |                                     |  |   |                                   |                     |
| 4b - If you wish to speak, please confirm which part of your rep   | presentation you wish to                           | speak to the inspector              | about and why they                  | y consider it be necessa                     | ry to speak at the hea                  | aring -                           |                     |

| Representor ID and details: 4138/DP1 Mr G David   |  |   |   |                      |  |  |  |
|---|--|---|---|----------------------|--|--|--|
| Date Lodged     Status     Petition and No.     Supporting Evidence       30/03/2012     M     □     0     □  | Additional SA SEA  |   | our comments to be consiered by 'written repres<br>at a hearing session of Public examination? V  |                      |  |  |  |
| 2a - Do you consider the LDP is Sound? Unsound  | 2b - If you think that the Plan is unsound and of Procedural Tests - P1 - Unanswered Consistency Tests - C1 - Unanswered Coherence and Effectiveness Tests - CE1 - | P2 - Unanswered C2 - Unanswered C3 - Unans                | soundness, please indicate which test(s) that it wered C4 - Unanswered CE3 - Yes CE4 - Unanswered | fails.               |  |  |  |
| 3a - Which part of the Deposit Plan are you commenting on?  | Policy Number: Paragraph MG2(11). MG12(11). MG15   | Number: Proposal Map: MG2(11)                             | Constraints Map App   | pendices:            |  |  |  |
| 3b - Do you wish to see any changes made to the Deposit Plan  | n as a result of your representation? Yes  | (If "No" or "Unanswered                                   | - go to 3d)   |                      |  |  |  |
| 3c - What changes would like to see made to the Deposit Plan  |  | New Paragraph: Amended Paragraph<br>Unanswered Unanswered | h: New Or Amended Site: Other (see Notes): Yes Unanswered   |                      |  |  |  |
| 3d - If your representation relates to a new, deleted or amende   | ed site, did you submit the site as a Candidate S<br>Site Name: Cowbridge Cattle Market Land w   |   | ise give the Candidate Site Name and reference<br>Site Reference: 178/CS1 2440/CS2                | ,                    |  |  |  |
| 3e - Please set out your representation below:<br>Policy MG2 (11) states that Cowbridge Cattle Market has   | been allocated for residential development. Th   | is is unsound and objected to on the gro                  | unds that-  |                      |  |  |  |
| The Cowbridge Cattle Market, which sells on average over  | er 500 head of sheep per week, is trading succe  | essfully and supporting the farming comr                  | nunity of the Vale of Glamorgan and should not  | be closed.           |  |  |  |
| On non market days the site is used for car and coach parking for up to 200 cars. Apart from an allocation of a small site adjacent to the town wall which would hold approximately 25 cars, no provision has been made within the LDP for the lost car and coach parking spaces. The loss of car parking spaces would have an adverse effect on the trading community in Cowbridge and the attractiveness of Cowbridge as a market town. |  |   |   |                      |  |  |  |
| Policies MG12 (11) and MG15 refer to a proposed site fo policy is objected to as being unsound.   | r the replacement cattle market. This is a green   | field site and proposals are made within                  | the LDP for its purchase and development as a   | market. The          |  |  |  |
| 3f - Please outline the changes you wish to see made to the Delete Policies MG2 (11), MG12(11) and MG15.  An additional policy should be included upholding the coron the site to support the attractiveness of Cowbridge as  | tinuation of the Cowbridge Cattle Market in sup  |   | ale of Glamorgan and the provision of improved  | I parking facilities |  |  |  |
| 4b - If you wish to speak, please confirm which part of your re   |  |   | ssary to speak at the hearing -   |                      |  |  |  |

| Representor ID and details: 4139/DP1 Mrs Anne Marie H  | awkins   |
|--|--|
| Date Lodged     Status     Petition and No.     Supporting Evidence       30/03/2012     M     0   | Additional SA SEA  Rep format:  Comment form  Additional SA SEA  Rep format:  You want your comments to be consiered by 'written representations' or do you want to speak at a hearing session of Public examination? Written  |
|  | 2b - If you think that the Plan is unsound and does not not meet one or more test(s) of soundness, please indicate which test(s) that it fails.  Procedural Tests - P1 - Unanswered P2 - Unanswered  Consistency Tests - C1 - Unanswered C2 - Unanswered C3 - Unanswered C4 - Unanswered  Coherence and Effectiveness Tests - CE1 - Unanswered CE2 - Yes CE3 - Unanswered CE4 - Unanswered   |
| 3a - Which part of the Deposit Plan are you commenting on?   | Policy Number:     Paragraph Number:     Proposal Map:     Constraints Map     Appendices:   |
| 3b - Do you wish to see any changes made to the Deposit Plan   | as a result of your representation? Yes (If "No" or "Unanswered" - go to 3d)   |
| 3c - What changes would like to see made to the Deposit Plan?  | New Policy:     Amended Policy:     New Paragraph:     Amended Paragraph:     New Or Amended Site:     Other (see Notes):       Unanswered     Unanswered     Yes     Unanswered   |
| 3d - If your representation relates to a new, deleted or amended   | d site, did you submit the site as a Candidate Site? Yes (If "Yes", please give the Candidate Site Name and reference if known)  Site Name: Land to west of St Athan Road Llandlethian, Land to east of St Athan Roa Site Reference: 2446/CS1, 2446/CS2  |
| My principal objection is that this is a greenfield site-once l<br>Glamorgan- Llandow airfield, parts of Barry and Penarth, s<br>eyesores. Greenfield sites should be protected and not bu | adjacent to St Athan Road, Cowbridge (2446/CS1 & CS2). built upon, it is lost forever and increases the unsustainable encroachment on countryside by urbanisation. There are brownfield sites in the Vale of small areas within smaller settlements, including Cowbridge. Developing these would both provide new homes and would in many cases remove ill upon.  byed by residents in adjacent, established housing and by dog walkers and ramblers using the public footpaths which traverse it. |
| The fields are serving a purpose- they are currently in use  | for grazing livestock, and are the habitat of wild animals and birds.  |
| The fields are in large parts extremely boggy and form par   | t of a natu <mark>ral d</mark> raina <mark>g</mark> e area. B <mark>uild</mark> ing upon such land is proven to be a major factor in flooding.   |
| Increased traffic would b a serious concern for both motori pavement along only one side and then only as far as Broom   | sts and pedestrians. St Athan Road would be, in part, impossible to widen without encroaching on gardens of local residents. It currently has a particular park Road.  |
| soon it will no longer be "The Jewel in the Heart of the Valo  | use living in a small community is attractive to young families. There is an obvious contraction here, but continue to increase the size of the town and e", as the Vale Council chose to describe it. It will become increasingly less attractive both as a place to live, and to the visitors who at present come to onal and gentler ambience of a small town. The local health centre might also be overstretched.   |
| People living adjacent to the proposed sites would see the and environmental, is a perfectly legitimate and natural co   | value of their homes fall and their quality of life adversely affected. Do not dismiss these objections as "nimbyism". Protecting one's assets, financial ncern.   |
| 3f - Please outline the changes you wish to see made to the De To have the candidate site removed and include it as a great state.   | eposit Plan to make it sound (if relevant) een wedge to prevent further development considerations and protect unspoilt greenfield sites.  |
| 4b - If you wish to speak, please confirm which part of your rep   | resentation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -   |

| Representor ID and details: 4140/DP1 Cardiff and Vale University H   | Health Board, Whitchurch Hospital  |   |
|--|--|---|
| Date Lodged     Status     Petition and No.     Supporting Evidence     Addition       02/04/2012     M     0  | Comment form   | 4a - do you want your comments to be consiered by 'written representations' or do you want to speak at a hearing session of Public examination? Written                         |
| Procedura  Consister  Coherence  | al Tests - P1 - Unanswered P2 - Unans<br>ncy Tests - C1 - Unanswered C2 - Unans<br>ce and Effectiveness Tests - CE1 - Unanswered |   |
| 3a - Which part of the Deposit Plan are you commenting on?   | <u>Paragraph Number:</u> 7.47  | Proposal Map: Constraints Map Appendices:  MG11   |
| 3b - Do you wish to see any changes made to the Deposit Plan as a result   | It of your representation? No (If  | "No" or "Unanswered" - go to 3d)  |
| 3c - What changes would like to see made to the Deposit Plan?  New Po Unansw Notes:  | olicy: Amended Policy: New Paragraph:  |   |
| 3d - If your representation relates to a new, deleted or amended site, did  Site Name  |  | (If "Yes", please give the Candidate Site Name and reference if known) Site Reference:  |
| 3e - Please set out your representation below: Policy MG11  Policy MG11 - Llandough Hospital - safeguards land 'for the future d which will provide' improved facilities for local residents together with |  | nospital related uses'. Cardiff and Vale University Health Board supports this policy,  |
| The Board also welcomes the requirement of the policy to ensure th future proposals for the site that respect local context and contribute   |  | rdance with policies MD1, MD2 and MD3. These policies will assist in the delivery of  |
| Proposals Map  |  |   |
|  | promising surrounding landscape quality or features of   | This allocation of land for potential hospital expansion/extension is welcomed and gives known ecological significance. The proposed inclusion of land to allow a connection at |
| The Board also supports the designation of Bus Priority Measures of transportation.  | on the A4055, which runs adjacent to the site. The pric  | rity measures will ensure that the UHL remains highly accessible by a choice of means   |
| Overall the University Health Board supports the proposed allocation   | n and does not seek any amendments to either the po  | icy, or the extent of the land allocation.  |
| 3f - Please outline the changes you wish to see made to the Deposit Plan<br>No comments  |  |   |
| 4b - If you wish to speak, please confirm which part of your representation  | on you wish to speak to the inspector about and why th   | ey consider it be necessary to speak at the hearing -   |

| Representor ID and details: 4141/DP1 Mr & Mrs David   |   |
|---|---|
| Date LodgedStatusPetition and No.Supporting Evidence30/03/2012M0  | Additional SA SEA Rep format: 4a - do you want your comments to be consiered by 'written representations' or do Comment form you want to speak at a hearing session of Public examination? Written  |
| 2a - Do you consider the LDP is Sound? Unsound  | 2b - If you think that the Plan is unsound and does not not meet one or more test(s) of soundness, please indicate which test(s) that it fails.  Procedural Tests - P1 - Unanswered P2 - Unanswered  Consistency Tests - C1 - Unanswered C2 - Unanswered C3 - Unanswered C4 - Unanswered  Coherence and Effectiveness Tests - CE1 - Unanswered CE2 - Yes CE3 - Yes CE4 - Unanswered   |
| 3a - Which part of the Deposit Plan are you commenting on?  | Policy Number:     Paragraph Number:     Proposal Map:     Constraints Map     Appendices:       MG2(11).     MG12(11).     MG15.   |
| 3b - Do you wish to see any changes made to the Deposit Plan  | as a result of your representation? Yes (If "No" or "Unanswered" - go to 3d)  |
| 3c - What changes would like to see made to the Deposit Plan  | New Policy: Amended Policy: New Paragraph: Amended Paragraph: New Or Amended Site: Other (see Notes): Unanswered Yes Unanswered Yes Unanswered  Notes:  |
| 3d - If your representation relates to a new, deleted or amende   | d site, did you submit the site as a Candidate Site? Yes (If "Yes", please give the Candidate Site Name and reference if known)  Site Name: Cowbridge Cattle Market Land west of Marley Tile Site, St Mary Hill Site Reference: 178/CS1 2440/CS2  |
|   | been allocated for residential development. This is unsound and objected to on the grounds that   |
| On non market days the site is used for car and coach paramade within the LDP for the lost car and coach parking smarket town.  | r 500 head of sheep per week, is trading successfully and supporting the farming community of the Vale of Glamorgan and should not be closed.  rking for up to 200 cars. Apart from an allocation of a small site adjacent to the town wall which would hold approximately 25 cars, no provision has been places. The loss of car parking spaces would have an adverse effect on the trading community in Cowbridge and the attractiveness of Cowbridge as a the replacement cattle market. This is a greenfield site and proposals are made within the LDP for its purchase and development as a market. The |
| 3f - Please outline the changes you wish to see made to the D Delete Policies MG2 (11), MG12(11) and MG15.  An additional policy should be included upholding the con | eposit Plan to make it sound (if relevant)  cinuation of the Cowbridge Cattle Market in support of the agricultural economy of the Vale of Glamorgan and the provision of improved parking facilities a tourist destination and the trading community of Cowbridge.   |
| 4b - If you wish to speak, please confirm which part of your re   | presentation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -   |

| Representor ID and details: 4142/DP1 Mrs M Thomas   |  |   |   |                    |
|---|--|---|---|--------------------|
| Date Lodged     Status     Petition and No.     Supporting Evidence       30/03/2012     M     □     0     □  | Additional SA SEA  |   | our comments to be consiered by 'written repres<br>at a hearing session of Public examination? W  |                    |
| 2a - Do you consider the LDP is Sound? Unsound  | 2b - If you think that the Plan is unsound and of Procedural Tests - P1 - Unanswered Consistency Tests - C1 - Unanswered Coherence and Effectiveness Tests - CE1 - | P2 - Unanswered C2 - Unanswered C3 - Unans                | soundness, please indicate which test(s) that it wered C4 - Unanswered CE3 - Yes CE4 - Unanswered | fails.             |
| 3a - Which part of the Deposit Plan are you commenting on?  | Policy Number: Paragraph MG2(11). MG12(11). MG15   | Number: Proposal Map: MG2(11)                             | Constraints Map App   | oendices:          |
| 3b - Do you wish to see any changes made to the Deposit Plan  | n as a result of your representation? Yes  | (If "No" or "Unanswered                                   | go to 3d)   |                    |
| 3c - What changes would like to see made to the Deposit Plan  |  | New Paragraph: Amended Paragraph<br>Unanswered Unanswered | h: New Or Amended Site: Other (see Notes): Yes Unanswered   |                    |
| 3d - If your representation relates to a new, deleted or amende   | ed site, did you submit the site as a Candidate S<br>Site Name: Cowbridge Cattle Market Land w   |   | use give the Candidate Site Name and reference<br>Site Reference: 178/CS1 2440/CS2                | •                  |
| 3e - Please set out your representation below:<br>Policy MG2 (11) states that Cowbridge Cattle Market has   | been allocated for residential development. Th   | is is unsound and objected to on the gro                  | unds that-  |                    |
| The Cowbridge Cattle Market, which sells on average over  | er 500 head of sheep per week, is trading succe  | essfully and supporting the farming comr                  | nunity of the Vale of Glamorgan and should not l  | be closed.         |
| On non market days the site is used for car and coach paramade within the LDP for the lost car and coach parking smarket town.  |  |   |   |                    |
| Policies MG12 (11) and MG15 refer to a proposed site fo policy is objected to as being unsound.   | r the replacement cattle market. This is a green   | field site and proposals are made within                  | the LDP for its purchase and development as a   | market. The        |
| 3f - Please outline the changes you wish to see made to the D Delete Policies MG2 (11), MG12(11) and MG15.  An additional policy should be included upholding the con on the site to support the attractiveness of Cowbridge as | tinuation of the Cowbridge Cattle Market in sup  |   | ale of Glamorgan and the provision of improved  | parking facilities |
| 4b - If you wish to speak, please confirm which part of your re   |  |   | ssary to speak at the hearing -   |                    |

(ordered by Representation ID No.)

| Representor ID and details: 4143/DP1 Stephanie Roo                                      | edemer  |                        |                                  |                                       |                       |  | _                              |
|---|---|------------------------|----------------------------------|---------------------------------------|-----------------------|--|--------------------------------|
| Date Lodged Status Petition and No. Supporting Evide 30/03/2012 M 0                     | nce Additional SA SEA                             |                        | Rep format:<br>Comment form      | · · · · · · · · · · · · · · · · · · · |                       | be consiered by 'written<br>sion of Public examination | •                              |
| 2a - Do you consider the LDP is Sound? Unsound  | 2b - If you think that the Procedural Tests -     |                        | nd does not not meet<br>P2 - Yes | one or more test(s) of                | f soundness, plea     | se indicate which test(s)                              | that it fails.                 |
|   | Consistency Tests -<br>Coherence and Effect       |                        |                                  | C3 - Yes<br>CE2 - Yes                 | C4 -<br>CE3 - Yes     | Yes<br>CE4 - Yes                                       |                                |
| 3a - Which part of the Deposit Plan are you commenting on                               | ? Policy Number:<br>MG9. MD12. MG2.               | · · · · · ·            |                                  | Proposal Map:<br>MG9                  | <b>7</b>              | Constraints MapFeb 2012                                | Appendices: Other - Not Listed |
| 3b - Do you wish to see any changes made to the Deposit F                               | Plan as a result of your rep                      | oresentation? Yes      | (If                              | "No" or "Unanswered                   | " - go to 3d)         |  |                                |
| 3c - What changes would like to see made to the Deposit P                               | lan? New Policy: Unanswered Notes:                | Amended Policy:<br>Yes | New Paragraph:<br>Unanswered     | Amended Paragra<br>Unanswered         | ph: New Or Ame<br>Yes | nded Site: Other (see N<br>Unanswered                  | <del></del>                    |
| 3d - If your representation relates to a new, deleted or ame                            | ended site, did you submit<br>Site Name: Land Eas |                        | te Site? Yes                     | (If "Yes", plea                       | ŭ                     | lidate Site Name and reference: Site Reference         | ,                              |
| 3e - Please set out your representation below:  REPRESENTATIONS AGAINST ALLOCATION OF G | YPSY & TRAVELLER SIT                              | TE AT LAND EAST O      | F.L. ANGAN                       |                                       |                       |  |                                |

TEST P1

The LDP has not been prepared in accordance with the Community Involvement Scheme, see below key points:

- The Emergency Services and Local Primary school have all confirmed that they have NOT been consulted on the proposed site MG9. The LEA confirmed they had not been consulted about the Gypsy site.
- Registered consultees have not been informed of the consultation stages.
- According to the Welsh Government's document 'Travelling to a better future' there is an onus on the LA to consult with its strategic partners in delivering Gypsy & Traveller sites. No consultation has taken place.
- Good practice (Welsh Government document 'Good Practice Design in designing Gypsy & Traveller sites') suggests that where Gypsy & Traveller sites are concerned the local community should be engaged as early as possible — we believe that the Council has undertaken the minimum consultation in terms of the LDP and insufficient consultation with respect to the Gypsy & Traveller site in accordance with best practice.

TEST P2

- 1. The Sustainability Appraisal is flawed and contradictory the proposed sites do not meet with national policy in respect of sustainability. The allocation of Llangan is not consistent with previous Planning Rejections by the Council which considered sustainability (Bonvilston Sept 2011) and with similar determinations by the Planning Inspectorate (Pembroke Sept 2011).
- 2. The allocation of MG9 is not consistent with the proposed LDP policies.

TEST C1

The Land Use Plan (with regards to Gypsy & Traveller sites) does not relate to any strategy - The Housing Strategy is out dated and does not provide any structure for assessing Gypsy & Traveller needs or site location.

TESTC2

(ordered by Representation ID No.)

Representor ID and details: 4143/DP1 Stephanie Roedemer

- 1. The Site allocation does not have regard to the following National Policy:
- -Welsh Government Circular (30/2007):
- The site is RURAL and is "UNSUSTAINABLE" as there are no local services (no shops, food and drink outlets, doctor, dentist, Library, rail services or any main settlement within 5km etc). Llangan and Fferm Goch both score 0 points for local services in the evidence based assessment 'Sustainable Settlements Appraisal'
- The site would not comply with a RURAL EXCEPTION POLICY as it advocates that all pitches are accommodated on a RURAL site including transient pitches which would not comply with TAN 2.
- Any business operated from the site would be in contradiction of RURAL EXCEPTION guidance.
- The site allocation does not take into account the "SCALE" of the resident community. Llangan has a population of less than 100 with 35 homes and this proposal nearly doubles the size of the Hamlet.
- Example of similar site. In 2007 an application of the Sustainability issue was applied by the Planning inspector in Pembroke where an appleal was refused solely on this basis.
- The VOG Council has refused an application recently in Bonvilston on the basis of Sustainability and services in this case were closer to the site than in the case of Llangan proposal.
- Designing Gypsy and Traveller Sites Good Practice Guide The site is too small; therefore cannot meet the needs identified in the LDP.
- -The site measures 7400 m2 and could only accommodate 14 pitches without infrastructure (quidance is 500m2 per pitch plus refuse area; office; play area; infrastructure (roads etc)
- The access road to the site does not meet the minimum requirements for emergency vehicles (3.7m it is actually 15m)
- The site access is poor and "unsafe" having extended walks (in excess of 800m to bus stop) along an unlit lane with no public footpath or street lighting.
- The proposal of 21 units on the site would restrict the ability of emergency vehicles to manoeuvre around the site.
- New sites grants are available (and cost should not be a material planning consideration).
- -The guidance requires that sites are:
- sustainable the Llangan site proposal is not
- equivalent to standards that would be expected for social housing in the settled community This would not meet the standards and this site would not have been considered appropriate for development for residential in either the current or proposed plans
- have the effect of encouraging and developing good relations between

Gypsies & Travellers and the settled community — the large scale of this proposal could mean that establishing good relations with the local community of Llangan would be unlikely and could also result in increased tensions in the community.

- based on WAG guidance of Design of Gypsy traveller sites the maximum number of pitches is 14, and the proposal at Llangan exceeds this number.
- Travelling to a Better Future
- Recommends that LA's engage with their Housing Association Partners to bring sites forward. The VOG Council has not done this.
- "Situating transit provision on residential Gypsy sites is not an option preferred by the Gypsy and Traveller community as this can lead to tensions among different family groups and make site management and maintenance very difficult." This creates a sense of "fear" within the settled Gypsy & Traveller community. The proposal is recommending that transient and permanent sites are co-located.
- Planning Policy Wales 2011
- The proposed site at Llangan is greenfield land, according to the definition of brownfield land set out in Figure 4 1 of PPW;
- it will not reduce the need to travel, due to the limited local service provision in close proximity to the site;
- offers very limited access to public transport facilities:
- is not large enough to provide ancillary facilities required to support a sustainable development as set out in paragraph 3.30 in accordance with Designing Gypsy and Travellers Sites Good Practice Guide;
- is located within a Special Landscape Area (SLA) and in close proximity to a Conservation Area. The assessment of the Llangan site incorrectly states that it is not within an SLA, so makes no reference to the sites proximity to the conservation area of Llangan. The location can be clearly seen from the conservation area.
- does not meet the identified needs of Gypsies and Travellers, in the Vale of Glamorgan (Fordham report 2008 evidence);
- does not promote sustainable access to employment, shopping, education, health, community, leisure and sports facilities;
- does not maximise opportunities for community development and social welfare:
- does not foster social inclusion due to the isolated location of the site; and
- does not contribute to improvements in health due to the isolation from services and facilities.

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2. MG2. The draft policy MG 2 actively discriminates the Gypsy community by excluding them from the wider housing programme and potentially abuses their human rights. Policy MG 2 should be revised to allow the VOG to identify appropriate sites in the same way as Affordable Housing.

#### TESTC3

- 1. The policy does not have due regard to the Wales Spatial Plan.
- The key theme of the Wales Spatial Plan is achieving sustainable development through focusing new development in areas which have good access to key services and facilities. As there are no services surrounding the site the allocation of MG9 is not consistent with the objectives of the Wales Spatial Plan. The Gypsy site proposal fails Soundness test Consistency C3 because the policy does not have due regard to the Wales Spatial Plan.

#### TESTC4

- 1. The allocation of this site does not have regard to the relevant Community Strategy in the following respects:
- "The diverse needs of local people are met through the provision of customer focused, accessible services and information" This cannot be achieved by the allocation of a non-accessible rural allocation.
- "Vale of Glamorgan residents and organisations respect the local environment and work together to meet the challenge of climate change". The allocation of MG9 places heavy emphasis on the use of the car to access the most basic facilities shops, health, education etc.
- "Older people are valued and empowered to remain independent, healthy and active. They have equality of opportunity and receive high quality services to meet their diverse needs"— All services are miles away and inaccessible to

the older community. The VERY POOR public transport system is located

1050m from the site and is in excess of the maximum distances as defined in

the proposed LDP and "Manual for Streets".

- "People of all ages are able to access coordinated learning opportunities and have the necessary skills to reach their full potential helping to remove barriers to employment"—There is no employment opportunity near to the site.
- The local primary school has confirmed that it is full and that its projections suggest that it doesn't have the capacity for such a large development (also consider the existing approval of 12 dwellings at Fferm Goch).
- The small local industrial unit has raised concerns in relation to the scale of the proposal.

#### TEST CE1

The Plan does not set out a coherent strategy in the following respects

- The Strategy makes the following statements:

The LDP will seek to provide a policy framework which: Manages the housing supply effectively in order to provide a range of good quality, affordable homes in sustainable locations

Reduces out commuting by providing opportunities for new housing, retail and employment development in accessible locations in the Vale of Glamorgan

The allocation of this rural site in open countryside does not meet this objective.

- The LDP also states its vision as being:
- "Our Vision for the Vale of Glamorgan is a place:

That is safe, clean and attractive, where individuals and communities have sustainable opportunities to improve their health, learning and skills, prosperity and wellbeing 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 sustainability of the area." The allocation of this site in policy MG9 does not meet these objectives being in a rural location with inadequate facilities and transport links.

- The Allocation of this site in policy MG9 does not comply with the following objectives of the LDP:
- -Objective 1: To sustain and further the development of sustainable communities within the Vale of Glamorgan, providing opportunities for living, learning, working and socialising for all. The site's location would clearly not meet this objective.
- Objective 2: To ensure that development within the Vale of Glamorgan makes a positive contribution towards reducing the impact of and mitigating the adverse effects of climate change. The allocation of this

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site will have entirely the opposite effect to this objective.

- Objective 3: To reduce the need for Vale of Glamorgan residents to travel to meet their daily needs and enabling them greater access to sustainable forms of transport. The allocation of this site will have entirely the opposite effect to this objective.
- Objective 4: To protect and enhance the Vale of Glamorgan's historic, built, and natural environment, The development of this site would not meet this objective; a planning refusal on an adjacent site in May 2002 stated "It is a proposal that would adversely affect the undeveloped rural character of the area"
- Objective 5: To maintain, enhance and promote community facilities and services in the Vale of Glamorgan The local primary school has not been consulted, had they been it would have been recognised that the school does not have capacity, nor is it projected to have the capacity.
- Objective 7: To provide the opportunity for people in the Vale of Glamorgan to meet their housing needs- States that development of housing should be in sustainable locations This is not. Furthermore, it brings into question POLICY MD12 which is discriminatory in that Gypsy & Traveller sites are treated differently from other housing allocations. An inclusive policy would see Gypsy & Traveller sites being assessed on the same basis as AFFORDABLE HOUSING and considered for ALL candidate residential sites in the LDP
- Objective 10: To ensure that development within the Vale of Glamorgan uses land effectively and efficiently and to promote the sustainable use and management of natural resources. The inappropriate use of finite resources can impact on the ability of future generations to fulfil their needs. The LDP through favouring the use of previously developed land and the sustainable use of natural resources of whatever kind and wherever they are located, will contribute to preserving their availability for future generations. - This is agricultural land in the Special Landscaped Area.

#### TEST CE2

The strategies, policies and allocations are not realistic and appropriate having considered relevant alternatives and are not founded on robust evidence:

- 1. The allocation of Llangan is purely on the basis of site ownership by the Vale and does not meet the requirement of Policy MD12.
- 2. The Gypsy & Traveller site assessment (anecdotal) conflicts with other evidence based background papers; specifically the Sustainable Settlement Appraisal. The SSA states 0 points for public transport but the Gypsy & Traveller site assessment states that public transport facilities are good.
- 3. The Gypsy Traveller site assessment states "good highway access", yet the access falls considerably short of the minimum requirement for vehicle access the access lane is 2.5m wide, against a minimum requirement of 3.7m plus footpath of 1.2m.
- 4. The Gypsy Traveller site assessment does not reflect the current legal obligations of the VOG in respect of this site, yet the other site assessments highlight legal issues.
- 5. Several privately-owned sites were put forward as candidate sites for Gypsy & Traveller sites but were dismissed as they were not in Council ownership. Not being in council ownership should not be a reason to reject privately owned sites.
- 6. The key issue is that the site allocation does not reflect the identified need of the Gypsy & Traveller community as highlighted in the 2008 Fordham report.
- 7. The Gypsy Traveller site assessment suggests that Fferm Goch is the local settlement when Llangan is recognised in this and historic documents as the local settlement being only 150m from the proposed site. It appears that the council has also linking the site at Llangan to the Hamlet of Fferm Goch in order to increase the site assessment positive score.
- 8. The assessment makes no reference that the site is in a Special Landscape Area (SLA).
- 9. The assessment makes no reference that the site is adjacent to a Conservation Area, within the Conservation Management Plan for this area there is a specific requirement to protect the view from the edge of the conservation area over the proposed site. The proposed site is clearly visible form the conservation area.
- 10. The allocation of Fferm Goch as a Minor Rural Settlement is incorrect. The appraisal scored 9 points, 3 are for employment which puts this site on par with the major settlements such as Barry. This is on the basis of 4 light industrial buildings. A survey of these employers has confirmed that zero new jobs have become available in the last 9 years and that the units collectively employ fewer than 15 people with no intention to expand. Furthermore, one of the units has been empty and the development is not a popular industrial site.
- 11. Fferm Goch has a population of less than 100 (98)— of the 5 sites in the Vale of Glamorgan with a population of 98 only Fferm Goch is classified as a Minor Rural site (probably based on the 9 points). The remainder are classified as Hamlets and there is a presumption against development in Hamlets (or as a minimum the scale would need to be appropriate and tied to a Rural Exception policy). The guidance requires ALL sites of a population below 100 to be classified as a Hamlet Fferm Goch should be recategorised as a Hamlet.
- 12. The Council has undertaken a study (Fordham report 2008) where the message was extremely strong that the Gypsy & Traveller community wanted smaller sites located on the fringes of larger communities. The report confirmed that isolated, rural sites restricted access to Health, Education and welfare facilities that disadvantaged them and needs to be seen in the light of the above objectives. The following is a quote from the Fordham report:
- "Participants living on Shirenewton had three main criticisms: the site was too big, the distance from local amenities along with the lack of local transport,"

"This created many problems for the residents, especially the poorest: 'for a person like me on the bread line it's very tough. I can't afford to use the car', 'everything is a mile away, including the bus stop. It takes a long walk on a busy road to get to the shops and schools".

"The tables demonstrate that access to services such as local shops, health centres and education facilities from both sites is difficult by foot and by local transport systems. This difficulty was eased when participants used their cars, however the level of ease was lower for Roverway due to the difficult entry onto the main road".

"Participants reported that access to local amenities, health services and education was low for both sites by foot or by public transport; "Everything is a mile away, including the bus stop. It takes a long walk on a busy road to get to the shops and schools".

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"It was thought that smaller sites would reduce the problem of on-site conflicts: 'they need smaller sites and not too many different families, otherwise when you have a row the whole site becomes a war zone"

"This affected the ability of the households interviewed to access local services such as shops, health centres and education facilities. It was reported that this problem mainly affected the women: men take the vehicles that the household own to work during the day, leaving the women without their own transport and often away from public transport routes"

"Participants did not specify where in Cardiff or the Vale of Glamorgan sites should be located. It was noted that sites should be on the outskirts of towns to enable access by foot to local services such as shops, the Launderette and health centres"

"While the focus of the survey was on accommodation requirements, the questionnaire also collected information on access to services, including health and education. Research has found that poor accommodation can prevent access to services and so cannot be seen in isolation."

"Participants living on sites felt that there were site restrictions that limited their work options. These were mainly associated with the location of the sites and lack of access to public transport rather than site regulations: 'no buses, no local transport. Bad access"

"Participants living on local authority sites reported that the lack of local public transport provision in the area affected their ability to send their children to school, access health services and work opportunities, and limited their ability to attend training and education courses"

"Participants were asked about where they would like future sites to be, but were not specific about locations within the County Boroughs, instead emphasising the importance of public transport to any new sites. Government draft guidance on site design stresses the importance of access to services and the promotion of integrated co-existence' between the site and surrounding community."

"The precise location, design and facilities of any new sites should be drawn up in consultation with Gypsies and Travellers to ensure that the additional provision meets their needs. The health and safety implications of a new site's location should be considered in finding a balance between offering sites in good locations and the additional land costs this would entail. The settled community neighbouring the sites should also be involved in the consultation from an early stage."

13. An independent highway study recently undertaken by Capita Symonds, surrounding the proposed site has concluded that:

"The 1km long lane itself is of poor horizontal alignment, with poor forward visibility and unsuitable for regular vehicular traffic. If the site is developed the lane itself would need major upgrading, which would certainly change its appearance within this rural environment."

"The village school is approximately 1km from the village and 900 metres from the proposed site. It is noted that the route does not offer any facilities for pedestrians, such that the only safe way for children to travel between the site and the school safely would be by vehicle. This route would also be potentially hazardous for cycle use for children, the elderly or infirm and could be potentially hazardous for all users other than by car."

"With regard to the appropriateness of the location for a traveller's site development in relation to transportation, it is difficult to refer to standard guidelines, as few relate to "rural highways", most highway design standards for residential development relate to urban areas. Hence, the advice contained within this report is based on best available information, acceptable highway standards for developments of similar size and transport needs of small communities. Welsh Government guidelines state sites should be situated in close proximity to transport links. The Llangan site would not appear to meet that criteria, being situated away from the main transport infrastructure, sites should also have ready access to schools, doctors and shops, against which requirements Llangan again appears to fail."

"With regards to the existing lane, it is generally considered that where there is direct access to dwellings, the previous standard for developments, Design Bulletin 32 offers guidance where it states that a desirable minimum carriageway width of 5.5 metres is appropriate, together with 2.0 metre wide footways on both sides. This will allow two way traffic at all times, and safe movement of pedestrians."

"Thus the lane itself should be widened to this minimum standard, which will require the removal of the existing hedge line on one or both sides of the lane and probable acquisition of land from the adjoining fields. This will of course change the environmental character of the area substantially, but is considered essential to cater for increased vehicle and pedestrian traffic"

14. There is complete inconsistency with the allocation of MG9 against the proposed policies.

#### TEST CE3

- 1. The VOG council make no reference as to how they are going to manage such a large site. The 21 unit site in Rover Way Cardiff has 3 full time Council staff allocated to it.
- 2. The current Housing Strategy expires April 2012 and makes no relevant reference as to how the Gypsy & Travelling Community will be monitored in terms of growth or need. Indeed, there is no strategy that underpins the Gypsy & Traveller community or housing at all.

(ordered by Representation ID No.)

Representor ID and details: 4143/DP1 Stephanie Roedemer

- 1. Policy MD12 (Gypsy & Traveller) is discriminatory. It offers no flexibility for the Council to bring forward sites that are sustainable / suitable for Gypsies & Travellers through the policies derived within the plan.

  2. MD12 should be redrafted to enable smaller, sustainable sites to be included within the Affordable Housing requirements and delivered through the Registered Social Landlord sector.
- 3. To argue that the Private Sector has been consulted to offer sites is not accepted. The private sector were not likely to volunteer sites for such a contentious use. The LDP should set clear strategies / policies to deliver sustainable sites for all members of the community; private; social and travelling. The current allocation does not meet this and could strongly be argued breeches the Human Rights of the Gypsy traveller community as it does not provide a suitable, sustainable site that meets the guidelines in the 2008 Fordham report.
- 3f Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)

The proposed Gypsy traveller site at Llangan (Policy MG9) should be removed from the LDP draft plan. The VOG should identify an alternative site that has been assessed according to a relative sustainability appraisal and meets the requirements of the Gypsy community as listed in the 2008 Fordham report.

Policy MD12 should be amended so that it does not discriminate against the Gypsy and Traveller community. All sites during the plan should be assessed on a similar basis as Affordable Housing.

4b - If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -



(ordered by Representation ID No.)

| Representor ID and details: 4144/DP1 Mrs. E. M. Crand  | on  |  |                              |                                      |   |                                 |                  |
|--|---|--|------------------------------|--------------------------------------|---|---------------------------------|------------------|
| Date Lodged     Status     Petition and No.     Supporting Evidence       02/04/2012     M     0 | Additional SA SEA                             |  | Rep format:<br>Letter        |                                      | ur comments to be cons<br>at a hearing session of F | •                               | •                |
| 2a - Do you consider the LDP is Sound? Unanswered  | 2b - If you think that the Procedural Tests - | ne Plan is unsound and P1 - Unanswered | does not not meet o          | ` '                                  | oundness, please indic                              | ate which test(s)               | that it fails.   |
|  | Consistency Tests -<br>Coherence and Effecti  | C1 - Unanswered iveness Tests - CE1 -  |                              | ered C3 - Unansw<br>CE2 - Unanswered |   | vered<br>CE4 - Unanswer         | red              |
| 3a - Which part of the Deposit Plan are you commenting on?                                       | Policy Number:<br>MG9                         | <u>Paragraph</u><br>                   |                              | Proposal Map:                        | <u>Cons</u>   | straints Map                    | Appendices:      |
| 3b - Do you wish to see any changes made to the Deposit Plan                                     | as a result of your rep                       | resentation? Unansw                    | ered (If "                   | No" or "Unanswered"                  | - go to 3d)   |                                 |                  |
| 3c - What changes would like to see made to the Deposit Plan                                     | ? New Policy:<br>Unanswered<br>Notes:         |  | New Paragraph:<br>Unanswered | Amended Paragraph<br>Unanswered      | n: New Or Amended Si<br>Unanswered                  | te: Other (see No<br>Unanswered | otes):           |
| 3d - If your representation relates to a new, deleted or amende                                  | ed site, did you submit t<br>Site Name:       | he site as a Candidate                 | Site? Unanswere              | d (If "Yes", pleas                   | e give the Candidate Si<br>Site Reference           |                                 | erence if known) |

3e - Please set out your representation below:

I have been informed that the Vale of Glamorgan Borough Council (VOG) intends to recreate a traveller site in the village of Llangan, as indicated in the Local Development Plan.

Consequently I wish to ask a number of questions and make other observations to which I hope you will respond.

- 1. Have alternative sites been considered and if refused could you tell me why?
- 2. I understand that members of the traveller community have made applications for sites and have been refused. Could you tell me why?
- 3. You state in your recent official documents that there is an existing gypsy site at Llangan. This is incorrect, since, in accordance with the legal decision taken by the High Court the land has agricultural status. In effect, you begin with a false premise. Why do you do this?
- 4. I also know that it is on record that the illegal site at Llangan is certainly not the best available. In fact, others have been suggested as more suitable. If this is the case, please elucidate the matter.
- 5. Has a full assessment of the impact of a traveller site development on Llangan Primary School been carried out? Has the head teacher been informed? I understand that the school does not have the facilities to accommodate more pupils.
- 6. To live in the villages of Tre-oes, St Mary Hill and Liangan is to experience an increasing traffic nightmare on the basis of volume and speed. These narrow lanes have now become shortcuts to the Bridgend and Brackla industrial estates. The Pencoed to Pentre Meyrick road is the arterial link between the M4 and A48 and goes on to the industrial estate at Llandow. Further traffic in the area would only exacerbate the problems of the existing road system.
- 7. Has a proper risk assessment been made of this proposed site regarding flooding, access for fire engines and the need for pedestrian walkways from the lane and then to the school?
- 8. I have been told that some of the information required by the authority is withheld because it is not in the public interest". I constitute the public and it is very much in my interest to know what decisions are made and how they are arrived at and how they impact on my community.
- 9. I understand that the Local Authority is obliged to consult with institutions and publics who may be affected by the decisions. No one whom we know in connection with this has been consulted. This is hardly a sound democratic, consultative process.

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Representor ID and details: 4144/DP1 Mrs. E. M. Crandon

- 10. Does the VOG not consider that 21 units for travellers are disproportionate to the existing hamlet of 35 houses? Surely a site of that size would create tension between the existing and the traveller community.
- 11. Has the travelling community been consulted on the suitability of the site regarding the conclusions of the Fordham Report?
- 12. Llangan enjoys conservation status in which the issues of use of land, aesthetic views/sights are outlined. This does not seem to apply here.
- 13. The site is rural with no local amenities (shops, transport, health facilities). This situation already exists for the villagers of Llangan and St Mary Hill.
- 14. In conclusion, I am against these proposals and request that the proposed Gypsy and Traveller site be taken out of the LDP.
- 3f Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
- 4b If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -

(ordered by Representation ID No.)

| Representor ID and details:                                  | 4145/DP1 Mr. G. L. Crandor      | 1   |                               |                              |                                |  |                                  |                  |
|--|---------------------------------|---|-------------------------------|------------------------------|--------------------------------|--|----------------------------------|------------------|
| Date Lodged Status Petition 02/04/2012 M                     | n and No. Supporting Evidence 0 | Additional SA SEA   |                               | Rep format:<br>Letter        | , ,                            | your comments to be cor<br>at a hearing session of | •                                | •                |
| 2a - Do you consider the LDP is Sound? Unanswered            |                                 | 2b - If you think that the Plan is unsound and does not not meet one or more test(s) of soundness, please indicate which test(s) that it fails.  Procedural Tests - P1 - Unanswered P2 - Unanswered |                               |                              |                                |  |                                  |                  |
|  |                                 | Consistency Tests - C1 - Unanswered C2 - Unanswered C3 - Unanswered C4 - Unanswered   |                               |                              |                                |  |                                  |                  |
|  |                                 | Coherence and Effect  | tiveness Tests - CE1          | - Unanswered                 | CE2 - Unanswered               | CE3 - Unanswered                                   | CE4 - Unanswe                    | red              |
| 3a - Which part of the Deposit Plan are you commenting on?   |                                 | Policy Number:  | Paragraph                     | n Number:                    | Proposal Map:                  | Con  | straints Map                     | Appendices:      |
|  |                                 | MG9   |                               |                              |                                |  |                                  |                  |
| 3b - Do you wish to see any cha                              | anges made to the Deposit Plan  | as a result of your rep   | presentation? Unansv          | vered (If                    | "No" or "Unanswered            | " - go to 3d)                                      |                                  |                  |
| 3c - What changes would like to see made to the Deposit Plan |                                 | ? New Policy:<br>Unanswered   | Amended Policy:<br>Unanswered | New Paragraph:<br>Unanswered | Amended Paragram<br>Unanswered | ph: New Or Amended S<br>Unanswered                 | Site: Other (see N<br>Unanswered | otes):           |
|  |                                 | Notes:  |                               |                              |                                |  |                                  |                  |
| 3d - If your representation rela                             | tes to a new, deleted or amende | ed site, did you submit<br>Site Name:   | the site as a Candidate       | Site? Unanswe                | red (If "Yes", plea            | ase give the Candidate S<br>Site Reference         |                                  | erence if known) |
|  |                                 |   |                               |                              | <b>,</b>                       |  |                                  |                  |

3e - Please set out your representation below:

I have been informed that the Vale of Glamorgan Borough Council (VOG) intends to recreate a traveller site in the village of Llangan, as indicated in the Local Development Plan.

Consequently I wish to ask a number of questions and make other observations to which I hope you will respond.

- 1. Have alternative sites been considered and if refused could you tell me why?
- 2. I understand that members of the traveller community have made applications for sites and have been refused. Could you tell me why?
- 3. You state in your recent official documents that there is an existing gypsy site at Llangan. This is incorrect, since, in accordance with the legal decision taken by the High Court the land has agricultural status. In effect, you begin with a false premise. Why do you do this?
- 4. I also know that it is on record that the illegal site at Llangan is certainly not the best available. In fact, others have been suggested as more suitable. If this is the case, please elucidate the matter.
- 5. Has a full assessment of the impact of a traveller site development on Llangan Primary School been carried out? Has the head teacher been informed? I understand that the school does not have the facilities to accommodate more pupils.
- 6. To live in the villages of Tre-oes, St Mary Hill and Liangan is to experience an increasing traffic nightmare on the basis of volume and speed. These narrow lanes have now become shortcuts to the Bridgend and Brackla industrial estates. The Pencoed to Pentre Meyrick road is the arterial link between the M4 and A48 and goes on to the industrial estate at Llandow. Further traffic in the area would only exacerbate the problems of the existing road system.
- 7. Has a proper risk assessment been made of this proposed site regarding flooding, access for fire engines and the need for pedestrian walkways from the lane and then to the school?
- 8. I have been told that some of the information required by the authority is withheld because it is not in the public interest". I constitute the public and it is very much in my interest to know what decisions are made and how they are arrived at and how they impact on my community.
- 9. I understand that the Local Authority is obliged to consult with institutions and publics who may be affected by the decisions. No one whom we know in connection with this has been consulted. This is hardly a sound democratic, consultative process.

(ordered by Representation ID No.)

Representor ID and details: 4145/DP1 Mr. G. L. Crandon

- 10. Does the VOG not consider that 21 units for travellers are disproportionate to the existing hamlet of 35 houses? Surely a site of that size would create tension between the existing and the traveller community.
- 11. Has the travelling community been consulted on the suitability of the site regarding the conclusions of the Fordham Report?
- 12. Llangan enjoys conservation status in which the issues of use of land, aesthetic views/sights are outlined. This does not seem to apply here.
- 13. The site is rural with no local amenities (shops, transport, health facilities). This situation already exists for the villagers of Llangan and St Mary Hill.
- 14. In conclusion, I am against these proposals and request that the proposed Gypsy and Traveller site be taken out of the LDP.
- 3f Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
- 4b If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -

| Representor ID and details: 4146/DP1 Mr M Ree   |
|---|
| Date Lodged       Status       Petition and No.       Supporting Evidence       Additional SA SEA       Rep format:       4a - do you want your comments to be consiered by 'written representations' or do         30/03/2012       M       0       Comment form       you want to speak at a hearing session of Public examination?       Written   |
| 2a - Do you consider the LDP is Sound? Unsound  2b - If you think that the Plan is unsound and does not not meet one or more test(s) of soundness, please indicate which test(s) that it fails.  Procedural Tests - P1 - Unanswered  Consistency Tests - C1 - Unanswered  Coherence and Effectiveness Tests - CE1 - Unanswered  CE2 - Yes  CE3 - Yes  CE4 - Unanswered  |
| 3a - Which part of the Deposit Plan are you commenting on? Policy Number: Paragraph Number: Proposal Map: Constraints Map Appendices:  MG2(11). MG12(11). MG15  |
| 3b - Do you wish to see any changes made to the Deposit Plan as a result of your representation? Yes (If "No" or "Unanswered" - go to 3d)   |
| 3c - What changes would like to see made to the Deposit Plan?    New Policy: Unanswered   Yes   Unanswered   Unanswered |
| 3d - If your representation relates to a new, deleted or amended site, did you submit the site as a Candidate Site? Yes (If "Yes", please give the Candidate Site Name and reference if known)  Site Name: Cowbridge Cattle Market Land west of Marley Tile Site, St Mary Hill Site Reference: 178/CS1 2440/CS2   |
| 3e - Please set out your representation below: Policy MG2 (11) states that Cowbridge Cattle Market has been allocated for residential development. This is unsound and objected to on the grounds that-   |
| The Cowbridge Cattle Market, which sells on average over 500 head of sheep per week, is trading successfully and supporting the farming community of the Vale of Glamorgan and should not be closed.  |
| On non market days the site is used for car and coach parking for up to 200 cars. Apart from an allocation of a small site adjacent to the town wall which would hold approximately 25 cars, no provision has been made within the LDP for the lost car and coach parking spaces. The loss of car parking spaces would have an adverse effect on the trading community in Cowbridge and the attractiveness of Cowbridge as a market town.   |
| Policies MG12 (11) and MG15 refer to a proposed site for the replacement cattle market. This is a greenfield site and proposals are made within the LDP for its purchase and development as a market. The policy is objected to as being unsound.   |
| 3f - Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)  Delete Policies MG2 (11), MG12(11) and MG15.  An additional policy should be included upholding the continuation of the Cowbridge Cattle Market in support of the agricultural economy of the Vale of Glamorgan and the provision of improved parking facilities   |
| on the site to support the attractiveness of Cowbridge as a tourist destination and the trading community of Cowbridge.   |
| 4b - If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -  |

(ordered by Representation ID No.)

| Representor ID and detai              | ls: 4147/D      | P1 Helen Huntley        |  |  |                              |                                |                                 |  |                 |
|---------------------------------------|-----------------|-------------------------|--|--|------------------------------|--------------------------------|---------------------------------|--|-----------------|
| Date Lodged Status Po<br>30/03/2012 M | etition and No. | Supporting Evidence     | Additional SA SEA                      |  | Rep format:<br>Letter        | , ,                            |                                 | e consiered by 'written on of Public examination | •               |
| 2a - Do you consider the L            | DP is Sound?    |                         | Procedural Tests -                     | ne Plan is unsound and<br>P1 - Unanswered<br>C1 - Unanswered | P2 - Unansv                  | wered                          |                                 | ` `  | hat it fails.   |
|                                       |                 |                         | Coherence and Effecti                  | iveness Tests - CE1  | - Unanswered                 | CE2 - Unanswered               | CE3 - Unanswere                 | ed CE4 - Unanswer                                | ed              |
| 3a - Which part of the Dep            |                 |                         | Policy Number:<br>MG2(19). MG2(20)     |  |                              | Proposal Map:                  | )                               | Constraints Map                                  | Appendices:     |
| 3b - Do you wish to see an            | y changes ma    | de to the Deposit Plan  | as a result of your rep                | resentation? Unansw  | vered (If                    | "No" or "Unanswered            | " - go to 3d)                   |  |                 |
| 3c - What changes would l             | ike to see mad  | le to the Deposit Plan? | New Policy:<br>Unanswered<br>Notes:    |  | New Paragraph:<br>Unanswered | Amended Paragrap<br>Unanswered | New Or Amend<br>Unanswered      | ded Site: Other (see No<br>Unanswered            | otes):          |
| 3d - If your representation           | relates to a ne | ·                       | d site, did you submit t<br>Site Name: | the site as a Candidate                                      | Site? Unanswer               | ed (If "Yes", plea             | se give the Candid<br>Site Refe | ate Site Name and refe<br>rence:                 | rence if known) |
| 0 - Dia                               |                 | -1                      |  |  |                              |                                |                                 |  |                 |

3e - Please set out your representation below:

VALE OF GLAMORGAN LOCAL DEVELOPMENT PLAN 2011-2026

As a resident of Murch Road, Dinas Powys, I am concerned and worried about the council's proposal to build at least 340 dwellings on the present Dinas Powys St Cyres School site.

The proposal is out of scale with existing residential areas and the proposed access is via Murch Road and then Murch Crescent. Section 4.5 of the LDP states 'that the LDP will ensure that new development is of a scale appropriate to its location'. I disagree that this will be the case. Murch Road and Murch Crescent each have only 50+ houses and thus 340 new houses beyond these roads will be far too large a development to add to what is here at present.

Furthermore, the St. Cyres site is in a relatively rural location. The peaceful character of this area will not be maintained if over 340 houses were built along with more cars that this would generate.

There is also a proposal to build more houses on Caerleon Road, Dinas Powys and both schemes will greatly increase the volume of traffic in our town, probably generating at least six hundred more cars needing to enter and leave the area. The traffic volume in and through Dinas Powys is already at saturation point, especially at peak times. (LDP Spatial Profile 3.20 - 'High levels of out commuting for work resulting in peak time congestion on the main distributer roads in the eastern Vale of Glamorgan'). This indeed means the A 4055 through Dinas Powys.

As access to the St. Cyres site and the Caerleon Road site is proposed to be via Murch Road, the junction of this road and Cardiff Road, A4055, will become intolerable. It is already an extremely busy junction with cars queuing back over the railway bridge on Murch Road.

The two thousand dwellings in Barry, which are already agreed, will generate at least this number of vehicles and many of them will probably travel through Dinas Powys on their way to and from Cardiff. This will take the situation well beyond saturation point and is not sustainable. Dinas Powys will be a deeply unattractive place to live.

The implications of too much traffic are high pollution levels from car emissions. C02, CO and PM1Os are particularly high even now as traffic is stationary and slow-moving and this is before any more cars are inevitably travelling through Dinas Powys. There are many references to a 'high quality of life' in the LDP. I suggest that more cars, pollution and having to allow ever more time for journeys, do not contribute to a high quality of life.

Section 4.6 of the LDP says that new developments will be in 'sustainable locations that minimise the need to travel'. I am not aware of plans to increase the number of trains and buses in the area. Indeed, there has recently been a reduction in bus services between Dinas Powys and Penarth to one bus every hour, instead of two I hope to see a written plan proposing to add many new trains and carriages and also buses. however, in order to do my job, I need to use a car. I have a large musical instrument and heavy bags to carry and have to travel all over S Wales. I cannot do this on public transport, even if it were of the highest quality and of great frequency.

(ordered by Representation ID No.)

Representor ID and details: 4147/DP1 Helen Huntley

Section 4.9 of the LDP: 'new development, particularly housing, does not impose undue pressure on community facilities such as schools and health facilities' I suggest that 400 new houses in Dinas Powys will indeed put too much pressure on existing facilities

Other suggestions must be considered for the St. Cyres School site in Dinas Powys. One option is to move the Infants' School to the existing St. Cyres building and its pleasant and rural site thus removing young children from the traffic pollution. The existing health centre for Dinas Powys is woefully inadequate at present. I suggest that a new, larger and more up to date centre is relocated to the existing Infants school building. Public transport will provide a service to this venue.

In the eleven years between 1998 and 2009, there was an average house building rate of 426 houses per annum (LDP Spatial Profile 3 8) If the proposed 10,000 dwellings for the whole of the Vale of Glamorgan are built in the years of the plan, 2011 - 2026, this will mean an average of 733 dwellings per annum, an enormous 56% increase over the previous average. Is the Vale's population going to increase by this amount? Further, are the council authorities confident that all these houses will be sold? We hear much in the news of the difficulty of first-time buyers finding the deposit for a house and only 35% of the proposed building will be for 'affordable homes'. I am sure that there is some need for more homes, but a 56% increase? I could accept more housing if I knew that the council's plans are sound, but I am not convinced.

Another aim of the LDP is to encourage leisure and tourism in the Vale. Until the council provides a massive increase in good quality public transport, visitors from Cardiff and the east will inevitably use private cars to go to the five beaches of Barry. The A4055 through Dinas Powys will again be a main route and how will gridlocked traffic encourage tourists to repeat their visits? Other towns in the Vale benefit from having by-passes- Cowbridge, Llantwit Major and Rhoose. Why should the residents of Dinas Powys be subjected to intolerable levels of traffic and all that that implies?

In conclusion, additional housing in Dinas Powys on the scale proposed in the LDP, could not be assimilated. It would have a detrimental impact on our existing character and local environment

3f - Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)

4b - If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -

| Representor ID and details: 4148/DP1 Mr L Phillips   |  |
|--|--|
| Date LodgedStatusPetition and No.Supporting Evidence30/03/2012M0   | Additional SA SEA Rep format: 4a - do you want your comments to be consiered by 'written representations' or do Comment form you want to speak at a hearing session of Public examination? Written   |
| 2a - Do you consider the LDP is Sound? Unsound   | 2b - If you think that the Plan is unsound and does not not meet one or more test(s) of soundness, please indicate which test(s) that it fails.  Procedural Tests - P1 - Unanswered P2 - Unanswered  Consistency Tests - C1 - Unanswered C2 - Unanswered C3 - Unanswered C4 - Unanswered  Coherence and Effectiveness Tests - CE1 - Unanswered CE2 - Yes CE3 - Yes CE4 - Unanswered  |
| 3a - Which part of the Deposit Plan are you commenting on?   | Policy Number:     Paragraph Number:     Proposal Map:     Constraints Map     Appendices:       MG2(11). MG12(11). MG15   |
| 3b - Do you wish to see any changes made to the Deposit Plan   | as a result of your representation? Yes (If "No" or "Unanswered" - go to 3d)   |
| 3c - What changes would like to see made to the Deposit Plan   | New Policy: Amended Policy: New Paragraph: Amended Paragraph: New Or Amended Site: Other (see Notes): Unanswered Ves Unanswered Notes:   |
| 3d - If your representation relates to a new, deleted or amende  | ed site, did you submit the site as a Candidate Site? Yes (If "Yes", please give the Candidate Site Name and reference if known) Site Name: Cowbridge Cattle Market - Land west of Marley Tile Site, St Mary Hill Site Reference: 178/CS1 2440/CS2   |
|  | been allocated for residential development. This is unsound and objected to on the grounds that-   |
| On non market days the site is used for car and coach paramade within the LDP for the lost car and coach parking smarket town. | er 500 head of sheep per week, is trading successfully and supporting the farming community of the Vale of Glamorgan and should not be closed.  Arking for up to 200 cars. Apart from an allocation of a small site adjacent to the town wall which would hold approximately 25 cars, no provision has been paces. The loss of car parking spaces would have an adverse effect on the trading community in Cowbridge and the attractiveness of Cowbridge as a replacement cattle market. This is a greenfield site and proposals are made within the LDP for its purchase and development as a market. The |
| policy is objected to as being unsound.  |  |
|  | deposit Plan to make it sound (if relevant)  Itinuation of the Cowbridge Cattle Market in support of the agricultural economy of the Vale of Glamorgan and the provision of improved parking facilities a tourist destination and the trading community of Cowbridge.  |
| 4b - If you wish to speak, please confirm which part of your re  | presentation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -  |

| Representor ID and details: 4149/DP1 Mrs P Morgan  |   |                                    |                                   |                                |                           |   |                          |
|--|---|------------------------------------|-----------------------------------|--------------------------------|---------------------------|---|--------------------------|
| Date LodgedStatusPetition and No.Supporting Evidence30/03/2012M0   | Additional SA SEA   |                                    | Rep format:<br>Comment form       | ,                              |                           | be consiered by 'written ion of Public examination  |                          |
| 2a - Do you consider the LDP is Sound? Unsound   | 2b - If you think that th<br>Procedural Tests -<br>Consistency Tests -<br>Coherence and Effecti | P1 - Unanswered<br>C1 - Unanswered | P2 - Unans<br>C2 - Unans          | ` '                            |                           | se indicate which test(s) Unanswered CE4 - Unanswer |                          |
| 3a - Which part of the Deposit Plan are you commenting on?   | Policy Number:<br>MG2(11). MG12(11).  |                                    | h Number:                         | Proposal Map:<br>MG2(11)       | <u> </u>                  | Constraints Map                                     | Appendices:              |
| 3b - Do you wish to see any changes made to the Deposit Plan   | as a result of your repr  | esentation? Yes                    | (If                               | "No" or "Unanswered            | " - go to 3d)             |   |                          |
| 3c - What changes would like to see made to the Deposit Plan   | New Policy:<br>Unanswered<br>Notes:   | Amended Policy:<br>Yes             | New Paragraph:<br>Unanswered      | Amended Paragrap<br>Unanswered | <u>New Or Amer</u><br>Yes | nded Site: Other (see No<br>Unanswered              | otes):                   |
| 3d - If your representation relates to a new, deleted or amende  | ed site, did you submit tl<br>Site Name: Cowbridge  |                                    |                                   | · ' '                          | 0                         | date Site Name and reference: 178/CS1 2440          | ,                        |
| 3e - Please set out your representation below:<br>Policy MG2 (11) states that Cowbridge Cattle Market has                      | been allocated for resid  | dential development. T             | his is unsound and                | l objected to on the gro       | unds that-                |   |                          |
| The Cowbridge Cattle Market, which sells on average over   | er 500 head of sheep pe   | er week, is trading succ           | es <mark>sfu</mark> lly and suppo | orting the farming comr        | nunity of the Vale        | of Glamorgan and shoul                              | d not be closed.         |
| On non market days the site is used for car and coach paramade within the LDP for the lost car and coach parking smarket town. |   |                                    |                                   |                                |                           |   |                          |
| Policies MG12 (11) and MG15 refer to a proposed site fo policy is objected to as being unsound.                                | the replacement cattle  | market. This is a gree             | nfield site and prop              | posals are made within         | the LDP for its pu        | rchase and developmen                               | t as a market. The       |
| 3f - Please outline the changes you wish to see made to the D Delete Policies MG2 (11), MG12(11) and MG15.                     | eposit Plan to make it s  | cound (if relevant)                |                                   |                                |                           |   |                          |
| An additional policy should be included upholding the con on the site to support the attractiveness of Cowbridge as            |   |                                    |                                   | Itural economy of the V        | ale of Glamorgan          | and the provision of imp                            | roved parking facilities |
| 4b - If you wish to speak, please confirm which part of your re  | oresentation you wish to  | speak to the inspecto              | r about and why th                | ney consider it be neces       | ssary to speak at         | the hearing -                                       |                          |

| Representor ID and details: 4150/DP1 Kristian Carnell  |  |                                    |                                 |   |                               |  |                              |
|--|--|------------------------------------|---------------------------------|---|-------------------------------|--|------------------------------|
| Date Lodged     Status     Petition and No.     Supporting Evidence       30/03/2012     M     0   | Additional SA SEA  |                                    | Rep format:<br>Letter           | ,   | ,                             | oe consiered by 'writter<br>on of Public examination   | n representations' or do on? |
| 2a - Do you consider the LDP is Sound? Unanswered  | 2b - If you think that the<br>Procedural Tests -<br>Consistency Tests -<br>Coherence and Effecti | P1 - Unanswered<br>C1 - Unanswered | P2 - Unans<br>C2 - Unans        | et one or more test(s) o<br>swered<br>swered C3 - Unans<br>CE2 - Unanswered | swered C4 - U                 |  | ,<br>                        |
| 3a - Which part of the Deposit Plan are you commenting on?   | Policy Number:<br>MG2(16)  | Paragrap<br>                       | h Number:                       | Proposal Map:   | )                             | Constraints Map  | Appendices:                  |
| 3b - Do you wish to see any changes made to the Deposit Plan   | as a result of your rep  | resentation? Unansv                | wered (I                        | If "No" or "Unanswered  | d" - go to 3d)                |  |                              |
| 3c - What changes would like to see made to the Deposit Plan?  | ? New Policy:<br>Unanswered<br>Notes:  | Amended Policy:<br>Unanswered      | New Paragraph:<br>Unanswered    | Amended Paragra<br>Unanswered   | ph: New Or Amen<br>Unanswered | ded Site: Other (see Number of Control of Co | <del></del>                  |
| 3d - If your representation relates to a new, deleted or amende  | ed site, did you submit t<br>Site Name:  | he site as a Candidate             | Site? Unanswe                   | ered (If "Yes", plea  | ase give the Candid           | date Site Name and reference:  | ference if known)            |
| 3e - Please set out your representation below:<br>I wish to protest at the plans to build 430 houses on land   | at Fort Rd, Lavernock.   |                                    |                                 |   |                               |  |                              |
| The following has not been considered by the planners ar   | nd if they had they woul   | d realise that the point           | s a <mark>re</mark> insurmounta | ble   |                               |  |                              |
| 1) 430 = 860 to 1200+ extra cars trying to exit Penarth on 2) 430 = erosion of green belt blurring boundaries and net 3) 430 = environmental impact on nature reserve and nature 4) 430 = excavating toxic sites, with disregard for archaect 5) 430 = flooding exasperated at Lavernock Road once field | gating the unique chara<br>ural habitat.<br>ological sensitivity on re                           | cter of Penarth & Sully            |                                 |   |                               |  |                              |
| The list is endless.   |  |                                    |                                 |   |                               |  |                              |
| Please don't build here.   |  |                                    |                                 |   |                               |  |                              |
| 3f - Please outline the changes you wish to see made to the D  | eposit Plan to make it s   | sound (if relevant)                |                                 |   |                               |  |                              |
| 4b - If you wish to speak, please confirm which part of your rep   | presentation you wish to   | speak to the inspector             | or about and why t              | hey consider it be nece   | essary to speak at tl         | <br>ne hearing -   |                              |

| Representor ID and details: 4150/DP2 Kristian Carnell   |  |  |   |   |  |  |
|---|--|--|---|---|--|--|
| Date Lodged     Status     Petition and No.     Supporting Evidence       01/02/2012     M     0  | Additional SA SEA  | <u>Rep format:</u><br>Eform  |   | ur comments to be cor<br>t a hearing session of                                     |  |  |
| 2a - Do you consider the LDP is Sound? Unsound  | 2b - If you think that the Plan is unsound and Procedural Tests - P1 - Yes   | d does not not meet<br>P2 - Yes  | one or more test(s) of s  | oundness, please indi   | cate which test(s) th  | nat it fails.  |
|   | Consistency Tests - C1 - Yes   | C2 - Yes   | C3 - Yes  | C4 - Yes  |  |  |
|   | Coherence and Effectiveness Tests - CE1  | - Yes  | CE2 - Yes   | CE3 - Yes   | CE4 - Yes  |  |
| 3a - Which part of the Deposit Plan are you commenting on?  |  | h Number:  | Proposal Map:   | Con   | straints Map   | Appendices:  |
|   | MG2(16) 1.1 - Intro  | oduction   | MG2   |   | er - Please<br>cify  | Appendix 1 - Glossary of Terms   |
| 3b - Do you wish to see any changes made to the Deposit Plar  | as a result of your representation? Yes  | (If  | "No" or "Unanswered" -  | go to 3d)   |  |  |
| 3c - What changes would like to see made to the Deposit Plan  | ? New Policy: Amended Policy:<br>No Yes  | New Paragraph:<br>No   | Amended Paragraph<br>No   | : New Or Amended S<br>No  | No Other (see No   | tes):  |
|   | Notes:   |  |   |   |  |  |
| 3d - If your representation relates to a new, deleted or amende   | ed site, did you submit the site as a Candidate<br>Site Name:  | Site? No   | (If "Yes", please   | e give the Candidate S<br>Site Reference  |  | ence if known)   |
| 3e - Please set out your representation below:<br>I am directly opposed to plans to develop site MG2 (16) v   | hich refers to the development of 450 houses   | on Lavernock road  | d.  |   |  |  |
| My opinion is that it is sheer madness to classify this as a your wording, the site would in no way "seek to protect or promote Penarth whatsoever as a sustainable transport to system is already well beyond capacity for residents in the morning or vice versa in the afternoon/evening, I would had documentation, would be put under more strain than it cu | enhance the special architectural and historic<br>own due to the sheer dangerous methods of e<br>e area and while I appreciate that the planner<br>ave thought it would be common sense not to | cinterest of the town<br>expecting cyclists or<br>s of the LDP in no w | n, nor the vitality, viability<br>pedestrians to deal with<br>vay have to deal with the | y and attractiveness of<br>a exceptionally high roa<br>a farcical traffic condition | the town centre." In<br>ad traffic during bus<br>ons leaving Penarth | n particular, it does not<br>y hours. The traffic<br>towards Cardiiff in the |
| Once again as per your own wording, it "In no way promo make up for the added transport users in the vicinity that for current users.   |  |  |   |   |  |  |
| Many of the consequences of placing such a large number proposal booklet let alone to common sense of any reside employment sites in the near vicinity to try and balance the   | ent in the area. To even suggest otherwise wit   | hout a complete ov   | erhaul of the transport re  | outes in and out of the   | area along with the  | creation of  |
| 3f - Please outline the changes you wish to see made to the D MG2(16) site removed as a potential development site, al  | . ,  | G2(25) which is effe   | ectly the same developm   | ent only larger and sli   | ghtly further along la   | avernock road.   |
| 4b - If you wish to speak, please confirm which part of your repair the points I have raised.   | oresentation you wish to speak to the inspector  | or about and why the   | ey consider it be necess  | ary to speak at the hea   | aring -  |  |

| Representor ID and details: 4151/DP1 Mr L J Howell   |   |                                  |                              |                                |                       |   |                          |
|--|---|----------------------------------|------------------------------|--------------------------------|-----------------------|---|--------------------------|
| Date Lodged     Status     Petition and No.     Supporting Evidence       M     □     0     □                                  | Additional SA SEA   |                                  | Rep format:<br>Comment form  |                                |                       | be consiered by 'written<br>ion of Public examination |                          |
| 2a - Do you consider the LDP is Sound? Unsound   | 2b - If you think that the P<br>Procedural Tests - P<br>Consistency Tests - C<br>Coherence and Effectiven | 1 - Unanswered<br>1 - Unanswered | P2 - Unansv<br>C2 - Unansv   | ` '                            |                       | ` '   |                          |
| 3a - Which part of the Deposit Plan are you commenting on?   | Policy Number:<br>MG2(11). MG12(11). MC   | <u>Paragraph</u><br>G15          |                              | Proposal Map:<br>MG2(11)       | )                     | Constraints Map                                       | Appendices:              |
| 3b - Do you wish to see any changes made to the Deposit Plan   | as a result of your represe   | entation? Yes                    | (If                          | "No" or "Unanswered'           | - go to 3d)           |   |                          |
| 3c - What changes would like to see made to the Deposit Plan   |   |                                  | New Paragraph:<br>Unanswered | Amended Paragrap<br>Unanswered | h: New Or Amer<br>Yes | nded Site: Other (see No<br>Unanswered                | otes):                   |
| 3d - If your representation relates to a new, deleted or amende  | ed site, did you submit the<br>Site Name: Cowbridge C   |                                  |                              | \ ' '                          | 0                     | date Site Name and refe<br>erence: 178/CS1 2440       | ,                        |
| 3e - Please set out your representation below:<br>Policy MG2 (11) states that Cowbridge Cattle Market has                      | been allocated for residen  | itial development. Thi           | is is unsound and            | objected to on the gro         | unds that-            |   |                          |
| The Cowbridge Cattle Market, which sells on average 500  | head of sheep per week,   | is trading successfull           | ly and supporting            | the farming community          | of the Vale of Gl     | amorgan and should not                                | be closed.               |
| On non market days the site is used for car and coach paramade within the LDP for the lost car and coach parking smarket town. |   |                                  |                              |                                |                       |   |                          |
| Policies MG12 (11) and MG15 refer to a proposed site fo policy is objected as being unsound.                                   | the replacement cattle ma   | arket. This is a green           | field site and prop          | osals are made within          | the LDP for its pu    | rchase and development                                | t as a market. The       |
| 3f - Please outline the changes you wish to see made to the D Delete Policies MG2 (11), MG12(11) and MG15.                     | eposit Plan to make it soul   | nd (if relevant)                 |                              |                                |                       |   |                          |
| An additional policy should be included upholding the con on the site to support the attractiveness of Cowbridge as            |   |                                  |                              | cural economy of the V         | ale of Glamorgan      | and the provision of imp                              | roved parking facilities |
| 4b - If you wish to speak, please confirm which part of your re  | presentation you wish to sp   | peak to the inspector            | about and why the            | ey consider it be neces        | sary to speak at t    | he hearing -  |                          |

| Representor ID and details: 4153/DP1 Mr M.E.J.Cradoo   | k  |   |  |  |  |
|--|--|---|--|--|--|
| Date Lodged     Status     Petition and No.     Supporting Evidence       30/03/2012     M     0   | e Additional SA SEA  |   |  | nts to be consiered by 'written<br>session of Public examination |  |
| 2a - Do you consider the LDP is Sound? Unsound   | 2b - If you think that the Plan is unsound Procedural Tests - P1 - Unanswere               |   | more test(s) of soundness,                                 | please indicate which test(s)                                    | that it fails.                                 |
|  | Consistency Tests - C1 - Unanswere   | d C2 - Unanswered   | C3 - Unanswered  | C4 - Unanswered  |  |
|  | Coherence and Effectiveness Tests - C  | E1 - Unanswered CE2 - Y   | 'es CE3 - Yes  | CE4 - Unanswer   | ed   |
| 3a - Which part of the Deposit Plan are you commenting on?   | Policy Number:         Parag           MG2(11).         MG12(11).         MG15.            | raph Number: Proposa  | <u>al Map:</u><br>иG2(11)                                  | Constraints Map  | Appendices:                                    |
| 3b - Do you wish to see any changes made to the Deposit Pla  | n as a result of your representation? Yes  | (If "No" or   | r "Unanswered" - go to 3d)                                 |  |  |
| 3c - What changes would like to see made to the Deposit Plan   | ? New Policy: Amended Policy:<br>Unanswered Yes<br>Notes:                                  |   | ended Paragraph: New Or<br>nswered Yes                     | Amended Site: Other (see No<br>Unanswered                        | otes):   |
| 3d - If your representation relates to a new, deleted or amend   | ed site, did you submit the site as a Candid<br>Site Name: Cowbridge Cattle Market ¬- I    |   | \ /1 0   | Candidate Site Name and refe<br>e Reference: 178/CS1 2440        | ,  |
| 3e - Please set out your representation below: Policy MG2 (11) states that Cowbridge Cattle Market ha The Cowbridge Cattle Market, which sells on average over |  |   | -  | Vale of Glamorgan and shoul                                      | d not be closed.                               |
| On non market days the site is used for car and coach p made within the LDP for the lost car and coach parking market town.                                    | arking for up to 200 cars. Apart from an allo<br>paces. The loss of car parking spaces wou | cation of a small site adjacent d have an adverse effect on the | t to the town wall which wou<br>he trading community in Co | ild hold approximately 25 cars<br>wbridge and the attractivenes  | , no provision has been<br>s of Cowbridge as a |
| Policies MG12 (11) and MG15 refer to a proposed site for policy is objected to as being unsound.   | r the replacement cattle market. This is a g   | reenfield site and proposals ar                                 | re made within the LDP for                                 | its purchase and developmen                                      | t as a market. The                             |
| 3f - Please outline the changes you wish to see made to the Delete Policies MG2 (11), MG12(11) and MG15.   | Deposit Plan to make it sound (if relevant)  |   |  |  |  |
| An additional policy should be includied upholding the co<br>on the site to support the attractiveness of Cowbridge as   |  |   | conomy of the Vale of Glam                                 | organ and the provision of imp                                   | proved parking facilities                      |
| 4b - If you wish to speak, please confirm which part of your re  | presentation you wish to speak to the inspe  | ector about and why they consi                                  | ider it be necessary to spea                               | ak at the hearing -  |  |

| Representor ID and details: 4154/DP1 Robert Craig  |   |                                     |                               |                                  |  |                               |                  |
|--|---|-------------------------------------|-------------------------------|----------------------------------|--|-------------------------------|------------------|
| Date Lodged     Status     Petition and No.     Supporting Evidence       02/04/2012     M     0                                 | Additional SA SEA                       |                                     | Rep format:<br>Comment form   |                                  | ir comments to be cons<br>a hearing session of F |                               |                  |
| •  | •                                       | Plan is unsound and P1 - Unanswered | does not not meet<br>P2 - Yes | t one or more test(s) of so      | oundness, please indica                          | ate which test(s) tha         | at it fails.     |
|  | Consistency Tests -                     | C1 - Yes                            | C2 - Yes                      | C3 - Unanswe                     | ered C4 - Yes                                    |                               |                  |
|  | Coherence and Effective                 | eness Tests - CE1 -                 | Unanswered                    | CE2 - Yes                        | CE3 - Unanswered                                 | CE4 - Unanswered              | I                |
| 3a - Which part of the Deposit Plan are you commenting on?   | Policy Number:                          | Paragraph                           | Number:                       | Proposal Map:                    | Cons   | traints Map                   | Appendices:      |
|  | MG2(15)                                 |                                     |                               |                                  |  |                               |                  |
| 3b - Do you wish to see any changes made to the Deposit Plan   | as a result of your repre               | esentation? Yes                     | (If                           | "No" or "Unanswered" -           | go to 3d)  |                               |                  |
| 3c - What changes would like to see made to the Deposit Plan?  |   | Amended Policy:                     | New Paragraph:<br>Unanswered  | Amended Paragraph:<br>Unanswered | New Or Amended Sit                               | e: Other (see Note Unanswered | <u>es):</u>      |
|  | Notes:                                  |                                     |                               |                                  |  |                               |                  |
| 3d - If your representation relates to a new, deleted or amende  | d site, did you submit th<br>Site Name: | e site as a Candidate               | Site? No                      | (If "Yes", please                | give the Candidate Site Reference:               |                               | nce if known)    |
| 3e - Please set out your representation below:   |   |                                     |                               |                                  |  |                               |                  |
| I wish to register my opposition to the Plan as outlined in F  | Policy MG2 (15) to build                | 345 houses on the lar               | d to the rear of Na           | ant yr Adar/Heol y Felin fo      | or the following reasons                         | S:-                           |                  |
| It would have devastating adverse effect on the health a provide access to the site.   | and quality of life of mys              | elf, my wife and family             | , especially if the           | narrow strip of ground be        | tween my house No 19                             | and No 20 Nant yr             | Adar was used to |
| <ol> <li>It would also seriously affect the value of my house.</li> <li>The plan does not show an access to the site.</li> </ol> |   |                                     |                               |                                  |  |                               |                  |
| 4. Traffic congestion, pollution and noise.  |   |                                     |                               |                                  |  |                               |                  |
| Removal of fine trees to provide for bridge over River H     Loss of a specially beautiful green field site                      | odnant.                                 |                                     |                               |                                  |  |                               |                  |
| 3f - Please outline the changes you wish to see made to the De   | eposit Plan to make it so               | ound (if relevant)                  |                               |                                  |  |                               |                  |
| 4b - If you wish to speak, please confirm which part of your rep   | resentation you wish to                 | speak to the inspector              | about and why th              | ey consider it be necessa        | ary to speak at the hea                          | <br>ring -                    |                  |

| Representor ID and details: 4155/DP1 Mr & Mrs C.B.Sir   | n  |  |  |  |   |  |
|---|--|--|--|--|---|--|
| Date Lodged     Status     Petition and No.     Supporting Evidence       30/03/2012     M     0  | e Additional SA SEA  | <u>Rep format:</u><br>Comment forr   | * *  | r comments to be consiere<br>a hearing session of Publi                              | ed by 'written representations' or do ic examination? Written   |  |
| 2a - Do you consider the LDP is Sound? Unsound  | Procedural Tests - P1 - Consistency Tests - C1 - Coherence and Effectiveness                       | Tests - CE1 - Unanswered   | swered C3 - Unanswe  | red C4 - Unanswere   | ad<br>4 - Unanswered  |  |
| 3a - Which part of the Deposit Plan are you commenting on?  | Policy Number:   | Paragraph Number:  | Proposal Map:  | <u>Constrain</u>   |   |  |
| 3b - Do you wish to see any changes made to the Deposit Plan  | as a result of your representat  | ion? Yes (   | If "No" or "Unanswered" -  | go to 3d)  |   |  |
| 3c - What changes would like to see made to the Deposit Plan  |  | ded Policy: New Paragraph: Unanswered  | Amended Paragraph:<br>Unanswered   | New Or Amended Site:<br>Unanswered   | Other (see Notes):<br>Unanswered  |  |
| 3d - If your representation relates to a new, deleted or amend  | ed site, did you submit the site a<br>Site Name:   | as a Candidate Site? No  | (If "Yes", please  | give the Candidate Site N<br>Site Reference:   | lame and reference if known)  |  |
| 3e - Please set out your representation below: St Cyres School, Dinas Powys The LDP proposal is to demolish the existing school build   | lings and build dwellings on the   | land and adjoining fields.   |  |  |   |  |
| We consider this public land should be retained and the Powys. The result is that parents dropping off and collect traffic at this school must be considerable and can only in  | ing infants from the school caus   | se congestion in Murch Road to   |  |  |   |  |
| It would be an obvious use of the existing St Cyres school  | ol buildings if the Infants School   | was transferred.   |  |  |   |  |
| In addition, for a considerable number of years, the Local Health Authority has attempted to find another site for the Dinas Powys Health Centre. A new site is required to enable the Centre to expand its facilities and to provide suitable parking, in particular, for the elderly population in Dinas Powys. Land could be provided on the St Cyres site to accommodate a new health centre. |  |  |  |  |   |  |
| Housing Proposal  |  |  |  |  |   |  |
| We are against the use of this land for housing for the re-<br>unacceptable. Murch Road between Camms Corner and<br>parking or the number of vehicles per household is great<br>until the road is clear of oncoming traffic before proceeding   | Windyridge, is congested alreader that the off-road parking which g. To add extra vehicles to this | dy with vehicles parked on either<br>h is available. As a result there is<br>situation would mean additional | r side of the road. This is be<br>s a "funnel" effect between<br>congestion at the Camms | ecause either the propertie<br>these two points with vehi<br>Corner end of Murch Roa | es concerned have no off-road<br>icles going one way having to stop<br>d and the Windyridge junction. |  |
| We are totally opposed to the opening of Windyridge to t pollution to the existing residents particularly at the antici   |  |  | t the road is inadequate to t  | ake any additional traffic o   | on the grounds of safety and  |  |
| 3f - Please outline the changes you wish to see made to the D   | eposit Plan to make it sound (if   |  |  |  |   |  |
| 4b - If you wish to speak, please confirm which part of your re   |  |  | hey consider it be necessa   | ry to speak at the hearing   | -   |  |

| Representor ID and details: 4155/DP2 Mr & Mrs C.B.Sim   |   |
|---|---|
| Date Lodged     Status     Petition and No.     Supporting Evidence       02/04/2012     M     □     0     □  | Additional SA SEA Rep format: 4a - do you want your comments to be consiered by 'written representations' or do Comment form you want to speak at a hearing session of Public examination? Written  |
| 2a - Do you consider the LDP is Sound? Unsound  | 2b - If you think that the Plan is unsound and does not not meet one or more test(s) of soundness, please indicate which test(s) that it fails.  Procedural Tests - P1 - Unanswered P2 - Unanswered |
|   | Consistency Tests - C1 - Yes C2 - Unanswered C3 - Unanswered C4 - Unanswered  |
|   | Coherence and Effectiveness Tests - CE1 - Unanswered CE2 - Yes CE3 - Unanswered CE4 - Unanswered  |
| 3a - Which part of the Deposit Plan are you commenting on?  | Policy Number:     Paragraph Number:     Proposal Map:     Constraints Map     Appendices:       23   |
| 3b - Do you wish to see any changes made to the Deposit Plan  | as a result of your representation? Yes (If "No" or "Unanswered" - go to 3d)  |
| 3c - What changes would like to see made to the Deposit Plan?   | New Policy: Amended Policy: New Paragraph: Amended Paragraph: New Or Amended Site: Other (see Notes): Unanswered Yes Unanswered Unanswered  Notes:  |
| 3d - If your representation relates to a new, deleted or amende   | d site, did you submit the site as a Candidate Site? No (If "Yes", please give the Candidate Site Name and reference if known) Site Name:   |
| 3e - Please set out your representation below: Under paragraph 5 (page 43 of the LDP) it states:-             |   |
| "All new developments that have a direct impact on the st   | rategic transportation infrastructure will be required to deliver appropriate improvements to the network". I assume this includes the network of roads.  |
| Following on from this in paragraph 5.63 reference is made  | e to Dinas Powys being a "key problem area" in respect of the scale of traffic and associated congestion on the A4055 in particular.  |
| It is my opinion that, at one time or another, whether for w  | ork or leisure all of the developments proposed in the LDP both commercial and housing will add to the traffic problems in Dinas Powys.   |
| The LDP does not make the Council's proposals condition moving or stationary vehicles along the Cardiff Road. | nal on the construction of a Dinas Powys By-Pass or suggest any other solutions to reduce the volume of traffic and the associated pollution from slow  |
| 3f - Please outline the changes you wish to see made to the D   | eposit Plan to make it sound (if relevant)  |
| 4b - If you wish to speak, please confirm which part of your rep  | resentation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -  |

| Representor ID and details: 4156/DP1 Mr Roy G Thoma  | as a second of the second of t |
|--|--|
| Date Lodged     Status     Petition and No.     Supporting Evidence       30/03/2012     M     □     0     □     | e Additional SA SEA Rep format: 4a - do you want your comments to be consiered by 'written representations' or do Letter you want to speak at a hearing session of Public examination?   |
| 2a - Do you consider the LDP is Sound? Unanswered  | 2b - If you think that the Plan is unsound and does not not meet one or more test(s) of soundness, please indicate which test(s) that it fails.  Procedural Tests - P1 - Unanswered P2 - Unanswered  |
|  | Consistency Tests - C1 - Unanswered C2 - Unanswered C3 - Unanswered C4 - Unanswered  |
|  | Coherence and Effectiveness Tests - CE1 - Unanswered CE2 - Unanswered CE3 - Unanswered CE4 - Unanswered  |
| 3a - Which part of the Deposit Plan are you commenting on?   | Policy Number: Paragraph Number: Proposal Map: Constraints Map Appendices:   |
|  | MG2  |
| 3b - Do you wish to see any changes made to the Deposit Pla  | n as a result of your representation? Unanswered (If "No" or "Unanswered" - go to 3d)  |
| 3c - What changes would like to see made to the Deposit Plar   | Unanswered Unanswered Unanswered Unanswered Unanswered   |
|  | Notes:   |
| 3d - If your representation relates to a new, deleted or amend   | ed site, did you submit the site as a Candidate Site? Unanswered (If "Yes", please give the Candidate Site Name and reference if known) Site Name:   |
| 3e - Please set out your representation below:  Vale of Glamorgan Deposit Local Development Plan 201             | 1- 2026  |
| I refer to the above plan and my comments are as follow  | s:   |
| Already the Cardiff Road from the centre of Dinas Powys Vale is going to make this inconvenient, expensive and f | s through to the Merrie Harrier is regularly restricted by a build up of traffic. The proposed housing developments in Dinas Powys and the south east of the rustrating situation worse.   |
| The need for a robust road infrastructure relieving the tra  | ffic congestion through Dinas Powys should be a high priority now and should be addressed and implemented prior to the housing developments.   |
| I believe that there should be an opportunity for the orga   | nisations involved in and making a profit from the housing developments to contribute to the wider issues, this would include the local highways network.  |
| 3f - Please outline the changes you wish to see made to the I  | Deposit Plan to make it sound (if relevant)  |
| 4b - If you wish to speak, please confirm which part of your re  | epresentation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -   |

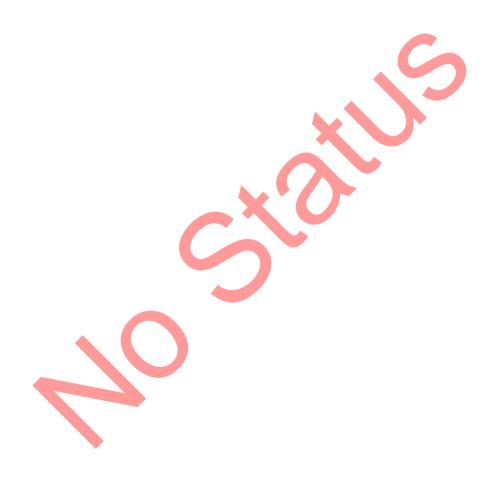
| Representor ID and details: 4157/DP1 Mr & Mrs T.C.Dorken   |             |
|--|-------------|
| Date Lodged       Status       Petition and No.       Supporting Evidence       Additional SA SEA       Rep format:       4a - do you want your comments to be consiered by 'written representations' or Comment form         30/03/2012       M       0       Comment form       you want to speak at a hearing session of Public examination? Written  | r do        |
| 2a - Do you consider the LDP is Sound? Unsound  2b - If you think that the Plan is unsound and does not not meet one or more test(s) of soundness, please indicate which test(s) that it fails.  Procedural Tests - P1 - Unanswered  Consistency Tests - C1 - Yes  C2 - Unanswered  C3 - Unanswered  C4 - Unanswered  Coherence and Effectiveness Tests - CE1 - Yes  CE2 - Unanswered  CE3 - Yes  CE4 - Yes  |             |
| 3a - Which part of the Deposit Plan are you commenting on? Policy Number: Paragraph Number: Proposal Map: Constraints Map Appendices:  MG2(16). MG2(17). MG2(18)   |             |
| 3b - Do you wish to see any changes made to the Deposit Plan as a result of your representation? Unanswered (If "No" or "Unanswered" - go to 3d)   |             |
| 3c - What changes would like to see made to the Deposit Plan?    New Policy:   Amended Policy:   Yes   Unanswered   Unansw |             |
| 3d - If your representation relates to a new, deleted or amended site, did you submit the site as a Candidate Site? No Site Name: (If "Yes", please give the Candidate Site Name and reference if known) Site Reference:   |             |
| 3e - Please set out your representation below:  1) The plan & SDA/SEA has failed to take adequate account of the indirect, secondary and cumulative effects of the housing allocations in the SE Vale area – communities of Sully, Penarth & Dinas Powys   |             |
| 2) The housing demand appears to have been determined on a need arising from growth in the Cardiff City region and is not based on evidenced local need of the existing communities in SE Vale.  3) Inadequate and unsatisfactory consideration has been given to the effects of the housing allocations (1590 units) on the existing transport, community, medical and educational infrastructure in SE Vale, particularly Penarth.   |             |
| 4) There are no firm proposals derived from a Transport Impact Assessment for new infrastructure to meet the travel demand from the housing allocation in the SE Vale.   |             |
| 5) The absence of effective and defined integrated transport provision will result in increased congestion on an already congested highway network, particularly at Dinas Powys, Penarth – (Redlands Road/Windsor Road) – Cogan, Merrie Harrier and Baron's Court junctions. The increased congestion will result in reductions in air quality standards, increased noise and community severance, which have been adequately assessed in the SEA. It is possible that increased emissions from traffic may result in breaches of the EU Air Quality levels. Increased noise levels may also breach EU Environmental No Objectives. There is a strong potential for a significant reduction in community health standards unless effective mitigation measures are provided.   | not<br>oise |
| 6) The proposed allocations for housing on Greenfield land (e.g. allocation M2(16) – Lower Penarth & MG2 (17) St Josephs) are intrinsically unsustainable until such time as all pre-developed or Brownfield have been utilised.   | sites       |
| 7) The Deposit Plan states that most residents from the housing allocations in the SE Vale will travel to Cardiff for employment and access to commercial/recreational and retail facilities. The LDP objective for sustainable communities and sustainable transport. However the Deposit Plan does not identify new or additional transport infrastructure in the SE Vale area to cater for the allocations – (Transport Poli SP7 includes no new transport provision to cover the future demand). The proposed housing allocations in the SE Vale area are therefore not sustainable or do not meet the plan objectives until such time new and enhanced integrated transport infrastructure is provided, supported by additional health, educational, employment and recreational resources within the established communities.  | icy         |
| 3f - Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)  1.Major housing allocations such as M2(16) in Lower Penarth should not be included in the LDP unless integrated and resourced transport infrastructure is provided, which can cater for constant and general traffic demand/travel demand.  | ated        |

(ordered by Representation ID No.)

Representor ID and details: 4157/DP1 Mr & Mrs T.C.Dorken

2. LDP housing allocations should only proceed if developers provide new transport infrastructure such as park & ride facilities at Penarth & Barry, a tram/guided bus system for the Cardiff City Region & additional bus and rail services, which reduce the need to travel by car within & through the SE Vale area.

4b - If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -



(ordered by Representation ID No.)

| Representor ID and details: 4158/DP1 Mrs Margaret J D  | avies   |   |   |
|--|---|---|---|
| Date Lodged     Status     Petition and No.     Supporting Evidence       02/04/2012     M     ✓     129     ✓ | Additional SA SEA   |   | want your comments to be consiered by 'written representations' or do speak at a hearing session of Public examination? Examination |
| 2a - Do you consider the LDP is Sound? Unanswered  |   | P2 - Unanswered                                 | t(s) of soundness, please indicate which test(s) that it fails.  Jnanswered C4 - Unanswered   |
|  | Coherence and Effectiveness Tests - CE1 -                       | Unanswered CE2 - Unanswer                       | ed CE3 - Unanswered CE4 - Unanswered  |
| 3a - Which part of the Deposit Plan are you commenting on?   | Policy Number: Paragraph  |   | Constraints Map Appendices:  Penarth Learning   |
| 3b - Do you wish to see any changes made to the Deposit Plan   | as a result of your representation? Yes                         | (If "No" or "Unans                              | wered" - go to 3d)  |
| 3c - What changes would like to see made to the Deposit Plan?  | <del></del>   | New Paragraph: Amended Pa Unanswered Unanswered | ragraph: New Or Amended Site: Other (see Notes): Yes Unanswered   |
| 3d - If your representation relates to a new, deleted or amende  | ed site, did you submit the site as a Candidate S<br>Site Name: | Site? Unanswered (If "Yes                       | , please give the Candidate Site Name and reference if known) Site Reference:   |

3e - Please set out your representation below:

The site is unsuitable for a learning community as there is no suitable access. Problems already experienced at St. Cyres Road and Redlands Avenue with traffic and pedestrians to 2 schools - St. Cyres Upper Comprehensive and Erw'r Delyn School for the physically handicapped; at Norris Close with traffic to Pen y Garth Welsh Primary School; at Sully Road, Erw'r Delyn Close, Meadowside and Cross Common Road with traffic to 3 schools - Ashgrove School for disabled children, Pen y Garth Welsh Primary School and St. Joseph's RC Primary School.

Now I understand the proposal is to combine St. Cyres Comprehensive Upper and Lower Schools (the lower school site in Dinas Powys to be designated for housing), a disabled school from Barry Maes Dyfan, Erw'r Delyn School and Ashgrove School. Despite Dr. Hicks, Headmaster of St. Cyres School and Vale officials assuring us there will be a reduced number of pupils to both comprehensive and disabled schools it will still be a great increase in numbers seeking access off Sully Road - 7 schools off a country road with horse riding schools, farms, a nursing home, hotel, church and garden centre all needing to use this road, if the road is to be improved the whole nature of this rural area will be altered.

Very little consultation has taken place but at a consultative event on January 19th 2012 we were urged to request for as many car park spaces as possible so that we would no longer have cars parked on our roads. At a meeting with Dr. Hicks on 6th February 2012 he made the same request saying they would need 350 car park spaces for teaching and ancillary staff. He told me he came to school by car as did all his teachers, that they were unable to use public transport, walk or cycle as had too much to carry and were unable to share lifts as lived in different localities yet in the leaflet handed to us at the consultative event it states that as part of the sustainability measures there will be development of a "green travel plan" to reduce the dependency on car usage of both staff and pupils. The Headmaster's statements are in complete contradiction to this. A suggestion was made at the meeting on January 19th by one of the local residents that to be totally green entrance to the school by pupils should be by bus only. This of course would not be possible for the pupils of Ashgrove School who have to come to school in individual taxis such is their disability. Consultations promised for February never took place. The event in January was not locally advertised, only residents of Erw'r Delyn Close received a letter for the afternoon session.

Numerous letters have been written to Council officials - some not even acknowledged.

Enclosed is petition of around 150 signatures with comments and attachments, one attachment showing traffic problems have been present since 1987 when South Glamorgan Council were petitioned.

Copy of comments made at consultative event 19th January 2012 at St. Cyres School.

Copy of letter confirming consultation meetings would be held in February 2012 and that they would be locally advertised.

Copy of some of letters sent to Council officers with copies of replies where received.

(ordered by Representation ID No.)

Representor ID and details: 4158/DP1 Mrs Margaret J Davies

Copy of Vaughan Gething A.M's letter dated 1st March 2012 to one of Vale Councillors. To date we have not been told of any response.

Copy of letters written to Jane Hutt A.M. and Vaughan Gething A.M. with my concerns.

Copy letter of one of St. Cyres School governors printed in "Penarth Times" with traffic concerns.

Copy of letter sent to Welsh Ministers objecting to the change of category of St. Cyres School from a foundation to a learning community.

- 3f Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
- 4b If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing The access to the school. Residents of Sully Road, Erw'r Delyn Close, Meadowside, Cross Common Road and Norris Close have formed an association and intend to instruct a planner once plans are submitted for the Learning Community. We are also having discussions with a police officer regarding traffic on Sully Road and report of a crime prevention team. I would appreciate having this information to hand when speaking to the Inspector.

| Representor ID and details: 4158/DP2 Mrs Margaret J D  | avies   |   |  |
|--|---|---|--|
| Date Lodged     Status     Petition and No.     Supporting Evidence       02/04/2012     M     □     0                 | Additional SA SEA   | <del></del> , ,   | be consiered by 'written representations' or do<br>sion of Public examination? Written |
| 2a - Do you consider the LDP is Sound? Unanswered  | 2b - If you think that the Plan is unsound and Procedural Tests - P1 - Unanswered | does not not meet one or more test(s) of soundness, plea P2 - Unanswered  | se indicate which test(s) that it fails.   |
|  | Consistency Tests - C1 - Unanswered   | C2 - Unanswered C3 - Unanswered C4 -  | Unanswered   |
|  | Coherence and Effectiveness Tests - CE1 -   | Unanswered CE2 - Unanswered CE3 - Unanswe   | ered CE4 - Unanswered  |
| 3a - Which part of the Deposit Plan are you commenting on?   | Policy Number: Paragraph  | Number: Proposal Map:   | Constraints Map Appendices:  |
|  | MG28(1). MG28(2)  |   |  |
| 3b - Do you wish to see any changes made to the Deposit Plan   | as a result of your representation? Unansw  | rered (If "No" or "Unanswered" - go to 3d)  |  |
| 3c - What changes would like to see made to the Deposit Plan   |   | New Paragraph: Amended Paragraph: New Or Ame Unanswered Unanswered Yes  | ended Site: Other (see Notes): Unanswered  |
|  | Notes:  |   |  |
| 3d - If your representation relates to a new, deleted or amende  | ed site, did you submit the site as a Candidate Site Name:                        |   | didate Site Name and reference if known) eference:                                     |
| 3e - Please set out your representation below:<br>MG28(1) extension of Cosmeston Country Park                          |   |   |  |
| No objection to the extension of this park so long as agric  | ultural land is not lost and a wildlife corridor is                               | pr <mark>es</mark> erved alongside.   |  |
| I am concerned about traffic using Sully Road to enter the   | e park as this country road is already experience                                 | ing severe traffic problems.  |  |
| MG28 (2) extension of Porthkerry Park  |   |   |  |
| This park is already extensive with ample space for the green Porthkerry. My late husband is buried there and although |   | extend it and thereby lose agricultural land. I also have coublic are encouraged to access this site by including it in t |  |
| Enclosed map showing agricultural land at Porthkerry Gra   | ade2 / Grade 4  |   |  |
| 3f - Please outline the changes you wish to see made to the D  | peposit Plan to make it sound (if relevant)                                       |   |  |
| 4h - If you wish to speak inlease confirm which part of your re  | oresentation you wish to speak to the inspector                                   | ahout and why they consider it he necessary to speak at   | the hearing -  |

| Representor ID and details: 4158/DP3 Mrs Margaret J D  | avies   |   |  |  |   |   |  |
|--|---|---|--|--|---|---|--|
| Date Lodged     Status     Petition and No.     Supporting Evidence       02/04/2012     M     □     0   | Additional SA SEA                             |   | Rep format:<br>Comment form            | you want to speak  | at a hearing session                        | e consiered by 'written re<br>n of Public examination | •  |
| 2a - Do you consider the LDP is Sound? Unanswered  | Consistency Tests - C1                        | - Unanswered<br>- Unanswered                  | oes not not meet P2 - Unans C2 - Unans | wered C3 - Unans   | soundness, please                           | indicate which test(s) the                            |  |
|  | Coherence and Effectivene                     | ss lests - CE1 - C                            | Jnanswered                             | CE2 - Unanswered   | CE3 - Unanswered                            | d CE4 - Unanswere                                     |  |
| 3a - Which part of the Deposit Plan are you commenting on?   | Policy Number:                                | Paragraph N                                   | Number:                                | Proposal Map:  |   | Constraints Map                                       | Appendices:                                |
|  | MG2(17)                                       |   |  | Fields beyond S<br>Primary School Penar<br>70 dwellings access to<br>Road. | th designated for                           |   |  |
| 3b - Do you wish to see any changes made to the Deposit Plan   | as a result of your represer                  | ntation? Yes                                  | (If                                    | "No" or "Unanswered  | " - go to 3d)                               |   |  |
| 3c - What changes would like to see made to the Deposit Plan   |   |   | lew Paragraph:<br>Inanswered           | Amended Paragrap<br>Unanswered   | <u>New Or Amende</u><br>Yes                 | ed Site: Other (see No<br>Unanswered                  | <u>tes):</u>                               |
|  | Notes:  |   |  |  |   |   |  |
| 3d - If your representation relates to a new, deleted or amende  | ed site, did you submit the sit<br>Site Name: | te as a Candidate Si                          | ite? Unanswer                          | red (If "Yes", plea  | ase give the Candida<br>Site Refer          | ate Site Name and refer<br>ence:                      | rence if known)                            |
| 3e - Please set out your representation below:   |   |   |  |  |   |   |  |
| I note in the adopted Vale of Glamorgan Unitary Develop local residents have informed me the land has flooded wi   |   |   |  | d I feel it should contin  | ue within the Green                         | Wedge in the Local De                                 | velopment Plan. Also                       |
| I also note the development is subject to improvements to safeguarding hedgerows, providing cycle paths, bridle pa |   |   |  |  |   | tment required to impro                               | ove this road -                            |
| Where are the facilities for such a development. Vale offi reduced. At present many of us living on and off Sully Ro a high proportion of young families needing schooling and   | ad have lived <mark>here many</mark> yea      | ster of St. Cyres Con<br>ars and are now pens | mprehensive Sch<br>sioners. The like   | nool have said that nun<br>lihood with new develo                          | nbers to the comprel<br>opments planned for | nensive and disabled so<br>Penarth and Dinas Pov      | chools are to be wys is that there will be |
| Map enclosed showing Grade 4 agricultural land.  |   |   |  |  |   |   |  |
| 3f - Please outline the changes you wish to see made to the D  | eposit Plan to make it sound                  | d (if relevant)                               |  |  |   |   |  |
| 4b - If you wish to speak, please confirm which part of your re  | presentation you wish to spe                  | eak to the inspector a                        | about and why th                       | ey consider it be neces  | ssary to speak at the                       | hearing -   |  |

| Representor ID and details: 4158/DP4 Mrs Margaret J D  | avies  |  |  |  |                           |
|--|--|--|--|--|---------------------------|
| Date Lodged     Status     Petition and No.     Supporting Evidence       02/04/2012     M     0     ✓   | Additional SA SEA  | Rep format:<br>Comment forr                        |  | ments to be consiered by 'written<br>uring session of Public examination |                           |
| 2a - Do you consider the LDP is Sound? Unanswered  | 2b - If you think that the Plan is u<br>Procedural Tests - P1 - Un | nsound and does not not mee<br>answered P2 - Unans | ` '                                      | ess, please indicate which test(s)                                       | that it fails.            |
|  | Consistency Tests - C1 - Un  | answered C2 - Unans                                | swered C3 - Unanswered                   | C4 - Unanswered  |                           |
|  | Coherence and Effectiveness Tes                                    | ts - CE1 - Unanswered                              | CE2 - Unanswered CE3 - I                 | Unanswered CE4 - Unanswe   | red                       |
| 3a - Which part of the Deposit Plan are you commenting on?   | Policy Number:   | Paragraph Number:                                  | Proposal Map:                            | Constraints Map  | Appendices:               |
|  |  |  | 13. MG13                                 |  |                           |
| 3b - Do you wish to see any changes made to the Deposit Plan   | as a result of your representation                                 | ? Yes (I   | f "No" or "Unanswered" - go to           | 3d)  |                           |
| 3c - What changes would like to see made to the Deposit Plan   | ? New Policy: Amended Unanswered Unanswered                        |  | Amended Paragraph: New<br>Unanswered Yes | Or Amended Site: Other (see N<br>Unanswered                              |                           |
|  | Notes:   |  |  |  |                           |
| 3d - If your representation relates to a new, deleted or amende  | ed site, did you submit the site as a<br>Site Name:                | Candidate Site? Unanswe                            | red (If "Yes", please give t             | the Candidate Site Name and refe<br>Site Reference:                      | erence if known)          |
| 3e - Please set out your representation below:<br>Rail Link – MG 20  |  |  |  |  |                           |
| There is already a train link to Rhoose so this would be a a shuttle bus from the centre of Cardiff as most modern a car but they have a good shuttle bus service from Bristol | irports servicing a capital city succ                              |  |  |  |                           |
| Adjacent site to Cardiff Airport and Port Road – MG 13   |  |  |  |  |                           |
| Land allocated for 77.4 hectares of employment.  |  |  |  |  |                           |
| There is already a site of some $70 - 80$ acres on which pl the county.  | anning permission has been grant                                   | ed so why not use this rather                      | than jeopardising people's livelih       | noods and minimising the quantity  | y of agricultural land in |
| It is also important that people arriving at Cardiff airport sl  | nould immediately see the beauty                                   | of the Welsh countryside - the                     | e lovely Vale of Glamorgan – rat         | ther than a business park.   |                           |
| Enclosed map showing quality of agricultural land at Portl   | nkerry grade 2/4.  |  |  |  |                           |
| 3f - Please outline the changes you wish to see made to the D  | eposit Plan to make it sound (if re                                | evant)   |  |  |                           |
| 4b - If you wish to speak, please confirm which part of your rep   | presentation you wish to speak to t                                | he inspector about and why the                     | hey consider it be necessary to          | speak at the hearing -   |                           |

| Representor ID and details: 4159/DP1 John Huw William  | ns  |  |                               |                                |                                |  |                                      |
|--|---|--|-------------------------------|--------------------------------|--------------------------------|--|--------------------------------------|
| Date Lodged     Status     Petition and No.     Supporting Evidence       02/04/2012     M     0   | Additional SA SEA                             |  | Rep format:<br>Comment form   |                                |                                | be consiered by 'writter<br>ion of Public examination  | n representations' or do on? Written |
| 2a - Do you consider the LDP is Sound? Unanswered  | 2b - If you think that the Procedural Tests - | ne Plan is unsound and<br>P1 - Yes               | does not not meet<br>P2 - Yes | one or more test(s) of         | soundness, pleas               | se indicate which test(s)  | ) that it fails.                     |
|  | Consistency Tests -                           | C1 - Yes   | C2 - Yes                      | C3 - Yes                       | C4 -                           | Yes  |                                      |
|  | Coherence and Effect                          | iveness Tests - CE1 -                            | Yes                           | CE2 - Yes                      | CE3 - Yes                      | CE4 - Yes  |                                      |
| 3a - Which part of the Deposit Plan are you commenting on?   | Policy Number:                                | Paragraph  | Number:                       | Proposal Map:                  |                                | Constraints Map  | Appendices:                          |
|  | MG2(19)                                       |  |                               |                                |                                |  |                                      |
| 3b - Do you wish to see any changes made to the Deposit Plan   | as a result of your rep                       | resentation? Yes                                 | (If                           | "No" or "Unanswered            | " - go to 3d)                  |  |                                      |
| 3c - What changes would like to see made to the Deposit Plan?  | New Policy: Unanswered                        |  | New Paragraph:<br>Unanswered  | Amended Paragram<br>Unanswered | oh: New Or Amer<br>Unanswered  | nded Site: Other (see Number of State Other other Other (see Number of State Other Othe |                                      |
|  | Notes:  |  |                               |                                |                                |  |                                      |
| 3d - If your representation relates to a new, deleted or amende  | •   | the site as a Candidate<br>Lower site Murch Road |                               | (If "Yes", plea                | ase give the Candi<br>Site Ref | date Site Name and reference:  | ference if known)                    |
| 3e - Please set out your representation below:   |   |  |                               | *                              |                                |  |                                      |
| The Vale Council must first give consideration to establish in turn will increase emissions from these cars lorries etc. you will receive from residents, the Vale council have an o | NO2, CO, PM10s. Ma                            | ssive structural impacts                         | s on these areas i            | .e. Cross Common Bri           | dge, Murch Road                | Bridge must be resolve   |                                      |
| 3f - Please outline the changes you wish to see made to the D  | eposit Plan to make it s                      | sound (if relevant)                              |                               |                                |                                |  |                                      |
| Responsibility must also be shown by the council to the ed<br>(Murch Road). Council to save money on headteacher, on<br>two schools at St Cyres this would allow space to construct  | nly one needed!! This w                       | vould give our present c                         |                               |                                |                                |  |                                      |
| 4h - If you wish to speak please confirm which part of your ren  | presentation you wish to                      | n sneak to the inspector                         | ahout and why th              | ev consider it he nece         | seary to speak at t            | the hearing -  |                                      |

| Representor ID and details: 4160/DP1 Mr Richard, Mrs S  | Sian & Ms Sarah Ellis  |  |   |
|---|--|--|---|
| Date Lodged     Status     Petition and No.     Supporting Evidence       30/03/2012     M     □     0     □      | Additional SA SEA  |  | ur comments to be consiered by 'written representations' or do t a hearing session of Public examination?               |
| 2a - Do you consider the LDP is Sound? Unanswered   | 2b - If you think that the Plan is unsound and d<br>Procedural Tests - P1 - Unanswered | oes not not meet one or more test(s) of s<br>P2 - Unanswered | oundness, please indicate which test(s) that it fails.  |
|   | Consistency Tests - C1 - Unanswered  | C2 - Unanswered C3 - Unansw                                  | ered C4 - Unanswered  |
|   | Coherence and Effectiveness Tests - CE1 -  | Jnanswered CE2 - Unanswered                                  | CE3 - Unanswered CE4 - Unanswered   |
| 3a - Which part of the Deposit Plan are you commenting on?  | Policy Number: Paragraph   | Number: Proposal Map:  | Constraints Map Appendices:   |
|   | MG2(19)  |  |   |
| 3b - Do you wish to see any changes made to the Deposit Plan  | as a result of your representation? Unanswe  | red (If "No" or "Unanswered" -                               | go to 3d)   |
| 3c - What changes would like to see made to the Deposit Plan'   |  | lew Paragraph: Amended Paragraph  Unanswered Unanswered      | New Or Amended Site: Other (see Notes): Unanswered Unanswered   |
|   | Notes:   |  |   |
| 3d - If your representation relates to a new, deleted or amende   | d site, did you submit the site as a Candidate S<br>Site Name:                         | ite? Unanswered (If "Yes", please                            | e give the Candidate Site Name and reference if known)<br>Site Reference:   |
| 3e - Please set out your representation below: We are writing to you regarding the Vale of Glamorgan De           | eposit Local Development Plan 2011 - 2026.   |  |   |
| We are appalled by the proposal to build 400+ houses on forseeable future.  | the St Cyres school site at the top of Murch Ro  | ad. To put it simply, the infrastructure for                 | such as development is not in place and will not be for the   |
|   |  |  | present, so the proposal to build more housing which would ead without adequate provision being made for amenities such |
| We appreciate that provision has to be made for future gr<br>before commencing development. The present proposals |  |  | sites be chosen where the infrastructure could be established   |
| 3f - Please outline the changes you wish to see made to the D   | eposit Plan to make it sound (if relevant)   |  |   |
| 4b - If you wish to speak, please confirm which part of your rep  | presentation you wish to speak to the inspector  | about and why they consider it be necess                     | ary to speak at the hearing -   |

(ordered by Representation ID No.)

| Representor ID and details: 4161/DP1 Mrs Kate Rice               |   |  |                              |                                 |   |                            |                                   |
|--|---|--|------------------------------|---------------------------------|---|----------------------------|-----------------------------------|
| Date LodgedStatusPetition and No.Supporting Evidence30/03/2012M0 | Additional SA SEA                       |  | Rep format:<br>Comment form  | ,                               | ur comments to be co<br>at a hearing session of | •                          | representations' or do n? Written |
| 2a - Do you consider the LDP is Sound? Unsound                   | Procedural Tests -                      | ne Plan is unsound and P1 - Unanswered C1 - Unanswered | P2 - Unansw                  | ered                            | coundness, please indi                          |                            | that it fails.                    |
|  |   | iveness Tests - CE1 -                                  |                              |                                 | CE3 - Unanswered                                |                            | red                               |
| , , ,  | Policy Number:<br>MG2(13)               | <u>Paragraph</u><br>                                   |                              | Proposal Map:                   | <u>Cor</u><br>                                  | nstraints Map              | Appendices:                       |
| 3b - Do you wish to see any changes made to the Deposit Plan     | as a result of your rep                 | resentation? Yes                                       | (If "                        | No" or "Unanswered"             | - go to 3d)                                     |                            |                                   |
| 3c - What changes would like to see made to the Deposit Plan     | ? New Policy:<br>Unanswered<br>Notes:   |  | New Paragraph:<br>Unanswered | Amended Paragraph<br>Unanswered | n: New Or Amended S<br>Yes                      | Other (see N<br>Unanswered | otes):                            |
| 3d - If your representation relates to a new, deleted or amende  | ed site, did you submit t<br>Site Name: | the site as a Candidate                                | Site? Yes                    | (If "Yes", please               | e give the Candidate S<br>Site Referenc         |                            | erence if known)                  |
| 3a - Please set out your representation helow:                   |   |  |                              |                                 |   |                            |                                   |

Within the Deposit Draft LDP supporting document- Designation of Special Landscape Areas (2008), the site allocated as MG2(13) is clearly shown as forming an integral part of the Lower Thaw Special Landscape Area (SLA 2— Upper and Lower Thaw Valley).

Para 5.3.11 of Planning Policy Wales (Edition 4, February 2011) (PPW) states that 'non statutory designations such as Special Landscape Areas or Sites of Importance for Nature Conservation should be solidly based on a formal scientific assessment of the nature conservation, landscape or geological value of the site.' This is what has occurred with the SLA designation report, incorporating the use of LANDMAP assessment methodology and a methodology for the designation of SLAs agreed with other South East Wales Local Planning Authorities. However, this approach has been undermined by the exclusion of site MG2 (13) from the SLA boundary where it has been transposed to the proposals map, without explanation of why this has been done.

Within the 2008 SLA supporting document the description of the Lower Thaw Valley highlights its 'dramatic valley form' and says it is a 'relatively uncommon' landscape. This document also points out that the landscape character is already being eroded by suburban development. The location of site MG2(13) extending southwards over the ridgeline and into the steep sided narrow valley will clearly only exacerbate this situation further. Para 3.2.2 of PPW states that Local Planning Authorities should consider the effect of development upon the conservation of landscape. Development of this site would clearly not achieve

PPW further sets out in para 4.1.7 the five main themes of the Welsh Government's Environment Strategy and Action Plan, one of which is to ensure distinctive biodiversity, landscapes and seascapes. Development of this site would clearly have a negative impact upon a relatively uncommon landscape which would be contrary to themes of the Environment Strategy.

Para 4.4.2 of PPW also states that planning policies and proposals should promote the 'conservation of biodiversity, habitats and landscapes' - again something which will not be achieved through the allocation of site MG2(13) for development.

#### Para 4.5.4 of PPW goes on to state:

Site MG2 (13)

'The countryside is a dynamic and multipurpose resource. In line with sustainability principles, it must be conserved and, where possible, enhanced for the sake of its ecological, geological, physiographical, historical, archaeological and agricultural value and for its landscape and natural resources, balancing the need to conserve these attributes against the economic, social and recreational needs of local communities and visitors.'

The Council's own supporting document states the features of the Lower Thaw valley are relatively uncommon and are already being eroded by suburban development around Cowbridge. These are not replaceable or frequently occurring features and as such it would be unsustainable to develop the site.

(ordered by Representation ID No.)

Representor ID and details: 4161/DP1 Mrs Kate Rice

Development of this site is also against the LDP's own aims and objectives. Objective 4 states:

'Objective 4—To protect and enhance the Vale of Glamorgan's historic, built and natural environment'

4.8. The historic, built and natural environment of the Vale of Glamorgan is highly valued by residents and visitors and includes European, national and local designations which provide local identify and distinctiveness and present opportunities for recreation and tourism. The LDP will ensure that these natural and built environment assets are protected, conserved and where appropriate enhanced as an important resource for local people and which attract visitors and contributes to the local economy.'

Allocation of site MG2 (13) clearly does not meet this objective. No justification is given for the exclusion of the site from the SLA boundary. The topography of the site clearly relates to the narrow Lower Thaw valley and extends the sprawl of Cowbridge in this southerly direction, exacerbating the already recognised problem of suburban development impacting negatively upon a relatively uncommon landscape.

LDPs must be found to be sound and based on credible evidence. In this instance I assert that the inclusion of this site for residential purposes is contrary to 3 key Welsh Government soundness tests, namely:

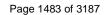
- Does it have regard to national policy?- no it doesn't as set out above:
- Does it set out a coherent strategy from which policies and allocations flow?- no it doesn't as the inclusion of this site clearly contradicts the LDPs own objectives;
- Are strategy, policy and allocations realistic and appropriate?- no they are not as this site clearly forms part of the Lower Thaw SLA designation.

On this basis I believe that the inclusion of this site could render the LDP unsound, and could jeopardise the adoption process of the LDP.

The allocation of the site is also clearly contrary to the Council's own objectives and comprehensive review of SLAs and therefore cannot be considered to be a sustainable use of land.

3f - Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant) I would like residential site MG2(13) removed from the deposit plan.

4b - If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -



| Representor ID and details: 4162/DP1 NA & RH Jones  |   |  |                                    |                              |                               |  |                         |
|---|---|--|------------------------------------|------------------------------|-------------------------------|--|-------------------------|
| Date Lodged<br>03/04/2012Status<br>MPetition and No.<br>DSupporting Evidence<br>D000                              | e Additional SA SEA                             |  | Rep format:<br>Comment form        | *                            |                               | be consiered by 'writter<br>sion of Public examinati |                         |
| 2a - Do you consider the LDP is Sound? Unsound  | 2b - If you think that th<br>Procedural Tests - | e Plan is unsound and<br>P1 - Unanswered | does not not mee<br>P2 - Unans     | ( ,                          | of soundness, pleas           | se indicate which test(s                             | ) that it fails.        |
|   | Consistency Tests -                             | C1 - Unanswered                          | C2 - Unans                         | swered C3 - Una              | nswered C4 -                  | Yes  |                         |
|   | Coherence and Effecti                           | veness Tests - CE1                       | - Unanswered                       | CE2 - Yes                    | CE3 - Unanswe                 | red CE4 - Unanswe                                    | ered                    |
| 3a - Which part of the Deposit Plan are you commenting on?  | Policy Number:                                  | <u>Paragraph</u>                         | Number:                            | Proposal Map:                |                               | Constraints Map                                      | Appendices:             |
|   | MG2(4)  |  |                                    |                              |                               |  |                         |
| 3b - Do you wish to see any changes made to the Deposit Pla   | n as a result of your rep                       | esentation? Yes                          | (11                                | f "No" or "Unanswere         | ed" - go to 3d)               |  |                         |
| 3c - What changes would like to see made to the Deposit Plan  | n? <u>New Policy:</u><br>Unanswered             | Amended Policy:<br>Unanswered            | New Paragraph:<br>Unanswered       | Amended Paragr<br>Unanswered | raph: New Or Amer             | nded Site: Other (see I                              | <del></del>             |
|   | Notes:  |  |                                    |                              |                               |  |                         |
| 3d - If your representation relates to a new, deleted or amend  | led site, did you submit t<br>Site Name:        | he site as a Candidate                   | Site? Unanswe                      | red (If "Yes", pl            | ease give the Cand<br>Site Re | idate Site Name and reference:                       | ference if known)       |
| 3e - Please set out your representation below:  |   |  |                                    | <del>y</del>                 |                               |  |                         |
| We feel that the additional housing in and around Highliq already hazardous due to the amount and speed of traffi |   |  | sure on the A4226                  | 6 Port Road. This will       | have a knock on ef            | fect to the Weycock Cro                              | oss roundabout which is |
| Having the additional traffic so close to the school, fire s at peak times now.                                   | tation and Tesco will incr                      | rease the risk of more a                 | ac <mark>cid</mark> ents already l | happening. Accessin          | g and exiting the A4          | 226 Port Road is alread                              | dy hazardous especially |
| More housing will result in increased residents which will  | put more strain on our a                        | already busy and strugg                  | gling Barry Hospita                | al and NHS dentist.          |                               |  |                         |
| 3f - Please outline the changes you wish to see made to the   | Deposit Plan to make it s                       | sound (if relevant)                      |                                    |                              |                               |  |                         |
| 4h - If you wish to speak please confirm which part of your re  | enresentation you wish to                       | speak to the inspecto                    | r about and why th                 | nev consider it be ned       | ressary to speak at           | the hearing -  |                         |

| Representor I              | ID and d    | etails:   | 4163/D          | P1 Mr Bernard Pope      | •  |   |                                  |                                       |                                 |   |                                      |
|----------------------------|-------------|-----------|-----------------|-------------------------|--|---|----------------------------------|---------------------------------------|---------------------------------|---|--------------------------------------|
| Date Lodged<br>02/04/2012  | Status<br>M | Petitio   | on and No.<br>0 | Supporting Evidence     | Additional SA SEA  |   | Rep format:<br>Comment forr      |                                       |                                 | pe consiered by 'writter<br>ion of Public examinati | n representations' or do on? Written |
| 2a - Do you co             | onsider th  | e LDP     | is Sound?       | Unsound                 | 2b - If you think that the Procedural Tests -            | ne Plan is unsound and<br>P1 - Unanswered | d does not not mee<br>P2 - Unans | et one or more test(s) of s<br>swered | soundness, pleas                | e indicate which test(s                             | ) that it fails.                     |
|                            |             |           |                 |                         | Consistency Tests -                                      | C1 - Unanswered                           | C2 - Unans                       | swered C3 - Unansw                    | vered C4 - l                    | Jnanswered  |                                      |
|                            |             |           |                 |                         | Coherence and Effect                                     | iveness Tests - CE1                       | - Unanswered                     | CE2 - Unanswered                      | CE3 - Unanswer                  | ed CE4 - Unanswe                                    | ered                                 |
| 3a - Which par             | rt of the [ | Deposit   | Plan are y      | ou commenting on?       | Policy Number:<br>SP2(2). Delivery and<br>Implementation | <u>Paragrap</u><br>                       | h Number:                        | Proposal Map:                         |                                 | Constraints Map                                     | Appendices:                          |
| 3b - Do you wi             | ish to see  | any ch    | nanges ma       | de to the Deposit Pla   | n as a result of your rep                                | resentation? Yes                          | <u> </u>                         | f "No" or "Unanswered"                | - go to 3d)                     |   |                                      |
| 3c - What char             | nges wou    | uld like  | to see mad      | de to the Deposit Plan  | ? New Policy:<br>Unanswered                              | Amended Policy:<br>Yes                    | New Paragraph:<br>Unanswered     | Amended Paragraph<br>Unanswered       | n: New Or Amen<br>Yes           | ded Site: Other (see I                              | <del></del>                          |
|                            |             |           |                 |                         | Notes:   |   |                                  |                                       |                                 |   |                                      |
| 3d - If your rep           | presenta    | tion rela | ates to a n     | ew, deleted or amend    | ed site, did you submit t<br>Site Name:                  | he site as a Candidate                    | Site? No                         | (If "Yes", pleas                      | se give the Candid<br>Site Refe | date Site Name and release                          | ference if known)                    |
| 3e - Please se<br>To remov | ,           |           |                 |                         | ew access from B4265                                     | to the south from the L                   | _DP.                             |                                       |                                 |   |                                      |
|                            |             |           |                 |                         | side proposals for a unit<br>en granted outline plann    |   | Academy at the Mo                | DD St Athan" - which will             | no longer be buil               | t. Also remove " and fr                             | om the MOD St Athan                  |
| The north                  | hern acce   | ess roa   | d is no lon     | ger required as the tra | ining academy is not be                                  | eing built at St Athan, a                 | also assurance wa                | s given to Llanmaes C.C               | bythe petitions c               | ommittee that the road                              | would not be built.                  |
| 3f - Please ou<br>As above |             | change    | es you wish     | n to see made to the [  | Deposit Plan to make it                                  | sound (if relevant)                       |                                  |                                       |                                 |   |                                      |
| 4h - If you wis            | sh to spe   | ak, plea  | se confirm      | which part of your re   | presentation you wish to                                 | speak to the inspecto                     | or about and why t               | nev consider it be necess             | sary to speak at t              | he hearing -  |                                      |

| Representor ID and details: 4164/DP1 Mrs Patricia Price  | )   |  |                                |                                       |                       |   |                      |
|--|---|--|--------------------------------|---------------------------------------|-----------------------|---|----------------------|
| Date Lodged     Status     Petition and No.     Supporting Evidence       30/03/2012     M     0   | Additional SA SEA   |  | Rep format:<br>Comment form    | · · · · · · · · · · · · · · · · · · · |                       | o be consiered by 'writter<br>ssion of Public examination | •                    |
| 2a - Do you consider the LDP is Sound? Unsound   | ,   | Plan is unsound and<br>P1 - Unanswered       | does not not mee<br>P2 - Unans | ` '                                   | soundness, plea       | ase indicate which test(s)                                | that it fails.       |
|  | Consistency Tests -   | C1 - Yes                                     | C2 - Unans                     | wered C3 - Unans                      | swered C4 -           | Unanswered  |                      |
|  | Coherence and Effective   | veness Tests - CE1 -                         | Unanswered                     | CE2 - Unanswered                      | CE3 - Yes             | CE4 - Unanswe   | ered                 |
| 3a - Which part of the Deposit Plan are you commenting on?   | Policy Number:  | <u>Paragraph</u>                             | Number:                        | Proposal Map:                         |                       | Constraints Map   | Appendices:          |
|  |   |  |                                | MG2(13)                               |                       |   |                      |
| 3b - Do you wish to see any changes made to the Deposit Plan   | as a result of your repre   | esentation? Yes                              | (li                            | f "No" or "Unanswered                 | " - go to 3d)         |   |                      |
| 3c - What changes would like to see made to the Deposit Plan   | •   |  | New Paragraph:<br>Unanswered   | Amended Paragram<br>Unanswered        | oh: New Or Ame<br>Yes | ended Site: Other (see N                                  | <del></del>          |
|  | Notes:  |  |                                |                                       |                       |   |                      |
| 3d - If your representation relates to a new, deleted or amende  | ed site, did you submit th<br>Site Name: Land to we   |  |                                |                                       | •                     | didate Site Name and ref<br>eference: 2446/CS1, 244       | ,                    |
| 3e - Please set out your representation below:  What consideration has been given- if at all- to the following lift at all- to | let", selling for profit Cardiff-Bridgend-Barry bridge has reached satur d sites with devastating i | ration point.<br>impact on the Vale in g     | general and Cowb               | ridge in particular. Onc              | e lost, this uniqu    | e character will be lost fo                               | r ever. Sympathy and |
| 3f - Please outline the changes you wish to see made to the D  Have candidate site removed and include as a green wed  | eposit Plan to make it so<br>ge to prevent further dev  | bund (if relevant)<br>velopment consideratio |                                |                                       |                       |   |                      |
| 4b - If you wish to speak, please confirm which part of your rep   | presentation you wish to  | speak to the inspector                       | about and why th               | nev consider it be nece               | ssarv to speak a      | t the hearing -   |                      |

| Representor ID and details: 4165/DP1 A F Thomas  |   |
|--|---|
| Date Lodged     Status     Petition and No.     Supporting Evidence       02/04/2012     M     0                         | Additional SA SEA Rep format: 4a - do you want your comments to be consiered by 'written representations' or do Comment form you want to speak at a hearing session of Public examination? Written  |
| 2a - Do you consider the LDP is Sound? Unsound   | 2b - If you think that the Plan is unsound and does not not meet one or more test(s) of soundness, please indicate which test(s) that it fails.  Procedural Tests - P1 - Unanswered P2 - Unanswered |
|  | Consistency Tests - C1 - Unanswered C2 - Unanswered C3 - Unanswered C4 - Unanswered   |
|  | Coherence and Effectiveness Tests - CE1 - Unanswered CE2 - Yes CE3 - Unanswered CE4 - Unanswered  |
| 3a - Which part of the Deposit Plan are you commenting on?   | Policy Number:     Paragraph Number:     Proposal Map:     Constraints Map     Appendices:       MG10(1)  |
| 3b - Do you wish to see any changes made to the Deposit Plan   | as a result of your representation? Yes (If "No" or "Unanswered" - go to 3d)  |
| 3c - What changes would like to see made to the Deposit Plan?  | <ul> <li>New Policy: Amended Policy: New Paragraph: Amended Paragraph: New Or Amended Site: Other (see Notes):</li> <li>Unanswered Unanswered Unanswered Unanswered</li> </ul>                      |
|  | Notes:  |
| 3d - If your representation relates to a new, deleted or amende  | ed site, did you submit the site as a Candidate Site? Unanswered (If "Yes", please give the Candidate Site Name and reference if known) Site Name:  |
| 3e - Please set out your representation below:  I wish to formally object to the proposed entrance siting of             | f the new St. Cyres School in Su <mark>lly</mark> Road, Penarth.  |
| With the additional transfer of four other schools to the sa   | ame site, the present size of Sully Road will not permit the anticipated significant increase in traffic.   |
| Sully Road at present is a narrow country road, and it is u  | inderstood from previous consultations with Vale of Glamorgan Borough Council senior personnel that no alteration to the width of Sully Road is planned.  |
| I consider that Sully Road will become a danger to childre   | en accessing the school on foot. In addition the volume of construction traffic poses a dangerous situation.  |
| 3f - Please outline the changes you wish to see made to the D  1) Consider alternative existing entrances in Redlands Av |   |
| 2) If (1) above cannot be considered then Sully Road must  | st be widened considerably to cope with the increased volume of traffic.  |
| 4h - If you wish to speak please confirm which part of your ren  | presentation you wish to speak to the inspector about and why they consider it he necessary to speak at the hearing -   |

| Representor ID and details: 4166/DP1 Mr Richard Harry  |  |   |                                       |  |  |  |  |
|--|--|---|---------------------------------------|--|--|--|--|
| Date Lodged<br>02/04/2012Status<br>MPetition and No.<br>0Supporting Evidence00   | Additional SA SEA  |   | Rep format:<br>Comment form           |  | comments to be consideral controls to be consideral controls to be considerated as the controls to be considerated as the control control controls to be considerated as the control control control control controls to be considerated as the control contr |  |  |
| 2a - Do you consider the LDP is Sound? Unsound   | 2b - If you think that the P Procedural Tests - P        | lan is unsound and do<br>1 - Yes            | es not not meet o                     | one or more test(s) of so                              | undness, please indicat  | e which test(s) tha                        | at it fails.                                 |
|  | Consistency Tests - C                                    | 1 - Yes                                     | C2 - Unansw                           | ered C3 - Unanswe                                      | red C4 - Unanswe   | ered                                       |  |
|  | Coherence and Effectiven                                 | ess Tests - CE1 - U                         | nanswered C                           | CE2 - Yes C  | E3 - Unanswered C  | CE4 - Unanswered                           |  |
| 3a - Which part of the Deposit Plan are you commenting on?   | Policy Number:   | Paragraph N                                 | umber: F                              | Proposal Map:  | Constr   | aints Map                                  | Appendices:                                  |
|  | 82   |   |                                       |  |  |  |  |
| 3b - Do you wish to see any changes made to the Deposit Plan   | as a result of your represe                              | entation? Yes                               | (If "                                 | No" or "Unanswered" - g                                | go to 3d)  |  |  |
| 3c - What changes would like to see made to the Deposit Plan?  |  |   | ew Paragraph:<br>nanswered            | Amended Paragraph:<br>Unanswered                       | New Or Amended Site Unanswered   | Other (see Note Yes                        | <u>es):</u>                                  |
|  | Notes: The plan relating                                 | g to St Nicholas site M                     | G2(33) is unsoun                      | nd. Removed from the LD                                | P altogether   |  |  |
| 3d - If your representation relates to a new, deleted or amende  | ed site, did you submit the s<br>Site Name: St. Nicholas | site as a Candidate Sit                     | e? No                                 | (If "Yes", please                                      | give the Candidate Site Site Reference:  |  | nce if known)                                |
| 3e - Please set out your representation below:   |  |   |                                       |  |  |  |  |
| This is a greenfield site on high grade agricultural land. T the village and conflicts with Council policy (MG7) for residual to the council policy (MG7) for re | he size of the development<br>dential development in Min | t would overwhelm the or Rural Settlements. | village and put p<br>Access to and fr | oressure on the services.  From this site would be ext | I feel the density of the remely dangerous with  | e site is not in kee<br>the volume of traf | ping with the rest of fic that uses the A48. |
| 3f - Please outline the changes you wish to see made to the Dr<br>I wish to see this plan removed from the LDP MG2 (33)  | eposit Plan to make it sour                              | nd (if relevant)                            |                                       |  |  |  |  |
| 4b - If you wish to speak, please confirm which part of your rep I consider this plan to be completely unsuitable for a village  |  | · ·   | •                                     | •  | •  | ng -                                       |  |

| Representor ID and details: 4166/DP2 Mr Richard Harry  |  |                                  |                             |                                |                       |   |                           |
|--|--|----------------------------------|-----------------------------|--------------------------------|-----------------------|---|---------------------------|
| Date Lodged Status Petition and No. Supporting Evidence 30/03/2012 M 0   | Additional SA SEA  |                                  | Rep format:<br>Comment form |                                |                       | be consiered by 'written<br>ion of Public examination |                           |
| 2a - Do you consider the LDP is Sound? Unsound   | 2b - If you think that the PI<br>Procedural Tests - P1<br>Consistency Tests - C1<br>Coherence and Effectivence | I - Unanswered<br>I - Unanswered | P2 - Unansw                 | ` '                            |                       | `,  |                           |
| 3a - Which part of the Deposit Plan are you commenting on?   | Policy Number:<br>MG2(11). MG12(11). MG  | Paragraph N                      |                             | Proposal Map:<br>MG2(11)       | )                     | Constraints Map                                       | Appendices:               |
| 3b - Do you wish to see any changes made to the Deposit Plar   | as a result of your represe  | ntation? Yes                     | (If '                       | "No" or "Unanswered"           | - go to 3d)           |   |                           |
| 3c - What changes would like to see made to the Deposit Plan   | ? New Policy: Ar Unanswered Ye Notes:  |                                  | ew Paragraph:<br>nanswered  | Amended Paragrap<br>Unanswered | h: New Or Amen<br>Yes | nded Site: Other (see No<br>Unanswered                | otes):                    |
| 3d - If your representation relates to a new, deleted or amende  | ed site, did you submit the s<br>Site Name: Cowbridge Ca   |                                  |                             | ` '                            | •                     | date Site Name and refe<br>erence: 178/CS1 2440       | ,                         |
| 3e - Please set out your representation below: Policy MG2 (11) states that Cowbridge Cattle Market has The Cowbridge Cattle Market, which sells on average over On non market days the site is used for car and coach parking s market town. | er 500 head of sheep per we  | eek, is trading succes           | sfully and support          | ting the farming comm          | nunity of the Vale    | d approximately 25 cars                               | , no provision has been   |
| Policies MG12 (11) and MG15 refer to a proposed site fo policy is objected to as being unsound.  | the replacement cattle ma  | rket. This is a greenfi          | eld site and propo          | osals are made within          | the LDP for its pu    | rchase and developmen                                 | t as a market. The        |
| 3f - Please outline the changes you wish to see made to the Delete Policies MG2 (11), MG12(11) and MG15.  An additional policy should be includied upholding the continuous description.   |  | ,                                | oort of the agricul         | tural economy of the V         | 'ale of Glamorgan     | and the provision of imp                              | proved parking facilities |
| on the site to support the attractiveness of Cowbridge as 4b - If you wish to speak, please confirm which part of your re  |  |                                  |                             | ey consider it be neces        | sary to speak at t    | he hearing -  |                           |

| Representor ID and details: 4167/DP1 D. & M.J.Morgan   | & Son  |  |  |
|--|--|--|--|
| Date Lodged     Status     Petition and No.     Supporting Evidence       30/03/2012     M     □     0     □   | Additional SA SEA  |  | our comments to be consiered by 'written representations' or do at a hearing session of Public examination? Written            |
| 2a - Do you consider the LDP is Sound? Unsound   | 2b - If you think that the Plan is unsound and of Procedural Tests - P1 - Unanswered Consistency Tests - C1 - Unanswered Coherence and Effectiveness Tests - CE1 - | P2 - Unanswered C2 - Unanswered C3 - Unans               | soundness, please indicate which test(s) that it fails.  wered C4 - Unanswered  CE3 - Yes CE4 - Unanswered                     |
| 3a - Which part of the Deposit Plan are you commenting on?   | Policy Number: Paragraph MG2(11). MG12(11). MG15   | Number: Proposal Map:MG2(11)                             | Constraints Map Appendices:  |
| 3b - Do you wish to see any changes made to the Deposit Plan   | n as a result of your representation? Yes  | (If "No" or "Unanswered                                  | - go to 3d)  |
| 3c - What changes would like to see made to the Deposit Plan   |  | New Paragraph: Amended Paragrap<br>Unanswered Unanswered | h: New Or Amended Site: Other (see Notes): Yes Unanswered  |
| 3d - If your representation relates to a new, deleted or amende  | ed site, did you submit the site as a Candidate S<br>Site Name: (a) Cowbridge Cattle Market (b) L  |  | se give the Candidate Site Name and reference if known)  Site Reference: (a) 178/CS1 (b) 2440/CS2                              |
| 3e - Please set out your representation below:<br>Policy MG2 (11) states that Cowbridge Cattle Market has  | been allocated for residential development. This   | s is unsound and objected to on the gro                  | unds that-   |
| The Cowbridge Cattle Market, which sells on average over   | er 500 head of sheep per week, is trading succe  | ssfully and supporting the farming comm                  | nunity of the Vale of Glamorgan and should not be closed.  |
|  |  |  | Ill which would hold approximately 25 cars, no provision has been munity in Cowbridge and the attractiveness of Cowbridge as a |
| Policies MG12 (11) and MG15 refer to a proposed site fo policy is objected to as being unsound.  | r the replacement cattle market. This is a green   | field site and proposals are made within                 | the LDP for its purchase and development as a market. The  |
| 3f - Please outline the changes you wish to see made to the Delete Policies MG2 (11), MG12(11) and MG15.  An additional policy should be included upholding the coron the site to support the attractiveness of Cowbridge as | tinuation of the Cowbridge Cattle Market in sup  |  | ale of Glamorgan and the provision of improved parking facilities  |
| 4b - If you wish to speak, please confirm which part of your re  |  |  | sary to speak at the hearing -   |

| Representor ID and details: 4168/DP1 Mr G.J.Holmes &  | Mrs T.D.Holmes   |   |
|---|--|---|
| Date Lodged     Status     Petition and No.     Supporting Evidence       30/03/2012     M     □     0     □                | Additional SA SEA  | Rep format: 4a - do you want your comments to be consiered by 'written representations' or do Comment form you want to speak at a hearing session of Public examination? Unanswered |
| 2a - Do you consider the LDP is Sound? Unanswered   | 2b - If you think that the Plan is unsound and do Procedural Tests - P1 - Unanswered | pes not not meet one or more test(s) of soundness, please indicate which test(s) that it fails.  P2 - Unanswered  |
|   | Consistency Tests - C1 - Unanswered  | C2 - Unanswered C3 - Unanswered C4 - Unanswered   |
|   | Coherence and Effectiveness Tests - CE1 - U  | Inanswered CE2 - Unanswered CE3 - Unanswered CE4 - Unanswered   |
| 3a - Which part of the Deposit Plan are you commenting on?  | Policy Number: Paragraph N   | Number: Proposal Map: Constraints Map Appendices:   |
|   |  |   |
| 3b - Do you wish to see any changes made to the Deposit Plan  | as a result of your representation? Unanswer   | red (If "No" or "Unanswered" - go to 3d)  |
| 3c - What changes would like to see made to the Deposit Plan?   |  | ew Paragraph: Amended Paragraph: New Or Amended Site: Other (see Notes):  nanswered Unanswered Unanswered   |
|   | Notes:   |   |
| 3d - If your representation relates to a new, deleted or amende   | d site, did you submit the site as a Candidate Si<br>Site Name:                      | te? Unanswered (If "Yes", please give the Candidate Site Name and reference if known) Site Reference:   |
| 3e - Please set out your representation below:  Vale of of Glamorgan Local Development Plan – Land to                       | he rear of Nant-yr-Adar, Llantwit Major. Housing                                     | g Proposal MG2 (15)   |
| We object to the Local Development Plan proposals relati  | ng to the suggested residential development, for                                     | 345 houses to the rear of Nant-yr-Adar, Ham Lane East, Llantwit Major.  |
| Traffic generated by a development of this scale would ha   | ve a massive impact on the adjoining housing d                                       | evelopment, in addition, it would create unacceptable difficulties on the adjacent road network.  |
| Ham Lane East and Boverton Road because of the school be no room for any more!  | ls in the area, including the New Welsh School,                                      | as it is now, we have parking everywhere on our estate, during school pick up times, there will obviously   |
| Also the impact the development would have on all our loo<br>In our view, it is totally irresponsible to contemplate a deve |  | iow!  |
| 3f - Please outline the changes you wish to see made to the D   | eposit Plan to make it sound (if relevant)   |   |
| 4b - If you wish to speak, please confirm which part of your rep  | resentation you wish to speak to the inspector a                                     | bout and why they consider it be necessary to speak at the hearing -  |

| Representor ID and details: 4169/DP1 Jacqueline Rule  |   |  | <del></del>   |  |  |  |  |  |
|---|---|--|---|--|--|--|--|--|
| Date Lodged     Status     Petition and No.     Supporting Evidence       30/03/2012     M     0  | Additional SA SEA   |  | your comments to be consiered by 'written representations' or do<br>cat a hearing session of Public examination?              |  |  |  |  |  |
| 2a - Do you consider the LDP is Sound? Unanswered  2b - If you think that the Plan is unsound and does not not meet one or more test(s) of soundness, please indicate which test(s) that it fails.  Procedural Tests - P1 - Unanswered  Consistency Tests - C1 - Unanswered C2 - Unanswered C3 - Unanswered C4 - Unanswered |   |  |   |  |  |  |  |  |
|   | Coherence and Effectiveness Tests - CE  | 1 - Unanswered CE2 - Unanswered  | CE3 - Unanswered CE4 - Unanswered   |  |  |  |  |  |
| 3a - Which part of the Deposit Plan are you commenting on?  |   | ph Number: <u>Proposal Map:</u>  | Constraints Map Appendices:   |  |  |  |  |  |
|   | MG2(4)  |  |   |  |  |  |  |  |
| 3b - Do you wish to see any changes made to the Deposit Plan  | as a result of your representation? Unan  |  | " - go to 3d)   |  |  |  |  |  |
| 3c - What changes would like to see made to the Deposit Plan?   | New Policy: Amended Policy: Unanswered Unanswered                                   | New Paragraph: Amended Paragra Unanswered Unanswered                                     | ph: New Or Amended Site: Other (see Notes): Unanswered Unanswered   |  |  |  |  |  |
|   | Notes:  |  |   |  |  |  |  |  |
| 3d - If your representation relates to a new, deleted or amende   | d site, did you submit the site as a Candida<br>Site Name:                          | te Site? Unanswered (If "Yes", ple   | ase give the Candidate Site Name and reference if known) Site Reference:  |  |  |  |  |  |
| 3e - Please set out your representation below:  |   |  |   |  |  |  |  |  |
| As a resident of Enfield Drive Barry I am writing to express  | my concerns at an item in the Vale of Gla   | morgan Local Development Plan 2011-202   | 6.  |  |  |  |  |  |
| Under Policy MG2 – Housing Allocations, I note that Item  | 4 refers to 'Land to the North of <mark>Waycoc</mark> k C                           | cross Barry' – 25.45 ha for 500 houses.  |   |  |  |  |  |  |
| I am dumbfounded that any consideration can be given to   | the allocation of this land for residential de-                                     | velopment as if developed this would caus  | e further phenomenal road and traffic problems to the area.   |  |  |  |  |  |
|   |   |  | ery new development along those roads. Since the completion of 4050 (Port Road) has increased congestion greatly and added to |  |  |  |  |  |
| The new Taylor Wimpey development 'Golwg-Y-Coed' on   | the Port Road (A4050) is nearing completion   | on and once the estate is inhabited there w  | ill be further pressure on this section of road.  |  |  |  |  |  |
| If the area in question was to be developed how would the Waycock Road (A4226-5 Mile Lane) would cause chaos a  | house owners access the estate? It canno the roundabout at the junction with Port R | t be done through our estate at Hunter's R<br>oad and Pontypridd Road and affect all tho | dge because there is no suitable access point. Access onto se Rhoose and St Athan areas heading into Barry.                   |  |  |  |  |  |
| We are told regularly of proposed improvements to roads improvement plan.   | in the area, but none ever seem to come to  | full fruition but I fail to see how permission   | can be given for this development without an accompanying road  |  |  |  |  |  |
| but are also unsightly blots on the landscape. So before ye   | ou tear up more of the valuable countryside   | please look again at the unused industrial   | n see many hectares of Brownfield sites that are not only lying idle sites.   |  |  |  |  |  |
| 3f - Please outline the changes you wish to see made to the De  | eposit Plan to make it sound (if relevant)  |  |   |  |  |  |  |  |
| 4b - If you wish to speak, please confirm which part of your rep  | resentation you wish to speak to the inspec   | tor about and why they consider it be nece   | ssary to speak at the hearing -   |  |  |  |  |  |

| Representor ID and details: 4169/DP2 Jacqueline Rule  |   |  |   |  |  |  |  |
|---|---|--|---|--|--|--|--|
| Date LodgedStatusPetition and No.Supporting Evidence30/03/2012M0  |   |  | r comments to be consiered by 'written representations' or do a hearing session of Public examination?          |  |  |  |  |
| 2a - Do you consider the LDP is Sound? Unanswered   |   | does not not meet one or more test(s) of so P2 - Unanswered C2 - Unanswered C3 - Unanswe | oundness, please indicate which test(s) that it fails.  ered C4 - Unanswered  CE3 - Unanswered CE4 - Unanswered |  |  |  |  |
| 3a - Which part of the Deposit Plan are you commenting on?  | Policy Number: Paragraph MG2(4)                           | Number: Proposal Map:  | Constraints Map Appendices:   |  |  |  |  |
| 3b - Do you wish to see any changes made to the Deposit Plan 3c - What changes would like to see made to the Deposit Plan?  | New Policy: Amended Policy:                               |  | go to 3d)  New Or Amended Site: Other (see Notes):  Unanswered Unanswered                                       |  |  |  |  |
| 3d - If your representation relates to a new, deleted or amende   | d site, did you submit the site as a Candidate Site Name: | Site? Unanswered (If "Yes", please   | give the Candidate Site Name and reference if known) Site Reference:  |  |  |  |  |
| 3e - Please set out your representation below: Policy MG2 - Housing Allocations Item 4 'Land to the North of Waycock Cross Barry' - 25.45ha for 500 houses.  As a resident of Enfield Drive Barry I am writing to express my concerns at an item in the Vale of Glamorgan Local Development Plan 2011-2026.  I am dumbfounded that this land can even be considered for residential development because it would cause further phenomenal road and traffic problems to the area.  Commuters using the A4226 and the A4050 at peak time are subjected to further traffic congestion and travel time increases with every new development along these roads. The building of the residential estate at Willow Heights a resulted in a great increase in the volume of traffic from the A423 I (Barry Docks Link Road) and added to travel time. |   |  |   |  |  |  |  |
| When the Taylor Wimpey development 'Golwg-Y-Coed' o  If this development was to go ahead how would house ow would cause chaos at the junction with Port Road and Pol  | ners access the estate? It cannot be through F            | Hunters' Ridge because there is no suitable  | access point. Access via Waycock Road (A4226- 5 Mile Lane)  |  |  |  |  |
| also unsightly blots on the landscape. So before you tear   | n or rent a house I am aware that there are ma            | any hectares of brown field sites dotted around the unused industrial sites and road im  | und the Vale of Glamorgan that are not only lying idle but are  |  |  |  |  |
| 3f - Please outline the changes you wish to see made to the D   |   |  |   |  |  |  |  |
| 4b - If you wish to speak, please confirm which part of your rep  | resentation you wish to speak to the inspector            | about and why they consider it be necessar   | ry to speak at the hearing -  |  |  |  |  |

(ordered by Representation ID No.)

| Representor                                    | ID and o    | letails:  | 4170/D          | P1 Mr & Mrs Hudson                            |                         |           |           |                             |                            |                     |                                      |                 |                    |                  |                                    |
|--|-------------|-----------|-----------------|---|-------------------------|-----------|-----------|-----------------------------|----------------------------|---------------------|--------------------------------------|-----------------|--------------------|------------------|------------------------------------|
| Date Lodged<br>30/03/2012                      | Status<br>M | Petiti    | on and No.<br>0 | Supporting Evidence                           | Additional SA SEA       |           |           |                             | Rep format:<br>Comment for |                     | 4a - do you want<br>you want to spea | •               |                    | •                | epresentations' or do<br>? Written |
| 2a - Do you consider the LDP is Sound? Unsound |             |           |                 | 2b - If you think that the Procedural Tests - |                         |           |           | does not not me<br>P2 - Yes | et one                     | e or more test(s) o | of soundness,                        | please indicat  | e which test(s) th | nat it fails.    |                                    |
|  |             |           |                 |   | Consistency Tests -     | C1 -      | Yes       |                             | C2 - Yes                   |                     | C3 - Yes                             | (               | C4 - Yes           |                  |                                    |
|  |             |           |                 |   | Coherence and Effect    | ivenes    | Tests -   | CE1                         | - Yes                      | CE                  | 2 - Yes                              | CE3 - Yes       | C                  | CE4 - Yes        |                                    |
| 3a - Which pa                                  | rt of the   | Deposit   | Plan are y      | ou commenting on?                             | Policy Number:          |           | <u>Pa</u> | aragraph                    | Number:                    | Pro                 | posal Map:                           |                 | Constr             | aints Map        | Appendices:                        |
|  |             |           |                 |   | MG9. MD12. MG2.         |           | 6.        | 49. 7.41                    | l                          | MG                  | 9                                    |                 |                    | Feb 2012         | Other - Not Listed                 |
| 3b - Do you w                                  | ish to se   | e any c   | hanges ma       | de to the Deposit Plan                        | as a result of your rep | resenta   | ition?    | Yes                         | (                          | (If "No             | o" or "Unanswere                     | d" - go to 3d)  |                    |                  |                                    |
| 3c - What cha                                  | inges wo    | uld like  | to see mad      | de to the Deposit Plan?                       | New Policy:             | Ame       | nded Po   | licy:                       | New Paragraph:             |                     | Amended Paragra                      | aph: New Or /   | Amended Site       | Other (see No    | tes):                              |
|  |             |           |                 |   | Unanswered              | Yes       |           |                             | Unanswered                 |                     | Unanswered                           | Yes             |                    | Unanswered       |                                    |
|  |             |           |                 |   | Notes:                  |           |           |                             |                            |                     |                                      |                 |                    |                  |                                    |
| 3d - If your re                                | presenta    | ation rel | ates to a ne    | ew, deleted or amende                         | d site, did you submit  | the site  | as a Ca   | ındidate                    | Site? Yes                  |                     | (If "Yes", ple                       | ease give the C | andidate Site      | Name and refer   | ence if known)                     |
|  |             |           |                 |   | Site Name: Land East    | st of Lla | ngan      |                             |                            |                     |                                      | Site            | Reference:         | Site reference M | G9/ID 22 Appendix 1                |
| 3e - Please s                                  | et out vo   | ur repre  | esentation l    | pelow:  |                         |           |           |                             |                            |                     |                                      |                 |                    |                  |                                    |

#### REPRESENTATIONS AGAINST ALLOCATION OF GYPSY & TRAVELLER SITE AT LAND EAST OF LLANGAN

TEST P1

The LDP has not been prepared in accordance with the Community Involvement Scheme, see below key points:

- The Emergency Services and Local Primary school have all confirmed that they have NOT been consulted on the proposed site MG9. The LEA confirmed they had not been consulted about the Gypsy site.
- Registered consultees have not been informed of the consultation stages.
- According to the Welsh Government's document 'Travelling to a better future' there is an onus on the LA to consult with its strategic partners in delivering Gypsy & Traveller sites. No consultation has taken place.
- Good practice (Welsh Government document 'Good Practice Design in designing Gypsy & Traveller sites') suggests that where Gypsy & Traveller sites are concerned the local community should be engaged as early as possible we believe that the Council has undertaken the minimum consultation in terms of the LDP and insufficient consultation with respect to the Gypsy & Traveller site in accordance with best practice.

TEST P2

- 1. The Sustainability Appraisal is flawed and contradictory the proposed sites do not meet with national policy in respect of sustainability. The allocation of Llangan is not consistent with previous Planning Rejections by the Council which considered sustainability (Bonvilston Sept 2011) and with similar determinations by the Planning Inspectorate (Pembroke Sept 2011).
- 2. The allocation of MG9 is not consistent with the proposed LDP policies.

TEST C1

The Land Use Plan (with regards to Gypsy & Traveller sites) does not relate to any strategy - The Housing Strategy is out dated and does not provide any structure for assessing Gypsy & Traveller needs or site location.

TESTC2

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Representor ID and details: 4170/DP1 Mr & Mrs Hudson

- 1. The Site allocation does not have regard to the following National Policy:
- -Welsh Government Circular (30/2007):
- The site is RURAL and is "UNSUSTAINABLE" as there are no local services (no shops, food and drink outlets, doctor, dentist, Library, rail services or any main settlement within 5km etc). Llangan and Fferm Goch both score 0 points for local services in the evidence based assessment 'Sustainable Settlements Appraisal'
- The site would not comply with a RURAL EXCEPTION POLICY as it advocates that all pitches are accommodated on a RURAL site including transient pitches which would not comply with TAN 2.
- Any business operated from the site would be in contradiction of RURAL EXCEPTION guidance.
- The site allocation does not take into account the "SCALE" of the resident community. Llangan has a population of less than 100 with 35 homes and this proposal nearly doubles the size of the Hamlet.
- Example of similar site. In 2007 an application of the Sustainability issue was applied by the Planning inspector in Pembroke where an appeal was refused solely on this basis.
- The VOG Council has refused an application recently in Bonvilston on the basis of Sustainability and services in this case were closer to the site than in the case of Llangan proposal.
- Designing Gypsy and Traveller Sites Good Practice Guide The site is too small; therefore cannot meet the needs identified in the LDP.
- -The site measures 7400 m2 and could only accommodate 14 pitches without infrastructure (guidance is 500m2 per pitch plus refuse area; office; play area; infrastructure (roads etc)
- The access road to the site does not meet the minimum requirements for emergency vehicles (3.7m it is actually 15m)
- The site access is poor and "unsafe" having extended walks (in excess of 800m to bus stop) along an unlit lane with no public footpath or street lighting.
- The proposal of 21 units on the site would restrict the ability of emergency vehicles to manoeuvre around the site.
- New sites grants are available (and cost should not be a material planning consideration).
- -The guidance requires that sites are:
- sustainable the Llangan site proposal is not
- equivalent to standards that would be expected for social housing in the settled community This would not meet the standards and this site would not have been considered appropriate for development for residential in either the current or proposed plans
- have the effect of encouraging and developing good relations between
- Gypsies & Travellers and the settled community the large scale of this proposal could mean that establishing good relations with the local community of Llangan would be unlikely and could also result in increased tensions in the community.
- based on WAG guidance of Design of Gypsy traveller sites the maximum number of pitches is 14, and the proposal at Llangan exceeds this number.
- Travelling to a Better Future
- Recommends that LA's engage with their Housing Association Partners to bring sites forward. The VOG Council has not done this.
- "Situating transit provision on residential Gypsy sites is not an option preferred by the Gypsy and Traveller community as this can lead to tensions among different family groups and make site management and maintenance very difficult." This creates a sense of "fear" within the settled Gypsy & Traveller community. The proposal is recommending that transient and permanent sites are co-located.
- Planning Policy Wales 2011
- The proposed site at Llangan is greenfield land, according to the definition of brownfield land set out in Figure 4 1 of PPW;
- it will not reduce the need to travel, due to the limited local service provision in close proximity to the site;
- offers very limited access to public transport facilities;
- is not large enough to provide ancillary facilities required to support a sustainable development as set out in paragraph 3.30 in accordance with Designing Gypsy and Travellers Sites Good Practice Guide;
- is located within a Special Landscape Area (SLA) and in close proximity to a Conservation Area. The assessment of the Llangan site incorrectly states that it is not within an SLA, so makes no reference to the sites proximity to the conservation area of Llangan. The location can be clearly seen from the conservation area.
- does not meet the identified needs of Gypsies and Travellers, in the Vale of Glamorgan (Fordham report 2008 evidence);
- does not promote sustainable access to employment, shopping, education, health, community, leisure and sports facilities;
- does not maximise opportunities for community development and social welfare;
- does not foster social inclusion due to the isolated location of the site; and

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- does not contribute to improvements in health due to the isolation from services and facilities.
- 2. MG2. The draft policy MG 2 actively discriminates the Gypsy community by excluding them from the wider housing programme and potentially abuses their human rights. Policy MG 2 should be revised to allow the VOG to identify appropriate sites in the same way as Affordable Housing.

#### TESTC3

- 1. The policy does not have due regard to the Wales Spatial Plan.
- The key theme of the Wales Spatial Plan is achieving sustainable development through focusing new development in areas which have good access to key services and facilities. As there are no services surrounding the site the allocation of MG9 is not consistent with the objectives of the Wales Spatial Plan. The Gypsy site proposal fails Soundness test Consistency C3 because the policy does not have due regard to the Wales Spatial Plan.

### TESTC4

- 1. The allocation of this site does not have regard to the relevant Community Strategy in the following respects:
- "The diverse needs of local people are met through the provision of customer focused, accessible services and information" This cannot be achieved by the allocation of a non-accessible rural allocation.
- "Vale of Glamorgan residents and organisations respect the local environment and work together to meet the challenge of climate change" The allocation of MG9 places heavy emphasis on the use of the car to access the most basic facilities shops, health, education etc.
- "Older people are valued and empowered to remain independent, healthy and active. They have equality of opportunity and receive high quality services to meet their diverse needs"— All services are miles away and inaccessible to

the older community. The VERY POOR public transport system is located

1050m from the site and is in excess of the maximum distances as defined in

the proposed LDP and "Manual for Streets".

- "People of all ages are able to access coordinated learning opportunities and have the necessary skills to reach their full potential helping to remove barriers to employment"—There is no employment opportunity near to the site.
- The local primary school has confirmed that it is full and that its projections suggest that it doesn't have the capacity for such a large development (also consider the existing approval of 12 dwellings at Fferm Goch).
- The small local industrial unit has raised concerns in relation to the scale of the proposal.

### TEST CE1

The Plan does not set out a coherent strategy in the following respects

- The Strategy makes the following statements:

The LDP will seek to provide a policy framework which: Manages the housing supply effectively in order to provide a range of good quality, affordable homes in sustainable locations

Reduces out commuting by providing opportunities for new housing, retail and employment development in accessible locations in the Vale of Glamorgan

The allocation of this rural site in open countryside does not meet this objective.

- The LDP also states its vision as being:
- "Our Vision for the Vale of Glamorgan is a place:

That is safe, clean and attractive, where individuals and communities have sustainable opportunities to improve their health, learning and skills, prosperity and wellbeing 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 sustainability of the area." The allocation of this site in policy MG9 does not meet these objectives being in a rural location with inadequate facilities and transport links.

- The Allocation of this site in policy MG9 does not comply with the following objectives of the LDP:
- -Objective 1: To sustain and further the development of sustainable communities within the Vale of Glamorgan, providing opportunities for living, learning, working and socialising for all. The site's location would clearly not meet this objective.

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Objective 2: To ensure that development within the Vale of Glamorgan makes a positive contribution towards reducing the impact of and mitigating the adverse effects of climate change. - The allocation of this site will have entirely the opposite effect to this objective.

- Objective 3: To reduce the need for Vale of Glamorgan residents to travel to meet their daily needs and enabling them greater access to sustainable forms of transport. The allocation of this site will have entirely the opposite effect to this objective.
- Objective 4: To protect and enhance the Vale of Glamorgan's historic, built, and natural environment. The development of this site would not meet this objective: a planning refusal on an adjacent site in May 2002 stated "It is a proposal that would adversely affect the undeveloped rural character of the area"
- Objective 5: To maintain, enhance and promote community facilities and services in the Vale of Glamorgan The local primary school has not been consulted, had they been it would have been recognised that the school does not have capacity, nor is it projected to have the capacity.
- Objective 7: To provide the opportunity for people in the Vale of Glamorgan to meet their housing needs- States that development of housing should be in sustainable locations This is not. Furthermore, it brings into question POLICY MD12 which is discriminatory in that Gypsy & Traveller sites are treated differently from other housing allocations. An inclusive policy would see Gypsy & Traveller sites being assessed on the same basis as AFFORDABLE HOUSING and considered for ALL candidate residential sites in the LDP
- Objective 10: To ensure that development within the Vale of Glamorgan uses land effectively and efficiently and to promote the sustainable use and management of natural resources. The inappropriate use of finite resources can impact on the ability of future generations to fulfil their needs. The LDP through favouring the use of previously developed land and the sustainable use of natural resources of whatever kind and wherever they are located, will contribute to preserving their availability for future generations. This is agricultural land in the Special Landscaped Area.

### TEST CE2

The strategies, policies and allocations are not realistic and appropriate having considered relevant alternatives and are not founded on robust evidence:

- 1. The allocation of Llangan is purely on the basis of site ownership by the Vale and does not meet the requirement of Policy MD12.
- 2. The Gypsy & Traveller site assessment (anecdotal) conflicts with other evidence based background papers; specifically the Sustainable Settlement Appraisal. The SSA states 0 points for public transport but the Gypsy & Traveller site assessment states that public transport facilities are good.
- 3. The Gypsy Traveller site assessment states "good highway access", yet the access falls considerably short of the minimum requirement for vehicle access the access lane is 2.5m wide, against a minimum requirement of 3.7m plus footpath of 1.2m.
- 4. The Gypsy Traveller site assessment does not reflect the current legal obligations of the VOG in respect of this site, yet the other site assessments highlight legal issues.
- 5. Several privately-owned sites were put forward as candidate sites for Gypsy & Traveller sites but were dismissed as they were not in Council ownership. Not being in council ownership should not be a reason to reject privately owned sites.
- 6. The key issue is that the site allocation does not reflect the identified need of the Gypsy & Traveller community as highlighted in the 2008 Fordham report.
- 7. The Gypsy Traveller site assessment suggests that Fferm Goch is the local settlement when Llangan is recognised in this and historic documents as the local settlement being only 150m from the proposed site. It appears that the council has also linking the site at Llangan to the Hamlet of Fferm Goch in order to increase the site assessment positive score.
- 8. The assessment makes no reference that the site is in a Special Landscape Area (SLA).
- 9. The assessment makes no reference that the site is adjacent to a Conservation Area, within the Conservation Management Plan for this area there is a specific requirement to protect the view from the edge of the conservation area over the proposed site. The proposed site is clearly visible form the conservation area.
- 10. The allocation of Fferm Goch as a Minor Rural Settlement is incorrect. The appraisal scored 9 points. 3 are for employment which puts this site on par with the major settlements such as Barry. This is on the basis of 4 light industrial buildings. A survey of these employers has confirmed that zero new jobs have become available in the last 9 years and that the units collectively employ fewer than 15 people with no intention to expand. Furthermore, one of the units has been empty and the development is not a popular industrial site.
- 11. Fferm Goch has a population of less than 100 (98)— of the 5 sites in the Vale of Glamorgan with a population of 98 only Fferm Goch is classified as a Minor Rural site (probably based on the 9 points). The remainder are classified as Hamlets and there is a presumption against development in Hamlets (or as a minimum the scale would need to be appropriate and tied to a Rural Exception policy). The guidance requires ALL sites of a population below 100 to be classified as a Hamlet Fferm Goch should be recategorised as a Hamlet.
- 12. The Council has undertaken a study (Fordham report 2008) where the message was extremely strong that the Gypsy & Traveller community wanted smaller sites located on the fringes of larger communities. The report confirmed that isolated, rural sites restricted access to Health, Education and welfare facilities that disadvantaged them and needs to be seen in the light of the above objectives. The following is a quote from the Fordham report:
- "Participants living on Shirenewton had three main criticisms: the site was too big, the distance from local amenities along with the lack of local transport,"

"This created many problems for the residents, especially the poorest: 'for a person like me on the bread line it's very tough. I can't afford to use the car', 'everything is a mile away, including the bus stop. It takes a long walk on a busy road to get to the shops and schools".

"The tables demonstrate that access to services such as local shops, health centres and education facilities from both sites is difficult by foot and by local transport systems. This difficulty was eased when participants used their cars, however the level of ease was lower for Roverway due to the difficult entry onto the main road".

"Participants reported that access to local amenities, health services and education was low for both sites by foot or by public transport: 'Everything is a mile away, including the bus stop. It takes a long walk on a busy road to get to the shops and schools".

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"It was thought that smaller sites would reduce the problem of on-site conflicts: 'they need smaller sites and not too many different families, otherwise when you have a row the whole site becomes a war zone"

"This affected the ability of the households interviewed to access local services such as shops, health centres and education facilities. It was reported that this problem mainly affected the women: men take the vehicles that the household own to work during the day, leaving the women without their own transport and often away from public transport routes"

"Participants did not specify where in Cardiff or the Vale of Glamorgan sites should be located. It was noted that sites should be on the outskirts of towns to enable access by foot to local services such as shops, the Launderette and health centres"

"While the focus of the survey was on accommodation requirements, the questionnaire also collected information on access to services, including health and education. Research has found that poor accommodation can prevent access to services and so cannot be seen in isolation."

"Participants living on sites felt that there were site restrictions that limited their work options. These were mainly associated with the location of the sites and lack of access to public transport rather than site regulations: 'no buses, no local transport, Bad access'

"Participants living on local authority sites reported that the lack of local public transport provision in the area affected their ability to send their children to school, access health services and work opportunities, and limited their ability to attend training and education courses"

"Participants were asked about where they would like future sites to be, but were not specific about locations within the County Boroughs, instead emphasising the importance of public transport to any new sites. Government draft guidance on site design stresses the importance of access to services and the promotion of integrated co-existence' between the site and surrounding community."

"The precise location, design and facilities of any new sites should be drawn up in consultation with Gypsies and Travellers to ensure that the additional provision meets their needs. The health and safety implications of a new site's location should be considered in finding a balance between offering sites in good locations and the additional land costs this would entail. The settled community neighbouring the sites should also be involved in the consultation from an early stage."

13. An independent highway study recently undertaken by Capita Symonds, surrounding the proposed site has concluded that:

"The 1km long lane itself is of poor horizontal alignment, with poor forward visibility and unsuitable for regular vehicular traffic. If the site is developed the lane itself would need major upgrading, which would certainly change its appearance within this rural environment."

"The village school is approximately 1km from the village and 900 metres from the proposed site. It is noted that the route does not offer any facilities for pedestrians, such that the only safe way for children to travel between the site and the school safely would be by vehicle. This route would also be potentially hazardous for cycle use for children, the elderly or infirm and could be potentially hazardous for all users other than by car."

"With regard to the appropriateness of the location for a traveller's site development in relation to transportation, it is difficult to refer to standard guidelines, as few relate to "rural highways", most highway design standards for residential development relate to urban areas. Hence, the advice contained within this report is based on best available information, acceptable highway standards for developments of similar size and transport needs of small communities. Welsh Government guidelines state sites should be situated in close proximity to transport links. The Llangan site would not appear to meet that criteria, being situated away from the main transport infrastructure, sites should also have ready access to schools, doctors and shops, against which requirements Llangan again appears to fail."

"With regards to the existing lane, it is generally considered that where there is direct access to dwellings, the previous standard for developments, Design Bulletin 32 offers guidance where it states that a desirable minimum carriageway width of 5.5 metres is appropriate, together with 2.0 metre wide footways on both sides. This will allow two way traffic at all times, and safe movement of pedestrians."

"Thus the lane itself should be widened to this minimum standard, which will require the removal of the existing hedge line on one or both sides of the lane and probable acquisition of land from the adjoining fields. This will of course change the environmental character of the area substantially, but is considered essential to cater for increased vehicle and pedestrian traffic"

14. There is complete inconsistency with the allocation of MG9 against the proposed policies.

### TEST CE3

- 1. The VOG council make no reference as to how they are going to manage such a large site. The 21 unit site in Rover Way Cardiff has 3 full time Council staff allocated to it.
- 2. The current Housing Strategy expires April 2012 and makes no relevant reference as to how the Gypsy & Travelling Community will be monitored in terms of growth or need. Indeed, there is no strategy that underpins the Gypsy & Traveller community or housing at all.

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TEST CE4

- 1. Policy MD12 (Gypsy & Traveller) is discriminatory. It offers no flexibility for the Council to bring forward sites that are sustainable / suitable for Gypsies & Travellers through the policies derived within the plan.
- 2. MD12 should be redrafted to enable smaller, sustainable sites to be included within the Affordable Housing requirements and delivered through the Registered Social Landlord sector.
- 3. To argue that the Private Sector has been consulted to offer sites is not accepted. The private sector were not likely to volunteer sites for such a contentious use. The LDP should set clear strategies / policies to deliver sustainable sites for all members of the community; private; social and travelling. The current allocation does not meet this and could strongly be argued breeches the Human Rights of the Gypsy traveller community as it does not provide a suitable, sustainable site that meets the guidelines in the 2008 Fordham report.
- 3f Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)

The proposed Gypsy traveller site at Llangan (Policy MG9) should be removed from the LDP draft plan. The VOG should identify an alternative site that has been assessed according to a relative sustainability appraisal and meets the requirements of the Gypsy community as listed in the 2008 Fordham report.

Policy MD12 should be amended so that it does not discriminate against the Gypsy and Traveller community. All sites during the plan should be assessed on a similar basis as Affordable Housing.

4b - If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing The policy MG9 (proposed Gypsy site at Llangan) does not meet with national policy in respect of sustainability, nor does it comply with a RURAL EXCEPTION POLICY. The number of pitches is too high when compared to the "Designing Gypsy and Traveller Sites Good Practice Guide".

(ordered by Representation ID No.)

| Representor  | ID and d   | etails:        | 4171/D           | P1 PR Lucas             |   |                  |            |            |                              |                |  |   |           |   |              |
|--|------------|----------------|------------------|-------------------------|---|------------------|------------|------------|------------------------------|----------------|--|---|-----------|---|--------------|
| Date Lodged<br>01/04/2012                                  |            | Petiti         | on and No.<br>21 | Supporting Evidence     | Additional SA SEA                             |                  |            |            | Rep format:<br>Comment for   |                | •  | t your comments to bak at a hearing session |           | •   | •            |
| 2a - Do you co   | onsider th | ne LDP         | is Sound?        |                         | 2b - If you think that the Procedural Tests - |                  |            | nd and     | does not not me<br>P2 - Yes  | et one         | or more test(s)                                    | of soundness, please                        | indicate  | which test(s) th  | at it fails. |
|  |            |                |                  |                         | Consistency Tests -                           | C1 -             | Unansw     | ered       | C2 - Yes                     |                | C3 - Yes   | C4 - Y                                      | es        |   |              |
|  |            |                |                  |                         | Coherence and Effect                          | tiveness         | s Tests -  | CE1 -      | Yes                          | CE2            | 2 - Yes  | CE3 - Unanswere                             | d Cl      | E4 - Unanswered   | t            |
| 3a - Which part of the Deposit Plan are you commenting on? |            | Policy Number: |                  | <u>Par</u>              | agraph  | Number:          | Pro        | oosal Map: |                              | Constra        | ints Map   | Appendices:                                 |           |   |              |
|  |            |                |                  | 49                      |   | 5.1 <sup>-</sup> | 1          |            | allo                         | ply Background | Residential<br>ge 145); Housing<br>Paper (November |   |           | Other - Not Listed  |              |
| 3b - Do you w  | ish to se  | e any cl       | nanges ma        | de to the Deposit Plan  | as a result of your rep                       | oresenta         | ation? Y   | 'es        |                              | (If "No        | or "Unanswere                                      | ed" - go to 3d)                             |           |   |              |
| 3c - What cha  | inges wo   | uld like       | to see mad       | de to the Deposit Plan? | New Policy: Unanswered Notes:                 | Ame<br>Yes       | nded Polic | -          | New Paragraph:<br>Unanswered | . 7            | Amended Paragr<br>Yes                              | Yes New Or Amend                            | led Site: | Other (see Not<br>Unanswered  | es):         |
| 3d - If your re  | epresenta  | tion rel       | ates to a ne     | ew, deleted or amende   | d site, did you submit<br>Site Name: The Gard |                  |            |            |                              |                | (If "Yes", pl                                      | ease give the Candid<br>Site Refe           |           | Name and reference of the Name and reference of the Name and reference of the Name and the Name | ,            |
| 3e - Please s  | et out vo  | ur renre       | sentation h      | oelow:                  |   |                  |            |            |                              |                |  |   |           |   |              |

REPRESENTATIONS ON VALE OF GLAMORGAN DRAFT DEPOSIT LDP RELATING TO THE ALLOCATION OF 40 HOUSES AT THE GARDEN EMPORIUM SITE. FFERM GOCH AND THE DESIGNATION OF FFERM GOCH AS A 'MINOR RURAL SETTLEMENT'.

#### Summary

- 1) The Garden Emporium site at Fferm Goch is a site with extant planning permission for 12 houses. The rationale for granting this planning permission on this site was overwhelmingly because it is a previouslydeveloped site, with derelict garden centre buildings on the site.
- 2) However, the proposed increase in draft LDP allocation, from 12 to 40 houses, is unacceptable. The principal justification for this increase appears to be the proposed new designation of Fferm Goch as a "Minor Rural Settlement". This designation is incorrect and totally inappropriate, for reasons set out below. Higher densities of development on this site (i.e. above the 12 houses permitted) - in particular for 42 and (after revisions) 24 houses - havebeen considered and rejected by the Council in the past. The issues that led to those rejections in particular that the site is unsustainable and a portion of the site is needed to protect a rare plant - have not changed. If this allocation is allowed there is a very real prospect that this level of housing is built - we are aware that the owners are already in pre-application discussions with the Council for 40 houses on this site, even though such discussions are inappropriately premature.
- 3) The extant planning permission includes conditions requiring the private houses to be livework units and a large portion of the site (approx 30%) to be set aside as a nature conservation area. If 40 houses were permitted on this site the developer would no doubt argue that neither of these conditions could be sustained. Other issues such as lack of public transport and lack of places at the local primary school cannot be satisfactorily resolved through condition or planning agreement.
- 4) For all these reasons, which are expanded on below, the allocation of the Garden Emporium site for 40 houses should not go forward in the draft LDP. The site should be allocated for 12 houses, in line with the extant planning permission and preserving the conditions on that planning permission requiring 1) 30% affordable housing and 2) the back portion of the site (approx 300/0 - edged in green on the attached approved plan) to be a habitat conservation area and excluded from this site altogether 3) the 8 private houses to be live-work units.
- 5) In addition, Fferm Goch should not be designated as a "Minor Rural Settlement". This was due to an incorrect "settlement scoring" of 9 which included 3 points allocated for "employment opportunities within settlement" on the basis of the nearby Westwinds industrial estate. These points should not have been allocated. 3 points puts this site on a par with towns in the Vale like Barry, which is entirely inappropriate. There are only 4 light industrial buildings on this site. A survey of these employers has confirmed that no new jobs have become available in the last 9 years and that the units collectively employ fewer than 15

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people with no intention to expand. Furthermore, one of the units has been empty and the development is not a popular industrial site.

Our representations in relation to each of the tests of 'soundness' are as follows:

TEST PI - It has not been prepared in accordance with the Delivery Agreement including the Community Involvement Scheme

The local community have not been involved in the decision to allocate this site for 40 houses. We understand that neither the school nor the LEA were consulted. We do not believe that Llangan Community Council was consulted at any previous stage in the draft LDP process.

TEST P2 - The plan and its policies have not been subjected to Sustainability Appraisal including Strategic Environmental Assessment

The Sustainability Appraisal of the Garden Emporium site is wrong in its assessment of the Garden Emporium site's ability to meet the Sustainability Appraisal's objectives because:

- 1. The site is incorrectly rated '++' (strongly contributes) as regards objective 1, which is "To provide the opportunity for people to meet their housing needs." Although this site falls within the Rural Vale, the Rural Vale is a very large area and there is no particular local specific need for this housing. As far as affordable housing is concerned, it is only proposed that the site provides the standard 35% affordable housing which means it is no different to better than any other site. The '++' rating should be reduced to '+' (contributes).
- 2. The site is incorrectly rated '+' (contributes) as regards objective 2, which is "To maintain, promote and enhance the range of local facilities". There is no suggestion that the proposed development will in any way enhance the local facilities. In fact it will place increased pressure on the following existing local facilities: the primary school, which has no spaces; the playground/open space at Fferm Goch, as we note there is no suggestion of on-site open space being provided on the Garden Emporium site (particularly given the high density of housing which 40 homes would involve and in fact on-site provision was not offered even for the extant planning permission for 12 houses); and the community hall, which already serves a large number of houses and is of a limited capacity. This' +' rating should be changed to a '--' ( strongly detracts) rating.
- 3. The site is incorrectly rated '++' (strongly contributes) as regards objective 8, which is "To use land effectively and efficiently". Although part of the site is 'brownfield' and has been previously developed as a garden centre, a large section at the rear of the site (approximately 30% of the entire site) has never been developed. It was this area which was identified as a habitat management area in the extant planning permission for 12 houses. The requirement for a habitat management area was in part due to the presence of a very rare species of plant on the site (Bithynian vetch). This rating should be reduced to a '+' (contributes) rating, to acknowledge the fact that while the development would reuse the developed part of the site, it would also use a currently undeveloped, greenfield, area.
- 4. The site is incorrectly rated '++' (strongly contributes) as regards objective 9, which is "To protect and enhance the built environment and natural environment". This is wrong for the reasons given in point 3 above. If the site was developed for 40 houses there would be no room whatsoever for any habitat management or other effective biodiversity area as has been required by the extant planning permission. This will mean the loss of a very rare plant species which has only been found in two other locations in the whole of Wales. This rating should therefore be reduced altogether to a '--' (strongly detracts) rating.
- 5. The site is incorrectly rated '0' (neutral) as regards objective 11, which is "To protect, enhance and promote the quality and character of the Vale of Glamorgan's culture and heritage." This is wrong for the same reasons as at points 3 and 4 above. The Council has resolved to protect the very rare plant species which has been added to its local biodiversity action plan. This resolution by the Council (which was made specifically in response to the survey which identified this plant on this site) indicates its recognition of the species' importance to the culture and heritage of the Vale of Glamorgan. This rating should therefore be reduced to a '--' (strongly detracts) rating.
- 6. The site is incorrectly rated '+' (contributes) rating as regards objective 12, which is, "To reduce the need to travel and enable the use of more sustainable modes of transport". This rating is wrong because although it will be possible to travel by foot or bicycle to the primary school and the community hall, every other service and local amenity including employment can only be accessed by private car. The bus service to the site is so poor that it does not even merit a rating on the Council's sustainable settlements score. This rating should therefore be reduced to a '- -' (strongly detracts) rating.

TEST C2 - It does not have regard to National Policy

- A) The proposed allocation of the Garden Emporium site for 40 houses fails to meet Planning Policy Wales (February 2011) ("PPW") in the following respects:
- 1. The Garden Emporium site is totally unsustainable. It is located in the Rural Vale, surrounded by open countryside and 7 miles from Cowbridge and 8 miles from Bridgend. Realistically anyone living in this location will rely on private cars to get to and from the site for work, shops, everything except the primary school, which, as stated below, is full.
- 2. The nearest corner shop is in Pencoed to which there is no public transport; otherwise it is necessary to drive to Cowbridge or Bridgend or one of the large supermarkets on the edge of Bridgend.

The current planning permission for the site is for 12 houses, of which at least 30% (i.e. 4) are to be affordable. There is a condition forming part of the planning permission (condition 10) which requires each of the 8 private units to be live-work units and requires that the business floor space of the live/work unit shall be finished ready for occupation before the residential floor space is occupied. The reason given for

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this condition is "In order to ensure a satisfactory and sustainable form of development which will support and enhance the local rural community and in order for the development to comply with policies ENV27, ENV29 and EMP2 of the UDP." It is apparent from reading documents associated with the planning permission that although the application originally proposed the live-work units and made much of them improving the sustainability of the site, at a later date the applicant asked the LP A not to impose this condition. However, the LP A insisted it was required.

There is no suggestion that the 40 houses now proposed for the site would be live-work units. Even if this condition was imposed this site would still be unsustainable as the residents would need to drive for everything except work. It also seems likely that they would need to make business-related journeys and of course, depending upon their business, additional car journeys could in fact be created by these businesses (for example, a hairdressers).

This is contrary to PPW (paragraph 4.6.2) which states, 'Development plans ... should secure a sustainable settlement pattern which meets the needs of the economy, the environment and health, while respecting local diversity and protecting the character and cultural identity of communities.'

2. The Garden Emporium site is very poorly served by public transport - there is only a very limited bus service to and from Fferm Goch (5 buses per day to Bridgend; 4 per day from Bridgend which go on to Cowbridge). There is no bus service to the nearest train station at Pencoed (3 miles away, along roads with no pedestrian footway). This is contrary to PPW (paragraph 4.6.4), which states, 'Local planning authorities should assess the extent to which their development plan settlement strategies and new development are consistent with minimising the need to travel and increasing accessibility by modes other than the private car. "Higher density development, including residential development, should be encouraged near public transport nodes or near corridors well served by public transport (or with the potential to be so served).'

This is added to by paragraph 4.6.7 PPW which stresses that, 'In rural areas the majority of new development should be located in those settlements which have relatively good accessibility by non-car modes.' This is emphasized again in paragraph 8.7.3 PPW which states, 'It is also expected that the proposed access to a development will reflect the likely travel patterns involved. It should ensure that people can reach the development, as far as practicable, by walking, cycling and public transport, as well as by car.'

3. The existing local infrastructure will not be able to serve a further 40 houses at the Garden Emporium site. There is very little local infrastructure available at this site, but two issues are relevant - the local primary school (Llangan primary school) and highways issues:

Llangan primary school

Llangan primary school is within walking distance of the site. However, this school is very small and is full. The Local Education Authority has told us that Llangan primary school's maximum capacity is 111 pupils, and the number on the roll as at September 2011 was 108 pupils. The admission number of new pupils each year is no more than 15. This is because several year groups are combined (i. e. two year groups being taught as a single class, in one classroom) and the LEA needs to comply with the requirement in its education plan to have no more than 30 children in each classroom. Although in some circumstances it might be appropriate to deal with this by seeking a s 1 06 contribution from the developers to increase the capacity of the school, in this case the school has neither the space nor the land to expand to take on more pupils.

Two classes are already being taught in terrapins located in the playground and the school only has a relatively small area of grass which has already been diminished as a result of building a new school hall and two classrooms a few years ago. It is noted that in the planning officer's report for the current 12-house planning permission the education authority thought that there was enough space in local primary school~ (it did not specify any in particular) to accommodate the children from 12 houses- 40 houses is very different. From speaking to the LEA, we understand that according to their formula for calculating the number of primary school places generated by new houses, 40 new houses would result in 15 primary age children needing places. There is therefore currently no possibility for the school to provide places for the primary-age children from this development who would have to be driven to other schools some distance away.

Highway safety issues

When Council considered the current planning permission the highways department was originally concerned about there being more than one exit from the site, when there were only 12 houses. The extant planning permission includes a condition (condition 20) that the site shall be served by no more than two means of access onto Ruthin Road - with the primary access to serve no more than 8 dwellings and the secondary access to serve no more than 4 dwellings. How many exits would be proposed for 40? This road is used heavily by traffic, particularly during peak times - many drivers, including a significant number of large lorries, use it as a short cut from the A48 to the M4. It is also the main pedestrian cycleway to Llangan primary school from Fferm Goch Heol Llidiard/St Mary Hill and is used on a daily basis by those residents for that purpose. Currently only a few single houses have driveways onto this road. Having an additional 40 houses here will increase the traffic considerably, at increased safety risk to existing drivers and pedestrians and cyclists.

This is therefore contrary to paragraph 4.6.8 of PPW which states, 'Development in the countryside should be located within and adjoining those settlements where it can be best accommodated in terms of infrastructure, access and habitat and landscape conservation.' It is also contrary to paragraph 9.2.9 of PPW which states, 'Local planning authorities should consider the following criteria in deciding which sites to allocate for housing in their development plans: ...

• the location of potential development sites and their accessibility to jobs, shops and services by modes other than the car, and the potential for improving such accessibility

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- the capacity of existing and potential infrastructure including public transport ... and social infrastructure (such as schools ... ), to absorb further development and the cost of adding further infrastructure ... "
- 4. The development of the Garden Emporium site cannot be described as infilling or a minor extension to Fferm Goch. It is located adjacent to Fferm Goch, but the proposed 40 houses are more than Fferm Goch and Heol Llidiard combined (which amount to 33 houses). It is totally out of scale for this area.

It also cannot be claimed to meet any "local need" for affordable housing. The Council's own background documents recognise that the need for affordable housing is greater in the larger settlements in the Vale, such as Barry. Section 3.9 of the draft LDP states that, 'The findings of the [Local Housing Market Assessment 2010] make clear that the area of greatest need is Barry followed by the coastal settlements of Rhoose, Llantwit Major and Penarth as well as the Rural and Eastern Vale." This statement is supported by the Council's 'Affordable Housing' background paper (November 2011), in which Table 2 in paragraph 3.7 specifies an identified need of 3.5 units of affordable housing per year in the Rural Vale. This is a very low number of units to be accommodated within a large area of land and there is no need for such a high concentration of units to be accommodated on the Garden Emporium site. In fact, the existing houses at Fferm Goch are sold at considerably less than the average house price in this area (i.e. the Rural Vale). No.3 Fferm Goch was sold in June 2011 for £180,000 and No.8 has been on the market for £185,000.

Notwithstanding these prices, these houses often remain on the market for some time – at least a year. Fferm Goch is private market housing which was originally Agricultural Settlement Houses (a form of Council housing) developed by the Welsh Land Society in 1939. Why do we need more houses at affordable prices in this location? There is no identified local need to be met.

We understand from speaking to a Council officer that the main reason the Council are prepared to consider 40 houses on this site is the need for more affordable housing in the Vale. While we have no problem with the principle of 35% of new housing being affordable, we do not think that this policy should be used to 'reverse engineer' such a huge increase in the total number of houses being proposed on this site. With the original planning permission 12 houses, 30% would have resulted in an entirely sensible allocation of 4 affordable houses. To invert this reasoning and specify a total of 40 houses in the hopes of raising the number of affordable housing on the site defies logic. At a rate of 3 5% this would only give 14 affordable houses - an increase of only 10 affordable houses from the existing planning permission - at the cost of an increase of 18 private houses (from 8 to 26). The detrimental impact this development will have on the local community is a disproportionate sacrifice to make for an additional 10 affordable houses.

The proposal for 40 houses on this site is therefore contrary to paragraph 4.6.8 of PPW which states, "Infilling or minor extensions to existing settlements may be acceptable, in particular where it meets a local need for affordable housing, but new building in the open countryside away from existing settlements or areas allocated for development in development plans must continue to be strictly controlled. All new development should respect the character of the surrounding area and should be of appropriate scale and design.

If 40 houses are built on the Garden Emporium site this will be significant overdevelopment of this site at a density which should not be permitted in this location. The following points are relevant:

- a) It is acknowledged and accepted that the site has existing planning permission for 12 houses; this is a brownfield site where there has been a number of failed garden centres and it was perhaps inevitable that it would eventually be developed for housing. The development of the site with 12 houses is accepted, although even with 12 houses there are still concerns about the impact these will have on the local school and highways.
- b) However, 40 houses will make the site crowded and out of keeping with the rural area. Fferm Goch has a particular and special history it was built by the Welsh Land Society in 1939 to promote employment in rural areas and in this case to provide social housing and a community for farm workers at the large farm across the road and the houses at Fferm Goch form 3 sides of a square with a large grass pitch and play area in the middle. There is no suggestion that the proposal for the Garden Emporium site would be designed in a similar way. Fferm Goch should not in any event be used as an excuse to set a "precedent" for this locality, where other housing consists of isolated dwellings.
- c) The previous planning history of the site is relevant the Council previously considered proposals for 42 and 24 houses and rejected both on grounds of over-development, of this site.

This is contrary to paragraph 9.2.12 ofPPW which states, 'Strong pressure for development may give rise to inappropriately high densities if not carefully controlled.' In paragraph 9.2.22 it states, 'In order to safeguard the character and appearance of the countryside, to reduce the need to travel by car and to economise on the provision of services, new houses in the countryside away from existing settlements recognised in development plans or from other areas allocated for development must be strictly controlled. Many parts of the countryside have isolated groups of dwellings. Sensitive filling-in of small gaps or minor extensions to such groups, in particular for affordable housing to meet local need, may be acceptable but much depends on the character of the surroundings, the pattern of development in the area and the accessibility to main towns and villages.' In paragraph 9.3.4 PPW states, 'In determining applications for new housing, local planning authorities should ensure that the proposed development does not damage an area's character and amenity.' The proposed development of this site with 40 houses would significantly damage the character of this area.

6. If 40 houses are built on the Garden Emporium Site, it will result in the loss of a rare plant species, Bithynian Vetch, which has been identified by the Council in its Local Biodiversity Action Plan.

The extant planning permission for the Garden Emporium site includes:

a) a condition (condition 9) that a significant proportion of the site (approx. 30% - being the whole of the back strip of the site edged green on the approved plan) shall have no buildings located on it and all

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properties shall be located at least 10 metres from this boundary within the development site; and

b) another condition (condition 12) that this area shall be designated as a habitat management area to be supported by a comprehensive habitat management plan. The plan is to pay particular regard to the areas where Bithynian vetch has been found and seek to maintain and conserve this species.

These conditions were imposed in particular to preserve the species Bithynian vetch. It is apparent from the planning officer's report associated with the current planning permission that Bithynian vetch was found on the site during the course of an ecological survey being carried out, at the request of the Countryside Council for Wales. The report states that Bithynian vetch is a rare species, included as vulnerable on the UK vascular plant red data list and endangered on the Welsh list. The report says that this species was previously unknown to occur in the Vale of Glamorgan and is known to occur on only 2 other sites in the whole of Wales. As a result, the Council held a special meeting to decide to protect this plant by placing it on the Council's 2002 Local Biodiversity Action Plan.

There is no suggestion in the draft LDP that this large part of the site - which the planning officer's report recognises is open land rather than previously-developed land - would not be open to development and it would seem difficult/impossible for a planning permission for 40 houses on this site to protect the same area as a "no-build" zone. The Proposals map includes this part of the site within the area proposed to be allocated for 40 houses. The fact that this open area of land at the back of the site would not be built on under the terms of the current planning permission was a material consideration for the planning officer in recommending approval of the planning application for 12 houses (see the planning officer's report, page 12).

The allocation of 40 houses is therefore contrary to PPW paragraph 5.2.8 which states, 'Local planning authorities must address biodiversity issues, in so far as they relate to land use planning in both development plans and development control decisions. Paragraph 5.2.2 of PPW recognises that, 'The Natural Environment and Rural Communities Act 2006 places a duty on every public authority, in exercising its functions, to have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity.' The extant planning permission allowed for the preservation of this rare plant by allocating a significant portion of the site to be a no-build zone - a habitat conservation area. This area will not be possible if 40 houses are built.

B) The proposed designation of Fferm Goch as a "Minor Rural Settlement" also fails to meet PPW because it is plainly not a sustainable settlement and has been incorrectly assessed by the Council. This incorrect designation (which is considered in detail in Test CE2 below) infringes the following paragraphs of PPW: 4,6.2, 4.6.4, 4.6.7, 4.6.8, 8.7.3, 9.2.9, 9.2.12, 9.2.22 and 9.3.4 (all as cited above). If it were identified as a Minor Rural Settlement, Fferm Goch would be at risk of future residential development being allowed in this location through policy MG7 of the draft LDP. Fferm Goch is not a location where new development should routinely be permitted since it would infringe all the sustainability principles for development in rural locations.

TEST C3 - It does not have regard to the Wales Spatial Plan (wSP)

The Wales Spatial Plan update 2008 states at paragraph 1.4 that, 'It is a principle of the Wales Spatial Plan that development should be sustainable. Sustainable development is about improving wellbeing and quality of life by integrating social, economic and environmental objectives in the context of more efficient use of natural resources.' The Garden Emporium Site is a totally unsustainable site for reasons given above (Test C2).

TEST C4 - It does not have regard to the relevant Community Strategy

The Community Strategy for the Vale 2011-21 sets out 10 priority outcomes. The allocation of the Garden Emporium for 40 houses fails to have regard to the following of these priorities:

- "2. The diverse needs of local people are met through the provision of customer focused, accessible services and information." This priority is not met because the Garden Emporium site is so far from shops, health services, local amenities and workplaces as well as having poor public transport.
- "3. Vale residents and organisations respect the local environment and work together to meet the challenge of climate change." This priority is not met because the Garden Emporium site will require all its residents to travel by car to access every local service save the primary school (which does not have sufficient space for the children of 40 families, so primary school pupils will have to travel by car to other schools) "4. Older people are valued and empowered to remain independent, healthy and active.

They have equality of opportunity and receive high quality services to meet their diverse needs." This priority is not met because public transport to this site is very poor both in terms of timetabling and route, which greatly inhibits their chance of remaining independent.

Also, there are no local services available to them such as healthcare, library or other local amenities.

- "5. Children and Young people in the Vale are well informed and supported to access a broad range of quality services that enable them to take full advantage of the life opportunities available in their local communities and beyond." This priority is not met because the local primary school is unable to accommodate the projected increase in pupil numbers from 40 new homes. Children will need to travel to other primary schools. Public transport from this site is very poor. Children will need to travel by car to primary school and to all other activities and services including leisure activities.
- "6. People of all ages are able to access coordinated learning opportunities and have the necessary skills to reach their full potential, helping to remove barriers to employment." This priority is not met because

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there are no learning opportunities present near the site nor, more importantly, are there any employment opportunities near the site either.

"7. The underlying causes of deprivation are tackled and the regeneration of the Vale continues, opportunities for individuals. and businesses are developed and the quality of the built and natural environment is protected and enhanced." This priority is not met because the proposed allocation of 40 houses on the Garden Emporium will not protect and enhance the natural environment of the Vale: in order to develop 40 houses the entirety of the site will have to be developed, whereas the current planning permission requires the back third of the site to be allocated as a habitat management area. A key reason for this habitat management area was to preserve a very rare plant species growing on the site.

"10. Health inequalities are reduced and residents are able to access the necessary services, information and advice to improve their wellbeing and quality of life." This priority is not met because there are no local health services near the site. Such services can only be accessed by driving to one of the nearby towns.

TEST C5 - The Plan does not set out a coherent strategy from which its policies and allocations logically flow and, where cross boundary issues are relevant, it is not compatible with the development plans prepared by neighbouring authorities.

The draft LDP Strategy is stated (page 23) to comprise four key elements - one of these is 'Other sustainable settlements to accommodate further housing and associated development'.

This element of the draft LDP strategy is based on the designation of certain towns and villages within the Vale as "sustainable settlements". However, Fferm Goch is wrongly identified in the strategy as a "Minor Rural Settlement", for reasons set out under Test CE2 below.

The draft LDP at Section 5. 10 (page 25) states that minor rural settlements are those 'considered to have sufficient population, services and facilities to assimilate growth without it having a detrimental impact on their existing character and local environment.' Also, at Section 5.16 of the draft LDP (page 27), 'The types of services and facilities typically found within the minor rural settlements include places of worship, community halls, small-scale retail uses and formal recreational facilities. A number of the smaller rural settlements also provide small-scale local employment opportunities, either within or in close proximity to the settlements.'

Neither of these descriptions fit Fferm Goch - for reasons set out under Test CE2. The strategy base for the rest of the LDP policies is therefore wrong in this respect.

The draft LDP Strategy is stated to follow on from the Vision and Objectives set out in the draft LDP. The Vision is stated to be for the Vale of Glamorgan to be "a place:

- That is safe, clean and attractive, where individuals and communities have sustainable opportunities to improve their health, learning and skills, prosperity and wellbeing ... "

The proposed allocation of the Garden Emporium site will be contrary to this Vision, being unsustainable development in an area with very poor public transport where there are no employment prospects and allieaming, health and other facilities can only be accessed using the car.

The allocation of this site will also be contrary to the following Objectives set out in the draft LDP:

"Objective 1: To sustain and further the development of sustainable communities within the Vale of Glamorgan, providing opportunities for living, learning, working and socialising for all" - The proposed Garden Emporium site is in a wholly unsustainable location, as is the adjacent Fferm Goch.

"Objective 2: To ensure that development within the Vale of Glamorgan makes a positive contribution towards reducing the impact of and mitigating the adverse effects of climate change." - The effects of climate change will be increased if a further 40 houses are built in this location where people will have to use cars to meet their daily needs.

"Objective 3: To reduce the need for Vale of Glamorgan residents to travel to meet their daily needs and enabling them greater access to sustainable forms of transport" - Public transport at this site is very poor.

"Objective 4: To protect and enhance the Vale of Glamorgan's historic, built and natural environment" - The proposed development of the Garden Emporium site represents overdevelopment of this site, which is out of keeping with the rural area. It will also fail to preserve the back third of the site as a habitat conservation area, as proposed by the extant planning permission for 12 houses on the site.

"Objective 5: To maintain, enhance and promote community facilities and services in the Vale of Glamorgan" - The proposed development at the Garden Emporium site will place increased pressure on resources - in particular Llangan primary school which is full.

"Objective 7: To provide the opportunity for people in the Vale of Glamorgan to meet their housing !leeds." - There is no need for this housing at this location.

"Objective 10: To ensure that development within the Vale of Glamorgan uses land effectively and efficiently and to promote the sustainable use and management of natural resources." – If 40 houses are allowed to be built at the Garden Emporium site then the rear part of the Garden Emporium site, which is greenfield and has not previously been built on, will be.

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TEST 2 - The strategy, policies and allocations are not realistic and appropriate having considered the relevant alternatives and/or are not founded on a robust and credible evidence base.

1. Incorrect classification of Fferm Goch as a Minor Rural Settlement (Section 5.11 of the draft LDP):

Fferm Goch has been wrongly classified by the Council as a "Minor Rural Settlement" for the following reasons:

- a) In the Council's 'Sustainable Settlements Appraisal Review' Background paper (November 2011) ('the SSAR') -Fferm Goch should have been classified as being one of the rural, hamlets and isolated areas of the Vale of Glamorgan with an 'Anomaly Settlement' score. In paragraph 5.15 of the SSAR, the Council recognises that there are a number of settlements with relatively high scores which have been identified with anomaly scores because, for example, the settlement is located within walking distance of a one-off, high-scoring facility. Paragraph 5.15 says anomaly settlements have been identified by 'overriding' or 'limiting' factors such as:
- (i) a general limited range of services and facilities within the settlement,
- (ii) a low population (generally below 100), and/or
- (iv) the settlement being in an otherwise isolated or sensitive location.

All of these factors apply to Fferm Goch. Fferm Goch is a classic example of an anomaly settlement since it receives a full 3' score due to its proximity to a primary school. The employment score is wrong (see below), so its overall score should have been 6. It has a population of 98 (i.e. below 100). It is in an isolated location.

- b) It is the smallest of the "Minor Rural Settlements" with only 98 residents (nb Council say should have over 100) there are several other settlements with higher populations which are not classified as Minor Rural Settlements.
- c) Unlike all the other "Minor Rural Settlements" it is not recognised locally as a village it has no place sign of its own, only a street sign.
- d) it was not originally classified as a "Minor Rural Settlement" it seems to have been reclassified during the development plan process probably due to representations by the property developers who own the Garden Emporium (we note representations made by Winchester Properties on the draft preferred strategy in March 2009).
- e) The settlement scoring criteria for Fferm Goch is wrong in the SSAR Fferm Goch scores 3 for employment which is defined as meaning that there are employment opportunities on site. The only employment opportunity near Fferm Goch is Westwinds industrial estate.

This is a very small estate with only 4 light industrial buildings. A survey of these employers has confirmed that no new jobs have become available in the last 9 years and that the units collectively employ fewer than 15 people with no intention to expand.

Furthermore, one of the units has been empty and the development is not a popular industrial site. It cannot be right that this small industrial estate is classified as the same employment opportunity as those available in towns in the Vale, such as Barry, Penarth and Cowbridge. We believe Fferm Goch should score 0 for employment.

- f) Fferm Goch rightly does not have any designation as a settlement in the current UDP it is correctly classified along with other small hamlets as "open countryside". In the planning officer's report which considered the current planning permission it was "concluded that the development of the site for no more than 12 residential units, when taking into account the other material considerations would be sufficient to outweigh the local policy presumption against such development found in the Unitary Development Plan, subject to conditions and a Section 106 Legal Agreement requiring contributions to mitigate the impacts of the development" (page 22). The planning officer's report also noted, at page 12, that, "Categorising the site as brown field or previously developed land is a material consideration that does not, on its own, justify its suitability for residential development, however, the proposed amendments to the scheme concentrating development into the previously built up part of the site does have a bearing on the consequent policy position",
- g) If the list of other Minor Rural Settlements is considered, together with those which the Council decided were Anomaly Settlements or simply HamletslRural Areas, Fferm Goch stands out as an odd allocation we would strongly suggest it cannot be considered equal to any of the other Minor Rural Settlements, including nearby Graig Penllyn and Treoes, which are both substantial villages. It is much more similar to The Herberts, which the Council considered to be an Anomaly Settlement inspite of it having a primary school like Fferm Goch, although The Herberts scores for having a bus service and being much nearer to Cowbridge, whereas Fferm Goch does not. There are also villages which again are much more substantial than Fferm Goch which are not recognised as Minor Rural Settlements, including nearby Llangan and Welsh St Donats.
- h) The draft LDP at Section 5.19 (page 33) sets out the following 'common objectives' for the Minor Rural Settlements:
- ' Favour proposals which seek to protect and enhance the viability, accessibility or community value of existing village facilities and transport services.

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- Provide for an appropriate level, range and choice of housing, including affordable rural housing to meet local need.
- Encourage the diversification of the rural economy by favouring appropriate employment and tourism related developments.

Further, these objects are supported by Policy MG7 which at section 7.34 (page 83) states,

'New development however must always be of an appropriate scale, form and design that is sympathetic to and respects the existing character of the village and the range of services and facilities that are available. This will generally comprise infilling or limited small scale extensions to the minor rural settlements, in particular where they meet the need for local affordable housing.' Considering these statements as a whole it is apparent that Fferm Goch does not fit comfortably as a Minor Rural Settlement.

- i) If it were identified as a Minor Rural Settlement, Fferm Goch would be at risk of future residential development being allowed in this location through policy MG7 of the draft LDP. Fferm Goch is not a location where new development should routinely be permitted since it would infringe all the sustainability principles for development in rural locations. The only reason housing development has been permitted at the Garden Emporium site is because it is a brownfield site this is an exceptional site in this location.
- 2. Inappropriate allocation of 40 houses at the Garden Emporium site at Fferm Goch (policy MG2):

The allocation of 40 houses at the Garden Emporium site is inappropriate for the following reasons:

- a) A large part of the argument for allowing a huge increase in the number of houses proposed at the Garden Emporium site appears to be the classification of fferm Goch as a minor rural settlement, which is incorrect for the reasons stated above.
- b) The number of houses to be allocated at the Garden Emporium should reflect the extant planning permission for 12 houses. The draft LDP, Section 7.11 (page 75) states that, 'The number of units proposed for each identified site [which includes the Garden Emporium] is based on a density range between 25 and 30 units net per hectare or where they are available, planning application or pre-application details. Where site densities differ from these levels, this reflects local site circumstances or sensitivities.' In this case there is an existing planning permission for 12 units which should therefore have been the starting point for this site and there are good reasons why a higher density of units should not be permitted and has been consistently refused by the Council on planning applications considered to date (unsustainability, lack of local infrastructure and employment, very poor public transport and preservation of a rare plant).
- c) Policy MG8 (page 84) states 'In Minor Rural Settlements, a net residential density of 25 net dwellings per hectare will be required.' It then continues 'Lower density levels will be permitted where it can be demonstrated that:
- 1. Development at the prescribed densities would have an unacceptable impact on the character of the surrounding area;
- 2. Reduced densities are required ... to preserve a feature that would contribute to existing or future local amenity. '-

In relation to point 1, above, development of 40 houses would have an unacceptable impact on this area which with the exception of Fferm Goch consists of isolated and dispersed rural houses.

In relation to point 2. above, there is an identified rare plant on this site which would be preserved by the extant planning permission.

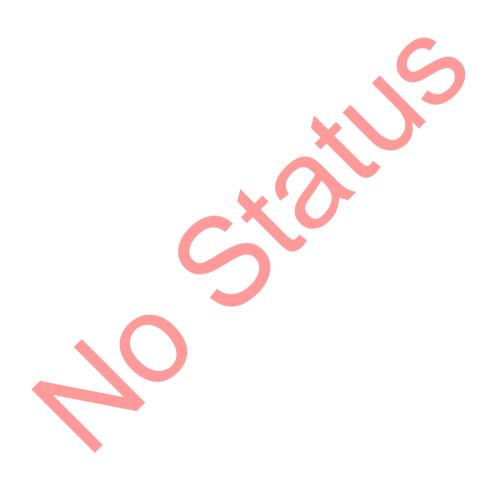
- 3f Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
  - a) Section 5.11 (page 26) delete Fferm Goch from the list of Minor Rural Settlements.
  - b) Policy MG2 (page 74) amend the number of houses allocated to The Garden Emporium, Fferm Goch from 40 to 12.
  - c) Residential allocations table (page 145) amend number of dwellings at The Garden Emporium, Fferm Goch from 40 to 12
  - d) Proposals map amend to exclude back area of site MG2(30) identified as habitat management area edged green on attached plan
  - e) Housing Supply Background Paper (November 2011) error in table 1 site no.30 The Garden Emporium, Fferm Goch number of units should be 12, not 220.
- 4b If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing Paragraph 5.11 (designation of Fferm Goch as a minor rural settlement)

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Policy MG2 (allocation of the Garden Emporium Site, Fferm Goch for 40 houses)

I am concerned that my representations may be dismissed by the Council and I would like the opportunity to make sure they have been understood.



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| Representor               | ID and d    | etails:    | 4171/D           | P2 PR Lucas             |   |                   |                      |                              |                 |                            |                            |   |   |
|---------------------------|-------------|------------|------------------|-------------------------|---|-------------------|----------------------|------------------------------|-----------------|----------------------------|----------------------------|---|---|
| Date Lodged<br>02/04/2012 | Status<br>M | Petition V | on and No.<br>34 | Supporting Evidence     | Additional SA SEA   |                   |                      | Rep format:<br>Comment for   |                 | , ,                        |                            | to be consiered by 'writter<br>ession of Public examinati | •   |
| 2a - Do you co            | onsider th  | ne LDP     | is Sound?        |                         | 2b - If you think that t<br>Procedural Tests -<br>Consistency Tests - | P1 - Yes          |                      | P2 - Yes                     |                 |                            |                            | ease indicate which test(s                                | that it fails.                                |
|                           |             |            |                  |                         | Coherence and Effec   | tiveness Tests    | - CE1 - `            | Yes                          | CE2 - Yes       | _                          | CE3 - Yes                  | CE4 - Yes   |   |
| 3a - Which pa             | rt of the I | Deposit    | Plan are y       |                         | Policy Number:<br>MG9. MD12. MG2.                                     | _                 | Paragraph .49. 6.52. | Number:<br>7.41. 7.44.       | Proposal M      |                            |                            | Constraints Map Feb 2012                                  | Appendices: Appendix 9 - Supporting Documents |
| 3b - Do you w             | ish to see  | e any cł   | nanges ma        | de to the Deposit Plan  | as a result of your rep   | oresentation?     | Yes                  |                              | (If "No" or "L  | Jnan <mark>swe</mark> red" | - go to 3d)                |   |   |
| 3c - What cha             | nges wo     | uld like   | to see mad       | le to the Deposit Plan? | New Policy: Unanswered Notes:   | Amended Po<br>Yes |                      | lew Paragraph:<br>Jnanswered | Amend<br>Unansv |                            | h: <u>New Or Am</u><br>Yes | nended Site: Other (see I<br>Unanswered                   | <del></del>                                   |
| 3d - If your re           | presenta    | ition rela | ates to a ne     | ew, deleted or amende   | d site, did you submit<br>Site Name: Land Ea                          |                   | andidate S           | iite? Yes                    | (II             | f "Yes", pleas             | •                          | ndidate Site Name and re<br>Reference: Site reference     | ,   |
| 3e - Please s             | et out vo   | ur repre   | sentation b      | pelow:                  |   |                   |                      |                              |                 |                            |                            |   |   |

The proposed Gypsy traveller site would be situated on a green field area close to the Hamlet of Llangan and would place an unacceptable pressure on the local infrastructure and services.

This proposal is against both local and national policy, in terms of development and does not meet the identified needs of the gypsy and traveller community as listed in the VOG, 2008 Fordham report. The council should seek to find smaller, suitable, sustainable sites where transient and permanent pitches are not co-located.

Attached additional information:

REPRESENTATIONS AGAINST ALLOCATION OF GYPSY & TRAVELLER SITE AT LAND EAST OF LLANGAN

TEST P1

The LDP has not been prepared in accordance with the Community Involvement Scheme, see below key points:

- The Emergency Services and Local Primary school have all confirmed that they have NOT been consulted on the proposed site MG9. The LEA confirmed they had not been consulted about the Gypsy site.
- Registered consultees have not been informed of the consultation stages.
- According to the Welsh Government's document 'Travelling to a better future' there is an onus on the LA to consult with its strategic partners in delivering Gypsy & Traveller sites. No consultation has taken place.
- Good practice (Welsh Government document 'Good Practice Design in designing Gypsy & Traveller sites') suggests that where Gypsy & Traveller sites are concerned the local community should be engaged as early as possible we believe that the Council has undertaken the minimum consultation in terms of the LDP and insufficient consultation with respect to the Gypsy & Traveller site in accordance with best practice.

TEST P2

1. The Sustainability Appraisal is flawed and contradictory — the proposed sites do not meet with national policy in respect of sustainability. The allocation of Llangan is not consistent with previous Planning Rejections by the Council which considered sustainability (Bonvilston Sept 2011) and with similar determinations by the Planning Inspectorate (Pembroke Sept 2011).

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2. The allocation of MG9 is not consistent with the proposed LDP policies.

#### TEST C1

The Land Use Plan (with regards to Gypsy & Traveller sites) does not relate to any strategy - The Housing Strategy is out dated and does not provide any structure for assessing Gypsy & Traveller needs or site location.

#### TESTC2

- 1. The Site allocation does not have regard to the following National Policy:
- -Welsh Government Circular (30/2007):
- The site is RURAL and is "UNSUSTAINABLE" as there are no local services

(no shops, food and drink outlets, doctor, dentist, Library, rail services or any main settlement within 5km etc). Llangan and Fferm Goch both score 0 points for local services in the evidence based assessment 'Sustainable Settlements Appraisal'

- The site would not comply with a RURAL EXCEPTION POLICY as it advocates that all pitches are accommodated on a RURAL site including transient pitches which would not comply with TAN 2.
- Any business operated from the site would be in contradiction of RURAL EXCEPTION guidance.
- The site allocation does not take into account the "SCALE" of the resident community. Llangan has a population of less than 100 with 35 homes and this proposal nearly doubles the size of the Hamlet.
- Example of similar site. In 2007 an application of the Sustainability issue was applied by the Planning inspector in Pembroke where an appeal was refused solely on this basis.
- The VOG Council has refused an application recently in Bonvilston on the basis of Sustainability and services in this case were closer to the site than in the case of Llangan proposal.
- Designing Gypsy and Traveller Sites Good Practice Guide The site is too small; therefore cannot meet the needs identified in the LDP.
- -The site measures 7400 m2 and could only accommodate 14 pitches without infrastructure (guidance is 500m2 per pitch plus refuse area; office; play area; infrastructure (roads etc)
- The access road to the site does not meet the minimum requirements for emergency vehicles (3.7m it is actually 15m)
- The site access is poor and "unsafe" having extended walks (in excess of 800m to bus stop) along an unlit lane with no public footpath or street lighting.
- The proposal of 21 units on the site would restrict the ability of emergency vehicles to manoeuvre around the site.
- New sites grants are available (and cost should not be a material planning consideration).
- -The guidance requires that sites are:
- sustainable the Llangan site proposal is not
- equivalent to standards that would be expected for social housing in the settled community This would not meet the standards and this site would not have been considered appropriate for development for residential in either the current or proposed plans
- have the effect of encouraging and developing good relations between

Gypsies & Travellers and the settled community — the large scale of this proposal could mean that establishing good relations with the local community of Llangan would be unlikely and could also result in increased tensions in the community.

- based on WAG guidance of Design of Gypsy traveller sites the maximum number of pitches is 14, and the proposal at Llangan exceeds this number.
- Travelling to a Better Future
- Recommends that LA's engage with their Housing Association Partners to bring sites forward. The VOG Council has not done this.
- "Situating transit provision on residential Gypsy sites is not an option preferred by the Gypsy and Traveller community as this can lead to tensions among different family groups and make site management and maintenance very difficult." This creates a sense of "fear" within the settled Gypsy & Traveller community. The proposal is recommending that transient and permanent sites are co-located.
- Planning Policy Wales 2011
- The proposed site at Llangan is greenfield land, according to the definition of brownfield land set out in Figure 4.1 of PPW;
- it will not reduce the need to travel, due to the limited local service provision in close proximity to the site;
- offers very limited access to public transport facilities;
- is not large enough to provide ancillary facilities required to support a sustainable development as set out in paragraph 3.30 in accordance with Designing Gypsy and Travellers Sites Good Practice Guide;

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- is located within a Special Landscape Area (SLA) and in close proximity to a Conservation Area. The assessment of the Llangan site incorrectly states that it is not within an SLA, so makes no reference to the sites proximity to the conservation area of Llangan. The location can be clearly seen from the conservation area.
- does not meet the identified needs of Gypsies and Travellers, in the Vale of Glamorgan (Fordham report 2008 evidence);
- does not promote sustainable access to employment, shopping, education, health, community, leisure and sports facilities;
- does not maximise opportunities for community development and social welfare;
- does not foster social inclusion due to the isolated location of the site; and
- does not contribute to improvements in health due to the isolation from services and facilities.
- 2. MG2. The draft policy MG 2 actively discriminates the Gypsy community by excluding them from the wider housing programme and potentially abuses their human rights. Policy MG 2 should be revised to allow the VOG to identify appropriate sites in the same way as Affordable Housing.

#### TESTC3

- 1. The policy does not have due regard to the Wales Spatial Plan.
- The key theme of the Wales Spatial Plan is achieving sustainable development through focusing new development in areas which have good access to key services and facilities. As there are no services surrounding the site the allocation of MG9 is not consistent with the objectives of the Wales Spatial Plan. The Gypsy site proposal fails Soundness test Consistency C3 because the policy does not have due regard to the Wales Spatial Plan.

### TESTC4

- 1. The allocation of this site does not have regard to the relevant Community Strategy in the following respects:
- "The diverse needs of local people are met through the provision of customer focused, accessible services and information". This cannot be achieved by the allocation of a non-accessible rural allocation.
- "Vale of Glamorgan residents and organisations respect the local environment and work together to meet the challenge of climate change"- The allocation of MG9 places heavy emphasis on the use of the car to access the most basic facilities shops, health, education etc.
- "Older people are valued and empowered to remain independent, healthy and active. They have equality of opportunity and receive high quality services to meet their diverse needs"— All services are miles away and inaccessible to

the older community. The VERY POOR public transport system is located

- 1050m from the site and is in excess of the maximum distances as defined in the proposed LDP and "Manual for Streets".
- "People of all ages are able to access coordinated learning opportunities and have the necessary skills to reach their full potential helping to remove barriers to employment"—There is no employment opportunity near to the site.

The local primary school has confirmed that it is full and that its projections suggest that it doesn't have the capacity for such a large development (also consider the existing approval of 12 dwellings at Fferm Goch).

- The small local industrial unit has raised concerns in relation to the scale of the proposal.

### TEST CE1

The Plan does not set out a coherent strategy in the following respects

- The Strategy makes the following statements:

The LDP will seek to provide a policy framework which: Manages the housing supply effectively in order to provide a range of good quality, affordable homes in sustainable locations

Reduces out commuting by providing opportunities for new housing, retail and employment development in accessible locations in the Vale of Glamorgan

The allocation of this rural site in open countryside does not meet this objective.

- The LDP also states its vision as being:
- "Our Vision for the Vale of Glamorgan is a place:

That is safe, clean and attractive, where individuals and communities have sustainable opportunities to improve their health, learning and skills, prosperity and wellbeing 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 sustainability of the area." The allocation of this site in policy MG9 does not meet these objectives being in a rural location with inadequate facilities and transport links.

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- The Allocation of this site in policy MG9 does not comply with the following objectives of the LDP:
- -Objective 1: To sustain and further the development of sustainable communities within the Vale of Glamorgan, providing opportunities for living, learning, working and socialising for all. The site's location would clearly not meet this objective.
- Objective 2: To ensure that development within the Vale of Glamorgan makes a positive contribution towards reducing the impact of and mitigating the adverse effects of climate change. The allocation of this site will have entirely the opposite effect to this objective.
- Objective 3: To reduce the need for Vale of Glamorgan residents to travel to meet their daily needs and enabling them greater access to sustainable forms of transport. The allocation of this site will have entirely the opposite effect to this objective.
- Objective 4: To protect and enhance the Vale of Glamorgan's historic, built, and natural environment. The development of this site would not meet this objective: a planning refusal on an adjacent site in May 2002 stated "It is a proposal that would adversely affect the undeveloped rural character of the area"
- Objective 5: To maintain, enhance and promote community facilities and services in the Vale of Glamorgan The local primary school has not been consulted, had they been it would have been recognised that the school does not have capacity, nor is it projected to have the capacity.
- Objective 7: To provide the opportunity for people in the Vale of Glamorgan to meet their housing needs- States that development of housing should be in sustainable locations This is not. Furthermore, it brings into question POLICY MD12 which is discriminatory in that Gypsy & Traveller sites are treated differently from other housing allocations. An inclusive policy would see Gypsy & Traveller sites being assessed on the same basis as AFFORDABLE HOUSING and considered for ALL candidate residential sites in the LDP
- Objective 10: To ensure that development within the Vale of Glamorgan uses land effectively and efficiently and to promote the sustainable use and management of natural resources. The inappropriate use of finite resources can impact on the ability of future generations to fulfil their needs. The LDP through favouring the use of previously developed land and the sustainable use of natural resources of whatever kind and wherever they are located, will contribute to preserving their availability for future generations. This is agricultural land in the Special Landscaped Area.

### TEST CE2

The strategies, policies and allocations are not realistic and appropriate having considered relevant alternatives and are not founded on robust evidence:

- 1. The allocation of Llangan is purely on the basis of site ownership by the Vale and does not meet the requirement of Policy MD12.
- 2. The Gypsy & Traveller site assessment (anecdotal) conflicts with other evidence based background papers; specifically the Sustainable Settlement Appraisal. The SSA states 0 points for public transport but the Gypsy & Traveller site assessment states that public transport facilities are good.
- 3. The Gypsy Traveller site assessment states "good highway access", yet the access falls considerably short of the minimum requirement for vehicle access the access lane is 2.5m wide, against a minimum requirement of 3.7m plus footpath of 1.2m.
- 4. The Gypsy Traveller site assessment does not reflect the current legal obligations of the VOG in respect of this site, yet the other site assessments highlight legal issues.
- 5. Several privately-owned sites were put forward as candidate sites for Gypsy & Traveller sites but were dismissed as they were not in Council ownership. Not being in council ownership should not be a reason to reject privately owned sites.
- 6. The key issue is that the site allocation does not reflect the identified need of the Gyosy & Traveller community as highlighted in the 2008 Fordham report.
- 7. The Gypsy Traveller site assessment suggests that Fferm Goch is the local settlement when Llangan is recognised in this and historic documents as the local settlement being only 150m from the proposed site. It appears that the council has also linking the site at Llangan to the Hamlet of Fferm Goch in order to increase the site assessment positive score.
- 8. The assessment makes no reference that the site is in a Special Landscape Area (SLA).
- 9. The assessment makes no reference that the site is adjacent to a Conservation Area, within the Conservation Management Plan for this area there is a specific requirement to protect the view from the edge of the conservation area over the proposed site. The proposed site is clearly visible form the conservation area.
- 10. The allocation of Fferm Goch as a Minor Rural Settlement is incorrect. The appraisal scored 9 points. 3 are for employment which puts this site on par with the major settlements such as Barry. This is on the basis of 4 light industrial buildings. A survey of these employers has confirmed that zero new jobs have become available in the last 9 years and that the units collectively employ fewer than 15 people with no intention to expand. Furthermore, one of the units has been empty and the development is not a popular industrial site.
- 11. Fferm Goch has a population of less than 100 (98) of the 5 sites in the Vale of Glamorgan with a population of 98 only Fferm Goch is classified as a Minor Rural site (probably based on the 9 points). The remainder are classified as Hamlets and there is a presumption against development in Hamlets (or as a minimum the scale would need to be appropriate and tied to a Rural Exception policy). The guidance requires ALL sites of a population below 100 to be classified as a Hamlet Fferm Goch should be recategorised as a Hamlet.
- 12. The Council has undertaken a study (Fordham report 2008) where the message was extremely strong that the Gypsy & Traveller community wanted smaller sites located on the fringes of larger communities. The report confirmed that isolated, rural sites restricted access to Health, Education and welfare facilities that disadvantaged them and needs to be seen in the light of the above objectives. The following is a quote from the Fordham report:

"Participants living on Shirenewton had three main criticisms: the site was too big, the distance from local amenities along with the lack of local transport,"

"This created many problems for the residents, especially the poorest: 'for a person like me on the bread line it's very tough. I can't afford to use the car', 'everything is a mile away, including the bus stop. It takes a long walk on a busy road to get to the shops and schools".

"The tables demonstrate that access to services such as local shops, health centres and education facilities from both sites is difficult by foot and by local transport systems. This difficulty was eased when

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participants used their cars, however the level of ease was lower for Roverway due to the difficult entry onto the main road".

"Participants reported that access to local amenities, health services and education was low for both sites by foot or by public transport: 'Everything is a mile away, including the bus stop. It takes a long walk on a busy road to get to the shops and schools".

"It was thought that smaller sites would reduce the problem of on-site conflicts: 'they need smaller sites and not too many different families, otherwise when you have a row the whole site becomes a war zone"

"This affected the ability of the households interviewed to access local services such as shops, health centres and education facilities. It was reported that this problem mainly affected the women: men take the vehicles that the household own to work during the day, leaving the women without their own transport and often away from public transport routes"

"Participants did not specify where in Cardiff or the Vale of Glamorgan sites should be located. It was noted that sites should be on the outskirts of towns to enable access by foot to local services such as shops, the Launderette and health centres"

"While the focus of the survey was on accommodation requirements, the questionnaire also collected information on access to services, including health and education. Research has found that poor accommodation can prevent access to services and so cannot be seen in isolation."

"Participants living on sites felt that there were site restrictions that limited their work options. These were mainly associated with the location of the sites and lack of access to public transport rather than site regulations: 'no buses, no local transport. Bad access"

"Participants living on local authority sites reported that the lack of local public transport provision in the area affected their ability to send their children to school, access health services and work opportunities, and limited their ability to attend training and education courses"

"Participants were asked about where they would like future sites to be, but were not specific about locations within the County Boroughs, instead emphasising the importance of public transport to any new sites. Government draft guidance on site design stresses the importance of access to services and the promotion of integrated co-existence' between the site and surrounding community."

"The precise location, design and facilities of any new sites should be drawn up in consultation with Gypsies and Travellers to ensure that the additional provision meets their needs. The health and safety implications of a new site's location should be considered in finding a balance between offering sites in good locations and the additional land costs this would entail. The settled community neighbouring the sites should also be involved in the consultation from an early stage."

13. An independent highway study recently undertaken by Capita Symonds, surrounding the proposed site has concluded that:

"The 1km long lane itself is of poor horizontal alignment, with poor forward visibility and unsuitable for regular vehicular traffic. If the site is developed the lane itself would need major upgrading, which would certainly change its appearance within this rural environment."

"The village school is approximately 1km from the village and 900 metres from the proposed site. It is noted that the route does not offer any facilities for pedestrians, such that the only safe way for children to travel between the site and the school safely would be by vehicle. This route would also be potentially hazardous for cycle use for children, the elderly or infirm and could be potentially hazardous for all users other than by car."

"With regard to the appropriateness of the location for a traveller's site development in relation to transportation, it is difficult to refer to standard guidelines, as few relate to "rural highways", most highway design standards for residential development relate to urban areas. Hence, the advice contained within this report is based on best available information, acceptable highway standards for developments of similar size and transport needs of small communities. Welsh Government guidelines state sites should be situated in close proximity to transport links. The Llangan site would not appear to meet that criteria, being situated away from the main transport infrastructure, sites should also have ready access to schools, doctors and shops, against which requirements Llangan again appears to fail."

"With regards to the existing lane, it is generally considered that where there is direct access to dwellings, the previous standard for developments, Design Bulletin 32 offers guidance where it states that a desirable minimum carriageway width of 5.5 metres is appropriate, together with 2.0 metre wide footways on both sides. This will allow two way traffic at all times, and safe movement of pedestrians."

"Thus the lane itself should be widened to this minimum standard, which will require the removal of the existing hedge line on one or both sides of the lane and probable acquisition of land from the adjoining fields. This will of course change the environmental character of the area substantially, but is considered essential to cater for increased vehicle and pedestrian traffic"

14. There is complete inconsistency with the allocation of MG9 against the proposed policies.

### TEST CE3

- 1. The VOG council make no reference as to how they are going to manage such a large site. The 21 unit site in Rover Way Cardiff has 3 full time Council staff allocated to it.
- 2. The current Housing Strategy expires April 2012 and makes no relevant reference as to how the Gypsy & Travelling Community will be monitored in terms of growth or need. Indeed, there is no strategy that

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underpins the Gypsy & Traveller community or housing at all.

### TEST CE4

- 1. Policy MD12 (Gypsy & Traveller) is discriminatory. It offers no flexibility for the Council to bring forward sites that are sustainable / suitable for Gypsies & Travellers through the policies derived within the plan.
- 2. MD12 should be redrafted to enable smaller, sustainable sites to be included within the Affordable Housing requirements and delivered through the Registered Social Landlord sector.
- 3. To argue that the Private Sector has been consulted to offer sites is not accepted. The private sector were not likely to volunteer sites for such a contentious use. The LDP should set clear strategies / policies to deliver sustainable sites for all members of the community; private; social and travelling. The current allocation does not meet this and could strongly be argued breeches the Human Rights of the Gypsy traveller community as it does not provide a suitable, sustainable site that meets the guidelines in the 2008 Fordham report.
- 3f Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)

The proposed Gypsy traveller site at Llangan (Policy MG9) should be removed from the LDP draft plan. The VOG should identify an alternative site that has been assessed according to a relative sustainability appraisal that considers the real situation in the local area and meets the requirements of the Gypsy community as listed in the 2008 Fordham report.

Policy MD12 should be amended so that it does not discriminate against the Gypsy & Traveller community. All sites during the plan should be assessed on a similar basis as Affordable Housing.

4b - If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -



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| Representor ID and details: 4172/DP1 P.Charteris   |   |                          |                              |                                       |   |                                |                |  |  |
|--|---|--------------------------|------------------------------|---------------------------------------|---|--------------------------------|----------------|--|--|
| Date Lodged     Status     Petition and No.     Supporting Evidence       30/03/2012     M     0 | Additional SA SEA   |                          | Rep format:<br>Letter        | ,                                     | r comments to be consideral a hearing session of Pu | •                              | •              |  |  |
| 2a - Do you consider the LDP is Sound? Unanswered  | 2b - If you think that the Plan is unsound and does not not meet one or more test(s) of soundness, please indicate which test(s) that it fails.  Procedural Tests - P1 - Unanswered P2 - Unanswered |                          |                              |                                       |   |                                |                |  |  |
|  | Consistency Tests - Coherence and Effective   |                          |                              | red C3 - Unanswe<br>E2 - Unanswered C |   | ered<br>CE4 - Unanswered       |                |  |  |
| 3a - Which part of the Deposit Plan are you commenting on?                                       | Policy Number:<br>MG2(19). MG2(20)  | <u>Paragraph</u><br>     | <u> </u>                     | oposal Map:                           | <u>Constr</u>                                       | raints Map                     | Appendices:    |  |  |
| 3b - Do you wish to see any changes made to the Deposit Plan                                     | as a result of your repre   | esentation? Unanswe      | ered (If "N                  | lo" or "Unanswered" - g               | go to 3d)   |                                |                |  |  |
| 3c - What changes would like to see made to the Deposit Plan?                                    | New Policy:<br>Unanswered<br>Notes:   |                          | New Paragraph:<br>Jnanswered | Amended Paragraph:<br>Unanswered      | New Or Amended Site<br>Unanswered                   | : Other (see Not<br>Unanswered | es):           |  |  |
| 3d - If your representation relates to a new, deleted or amende                                  | ed site, did you submit th<br>Site Name:  | ne site as a Candidate S | Site? Unanswered             | (If "Yes", please                     | give the Candidate Site<br>Site Reference:          | Name and refere                | ence if known) |  |  |

3e - Please set out your representation below:

As a resident of Dinas Powys I wish to express my concerns re. the implications of the effect that the proposed additional housing would have on the local highways network.

In Dinas Powys it is proposed that a minimum of 400 addition houses will be built on the St Cyres annexe and Caerleon Road, Both sites are on the Murch side of the community which is served by only two access points to the main road [A4055]. Both these junctions, namely the Infants School traffic lights at Murch Bridge and Cross Common Road at its junction with the A4055 are either at capacity or structurally suspect.

The 400 houses would generate between 600 to 800 additional cars in both directions, particularly at peak times. The additional traffic would have a profound and adverse impact on the community as the existing roads are under great pressure now.

Further, I am concerned that there have not been any proposed extra community facilities of substance. A local church is in desperate need of a permanent base, the local sporting facilities are not adequate for the present demand and medical services are restricted due to the limitations of space at the Dinas Powys Surgery premises on Cardiff Road.

There appears to be no serious consideration having been given to other views as to the future possible use of St Cyres Annexe, Murch Road. It is worth noting that the school buildings are in good condition although in need of a little investment. To simply seek to tear down the school without any reference to the community needs would be a shameful waste. I also have concerns regarding the capacity of the local schools to accommodate the extra pupils due to the additional houses.

Then there is the wider consideration of the Plan. Up to 10,000 additional houses are planned, many in the south east area of the Vale, e.g. 2,000 units already having been approved at the Waterfront, Barry.

Much of this traffic will be funnelled through Dinas Powys and join the ever lengthening queues leading to and from the Merrie Harrier. The proposals in Sully, Penarth, Lavernock and the land adjacent St Josephs' School, Sully Road will only add to the existing congestion at this junction.

Already the air pollution levels are excessive. The Nitrogen Dioxide [N02] levels are recorded as being 43.8 units with the maximum recommended level being 40 units along Cardiff Road, Eastbrook. An increase in vehicles, particularly standing traffic, would exacerbate the situation. The level of other emissions such as CO (carbon monoxide) and Particulates [PM105] are not available but need clarifying

The Deposit plan does not indicate what measures will be taken to encourage the availability and use of public transport. I understand that there is a serious lack of rolling stock in Wales and providing extra trains will be a major challenge. Additional buses would simply be caught up in the traffic chaos the extra housing would cause.

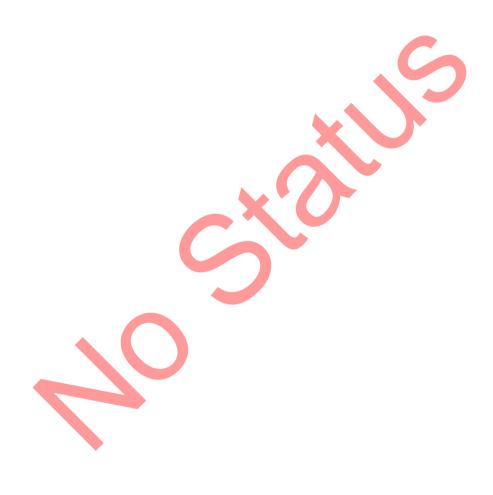
It is essential that major highway infrastructure improvements are made BEFORE hundreds of additional housing could even be considered.

(ordered by Representation ID No.)

Representor ID and details: 4172/DP1 P.Charteris

3f - Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)

4b - If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -



(ordered by Representation ID No.)

| Representor ID and details: 4173/DP1 RS Powell  |   |   |                                  |  |                                      |  |                                    |
|---|---|---|----------------------------------|--|--------------------------------------|--|------------------------------------|
| Date Lodged     Status     Petition and No.     Supporting Evidence       02/04/2012     M     0  | e Additional SA SEA                           |   | Rep format:<br>Comment form      | 4a - do you want you<br>you want to speak at |                                      |  | representations' or do on? Written |
| 2a - Do you consider the LDP is Sound? Unsound  | 2b - If you think that the Procedural Tests - | he Plan is unsound and<br>P1 - Unanswered       | does not not meet<br>P2 - Unansw | one or more test(s) of so<br>rered           | undness, please ind                  | licate which test(s)                   | that it fails.                     |
|   | Consistency Tests -                           | C1 - Unanswered                                 | C2 - Unansw                      | ered C3 - Unanswe                            | red C4 - Unan                        | swered                                 |                                    |
|   | Coherence and Effect                          | tiveness Tests - CE1 -                          | Unanswered (                     | CE2 - Yes C                                  | E3 - Unanswered                      | CE4 - Unanswe                          | red                                |
| 3a - Which part of the Deposit Plan are you commenting on?  | Policy Number:                                | <u>Paragraph</u>                                | Number: F                        | Proposal Map:                                | <u>Co</u>                            | nstraints Map                          | Appendices:                        |
|   |   |   |                                  | MG2(13)                                      |                                      |  |                                    |
| 3b - Do you wish to see any changes made to the Deposit Pla   | an as a result of your rep                    | presentation? Yes                               | (If '                            | No" or "Unanswered" - g                      | go to 3d)                            |  |                                    |
| 3c - What changes would like to see made to the Deposit Pla   | n? New Policy:<br>Unanswered                  |   | New Paragraph:<br>Unanswered     | Amended Paragraph:<br>Unanswered             | New Or Amended<br>Yes                | Site: Other (see N<br>Unanswered       | <del></del>                        |
|   | Notes:  |   |                                  |  |                                      |  |                                    |
| 3d - If your representation relates to a new, deleted or amend  | , ,   | the site as a Candidate west of St Athan Road L | . <b>.</b>                       |  | give the Candidate<br>Site Reference | Site Name and reference: 2446/CS1, 244 | ,                                  |
| 3e - Please set out your representation below: -I do not support this planI believe that a development of 100 houses will not fit ir -There are clearly going to access issues especially fror -There will be considerable impact on Cowbridge with pr -The current area is a designated Public Right of Way. | n the windmill lane area                      |   |                                  |  |                                      |  |                                    |
| 3f - Please outline the changes you wish to see made to the Have candidate site removed and include as a green we   |   |   | ns.                              |  |                                      |  |                                    |
| 4b - If you wish to speak, please confirm which part of your re   | epresentation you wish t                      | o speak to the inspector                        | about and why the                | y consider it be necessa                     | ry to speak at the he                | earing -                               |                                    |

(ordered by Representation ID No.)

| Representor ID and details: 4174/DP1 D Williams  |   |  |                              |                                 |  |                                |                 |  |  |  |
|--|---|--|------------------------------|---------------------------------|--|--------------------------------|-----------------|--|--|--|
| Date Lodged     Status     Petition and No.     Supporting Evidence       02/04/2012     M     0 | Additional SA SEA                             |  | Rep format:<br>Comment form  | , ,                             | our comments to be cons<br>at a hearing session of P | •                              | •               |  |  |  |
| 2a - Do you consider the LDP is Sound? Unsound   | 2b - If you think that the Procedural Tests - | b - If you think that the Plan is unsound and does not not meet one or more test(s) of soundness, please indicate which test(s) that it fails.  Procedural Tests - P1 - Unanswered P2 - Unanswered |                              |                                 |  |                                |                 |  |  |  |
|  | Consistency Tests -                           | C1 - Unanswered  | C2 - Unanswe                 | ered C3 - Unansv                | vered C4 - Unansw                                    | ered                           |                 |  |  |  |
|  | Coherence and Effect                          | tiveness Tests - CE1 - l   | Jnanswered C                 | E2 - Unanswered                 | CE3 - Unanswered                                     | CE4 - Yes                      |                 |  |  |  |
| 3a - Which part of the Deposit Plan are you commenting on?                                       | Policy Number:                                | Paragraph N  | Number: P                    | roposal Map:                    | Cons   | traints Map                    | Appendices:     |  |  |  |
|  | MG9   | 7.41. 7.44.  |                              |                                 |  |                                |                 |  |  |  |
| 3b - Do you wish to see any changes made to the Deposit Plan                                     | as a result of your rep                       | presentation? Yes  | (If "N                       | No" or "Unanswered"             | - go to 3d)  |                                |                 |  |  |  |
| 3c - What changes would like to see made to the Deposit Plan                                     | ? New Policy:<br>Unanswered                   |  | lew Paragraph:<br>Inanswered | Amended Paragraph<br>Unanswered | n: New Or Amended Sit                                | e: Other (see No<br>Unanswered | otes):          |  |  |  |
|  | Notes:  |  |                              |                                 |  |                                |                 |  |  |  |
| 3d - If your representation relates to a new, deleted or amende                                  | ed site, did you submit<br>Site Name:         | the site as a Candidate S  | ite? No                      | (If "Yes", pleas                | e give the Candidate Sit<br>Site Reference:          | e Name and refe                | rence if known) |  |  |  |
|  |   |  |                              |                                 |  |                                |                 |  |  |  |

3e - Please set out your representation below:

Re: Draft Deposit Local Development Plan Policy MG9 - Traveller Site, Llangan

We are writing in response to the recently published Draft Deposit Local Development Plan, published December 2011. We have reviewed the document and have particular concerns over the proposed gypsy and traveller site extension

Access to this small traveller site is currently via a narrow unclassified carriageway which is barely wide enough for a single private car in many places. We have concern that if this site is allocated as a transit site for up to 15 transit caravans, there will be increased amounts of vehicle movements from large caravans being towed by cars. This will cause disruption to the local residents and parents wishing to pick up and drop off their children in the nearby Llangan Primary School.

As a transit site, there is no stipulation as to how frequently travellers can move onto the next site from this location. Because of this, we have concern that the abovementioned disruption could occur as often as weekly, in theory. The access into the existing gypsy site is narrow, with limited visibility when entering or exiting the site for a car, let alone a car towing a large caravan behind it. We also envisage further problems when the time comes to extend the current 3-4 permanent static caravans to six. The lorries which would be required to transport such large structures would cause us residents great concern for highway safety along this stretch of road.

In addition to this, we note that no other traveller sites have been allocated in the Vale of Glamorgan area. As the Local Development Plan is due to remain in place for 10-15 years (once adopted), this is a cause for alarm to the local residents of Penllyn, Craig Penllyn, Treoes and Liangan. We wonder whether a scenario will arise whereby a sudden influx of (travellers) wishing to live in this area will leave the traveller site full to capacity. This will result in the gypsy-travellers needing an extension to or an additional site in which to reside. We do not believe that this location is sustainable for the 6 permanent and 1 5 transit caravans which are listed in the draft LDP, let alone additional pitches in the land which surrounds.

Policy MD1 2.5 of the draft deposit plan states that:

"The existing highway network is adequate to serve the site and a satisfactory means of access can be provided, including provision for parking, turning, servicing and emergency vehicles".

We do not believe that the proposed land allocation for a traveller site at Llangan meets this standard, so how is it that additional sites for which planning permission is sought in the future would have to comply with this criteria?

The traveller site is obviously outside of the settlement boundary of Llangan. We do wonder, however, that a site as extensive as the one which is being proposed in the LDP can be sustainable in this area. There are very few shops and services which serve the locality, and the surrounding primary schools at Llangan and Colwinston are at full capacity. If it is vital that a new dwelling must meet specific standards

(ordered by Representation ID No.)

Representor ID and details: 4174/DP1 D Williams

as laid out in the UDP and LDP, why is it that travellers are not required to meet these criteria? For example, new dwellings are not normally permitted if they are heavily reliant on car use as they are seen as unsustainable and not considerate of the environment for future generations to live in. However, the LDP has stated that there must be sufficient access and turning for vehicles on a traveller site.

The site is already in a prominent location, and the impact of the stark white caravans and associated buildings on the open countryside results in a scar which is visible from the surrounding villages. The extension to this site, along with the ornamentation which usually accompanies the development of caravan sites would result in a significant loss to the agricultural feel of the locality which is a general characteristic of the rural Vale of Glamorgan.

We believe that an extension to this site will result in more children gaining priority over local children living in the surrounding villages for the coveted school places in Llangan and Colwinston Primary Schools. This would also go against the sustainability agenda as laid out in Planning Policy Wales, where the Welsh Government wishes to reduce Wales's carbon emissions by the year 2020. This is due to the fact that fewer children will be able to walk or catch the local bus to school and will be heavily reliant on their parents taking them further afield to Cowbridge or Bridgend in private transport.

We hope that you will take our comments into account prior to the Draft Deposit Local Development Plan being adopted. If you do require any further information, please do not hesitate to contact me.

- 3f Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
- 4b If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -



(ordered by Representation ID No.)

| Representor ID and details: 4175/DP1 J Day   |  |   |                             |  |   |                             |                 |  |  |  |
|--|--|---|-----------------------------|--|---|-----------------------------|-----------------|--|--|--|
| Date Lodged     Status     Petition and No.     Supporting Evidence       02/04/2012     M     0 | Additional SA SEA                            |   | Rep format:<br>Comment form | , ,                                    | r comments to be consider a hearing session of Pu | •                           | •               |  |  |  |
| 2a - Do you consider the LDP is Sound? Unsound   | •  | 2b - If you think that the Plan is unsound and does not not meet one or more test(s) of soundness, please indicate which test(s) that it fails.  Procedural Tests - P1 - Unanswered P2 - Unanswered |                             |  |   |                             |                 |  |  |  |
|  | Consistency Tests -<br>Coherence and Effecti | C1 - Unanswered iveness Tests - CE1 - L   |                             | ered C3 - Unanswe<br>E2 - Unanswered C |   | red<br>E4 - Yes             |                 |  |  |  |
| 3a - Which part of the Deposit Plan are you commenting on?                                       | Policy Number:<br>MG9                        | <u>Paragraph N</u><br>7.41. 7.44.   |                             | roposal Map:                           | <u>Constr</u>                                     | aints Map                   | Appendices:     |  |  |  |
| 3b - Do you wish to see any changes made to the Deposit Plan                                     | as a result of your repr                     | resentation? Yes  | (If "N                      | No" or "Unanswered" -                  | go to 3d)   |                             |                 |  |  |  |
| 3c - What changes would like to see made to the Deposit Plan                                     | ? New Policy:<br>Unanswered<br>Notes:        |   | ew Paragraph:<br>Inanswered | Amended Paragraph:<br>Unanswered       | New Or Amended Site:<br>Yes                       | Other (see No<br>Unanswered | tes):           |  |  |  |
| 3d - If your representation relates to a new, deleted or amende                                  | ed site, did you submit t<br>Site Name:      | he site as a Candidate Si   | ite? No                     | (If "Yes", please                      | give the Candidate Site<br>Site Reference:        | Name and refe               | rence if known) |  |  |  |

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(ordered by Representation ID No.)

Representor ID and details: 4175/DP1 J Day

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- 4b If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -



(ordered by Representation ID No.)

| Representor ID and details: 4176/DP1 Kate Towler  |  |                                    |                              |  |  |   |  |  |
|---|--|------------------------------------|------------------------------|--|--|---|--|--|
| Date Lodged     Status     Petition and No.     Supporting Evidence       02/04/2012     M     □     0     □                | Additional SA SEA                                |                                    | Rep format:<br>Comment form  |  | ur comments to be consiered bat a hearing session of Public ex | y 'written representations' or do<br>xamination? Written      |  |  |
| 2a - Do you consider the LDP is Sound? Unsound  | 2b - If you think that th<br>Procedural Tests -  | ne Plan is unsound and<br>P1 - Yes | does not not mee             | t one or more test(s) of s   | soundness, please indicate whic                                | ch test(s) that it fails.                                     |  |  |
|   | Consistency Tests -                              | C1 - Yes                           | C2 - Yes                     | C3 - Yes   | C4 - Yes   |   |  |  |
|   | Coherence and Effect                             | iveness Tests - CE1 -              | - Yes                        | CE2 - Yes  | CE3 - Yes CE4 - Y  | Yes   |  |  |
| 3a - Which part of the Deposit Plan are you commenting on?  | Policy Number:                                   | Paragraph                          | Number:                      | Proposal Map:  | <u>Constraints</u>   | Map <u>Appendices:</u>  |  |  |
|   | MG9. MD12. MG2                                   | 6.49. 6.52                         | 2. 7.41. 7.44.               | MG9 MG9 Feb 2012   |  | O12 Appendix 9 - Supporting Documents                         |  |  |
| 3b - Do you wish to see any changes made to the Deposit Plan  | as a result of your rep                          | resentation? Yes                   | (lf                          | "No" or "Unanswered"   | - go to 3d)  |   |  |  |
| 3c - What changes would like to see made to the Deposit Plan'   | ? New Policy:<br>Unanswered                      |                                    | New Paragraph:<br>Unanswered | : Amended Paragraph: New Or Amended Site: Other (see Notes): Unanswered Yes Unanswered |  |   |  |  |
|   | Notes:   |                                    |                              |  |  |   |  |  |
| 3d - If your representation relates to a new, deleted or amende   | ed site, did you submit t<br>Site Name: Land Eas |                                    | Site? Yes                    | (If "Yes", pleas   | e give the Candidate Site Name<br>Site Reference: Site re      | e and reference if known)<br>eference MG 9 / ID 22 Appendix 1 |  |  |
| 3e - Please set out your representation below: 1. The Vale of Glamorgan has not followed guidelines set                     | out by the Welsh Gove                            | ernment and Fordham F              | Report.                      |  |  |   |  |  |
| 2. The Sustainability Appraisal is flawed and contradictory   | , the proposed site doe                          | es not meet with nationa           | al policy in respect         | of sustainability.   |  |   |  |  |
| 3. The allocation of MG 9 is not consistent with the propos   | sed LDP policies.                                |                                    |                              |  |  |   |  |  |
| 4. The site is rural and unsustainable, a score of nil points   | s in the evidence based                          | assessment sustainab               | le settlements app           | oraisal.   |  |   |  |  |
| 5. Allocation of Llangan is not consistent with previous pla  | anning rejections by the                         | VoG which considered               | I sustainability (Bo         | nvilston, Sept 2011).  |  |   |  |  |
| 6. Site allocation does not take into account the scale of t  | he resident community                            |                                    |                              |  |  |   |  |  |
| 3f - Please outline the changes you wish to see made to the D<br>Site MG 9 is removed from the plan and an alternative site | •  | •                                  | ve sustainability a          | ppraisal is put in its place   | е.   |   |  |  |
| Policy MD 12 is amended so that it does not discriminate  | against the gypsy and                            | traveller community. All           | sites during the p           | lan be assessed on a si  | milar basis as affordable housin                               | ng.   |  |  |
| 4b - If you wish to speak, please confirm which part of your rep  | oresentation you wish to                         | speak to the inspector             | r about and why th           | ney consider it be necess  | sary to speak at the hearing -                                 |   |  |  |

(ordered by Representation ID No.)

| Representor ID and details: 4177/DP1 Sara Ann Towler  |                            |   |   |  |   |   |   |
|---|----------------------------|---|---|--|---|---|---|
| Date Lodged Status Petition and No. Supporting Evidence 02/04/2012 M 0  | Additional SA SEA          |   | Rep format:<br>Comment for                  | •  |   | o be consiered by 'writter<br>ssion of Public examinati |   |
| 2a - Do you consider the LDP is Sound? Unsound  | 2b - If you think that the | e Plan is unsound ar<br>P1 - Yes              | nd does not not med                         | et one or more test(s) o                         | f soundness, plea                         | ase indicate which test(s                               | ) that it fails.                        |
|   | Consistency Tests -        | C1 - Yes                                      | C2 - Yes                                    | C3 - Yes   | C4 -                                      | · Yes   |   |
|   | Coherence and Effective    | veness Tests - CE                             | 1 - Yes                                     | CE2 - Yes  | CE3 - Yes                                 | CE4 - Yes   |   |
| 3a - Which part of the Deposit Plan are you commenting on?  | Policy Number:             | Paragra                                       | ph Number:                                  | Proposal Map:                                    |   | Constraints Map   | Appendices:                             |
| , , ,   | MG9. MD12. MG2             | 6.49. 6.                                      | 52. 7.41. 7.44.                             | MG9  |   | Feb 2012  | Appendix 9 -<br>Supporting<br>Documents |
| 3b - Do you wish to see any changes made to the Deposit Plar  | as a result of your repr   | esentation? Yes                               |   | If "No" or "Unanswered                           | d" - go to 3d)                            |   |   |
| 3c - What changes would like to see made to the Deposit Plan  | Unanswered                 | Amended Policy:<br>Yes                        | New Paragraph:<br>Unanswered                | Amended Paragra Unanswered                       | ph: New Or Ame<br>Yes                     | ended Site: Other (see I<br>Unanswered                  | Notes):                                 |
| 2d. If your representation relates to a new deleted or amond  | Notes:                     | an aite an a Condidat                         | o Cito 2 Von                                | /lf "Vaa" pla                                    | and give the Con                          | didata Cita Nama and rat                                | forence if known)                       |
| 3d - If your representation relates to a new, deleted or amende   | Site Name: Land east       |   | e Site? Yes                                 | (II res, pie                                     | -   | didate Site Name and reference: Site Reference          |   |
| 3e - Please set out your representation below:  I wish to object to the proposal on the following grounds:  |                            |   |   |  |   |   |   |
| Test P1 The proposal has not been drawn up in the accordance w Involvement Scheme: the emergency services and local Welsh Government have informed that there is an onus of           | primary school have not    | been consulted on the consult with its strate | ne proposed site M<br>gic partners in deliv | G9 and registered cons<br>rering Gypsy and Trave | sultees have not b<br>ller sites - no cor | peen informed of the con<br>sultation has taken place   | sultation stages. The                   |
| The Vale of Glamorgan Council has undertaken the minir Traveller sites.   | num consultation with th   | ne local community a                          | nd this goes agains                         | st the Welsh Governme                            | nt good practice                          | guidelines in respect of c                              | designing Gypsy and                     |
| Test P2 The proposed site does not meet with national policy in re Llangan is not consistent with previous planning rejection Bonvilston) by the Vale of Glamorgan and MG9 is not cor | s (the application in      | ed LDP policies.                              |   |  |   |   |   |
| Test CI The Housing Strategy is not up to date and doesn't provide  | de any structure for asse  | essing the needs or lo                        | ocation of the site f                       | or Gypsy and Traveller                           | families.                                 |   |   |

Test C2

The proposed site is in a rural hamlet, 4 miles north west of Cowbridge and 4.5 miles east of Bridgend, there are no local services i.e. no shops, no medical centre, no dentist, no transport and Llangan scores 0 points in the evidence based sustainable settlements appraisal.

The site would not comply with a rural exception policy as it suggests that all pitches are accommodated on a rural site including transient pitches which would not comply with TAN 2.

The hamlet of Llangan has a very small population of less than 100 residents and 35 homes and this site proposal would nearly double the size of the hamlet which has obviously not been taken into account.

(ordered by Representation ID No.)

Representor ID and details: 4177/DP1 Sara Ann Towler

A similar application in Pembroke was turned down solely on the basis on sustainability and the Vale of Glamorgan also turned down an application in Bonvilston again on the basis of sustainability.

The site is also very small and cannot meet LDP recommendations:

The site could only accommodate 14 pitches and 21 are being planned. Guidelines recommend 500m2 per pitch plus refuse area, office, play area, infrastructure. As the total area measures 7400m2 the sums do not add up.

Emergency vehicles need a minimum access requirement of 3.7rn the road actually measures 2.5m.

The site access does not have a footpath or street lighting and the nearest bus stop is in excess 800m away.

If 21 units are sited, emergency vehicles would have great difficulty in manoeuvring on the site.

The site should be sustainable which it is not. Guidance requires that standards match those that would be expected for social housing. The site would not be considered appropriate for development for residential housing either social or private.

The Welsh Government (travelling to a better future) recommends that the Local

Authority engages with their Housing Association Partners which the Vale of Glamorgan has not done.

The Vale of Glamorgan proposal is recommending that transient and permanent sites are located together — this can cause tension between permanent and transient residents and does not generate cohesion between both parties.

Test C3

#### Test C4

"Vale of Glamorgan residents and organisations respect the local environment and work together to meet the challenge of climate change" The site at MG9 will wholly rely on the use of private vehicles for travelling to schools, shops, medical facilities and entertainment.

"Older people are valued and empowered to remain independent, healthy and active.

They have equality of opportunity and receive high quality services to meet their diverse needs". As pointed out in my previous paragraph, shops, medical facilities are not accessible unless private vehicles are at one's disposal, the public transport is very poor and the nearest bus stop is over the recommended maximum distance from MG9 as set out in the LDP and "Manuel for Streets".

"People of all ages are able to access coordinated learning opportunities and have the necessary skills to reach their full potential, helping remove barriers to employment"

Llangan is a rural hamlet with no employment opportunities whatsoever. Llangan

Primary School is full and having been extended in the last few years it is highly unlikely with the waiting list in the Vale of Glamorgan for many local schools to be updated that Llangan School can take priority to be further developed to accommodate more pupils from such a large development at MG9.

#### Test CE1

The site allocation of MG9 does not provide the opportunity for living, learning, working and socialising for all as stated in the Vale of Glamorgan LDP's vision.

The site allocation of MG9 will not have the impact of and mitigating the adverse effects of climate change. Every person travelling to and from the site will have to do so by means of private transport.

The site allocation of MG9 will not help residents to travel to meet their daily needs and enable them to greater access to sustainable forms of transport.

The site allocation of MG9 will adversely affect the undeveloped rural character of Llangan.

The site allocation of MG9 will not enhance or promote community facilities as the local school is already full.

The site allocation of MG9 is not in a sustainable location.

#### Test CE2

The site is owned by the Vale of Glamorgan Council and the allocation of MG9 is purely on the basis that the Vale owns this site.

(ordered by Representation ID No.)

Representor ID and details: 4177/DP1 Sara Ann Towler

The site assessment states that there is 'good highway access', however, the access lane falls short of the minimum required for vehicle access as stated in my comments under TEST C2.

The assessment does not take into account that the site is next to a Conservation Area and makes no reference that the site is in a Special Landscape Area and that the view from the edge of the conservation area needs to be protected.

The message which resulted from the study (Fordham's) undertaken by the Vale of

Glamorgan Council is that the Gypsy and Traveller community want smaller sites on the fringes of larger communities. Llangan is not a large community (my comments under TEST C2 refers). The report confirms that isolated, rural sites restrict access to Health, Education and welfare facilities. Again, I stress that Llangan is a rural hamlet with no facilities of shops, Dr's surgeries, dental practitioners, transport links, laundrettes or entertainment.

Test CE3

How is the site going to be managed? The Vale of Glamorgan has not suggested how this is going to be achieved. With such a large site being proposed management strategies must be implemented.

3f - Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)

Site MG 9 is removed from the plan and an alternative site that has been properly assessed according to a relative sustainability appraisal is put in its place.

Policy MD 12 is amended so that it does not discriminate against the gypsy and traveller community. All sites during the plan should be assessed on a similar basis as affordable housing.

4b - If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -

(ordered by Representation ID No.)

| Representor               | ID and  | details:     | 4178/DI        | P1 Michael Towler      |   |                   |                |                         |                              |                         |   |   |
|---------------------------|---|--------------|----------------|------------------------|---|-------------------|----------------|-------------------------|------------------------------|-------------------------|---|---|
| Date Lodged<br>02/04/2012 | Status<br>M   | Petition     | n and No.<br>0 | Supporting Evidence    | Additional SA SEA   |                   |                | p format:<br>mment form | ,                            | ,                       | o be consiered by 'written<br>ssion of Public examination | •                                       |
| 2a - Do you c             | onsider t   | he LDP is    | Sound?         |                        | 2b - If you think that the Procedural Tests - Consistency Tests - | P1 - Yes          | Р              | 2 - Yes                 | ` `                          |                         | ase indicate which test(s)                                | that it fails.                          |
|                           |   |              |                |                        | Coherence and Effec   |                   |                |                         | CE2 - Yes                    | CE3 - Yes               | CE4 - Yes   |   |
| 3a - Which pa             | a - Which part of the Deposit Plan are you commenting on? |              |                | ou commenting on?      | Policy Number:  | <u>P:</u>         | aragraph Numb  | <u>per:</u> <u>F</u>    | Proposal Map:                |                         | Constraints Map   | Appendices:                             |
|                           |   |              |                |                        | MG9. MD12. MG2.   | . 6.              | 49. 6.52. 7.41 | l. 7.44. N              | MG9                          |                         | Feb 2012  | Appendix 9 -<br>Supporting<br>Documents |
| 3b - Do you v             | ish to se   | e any cha    | anges mad      | de to the Deposit Plan | as a result of your rep   | oresentation?     | Yes            | (lf "                   | "No" or "Unanswere           | ed" - go to 3d)         |   |   |
| 3c - What ch              | anges wo  | ould like to | see mad        | e to the Deposit Plan? | New Policy:<br>Unanswered<br>Notes:                               | Amended Po<br>Yes | <del></del>    | Paragraph:<br>swered    | Amended Paragr<br>Unanswered | raph: New Or Ame<br>Yes | ended Site: Other (see N<br>Unanswered                    | <del></del>                             |
| 3d - If your r            | epresent  | ation relat  | es to a ne     | w, deleted or amende   | d site, did you submit<br>Site Name: Land Ea                      |                   | ndidate Site?  | Yes                     | (If "Yes", pl                | · ·                     | didate Site Name and reference: Site reference            | ,                                       |
| 3e - Please               | set out vo  | our repres   | entation b     | elow:                  |   |                   |                |                         |                              |                         |   |   |

The proposed Gypsy traveller site would be situated on a greenfield area close to the Hamlet of Llangan and would place an unacceptable pressure on the local infrastructure and services.

This proposal is against both local and national policy, in terms of development and does not meet the identified needs of the gypsy and traveller community (listed in the Council's own report – Fordham report)

I do not support this unfair proposal, the Council should seek to find smaller, more suitable, sustainable sites where transient and permanent pitches are not co-located. The new sites should meet the needs of the gypsy traveller community and take into consideration Special Landscape Area (SLA) and Conservation Areas and the local environment.

REPRESENTATIONS AGAINST ALLOCATION OF GYPSY & TRAVELLER SITE AT LAND EAST OF LLANGAN

### TEST P1

The LDP has not been prepared in accordance with the Community Involvement Scheme, see below key points:

- The Emergency Services and Local Primary school have all confirmed that they have NOT been consulted on the proposed site MG9. The LEA confirmed they had not been consulted about the Gypsy site.
- Registered consultees have not been informed of the consultation stages.
- According to the Welsh Government's document 'Travelling to a better future' there is an onus on the LA to consult with its strategic partners in delivering Gypsy & Traveller sites. No consultation has taken place.
- Good practice (Welsh Government document 'Good Practice Design in designing Gypsy & Traveller sites') suggests that where Gypsy & Traveller sites are concerned the local community should be engaged as early as possible we believe that the Council has undertaken the minimum consultation in terms of the LDP and insufficient consultation with respect to the Gypsy & Traveller site in accordance with best practice.

### TEST P2

1. The Sustainability Appraisal is flawed and contradictory — the proposed sites do not meet with national policy in respect of sustainability. The allocation of Llangan is not consistent with previous Planning Rejections by the Council which considered sustainability (Bonvilston Sept 2011) and with similar determinations by the Planning Inspectorate (Pembroke Sept 2011).

(ordered by Representation ID No.)

Representor ID and details: 4178/DP1 Michael Towler

2. The allocation of MG9 is not consistent with the proposed LDP policies.

#### TEST C1

The Land Use Plan (with regards to Gypsy & Traveller sites) does not relate to any strategy - The Housing Strategy is out dated and does not provide any structure for assessing Gypsy & Traveller needs or site location.

#### TESTC2

- 1. The Site allocation does not have regard to the following National Policy:
- -Welsh Government Circular (30/2007):
- The site is RURAL and is "UNSUSTAINABLE" as there are no local services (no shops, food and drink outlets, doctor, dentist, Library, rail services or any main settlement within 5km etc). Llangan and Fferm Goch both score 0 points for local services in the evidence based assessment 'Sustainable Settlements Appraisal'
- The site would not comply with a RURAL EXCEPTION POLICY as it advocates that all pitches are accommodated on a RURAL site including transient pitches which would not comply with TAN 2.
- Any business operated from the site would be in contradiction of RURAL EXCEPTION guidance.
- The site allocation does not take into account the "SCALE" of the resident community. Llangan has a population of less than 100 with 35 homes and this proposal nearly doubles the size of the Hamlet.
- Example of similar site. In 2007 an application of the Sustainability issue was applied by the Planning inspector in Pembroke where an appeal was refused solely on this basis.
- The VOG Council has refused an application recently in Bonvilston on the basis of Sustainability and services in this case were closer to the site than in the case of Llangan proposal.
- Designing Gypsy and Traveller Sites Good Practice Guide The site is too small; therefore cannot meet the needs identified in the LDP.
- -The site measures 7400 m2 and could only accommodate 14 pitches without infrastructure (guidance is 500m2 per pitch plus refuse area; office; play area; infrastructure (roads etc)
- The access road to the site does not meet the minimum requirements for emergency vehicles (3.7m it is actually 15m)
- The site access is poor and "unsafe" having extended walks (in excess of 800m to bus stop) along an unlit lane with no public footpath or street lighting.
- The proposal of 21 units on the site would restrict the ability of emergency vehicles to manoeuvre around the site.
- New sites grants are available (and cost should not be a material planning consideration).
- -The guidance requires that sites are:
- sustainable the Llangan site proposal is not
- equivalent to standards that would be expected for social housing in the settled community This would not meet the standards and this site would not have been considered appropriate for development for residential in either the current or proposed plans
- have the effect of encouraging and developing good relations between
- Gypsies & Travellers and the settled community the large scale of this proposal could mean that establishing good relations with the local community of Llangan would be unlikely and could also result in increased tensions in the community.
- based on WAG guidance of Design of Gypsy traveller sites the maximum number of pitches is 14, and the proposal at Llangan exceeds this number.
- Travelling to a Better Future
- Recommends that LA's engage with their Housing Association Partners to bring sites forward. The VOG Council has not done this.
- "Situating transit provision on residential Gypsy sites is not an option preferred by the Gypsy and Traveller community as this can lead to tensions among different family groups and make site management and maintenance very difficult." This creates a sense of "fear" within the settled Gypsy & Traveller community. The proposal is recommending that transient and permanent sites are co-located.
- Planning Policy Wales 2011
- The proposed site at Llangan is greenfield land, according to the definition of brownfield land set out in Figure 4 1 of PPW;
- it will not reduce the need to travel, due to the limited local service provision in close proximity to the site;

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- offers very limited access to public transport facilities;
- is not large enough to provide ancillary facilities required to support a sustainable development as set out in paragraph 3.30 in accordance with Designing Gypsy and Travellers Sites Good Practice Guide;
- is located within a Special Landscape Area (SLA) and in close proximity to a Conservation Area. The assessment of the Llangan site incorrectly states that it is not within an SLA, so makes no reference to the sites proximity to the conservation area of Llangan. The location can be clearly seen from the conservation area.
- does not meet the identified needs of Gypsies and Travellers, in the Vale of Glamorgan (Fordham report 2008 evidence);
- does not promote sustainable access to employment, shopping, education, health, community, leisure and sports facilities;
- does not maximise opportunities for community development and social welfare;
- does not foster social inclusion due to the isolated location of the site: and
- does not contribute to improvements in health due to the isolation from services and facilities.
- 2. MG2. The draft policy MG 2 actively discriminates the Gypsy community by excluding them from the wider housing programme and potentially abuses their human rights. Policy MG 2 should be revised to allow the VOG to identify appropriate sites in the same way as Affordable Housing.

### TESTC3

- 1. The policy does not have due regard to the Wales Spatial Plan.
- The key theme of the Wales Spatial Plan is achieving sustainable development through focusing new development in areas which have good access to key services and facilities. As there are no services surrounding the site the allocation of MG9 is not consistent with the objectives of the Wales Spatial Plan. The Gypsy site proposal fails Soundness test Consistency C3 because the policy does not have due regard to the Wales Spatial Plan.

### TESTC4

- 1. The allocation of this site does not have regard to the relevant Community Strategy in the following respects:
- "The diverse needs of local people are met through the provision of customer focused, accessible services and information"- This cannot be achieved by the allocation of a non-accessible rural allocation.
- "Vale of Glamorgan residents and organisations respect the local environment and work together to meet the challenge of climate change"- The allocation of MG9 places heavy emphasis on the use of the car to access the most basic facilities shops, health, education etc.
- "Older people are valued and empowered to remain independent, healthy and active. They have equality of opportunity and receive high quality services to meet their diverse needs"— All services are miles away and inaccessible to

the older community. The VERY POOR public transport system is located

1050m from the site and is in excess of the maximum distances as defined in

the proposed LDP and "Manual for Streets".

- "People of all ages are able to access coordinated learning opportunities and have the necessary skills to reach their full potential helping to remove barriers to employment"—There is no employment opportunity near to the site.

The local primary school has confirmed that it is full and that its projections suggest that it doesn't have the capacity for such a large development (also consider the existing approval of 12 dwellings at Fferm Goch).

- The small local industrial unit has raised concerns in relation to the scale of the proposal.

#### TEST CE1

The Plan does not set out a coherent strategy in the following respects

- The Strategy makes the following statements:

The LDP will seek to provide a policy framework which: Manages the housing supply effectively in order to provide a range of good quality, affordable homes in sustainable locations

Reduces out commuting by providing opportunities for new housing, retail and employment development in accessible locations in the Vale of Glamorgan

The allocation of this rural site in open countryside does not meet this objective.

- The LDP also states its vision as being:

"Our Vision for the Vale of Glamorgan is a place:

That is safe, clean and attractive, where individuals and communities have sustainable opportunities to improve their health, learning and skills, prosperity and wellbeing and

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Representor ID and details: 4178/DP1 Michael Towler

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 sustainability of the area." The allocation of this site in policy MG9 does not meet these objectives being in a rural location with inadequate facilities and transport links.

- The Allocation of this site in policy MG9 does not comply with the following objectives of the LDP:
- -Objective 1: To sustain and further the development of sustainable communities within the Vale of Glamorgan, providing opportunities for living, learning, working and socialising for all. The site's location would clearly not meet this objective.
- Objective 2: To ensure that development within the Vale of Glamorgan makes a positive contribution towards reducing the impact of and mitigating the adverse effects of climate change. The allocation of this site will have entirely the opposite effect to this objective.
- Objective 3: To reduce the need for Vale of Glamorgan residents to travel to meet their daily needs and enabling them greater access to sustainable forms of transport. The allocation of this site will have entirely the opposite effect to this objective.
- Objective 4: To protect and enhance the Vale of Glamorgan's historic, built, and natural environment. The development of this site would not meet this objective: a planning refusal on an adjacent site in May 2002 stated "It is a proposal that would adversely affect the undeveloped rural character of the area"
- Objective 5: To maintain, enhance and promote community facilities and services in the Vale of Glamorgan The local primary school has not been consulted, had they been it would have been recognised that the school does not have capacity, nor is it projected to have the capacity.
- Objective 7: To provide the opportunity for people in the Vale of Glamorgan to meet their housing needs- States that development of housing should be in sustainable locations This is not. Furthermore, it brings into question POLICY MD12 which is discriminatory in that Gypsy & Traveller sites are treated differently from other housing allocations. An inclusive policy would see Gypsy & Traveller sites being assessed on the same basis as AFFORDABLE HOUSING and considered for ALL candidate residential sites in the LDP
- Objective 10: To ensure that development within the Vale of Glamorgan uses land effectively and efficiently and to promote the sustainable use and management of natural resources. The inappropriate use of finite resources can impact on the ability of future generations to fulfil their needs. The LDP through favouring the use of previously developed land and the sustainable use of natural resources of whatever kind and wherever they are located, will contribute to preserving their availability for future generations. This is agricultural land in the Special Landscaped Area.

#### TEST CE2

The strategies, policies and allocations are not realistic and appropriate having considered relevant alternatives and are not founded on robust evidence:

- 1. The allocation of Llangan is purely on the basis of site ownership by the Vale and does not meet the requirement of Policy MD12.
- 2. The Gypsy & Traveller site assessment (anecdotal) conflicts with other evidence based background papers; specifically the Sustainable Settlement Appraisal. The SSA states 0 points for public transport but the Gypsy & Traveller site assessment states that public transport facilities are good.
- 3. The Gypsy Traveller site assessment states "good highway access", yet the access falls considerably short of the minimum requirement for vehicle access the access lane is 2.5m wide, against a minimum requirement of 3.7m plus footpath of 1.2m.
- 4. The Gypsy Traveller site assessment does not reflect the current legal obligations of the VOG in respect of this site, yet the other site assessments highlight legal issues.
- 5. Several privately-owned sites were put forward as candidate sites for Gypsy & Traveller sites but were dismissed as they were not in Council ownership. Not being in council ownership should not be a reason to reject privately owned sites.
- 6. The key issue is that the site allocation does not reflect the identified need of the Gypsy & Traveller community as highlighted in the 2008 Fordham report.
- 7. The Gypsy Traveller site assessment suggests that Fferm Goch is the local settlement when Llangan is recognised in this and historic documents as the local settlement being only 150m from the proposed site. It appears that the council has also linking the site at Llangan to the Hamlet of Fferm Goch in order to increase the site assessment positive score.
- 8. The assessment makes no reference that the site is in a Special Landscape Area (SLA).
- 9. The assessment makes no reference that the site is adjacent to a Conservation Area, within the Conservation Management Plan for this area there is a specific requirement to protect the view from the edge of the conservation area over the proposed site. The proposed site is clearly visible form the conservation area.
- 10. The allocation of Fferm Goch as a Minor Rural Settlement is incorrect. The appraisal scored 9 points. 3 are for employment which puts this site on par with the major settlements such as Barry. This is on the basis of 4 light industrial buildings. A survey of these employers has confirmed that zero new jobs have become available in the last 9 years and that the units collectively employ fewer than 15 people with no intention to expand. Furthermore, one of the units has been empty and the development is not a popular industrial site.
- 11. Fferm Goch has a population of less than 100 (98)— of the 5 sites in the Vale of Glamorgan with a population of 98 only Fferm Goch is classified as a Minor Rural site (probably based on the 9 points). The remainder are classified as Hamlets and there is a presumption against development in Hamlets (or as a minimum the scale would need to be appropriate and tied to a Rural Exception policy). The guidance requires ALL sites of a population below 100 to be classified as a Hamlet Fferm Goch should be recategorised as a Hamlet.
- 12. The Council has undertaken a study (Fordham report 2008) where the message was extremely strong that the Gypsy & Traveller community wanted smaller sites located on the fringes of larger communities. The report confirmed that isolated, rural sites restricted access to Health, Education and welfare facilities that disadvantaged them and needs to be seen in the light of the above objectives. The following is a quote from the Fordham report:
- "Participants living on Shirenewton had three main criticisms: the site was too big, the distance from local amenities along with the lack of local transport."

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"This created many problems for the residents, especially the poorest: 'for a person like me on the bread line it's very tough. I can't afford to use the car', 'everything is a mile away, including the bus stop. It takes a long walk on a busy road to get to the shops and schools".

"The tables demonstrate that access to services such as local shops, health centres and education facilities from both sites is difficult by foot and by local transport systems. This difficulty was eased when participants used their cars, however the level of ease was lower for Roverway due to the difficult entry onto the main road".

"Participants reported that access to local amenities, health services and education was low for both sites by foot or by public transport: 'Everything is a mile away, including the bus stop. It takes a long walk on a busy road to get to the shops and schools".

"It was thought that smaller sites would reduce the problem of on-site conflicts: 'they need smaller sites and not too many different families, otherwise when you have a row the whole site becomes a war zone"

"This affected the ability of the households interviewed to access local services such as shops, health centres and education facilities. It was reported that this problem mainly affected the women: men take the vehicles that the household own to work during the day, leaving the women without their own transport and often away from public transport routes"

"Participants did not specify where in Cardiff or the Vale of Glamorgan sites should be located. It was noted that sites should be on the outskirts of towns to enable access by foot to local services such as shops, the Launderette and health centres"

"While the focus of the survey was on accommodation requirements, the questionnaire also collected information on access to services, including health and education. Research has found that poor accommodation can prevent access to services and so cannot be seen in isolation."

"Participants living on sites felt that there were site restrictions that limited their work options. These were mainly associated with the location of the sites and lack of access to public transport rather than site regulations: 'no buses, no local transport. Bad access"

"Participants living on local authority sites reported that the lack of local public transport provision in the area affected their ability to send their children to school, access health services and work opportunities, and limited their ability to attend training and education courses"

"Participants were asked about where they would like future sites to be, but were not specific about locations within the County Boroughs, instead emphasising the importance of public transport to any new sites. Government draft guidance on site design stresses the importance of access to services and the promotion of integrated co-existence' between the site and surrounding community."

"The precise location, design and facilities of any new sites should be drawn up in consultation with Gypsies and Travellers to ensure that the additional provision meets their needs. The health and safety implications of a new site's location should be considered in finding a balance between offering sites in good locations and the additional land costs this would entail. The settled community neighbouring the sites should also be involved in the consultation from an early stage."

13. An independent highway study recently undertaken by Capita Symonds, surrounding the proposed site has concluded that:

"The 1km long lane itself is of poor horizontal alignment, with poor forward visibility and unsuitable for regular vehicular traffic. If the site is developed the lane itself would need major upgrading, which would certainly change its appearance within this rural environment."

"The village school is approximately 1km from the village and 900 metres from the proposed site. It is noted that the route does not offer any facilities for pedestrians, such that the only safe way for children to travel between the site and the school safely would be by vehicle. This route would also be potentially hazardous for cycle use for children, the elderly or infirm and could be potentially hazardous for all users other than by car."

"With regard to the appropriateness of the location for a traveller's site development in relation to transportation, it is difficult to refer to standard guidelines, as few relate to "rural highways", most highway design standards for residential development relate to urban areas. Hence, the advice contained within this report is based on best available information, acceptable highway standards for developments of similar size and transport needs of small communities. Welsh Government guidelines state sites should be situated in close proximity to transport links. The Llangan site would not appear to meet that criteria, being situated away from the main transport infrastructure, sites should also have ready access to schools, doctors and shops, against which requirements Llangan again appears to fail."

"With regards to the existing lane, it is generally considered that where there is direct access to dwellings, the previous standard for developments, Design Bulletin 32 offers guidance where it states that a desirable minimum carriageway width of 5.5 metres is appropriate, together with 2.0 metre wide footways on both sides. This will allow two way traffic at all times, and safe movement of pedestrians."

"Thus the lane itself should be widened to this minimum standard, which will require the removal of the existing hedge line on one or both sides of the lane and probable acquisition of land from the adjoining fields. This will of course change the environmental character of the area substantially, but is considered essential to cater for increased vehicle and pedestrian traffic"

14. There is complete inconsistency with the allocation of MG9 against the proposed policies.

(ordered by Representation ID No.)

Representor ID and details: 4178/DP1 Michael Towler

#### TEST CE3

- 1. The VOG council make no reference as to how they are going to manage such a large site. The 21 unit site in Rover Way Cardiff has 3 full time Council staff allocated to it.
- 2. The current Housing Strategy expires April 2012 and makes no relevant reference as to how the Gypsy & Travelling Community will be monitored in terms of growth or need. Indeed, there is no strategy that underpins the Gypsy & Traveller community or housing at all.

### TEST CE4

- 1. Policy MD12 (Gypsy & Traveller) is discriminatory. It offers no flexibility for the Council to bring forward sites that are sustainable / suitable for Gypsies & Travellers through the policies derived within the plan.

  2. MD12 should be redrafted to enable smaller, sustainable sites to be included within the Affordable Housing requirements and delivered through the Registered Social Landlord sector.
- 3. To argue that the Private Sector has been consulted to offer sites is not accepted. The private sector were not likely to volunteer sites for such a contentious use. The LDP should set clear strategies / policies to deliver sustainable sites for all members of the community; private; social and travelling. The current allocation does not meet this and could strongly be argued breeches the Human Rights of the Gypsy traveller community as it does not provide a suitable, sustainable site that meets the guidelines in the 2008 Fordham report.
- 3f Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)

The proposed Gypsy traveller site at Llangan (Policy MG9) should be removed from the LDP draft plan. The VOG should identify an alternative site that has been assessed according to a relative sustainability appraisal that considers the real situation in the local area and meets the requirements of the Gypsy community as listed in the 2008 Fordham report.

Policy MD12 should be amended so that it does not discriminate against the Gypsy and Traveller community. All sites during the plan should be assessed on a similar basis as Affordable Housing.

4b - If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -



(ordered by Representation ID No.)

| Representor  | ID and o   | details:                    | 4179/D                                | P1 Neil & Rhian Feni    | า   |                      |            |                              |   |                       |  |                |
|--|------------|-----------------------------|---------------------------------------|-------------------------|---|----------------------|------------|------------------------------|---|-----------------------|--|----------------|
| Date Lodged<br>02/04/2012                                  |            | Petiti                      | on and No.<br>0                       | Supporting Evidence     | Additional SA SEA                             |                      |            | Rep format:<br>Comment for   | ·   | •                     | o be consiered by 'writte<br>ssion of Public examinati | •              |
| 2a - Do you o  | consider t | he LDP                      | is Sound?                             | Unsound                 | •   | P1 - Yes<br>C1 - Yes |            | P2 - Yes<br>C2 - Yes         | ct one or more test(s)  C3 - Yes  CE2 - Yes   |                       | ase indicate which test(s - Yes  CE4 - Yes             | that it fails. |
| 3a - Which part of the Deposit Plan are you commenting on? |            | Policy Number:<br>MD12. MG9 | <u>Paragraph Number:</u><br>0.0 - All |                         | •   | Proposal Map:        | )          | Constraints Map Feb 2012     | Appendices: Appendix 9 - Supporting Documents |                       |  |                |
| 3b - Do you v  | vish to se | e any cl                    | nanges ma                             | de to the Deposit Plan  | as a result of your rep                       | presentation?        | Yes        |                              | If "No" or "Unanswere                         | ed" - go to 3d)       |  |                |
| 3c - What ch   | anges wo   | ould like                   | to see mad                            | de to the Deposit Planí | New Policy: Unanswered Notes:                 | Amended Po<br>Yes    |            | New Paragraph:<br>Unanswered | Amended Paragr<br>Unanswered                  | aph: New Or Am<br>Yes | ended Site: Other (see<br>Unanswere                    | <del></del>    |
| 3d - If your r   | epresenta  | ation rel                   | ates to a n                           | ew, deleted or amende   | ed site, did you submit<br>Site Name: Land ea |                      | andidate : | Site? Yes                    | (If "Yes", pl                                 | J                     | ndidate Site Name and re<br>eference: MG 9 / ID 22 /   | ,              |
| 2a Dlagge  | 001 0111   |                             | oontotion l                           | halauu                  |   |                      |            |                              |   |                       |  |                |

3e - Please set out your representation below:

#### TEST P1

- 1. That it has not been prepared in accordance with the Community Involvement Scheme:
- o The Emergency Services and Local Primary school have all confirmed that they have NOT been consulted on the proposed site MG9.
- o Registered consultees have not been informed of the consultation stages.
- O According the WG (Travelling to a better future) there is an onus on the LA to consult with its strategic partners in delivering G&T sites. No consultation has taken place.
- O Good practice (WG Good Practice Design in designing GT sites) suggests where G&T are concerned the local community should be engaged as early as possible we believe that the VoG has undertaken the minimum consultation in terms of the LDP and insufficient consultation with respect to the G&T site in accordance with best practice.

- 1. That the sustainability appraisal is flawed and contradictory proposed sites do not meet with national policy in respect of sustainability. The allocation of Llangan is not consistent with previous Planning Rejections by the VoG which considered sustainability (Bonvilston Sept 2011) and with similar determinations by the Planning Inspectorate (Pembroke Sept 2011).
- 2. The allocation of MG9 is not consistent with the proposed LDP policies

#### TEST C1

1. The Land Use Plan (with regards to G&T) does not relate to any strategy – the Housing Strategy is out dated and does not provide any structure for assessing G&T needs or site location.

#### TEST C2

1. The Site allocation (in regards to G&T) does not have regard to National Policy:

#### Welsh Government Circular (30/2007)

- The site is RURAL and is "UNSUSTAINABLE" as there are no local services (shops; transport; health etc); both Llangan and Fferm Goch Score 0 points in the evidence based assessment SUSTAINABLE SETTLEMENTS APPRAISAL
- The site would not comply with a RURAL EXCEPTION POLICY as it advocates that all pitches are accommodated on a RURAL site including transient pitches which would not comply with TAN 2.

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- Business would be operated from the site in contradiction of RURAL EXCEPTION guidance.
- The site allocation does not take into account the "SCALE "of the resident community. Llangan has a population of less than 100 with 35 homes and this proposal nearly doubles the size of the Hamlet.
- Recent application of the Sustainability issue was applied by the Planning inspector in Pembroke where an appeal was refused solely on this basis.
- The VoG has refused an application in Bonvilston on the basis of

Sustainability and services were closer to this site.

Designing Gypsy and Traveller Sites Good Practice Guide - The site is too small: therefore cannot meet the needs identified in the LDP.

- The site measures 7400 m2 and could only accommodate 14 pitches without infrastructure (guidance is 500m2 per pitch plus Refuse area; office; play area; infrastructure (roads etc)
- The site does not need the minimum requirements for emergency vehicles (3.7m it is actually 2.5m)
- The site access is poor and "unsafe" having extended walks (in excess of 800m to bus stop) along an unlit land with no public footpath or street lighting.
- The proposal of 21 units on the site would restrict the ability of emergency vehicles to manoeuvre around the site.
- New sites grants are available (and cost should not be a material planning consideration).
- The guidance requires that sites are:
- Sustainable this proposal is not
- are equivalent to standards that would be expected for social housing in the settled community This would not meet the standards and this site would not have been considered appropriate for development for residential in either the current or proposed plans
- have the effect of encouraging and developing good relations between Gypsy Travellers and the settled community the scale of this proposal can only result in fear and tensions with the local community.

#### Travelling to a Better Future

- Recommends that LA's engage with their Housing Association Partners to bring sites forward which the VoG has not done.
- "Situating transit provision on residential sites is not an option preferred by the Gypsy and Traveller community as this can lead to tensions among different family groups and make site management and maintenance very difficult." This creates a sense of "fear" within the settled community. The proposal is recommending that transient and permanent sites are co-located.

#### Planning Policy Wales

- Is green field land in accordance with the definition of brownfield land set out in Figure 4.1 of PPW;
- Will not reduce the need to travel due to the limited local service provision in close proximity to the site:
- Holds very limited access to public transport facilities;
- Is not large enough to provide ancillary facilities required to support a sustainable development as set out in paragraph 3.30 in accordance with Designing Gypsy and Travellers Sites Good Practice Guide;
- Is located within a Special Landscape Area and in close proximity to a Conservation Area:
- Does not meet the identified needs of Gypsies and Travellers, in the Vale of Glamorgan (Fordham evidence):
- Does not promote sustainable access to employment, shopping, education, health, community, leisure and sports facilities;
- Does not maximise opportunities for community development and social welfare:
- Does not foster social inclusion due to the isolated location of the site: and
- Does not contribute to improvements in health due to the isolation from services and facilities.

#### TEST C3

- 1. The policy has due regard to the Wales Spatial Plan.
- O The key theme of the Wales Spatial Plan is achieving sustainable development through focusing new development in areas which have good access to key services and facilities. As there are no services surrounding the site the allocation of MG9 is not consistent with the objectives of the Wales Spatial Plan. Therefore it fails Soundness test Consistency C3 because the policy does not have due regard to the Wales Spatial Plan.

#### TEST C4

- 1. It does not have regard to the relevant Community Strategy.
- O "The diverse needs of local people are met through the provision of customer focused accessible services and information" This cannot be achieved by the allocation of a non-accessible rural allocation.
- O Vale of Glamorgan residents and organisations respect the local environment and work together to meet the challenge of climate change"- The allocation of MG9 places heavy emphasis on the use of the car to access the most basic facilities, shops, health, education etc.
- O "Older people are valued and empowered to remain independent, healthy and active. They have equality of opportunity and receive high quality services to meet their diverse needs" All services are miles away and inaccessible to the older community. The VERY POOR public transport system is located 1050m from the site and is in excess of the maximum distances as defined in the proposed LDP and "Manual for Streets".
- O "People of all ages are able to access coordinated learning opportunities and have the necessary skills to reach their full potential helping to remove barriers to employment," There is no employment opportunity near to the site. The local primary school has confirmed that it is full and that its projections suggest that it doesn't have the capacity for such a large development (also consider the existing approval of 12 dwellings at Fferm Goch).

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O The local industrial unit has raised concerns in relation to the scale of the proposal and the implied anti-social behaviour (evidenced by the travellers concerns themselves within the Fordham Report and the Guidance for G&T which recommends sites not larger than 14 units and not of mixed tenure permanent I transient).

#### TEST CE1

- 1. The Plan does not set out a coherent strategy which its policies and allocation logically flow:
- o The Strategy makes the following statements:
- The LDP will seek to provide a policy framework which:

Manages the housing supply effectively in order to provide a range of good quality, affordable homes in sustainable locations

Reduces out commuting by providing opportunities for new housing, retail and employment development in accessible locations in the Vale of Glamorgan

The allocation of this rural site in open countryside does not meet this objective

o The LDP also states its vision as being:

"Our Vision for the Vale of Glamorgan is a place:

That is safe, clean and attractive, where individuals and communities have sustainable opportunities to improve their health, learning and skills, prosperity and wellbeing 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 sustainability of the area."

The allocation of MG9 does not meet these objectives being in a Rural Location with inadequate facilities and transport links.

O The Allocation of MG9 does not comply with the following objectives:

- Objective 1: To sustain and further the development of sustainable communities within the Vale of Glamorgan, providing opportunities for living, learning, working and socialising for all. The sites location would clearly not meet this objective.
- Objective 2: To ensure that development within the Vale of Glamorgan makes a positive contribution towards reducing the impact of and mitigating the adverse effects of climate change. Site location prohibitive.
- Objective 3: To reduce the need for Vale of Glamorgan residents to travel to meet their daily needs and enabling them greater access to sustainable forms of transport Site location prohibitive.
- Objective 4: To protect and enhance the Vale of Glamorgan's historic, built, and natural environment (Planning refusal on an adjacent site in May 2002 stated "It is a proposal that would adversely affect the undeveloped rural character of the area")
- Objective 5: To maintain, enhance and promote community facilities and services in the Vale of Glamorgan. The local primary school has not been consulted, had they been it would have been recognised that the school does not have capacity, nor is it projected to have the capacity.

Objective 7: To provide the opportunity for people in the Vale of Glamorgan to meet their housing needs- States that development of housing should be in sustainable locations -This is not. Furthermore, it brings into question POLICY MD12 which is discriminatory in that GT sites are treated differently from other housing allocations. An inclusive policy would see GT sites being assessed on the same basis as AFFORDABLE HOUSING and considered for ALL candidate residential sites in the LDP.

Objective 10: To ensure that development within the Vale of Glamorgan uses land effectively and efficiently and to promote the sustainable use and management of natural resources. The inappropriate use of finite resources can impact on the ability of future generations to fulfil their needs. The LDP through favouring the use of previously developed land and the sustainable use of natural resources of whatever kind and wherever they are located, will contribute to preserving their availability for future generations. This is agricultural land in the Special Landscaped Area

#### TEST CE2

- 1. The strategies; policies and allocations are not realistic and appropriate having considered relevant alternatives and are not founded on robust evidence:
- 1. The allocation of Llangan is purely on the basis of site ownership by the Vale and does not meet the requirement of Policy MD12.
- 2. The G&T site assessment (anecdotal) conflicts with other evidence based background papers; specifically the Sustainable Settlement Appraisal.

The SSA states 0 points for public transport but the G&T site assessment states that this is good.

- 3. The G&T site assessment states "good highway access", yet the access falls considerably short of the minimum requirement for vehicle access. At 2.5m against a minimum 3.7m plus footpath of 1.2m.
- 4. The G&T site assessment does not reflect the current legal obligations of the Council, yet the other site assessments highlight legal issues.
- 5. Several Private sites were put forward as candidate sites for G&T but were dismissed as they were not in Council ownership what was the point of asking the private sector.
- 6. The key issue is that the site allocation does not reflect the identified need of the G&T community as highlighted in the Fordham report.
- 7. The G&T site assessment suggests that Fferm Goch is the local settlement when Llangan is recognised in this and historic documents as the local settlement being only 150m from the proposed site.
- 8. The assessment makes no reference that the site is in a Special Landscape Area.
- 9. The assessment makes no reference that the site is adjacent to a Conservation Area, within the Conservation Management Plan for this area there is a specific requirement to protect the view from the edge of the conservation area over the proposed site.
- 10. The allocation of Fferm Goch as a Minor Rural Settlement is questionable. The appraisal scored 9 points. 3 are for employment which puts this site on par with the major settlements such as Barry. This is on the basis of 4 light industrial buildings. A survey of these employers has confirmed that 0 new jobs have become available in the last 9 years and that the units employ less than 15 people with no intention to expand. Furthermore, one of the units has been empty and the development is not a popular industrial site.

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- 11. Fferm Goch has a population of less than 100 (98) of the S sites with a population of 98 only Fferm Goch is classified as a Minor Rural site (probably based on the 9 points). The remainder are classified as Hamlets and there is a presumption against development in Hamlets (or as a minimum the scale would need to be appropriate and tied to a Rural Exception policy). The guidance requires ALL sites of a population below 100 to be classified as a Hamlet.
- 12. The VoG has undertaken a study (Fordham) where the message was extremely strong that the G&T community wanted smaller sites located on the fringes of larger communities. The report confirmed that isolated, rural sites restricted access to Health. Education and welfare facilities that disadvantaged them and needs to be seen in the light of the above objectives

"Participants living on Shirenewton had three main criticisms: the site was too big, the distance from local amenities along with the lack of local transport,"

"This created many problems for the residents, especially the poorest: 'for a person like me on the bread line it's very tough. I can't afford to use the car 'everything is a mile away, including the bus stop. It takes a long walk on a busy road to get to the shops and schools"

"The tables demonstrate that access to services such as local shops, health centres and education facilities from both sites is difficult by foot and by local transport systems. This difficulty was eased when participants used their cars, however the level of ease was lower for Roverway due to the difficult entry onto the main road".

"Participants reported that access to local amenities, health services and education was low for both sites by foot or by public transport:

"Everything is a mile away, including the bus stop. It takes a long walk on a busy road to get to the shops and schools"

"It was thought that smaller sites would reduce the problem of onsite conflicts: 'they need smaller sites and not too many different families, otherwise when you have a row the whole site becomes a war zone"

'This affected the ability of the households interviewed to access local services such as shops, health centres and education facilities. It was reported that this problem mainly affected the women: men take the vehicles that the household own to work during the day, leaving the women without their own transport and often away from public transport routes"

"Participants did not specify where in Cardiff or the Vale of Glamorgan sites should be located, It was noted that sites should be on the outskirts of towns to enable access by foot to local services such as shops, the launderette and health centres"

"While the focus of the survey was on accommodation requirements, the questionnaire also collected information on access to services, including health and education. Research has found that poor accommodation can prevent access to services and so cannot be seen in isolation."

'participants living on sites felt that there were site restrictions that limited their work options. These were mainly associated with the location of the sites and lack of access to public transport rather than site regulations: 'no buses, no local transport, bad access"

"Participants living on local authority sites reported that the lack of local public transport provision in the area affected their ability to send their children to school, access health services and work opportunities, and limited their ability to attend training and education courses"

Participants were asked about where they would like future sites to be, but were not specific about locations within the County Boroughs, instead emphasising the importance of public transport to any new sites. Government draft guidance on site design stresses the importance of access to services and the promotion of integrated co existence' between the site and surrounding community. 19 The precise location, design and facilities of any new sites should be drawn up in consultation with Gypsies and Travellers to ensure that the additional provision meets their needs. The health and safety implications of a new site s location should be considered in finding a balance between offering sites in good locations and the additional land costs this would entail the settled community neighbouring the sites should also be involved in the consultation from an early stage.

13. An independent highway study surrounding the proposed site has concluded that:

"The 1km long lane itself of poor horizontal alignment, with poor forward visibility and unsuitable for regular vehicular traffic. If the site is developed the lane itself would need major upgrading, which would certainly change its appearance within this rural environment"

"The village school is approximately 1km from the village and 900metres from the proposed site. It is noted that the route does not offer any facilities for pedestrians, such that the only safe way for children to travel between the site and the school safely would be by vehicle. This route would also be potentially hazardous for cycle use for children, the elderly or infirm and could be potentially hazardous for all users other than by car."

"With regard to the appropriateness of the location for a traveller's site development; in relation to transportation, it is difficult to refer to standard guidelines, as few relate to "rural highways' most highway design standards for residential development relate to urban areas. Hence, the advice contained within this report is based on best available information, acceptable highway standards for developments of similar size and transport needs of small communities. Welsh Government guidelines state sites should be situated in close proximity to transport links. The Llangan site would not appear to meet that criteria, being situated

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away from the main transport infrastructure, sites should also have ready access to schools, doctors and shops against which requirements Llangan again appears to fail"

"With regards to the existing lane, it is generally considered that where there is direct access to dwellings, the previous standard for developments, Design Bulletin 32, offers guidance where it states that a desirable minimum carriageway width of 5.5metres is appropriate, together with 2.0 metre wide footways on both sides. This will allow two way traffic at all times, and safe movement of pedestrians. However, as there is no direct access off the lane (apart from into the proposed development)"

"Thus the lane itself should be widened to this minimum standard, which will require the removal of the existing hedge line on one or both sides of the lane and probable acquisition of land from the adjoining fields. This will of course change the environmental character of the area substantially, but is considered essential to cater for increased vehicle and pedestrian traffic"

14. There is complete in consistency with the allocation of MG9 against the proposed policies.

#### TEST CE3

1. The VoG make no reference as to how they are going to manage such a large site.

The 21 unit site in Rover Way Cardiff, has 3 full time staff.

2. The current Housing Strategy expires Apr 2012 and makes no relevant reference as to how the Travelling Community will be monitored in terms of growth or need. Indeed, there is no strategy that underpins the G&T community or housing at all.

#### TEST CE4

- 1. Policy MD12 (G&T) is discriminatory. It offers no flexibility for the VoG to bring forward sites that are sustainable / suitable for G&T through the policies derived within the plan.
- 2. MD12 should be redrafted to enable smaller, sustainable sites to be included within the Affordable Housing requirements and delivered through the RSL sector.
- 3f Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
  - 1. We are suggesting that the site MG9 is removed from the plan and an alternative site that has been assessed according to a relative sustainability appraisal is put in its place.
  - 2. We are suggesting that Policy MD 12 is amended so that it does not discriminate against the G&T community. All sites during the plan should be assessed on a similar basis as Affordable Housing.
- 4b If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -



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| Representor                                    | ID and d    | etails:   | 4180/D          | P1 Paul Simpson         |   |            |         |                            |                             |  |                               |                         |                                   |                                |
|--|-------------|-----------|-----------------|-------------------------|---|------------|---------|----------------------------|-----------------------------|--|-------------------------------|-------------------------|-----------------------------------|--------------------------------|
| Date Lodged<br>02/04/2012                      | Status<br>M | Petition  | on and No.<br>0 | Supporting Evidence     |   |            |         | Rep format:<br>Comment for | rm                          | 4a - do you want your comments to be consiered by 'written representations' or you want to speak at a hearing session of Public examination? Written |                               |                         |                                   |                                |
| 2a - Do you consider the LDP is Sound? Unsound |             |           |                 |                         | Procedural Tests -                              | P1 -       | Yes     |                            | P2 - Yes                    |  |                               | of soundness, ple       | ease indicate which test(s        | ) that it fails.               |
|  |             |           |                 |                         | Consistency Tests -<br>Coherence and Effect     |            |         |                            |                             |  | C3 - Yes<br>E2 - Yes          | C4<br>CE3 - Yes         | - Yes<br>CE4 - Yes                |                                |
| 3a - Which pa                                  | rt of the   | Deposit   | Plan are y      | •                       | Policy Number:<br>MG9. MD12. MG2.               | ·          |         | aragraph<br>49. 7.4        | <u>Number:</u><br>1         |  | oposal Map:                   | <b>)</b>                | Constraints Map                   | Appendices: Other - Not Listed |
| 3b - Do you w                                  | ish to se   | e any cl  | nanges ma       | de to the Deposit Plan  | as a result of your rep                         | resenta    | ition?  | Yes                        |                             | (If "N   | lo" or "Unanswered            | d" - go to 3d)          |                                   |                                |
| 3c - What cha                                  | nges wo     | uld like  | to see mad      | le to the Deposit Plan? | New Policy: Unanswered Notes:                   | Ame<br>Yes | nded Po | licy:                      | New Paragraph<br>Unanswered |  | Amended Paragra<br>Unanswered | <u>New Or Am</u><br>Yes | nended Site: Other (see Unanswere | <del></del>                    |
| 3d - If your re                                | presenta    | tion rela | ates to a ne    | •                       | d site, did you submit i<br>Site Name: Land Eas |            |         | ndidate                    | Site? Yes                   | •  | (If "Yes", ple                | •                       | ndidate Site Name and re          | •                              |
| 3e - Please s                                  | et out vo   | ur repre  | sentation b     | pelow:                  |   |            |         |                            |                             | 7  |                               |                         |                                   |                                |

e - 1 lease set out your representation below.

#### REPRESENTATIONS AGAINST ALLOCATION OF GYPSY & TRAVELLER SITE AT LAND EAST OF LLANGAN

TEST P1

The LDP has not been prepared in accordance with the Community Involvement Scheme, see below key points:

- The Emergency Services and Local Primary school have all confirmed that they have NOT been consulted on the proposed site MG9. The LEA confirmed they had not been consulted about the Gypsy site.
- Registered consultees have not been informed of the consultation stages.
- According to the Welsh Government's document 'Travelling to a better future' there is an onus on the LA to consult with its strategic partners in delivering Gypsy & Traveller sites. No consultation has taken place.
- Good practice (Welsh Government document 'Good Practice Design in designing Gypsy & Traveller sites') suggests that where Gypsy & Traveller sites are concerned the local community should be engaged as early as possible we believe that the Council has undertaken the minimum consultation in terms of the LDP and insufficient consultation with respect to the Gypsy & Traveller site in accordance with best practice.

TEST P2

- 1. The Sustainability Appraisal is flawed and contradictory the proposed sites do not meet with national policy in respect of sustainability. The allocation of Llangan is not consistent with previous Planning Rejections by the Council which considered sustainability (Bonvilston Sept 2011) and with similar determinations by the Planning Inspectorate (Pembroke Sept 2011).
- 2. The allocation of MG9 is not consistent with the proposed LDP policies.

TEST C1

The Land Use Plan (with regards to Gypsy & Traveller sites) does not relate to any strategy - The Housing Strategy is out dated and does not provide any structure for assessing Gypsy & Traveller needs or site location.

TESTC2

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- 1. The Site allocation does not have regard to the following National Policy:
- -Welsh Government Circular (30/2007):
- The site is RURAL and is "UNSUSTAINABLE" as there are no local services (no shops, food and drink outlets, doctor, dentist, Library, rail services or any main settlement within 5km etc). Llangan and Fferm Goch both score 0 points for local services in the evidence based assessment 'Sustainable Settlements Appraisal'
- The site would not comply with a RURAL EXCEPTION POLICY as it advocates that all pitches are accommodated on a RURAL site including transient pitches which would not comply with TAN 2.
- Any business operated from the site would be in contradiction of RURAL EXCEPTION guidance.
- The site allocation does not take into account the "SCALE" of the resident community. Llangan has a population of less than 100 with 35 homes and this proposal nearly doubles the size of the Hamlet.
- Example of similar site. In 2007 an application of the Sustainability issue was applied by the Planning inspector in Pembroke where an appeal was refused solely on this basis.
- The VOG Council has refused an application recently in Bonvilston on the basis of Sustainability and services in this case were closer to the site than in the case of Llangan proposal.
- Designing Gypsy and Traveller Sites Good Practice Guide The site is too small; therefore cannot meet the needs identified in the LDP.
- -The site measures 7400 m2 and could only accommodate 14 pitches without infrastructure (quidance is 500m2 per pitch plus refuse area; office; play area; infrastructure (roads etc)
- The access road to the site does not meet the minimum requirements for emergency vehicles (3.7m it is actually 15m)
- The site access is poor and "unsafe" having extended walks (in excess of 800m to bus stop) along an unlit lane with no public footpath or street lighting.
- The proposal of 21 units on the site would restrict the ability of emergency vehicles to manoeuvre around the site.
- New sites grants are available (and cost should not be a material planning consideration).
- -The guidance requires that sites are:
- sustainable the Llangan site proposal is not
- equivalent to standards that would be expected for social housing in the settled community This would not meet the standards and this site would not have been considered appropriate for development for residential in either the current or proposed plans
- have the effect of encouraging and developing good relations between
- Gypsies & Travellers and the settled community the large scale of this proposal could mean that establishing good relations with the local community of Llangan would be unlikely and could also result in increased tensions in the community.
- based on WAG guidance of Design of Gypsy traveller sites the maximum number of pitches is 14, and the proposal at Llangan exceeds this number.
- Travelling to a Better Future
- Recommends that LA's engage with their Housing Association Partners to bring sites forward. The VOG Council has not done this.
- "Situating transit provision on residential Gypsy sites is not an option preferred by the Gypsy and Traveller community as this can lead to tensions among different family groups and make site management and maintenance very difficult." This creates a sense of "fear" within the settled Gypsy & Traveller community. The proposal is recommending that transient and permanent sites are co-located.
- Planning Policy Wales 2011
- The proposed site at Llangan is greenfield land, according to the definition of brownfield land set out in Figure 4 1 of PPW;
- it will not reduce the need to travel, due to the limited local service provision in close proximity to the site;
- offers very limited access to public transport facilities;
- is not large enough to provide ancillary facilities required to support a sustainable development as set out in paragraph 3.30 in accordance with Designing Gypsy and Travellers Sites Good Practice Guide;
- is located within a Special Landscape Area (SLA) and in close proximity to a Conservation Area. The assessment of the Llangan site incorrectly states that it is not within an SLA, so makes no reference to the sites proximity to the conservation area of Llangan. The location can be clearly seen from the conservation area.
- does not meet the identified needs of Gypsies and Travellers, in the Vale of Glamorgan (Fordham report 2008 evidence);
- does not promote sustainable access to employment, shopping, education, health, community, leisure and sports facilities;
- does not maximise opportunities for community development and social welfare;
- does not foster social inclusion due to the isolated location of the site; and

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- does not contribute to improvements in health due to the isolation from services and facilities.
- 2. MG2. The draft policy MG 2 actively discriminates the Gypsy community by excluding them from the wider housing programme and potentially abuses their human rights. Policy MG 2 should be revised to allow the VOG to identify appropriate sites in the same way as Affordable Housing.

#### TESTC3

- 1. The policy does not have due regard to the Wales Spatial Plan.
- The key theme of the Wales Spatial Plan is achieving sustainable development through focusing new development in areas which have good access to key services and facilities. As there are no services surrounding the site the allocation of MG9 is not consistent with the objectives of the Wales Spatial Plan. The Gypsy site proposal fails Soundness test Consistency C3 because the policy does not have due regard to the Wales Spatial Plan.

#### TESTC4

- 1. The allocation of this site does not have regard to the relevant Community Strategy in the following respects:
- "The diverse needs of local people are met through the provision of customer focused, accessible services and information" This cannot be achieved by the allocation of a non-accessible rural allocation.
- "Vale of Glamorgan residents and organisations respect the local environment and work together to meet the challenge of climate change" The allocation of MG9 places heavy emphasis on the use of the car to access the most basic facilities shops, health, education etc.
- "Older people are valued and empowered to remain independent, healthy and active. They have equality of opportunity and receive high quality services to meet their diverse needs"— All services are miles away and inaccessible to

the older community. The VERY POOR public transport system is located

1050m from the site and is in excess of the maximum distances as defined in

the proposed LDP and "Manual for Streets".

- "People of all ages are able to access coordinated learning opportunities and have the necessary skills to reach their full potential helping to remove barriers to employment"—There is no employment opportunity near to the site.
- The local primary school has confirmed that it is full and that its projections suggest that it doesn't have the capacity for such a large development (also consider the existing approval of 12 dwellings at Fferm Goch).
- The small local industrial unit has raised concerns in relation to the scale of the proposal.

#### TEST CE1

The Plan does not set out a coherent strategy in the following respects

- The Strategy makes the following statements:

The LDP will seek to provide a policy framework which: Manages the housing supply effectively in order to provide a range of good guality, affordable homes in sustainable locations

Reduces out commuting by providing opportunities for new housing, retail and employment development in accessible locations in the Vale of Glamorgan

The allocation of this rural site in open countryside does not meet this objective.

- The LDP also states its vision as being:
- "Our Vision for the Vale of Glamorgan is a place:

That is safe, clean and attractive, where individuals and communities have sustainable opportunities to improve their health, learning and skills, prosperity and wellbeing 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 sustainability of the area." The allocation of this site in policy MG9 does not meet these objectives being in a rural location with inadequate facilities and transport links.

- The Allocation of this site in policy MG9 does not comply with the following objectives of the LDP:
- -Objective 1: To sustain and further the development of sustainable communities within the Vale of Glamorgan, providing opportunities for living, learning, working and socialising for all. The site's location would clearly not meet this objective.

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Objective 2: To ensure that development within the Vale of Glamorgan makes a positive contribution towards reducing the impact of and mitigating the adverse effects of climate change. - The allocation of this site will have entirely the opposite effect to this objective.

- Objective 3: To reduce the need for Vale of Glamorgan residents to travel to meet their daily needs and enabling them greater access to sustainable forms of transport. The allocation of this site will have entirely the opposite effect to this objective.
- Objective 4: To protect and enhance the Vale of Glamorgan's historic, built, and natural environment. The development of this site would not meet this objective: a planning refusal on an adjacent site in May 2002 stated "It is a proposal that would adversely affect the undeveloped rural character of the area"
- Objective 5: To maintain, enhance and promote community facilities and services in the Vale of Glamorgan The local primary school has not been consulted, had they been it would have been recognised that the school does not have capacity, nor is it projected to have the capacity.
- Objective 7: To provide the opportunity for people in the Vale of Glamorgan to meet their housing needs- States that development of housing should be in sustainable locations This is not. Furthermore, it brings into question POLICY MD12 which is discriminatory in that Gypsy & Traveller sites are treated differently from other housing allocations. An inclusive policy would see Gypsy & Traveller sites being assessed on the same basis as AFFORDABLE HOUSING and considered for ALL candidate residential sites in the LDP
- Objective 10: To ensure that development within the Vale of Glamorgan uses land effectively and efficiently and to promote the sustainable use and management of natural resources. The inappropriate use of finite resources can impact on the ability of future generations to fulfil their needs. The LDP through favouring the use of previously developed land and the sustainable use of natural resources of whatever kind and wherever they are located, will contribute to preserving their availability for future generations. This is agricultural land in the Special Landscaped Area.

#### TEST CE2

The strategies, policies and allocations are not realistic and appropriate having considered relevant alternatives and are not founded on robust evidence:

- 1. The allocation of Llangan is purely on the basis of site ownership by the Vale and does not meet the requirement of Policy MD12.
- 2. The Gypsy & Traveller site assessment (anecdotal) conflicts with other evidence based background papers; specifically the Sustainable Settlement Appraisal. The SSA states 0 points for public transport but the Gypsy & Traveller site assessment states that public transport facilities are good.
- 3. The Gypsy Traveller site assessment states "good highway access", yet the access falls considerably short of the minimum requirement for vehicle access the access lane is 2.5m wide, against a minimum requirement of 3.7m plus footpath of 1.2m.
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- "Participants living on Shirenewton had three main criticisms: the site was too big, the distance from local amenities along with the lack of local transport,"

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#### TEST CE3

- 1. The VOG council make no reference as to how they are going to manage such a large site. The 21 unit site in Rover Way Cardiff has 3 full time Council staff allocated to it.
- 2. The current Housing Strategy expires April 2012 and makes no relevant reference as to how the Gypsy & Travelling Community will be monitored in terms of growth or need. Indeed, there is no strategy that underpins the Gypsy & Traveller community or housing at all.

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TEST CE4

- 1. Policy MD12 (Gypsy & Traveller) is discriminatory. It offers no flexibility for the Council to bring forward sites that are sustainable / suitable for Gypsies & Travellers through the policies derived within the plan.
- 2. MD12 should be redrafted to enable smaller, sustainable sites to be included within the Affordable Housing requirements and delivered through the Registered Social Landlord sector.
- 3. To argue that the Private Sector has been consulted to offer sites is not accepted. The private sector were not likely to volunteer sites for such a contentious use. The LDP should set clear strategies / policies to deliver sustainable sites for all members of the community; private; social and travelling. The current allocation does not meet this and could strongly be argued breeches the Human Rights of the Gypsy traveller community as it does not provide a suitable, sustainable site that meets the guidelines in the 2008 Fordham report.
- 3f Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)

The proposed Gypsy traveller site at Llangan (Policy MG9) should be removed from the LDP draft plan. The VOG should identify an alternative site that has been assessed according to a relative sustainability appraisal and meets the requirements of the Gypsy community as listed in the 2008 Fordham report.

Policy MD12 should be amended so that it does not discriminate against the Gypsy and Traveller community. All sites during the plan should be assessed on a similar basis as Affordable Housing.

4b - If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing The policy MG9 (proposed Gypsy site at Llangan) does not meet with national policy in respect of sustainability, nor does it comply with a RURAL EXCEPTION POLICY. The number of pitches is too high when compared to the "Designing Gypsy and Traveller Sites Good Practice Guide".

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|--|---|-----------------------|---|----------------------------|------------------|--|--------------------|--|--|
| Date Lodged     Status     Petition and No.     Supporting Evidence       02/04/2012     M     0 | e Additional SA SEA Rep format:  Comment for  |                       | 4a - do you want your comments to be consiered by 'written representations' or do you want to speak at a hearing session of Public examination? Written |                            |                  |  |                    |  |  |
| ,  | 2b - If you think that the Plan is unsound and does not not meet one or more test(s) of soundness, please indicate which test(s) that it fails.  Procedural Tests - P1 - Yes P2 - Yes |                       |   |                            |                  |  |                    |  |  |
|  | Consistency Tests -   |                       |   | C3 - Yes                   | C4 ·             | Yes                                    |                    |  |  |
|  | Coherence and Effecti   | veness Tests - 0      | CE1 - Yes   | CE2 - Yes                  | CE3 - Yes        | CE4 - Yes                              |                    |  |  |
| 3a - Which part of the Deposit Plan are you commenting on?                                       | Policy Number:  | Parag                 | graph Number:   | Proposal Map:              |                  | Constraints Map                        | Appendices:        |  |  |
|  | MG9. MD12. MG2  | 6.49.                 | 7.41  | MG9                        |                  | Feb 2012                               | Other - Not Listed |  |  |
| 3b - Do you wish to see any changes made to the Deposit Plan                                     | as a result of your repr  | resentation? Ye       | s (I  | f "No" or "Unanswered      | d" - go to 3d)   |  |                    |  |  |
| 3c - What changes would like to see made to the Deposit Plan?                                    | New Policy:<br>Unanswered   | Amended Policy<br>Yes | : New Paragraph: Unanswered   | Amended Paragra Unanswered | New Or Am<br>Yes | ended Site: Other (see I<br>Unanswered | <del></del>        |  |  |
|  | Notes:  |                       |   |                            |                  |  |                    |  |  |
| 3d - If your representation relates to a new, deleted or amende                                  | d site, did you submit t<br>Site Name: Land east  |                       | date Site? Yes  | (If "Yes", ple             | ū                | didate Site Name and rei               | ,                  |  |  |
| 3e - Please set out your representation below:   |   |                       |   | <b>,</b>                   |                  |  |                    |  |  |

i ioada dat dat year representation below

#### REPRESENTATIONS AGAINST ALLOCATION OF GYPSY & TRAVELLER SITE AT LAND EAST OF LLANGAN

TEST P1

The LDP has not been prepared in accordance with the Community Involvement Scheme, see below key points:

- The Emergency Services and Local Primary school have all confirmed that they have NOT been consulted on the proposed site MG9. The LEA confirmed they had not been consulted about the Gypsy site.
- Registered consultees have not been informed of the consultation stages.
- According to the Welsh Government's document 'Travelling to a better future' there is an onus on the LA to consult with its strategic partners in delivering Gypsy & Traveller sites. No consultation has taken place.
- Good practice (Welsh Government document 'Good Practice Design in designing Gypsy & Traveller sites') suggests that where Gypsy & Traveller sites are concerned the local community should be engaged as early as possible we believe that the Council has undertaken the minimum consultation in terms of the LDP and insufficient consultation with respect to the Gypsy & Traveller site in accordance with best practice.

TEST P2

- 1. The Sustainability Appraisal is flawed and contradictory the proposed sites do not meet with national policy in respect of sustainability. The allocation of Llangan is not consistent with previous Planning Rejections by the Council which considered sustainability (Bonvilston Sept 2011) and with similar determinations by the Planning Inspectorate (Pembroke Sept 2011).
- 2. The allocation of MG9 is not consistent with the proposed LDP policies.

TEST C1

The Land Use Plan (with regards to Gypsy & Traveller sites) does not relate to any strategy - The Housing Strategy is out dated and does not provide any structure for assessing Gypsy & Traveller needs or site location.

TESTC2

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- 1. The Site allocation does not have regard to the following National Policy:
- -Welsh Government Circular (30/2007):
- The site is RURAL and is "UNSUSTAINABLE" as there are no local services (no shops, food and drink outlets, doctor, dentist, Library, rail services or any main settlement within 5km etc). Llangan and Fferm Goch both score 0 points for local services in the evidence based assessment 'Sustainable Settlements Appraisal'
- The site would not comply with a RURAL EXCEPTION POLICY as it advocates that all pitches are accommodated on a RURAL site including transient pitches which would not comply with TAN 2.
- Any business operated from the site would be in contradiction of RURAL EXCEPTION guidance.
- The site allocation does not take into account the "SCALE" of the resident community. Llangan has a population of less than 100 with 35 homes and this proposal nearly doubles the size of the Hamlet.
- Example of similar site. In 2007 an application of the Sustainability issue was applied by the Planning inspector in Pembroke where an appeal was refused solely on this basis.
- The VOG Council has refused an application recently in Bonvilston on the basis of Sustainability and services in this case were closer to the site than in the case of Llangan proposal.
- Designing Gypsy and Traveller Sites Good Practice Guide The site is too small; therefore cannot meet the needs identified in the LDP.
- -The site measures 7400 m2 and could only accommodate 14 pitches without infrastructure (quidance is 500m2 per pitch plus refuse area; office; play area; infrastructure (roads etc)
- The access road to the site does not meet the minimum requirements for emergency vehicles (3.7m it is actually 15m)
- The site access is poor and "unsafe" having extended walks (in excess of 800m to bus stop) along an unlit lane with no public footpath or street lighting.
- The proposal of 21 units on the site would restrict the ability of emergency vehicles to manoeuvre around the site.
- New sites grants are available (and cost should not be a material planning consideration).
- -The guidance requires that sites are:
- sustainable the Llangan site proposal is not
- equivalent to standards that would be expected for social housing in the settled community This would not meet the standards and this site would not have been considered appropriate for development for residential in either the current or proposed plans
- have the effect of encouraging and developing good relations between
- Gypsies & Travellers and the settled community the large scale of this proposal could mean that establishing good relations with the local community of Llangan would be unlikely and could also result in increased tensions in the community.
- based on WAG guidance of Design of Gypsy traveller sites the maximum number of pitches is 14, and the proposal at Llangan exceeds this number.
- Travelling to a Better Future
- Recommends that LA's engage with their Housing Association Partners to bring sites forward. The VOG Council has not done this.
- "Situating transit provision on residential Gypsy sites is not an option preferred by the Gypsy and Traveller community as this can lead to tensions among different family groups and make site management and maintenance very difficult." This creates a sense of "fear" within the settled Gypsy & Traveller community. The proposal is recommending that transient and permanent sites are co-located.
- Planning Policy Wales 2011
- The proposed site at Llangan is greenfield land, according to the definition of brownfield land set out in Figure 4 1 of PPW;
- it will not reduce the need to travel, due to the limited local service provision in close proximity to the site;
- offers very limited access to public transport facilities;
- is not large enough to provide ancillary facilities required to support a sustainable development as set out in paragraph 3.30 in accordance with Designing Gypsy and Travellers Sites Good Practice Guide;
- is located within a Special Landscape Area (SLA) and in close proximity to a Conservation Area. The assessment of the Llangan site incorrectly states that it is not within an SLA, so makes no reference to the sites proximity to the conservation area of Llangan. The location can be clearly seen from the conservation area.
- does not meet the identified needs of Gypsies and Travellers, in the Vale of Glamorgan (Fordham report 2008 evidence);
- does not promote sustainable access to employment, shopping, education, health, community, leisure and sports facilities;
- does not maximise opportunities for community development and social welfare;
- does not foster social inclusion due to the isolated location of the site; and

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- does not contribute to improvements in health due to the isolation from services and facilities.
- 2. MG2. The draft policy MG 2 actively discriminates the Gypsy community by excluding them from the wider housing programme and potentially abuses their human rights. Policy MG 2 should be revised to allow the VOG to identify appropriate sites in the same way as Affordable Housing.

#### TESTC3

- 1. The policy does not have due regard to the Wales Spatial Plan.
- The key theme of the Wales Spatial Plan is achieving sustainable development through focusing new development in areas which have good access to key services and facilities. As there are no services surrounding the site the allocation of MG9 is not consistent with the objectives of the Wales Spatial Plan. The Gypsy site proposal fails Soundness test Consistency C3 because the policy does not have due regard to the Wales Spatial Plan.

#### TESTC4

- 1. The allocation of this site does not have regard to the relevant Community Strategy in the following respects:
- "The diverse needs of local people are met through the provision of customer focused, accessible services and information" This cannot be achieved by the allocation of a non-accessible rural allocation.
- "Vale of Glamorgan residents and organisations respect the local environment and work together to meet the challenge of climate change" The allocation of MG9 places heavy emphasis on the use of the car to access the most basic facilities shops, health, education etc.
- "Older people are valued and empowered to remain independent, healthy and active. They have equality of opportunity and receive high quality services to meet their diverse needs"— All services are miles away and inaccessible to

the older community. The VERY POOR public transport system is located

1050m from the site and is in excess of the maximum distances as defined in

the proposed LDP and "Manual for Streets".

- "People of all ages are able to access coordinated learning opportunities and have the necessary skills to reach their full potential helping to remove barriers to employment"—There is no employment opportunity near to the site.
- The local primary school has confirmed that it is full and that its projections suggest that it doesn't have the capacity for such a large development (also consider the existing approval of 12 dwellings at Fferm Goch).
- The small local industrial unit has raised concerns in relation to the scale of the proposal.

#### TEST CE1

The Plan does not set out a coherent strategy in the following respects

- The Strategy makes the following statements:

The LDP will seek to provide a policy framework which: Manages the housing supply effectively in order to provide a range of good guality, affordable homes in sustainable locations

Reduces out commuting by providing opportunities for new housing, retail and employment development in accessible locations in the Vale of Glamorgan

The allocation of this rural site in open countryside does not meet this objective.

- The LDP also states its vision as being:
- "Our Vision for the Vale of Glamorgan is a place:

That is safe, clean and attractive, where individuals and communities have sustainable opportunities to improve their health, learning and skills, prosperity and wellbeing 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 sustainability of the area." The allocation of this site in policy MG9 does not meet these objectives being in a rural location with inadequate facilities and transport links.

- The Allocation of this site in policy MG9 does not comply with the following objectives of the LDP:
- -Objective 1: To sustain and further the development of sustainable communities within the Vale of Glamorgan, providing opportunities for living, learning, working and socialising for all. The site's location would clearly not meet this objective.

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Objective 2: To ensure that development within the Vale of Glamorgan makes a positive contribution towards reducing the impact of and mitigating the adverse effects of climate change. - The allocation of this site will have entirely the opposite effect to this objective.

- Objective 3: To reduce the need for Vale of Glamorgan residents to travel to meet their daily needs and enabling them greater access to sustainable forms of transport. The allocation of this site will have entirely the opposite effect to this objective.
- Objective 4: To protect and enhance the Vale of Glamorgan's historic, built, and natural environment. The development of this site would not meet this objective: a planning refusal on an adjacent site in May 2002 stated "It is a proposal that would adversely affect the undeveloped rural character of the area"
- Objective 5: To maintain, enhance and promote community facilities and services in the Vale of Glamorgan The local primary school has not been consulted, had they been it would have been recognised that the school does not have capacity, nor is it projected to have the capacity.
- Objective 7: To provide the opportunity for people in the Vale of Glamorgan to meet their housing needs- States that development of housing should be in sustainable locations This is not. Furthermore, it brings into question POLICY MD12 which is discriminatory in that Gypsy & Traveller sites are treated differently from other housing allocations. An inclusive policy would see Gypsy & Traveller sites being assessed on the same basis as AFFORDABLE HOUSING and considered for ALL candidate residential sites in the LDP
- Objective 10: To ensure that development within the Vale of Glamorgan uses land effectively and efficiently and to promote the sustainable use and management of natural resources. The inappropriate use of finite resources can impact on the ability of future generations to fulfil their needs. The LDP through favouring the use of previously developed land and the sustainable use of natural resources of whatever kind and wherever they are located, will contribute to preserving their availability for future generations. This is agricultural land in the Special Landscaped Area.

#### TEST CE2

The strategies, policies and allocations are not realistic and appropriate having considered relevant alternatives and are not founded on robust evidence:

- 1. The allocation of Llangan is purely on the basis of site ownership by the Vale and does not meet the requirement of Policy MD12.
- 2. The Gypsy & Traveller site assessment (anecdotal) conflicts with other evidence based background papers; specifically the Sustainable Settlement Appraisal. The SSA states 0 points for public transport but the Gypsy & Traveller site assessment states that public transport facilities are good.
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Representor ID and details: 4181/DP1 Sara Simpson

TEST CE4

- 1. Policy MD12 (Gypsy & Traveller) is discriminatory. It offers no flexibility for the Council to bring forward sites that are sustainable / suitable for Gypsies & Travellers through the policies derived within the plan.
- 2. MD12 should be redrafted to enable smaller, sustainable sites to be included within the Affordable Housing requirements and delivered through the Registered Social Landlord sector.
- 3. To argue that the Private Sector has been consulted to offer sites is not accepted. The private sector were not likely to volunteer sites for such a contentious use. The LDP should set clear strategies / policies to deliver sustainable sites for all members of the community; private; social and travelling. The current allocation does not meet this and could strongly be argued breeches the Human Rights of the Gypsy traveller community as it does not provide a suitable, sustainable site that meets the guidelines in the 2008 Fordham report.
- 3f Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
  - The proposed Gypsy traveller site at Llangan (Policy MG9) should be removed from the LDP draft plan. The VOG should identify an alternative site that has been assessed according to a relative sustainability appraisal and meets the requirements of the Gypsy community as listed in the 2008 Fordham report.
  - Policy MD12 should be amended so that it does not discriminate against the Gypsy and Traveller community. All sites during the plan should be assessed on a similar basis as Affordable Housing.
- 4b If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing The policy MG9 (proposed Gypsy site at Llangan) does not meet with national policy in respect of sustainability, nor does it comply with a RURAL EXCEPTION POLICY. The number of pitches is too high when compared to the "Designing Gypsy and Traveller Sites Good Practice Guide".

(ordered by Representation ID No.)

| Representor II                           | D and de    | etails:    | 4182/DI        | P1 Mr S.A.Thomas                                 |   |   |                              |                               |  |                                 |                       |
|--|-------------|------------|----------------|--|---|---|------------------------------|-------------------------------|--|---------------------------------|-----------------------|
| Date Lodged<br>21/03/2012                | Status<br>M | Petitio    | n and No.<br>0 | Supporting Evidenc                               | Additional SA SEA                         |   | Rep format:<br>Letter        | ,                             | your comments to be cor<br>k at a hearing session of   | ,                               | •                     |
| 2a - Do you cor                          | nsider th   | e LDP is   | s Sound?       | Unanswered                                       | Procedural Tests -<br>Consistency Tests - | he Plan is unsound an<br>P1 - Unanswered<br>C1 - Unanswered<br>tiveness Tests - CE1 | P2 - Unans<br>C2 - Unans     | wered                         |  |                                 |                       |
| 3a - Which part                          | t of the D  | eposit l   | Plan are yo    | ou commenting on?                                | Policy Number:<br>MG2(11)                 | <u>Paragra</u>  | oh Number:                   | Proposal Map:                 | <u>Con</u><br>   | nstraints Map                   | Appendices:           |
| 3b - Do you wis                          | sh to see   | any ch     | anges mad      | de to the Deposit Pla                            | n as a result of your rep                 | oresentation? Unans   | swered (li                   | f "No" or "Unanswered         | d" - go to 3d)   |                                 |                       |
| 3c - What chan                           | nges wou    | ld like to | o see mad      | le to the Deposit Plar                           | ? New Policy:<br>Unanswered<br>Notes:     | Amended Policy:<br>Unanswered   | New Paragraph:<br>Unanswered | Amended Paragra<br>Unanswered | ph: New Or Amended S<br>Unanswered   | <u>Other (see No</u> Unanswered | otes):                |
| 3d - If your rep                         | oresentat   | ion rela   | tes to a ne    | ew, deleted or amend                             | ed site, did you submit<br>Site Name:     | the site as a Candidat  | e Site? Unanswe              | red (If "Yes", ple            | ase give the Candidate S<br>Site Reference   |                                 | rence if known)       |
| 3e - Please se<br>It is propo<br>reason: | ,           |            |                |  | restock market site for                   | housing development.  | I strongly believe th        | nat this entire site shou     | ld be retained and develo  | oped for car parkin             | g, for the following  |
|  | Ü           | •          |                |  | •   | ·   | , ,                          | ·                             | l, reindeer day, sports eve  | , .                             | e.                    |
| 3.Althoug                                | h Waitro    | se will b  | oring some     |  |   |   |                              | ·                             | wn rather than Bridgend on the control of the contr |                                 | is implemented, a net |
| salons, gi                               | ift shops,  | cafes a    | and restau     |  | g capacity will make Co                   |   |                              |                               | le range of ladies fashion<br>lood of a high proportion  |                                 |                       |
| signatorie                               | es oppos    | ed the C   | Council's p    |  |   |   |                              |                               | et resolution dated 20 Se<br>market site for parking. T  |                                 |                       |
| 6. The she revenue to                    |             |            |                | e of this site will likely                       | result in a permanent r                   | reduction in footfall to the  | he Cowbridge retail          | trade, and a conseque         | ent long term loss of inve   | estment, employme               | nt and business rate  |
| •  | -           |            |                | in modern Britain. Ma<br>e (i.e. parking) provis | , ,                                       | een blighted as a resul   | t of ill-judged planni       | ing decisions. Vale of        | Glamorgan Council have   | a duty to nurture a             | nd encourage trade in |
| 3f - Please out                          | tline the   | change     | s you wish     | to see made to the I                             | Deposit Plan to make it                   | sound (if relevant)   |                              |                               |  |                                 |                       |
| 4b - If you wish                         | h to spea   | ak, pleas  | se confirm     | which part of your re                            | presentation you wish                     | to speak to the inspect   | or about and why th          | ney consider it be nece       | essary to speak at the hea   | aring -                         |                       |

(ordered by Representation ID No.)

| Representor ID and details: 4183/DP1 J E Williams  |  |                      |                               |                          |                       |   | _                  |
|--|--|----------------------|-------------------------------|--------------------------|-----------------------|---|--------------------|
| Date Lodged Status Petition and No. Supporting Evidence 02/04/2012 M 0                   | Additional SA SEA                                |                      | Rep forma<br>Comment          |                          |                       | o be consiered by 'writter<br>ssion of Public examinati |                    |
| 2a - Do you consider the LDP is Sound? Unsound   | 2b - If you think that the Procedural Tests -    |                      | nd and does not not<br>P2 - Y | meet one or more test(s) | of soundness, ple     | ase indicate which test(s                               | ) that it fails.   |
|  | Consistency Tests -                              | C1 - Yes             | C2 - Y                        | es C3 - Yes              | C4                    | · Yes   |                    |
|  | Coherence and Effect                             | iveness Tests -      | CE1 - Yes                     | CE2 - Yes                | CE3 - Yes             | CE4 - Yes   |                    |
| 3a - Which part of the Deposit Plan are you commenting on?                               | Policy Number:                                   | <u>Para</u>          | agraph Number:                | Proposal Map:            |                       | Constraints Map   | Appendices:        |
|  | MG9. MD12. MG2                                   | 6.49                 | 9. 7.41                       | MG9                      |                       | Feb 2012  | Other - Not Listed |
| 3b - Do you wish to see any changes made to the Deposit Plar                             | as a result of your rep                          | resentation? Y       | es                            | (If "No" or "Unanswere   | ed" - go to 3d)       |   |                    |
| 3c - What changes would like to see made to the Deposit Plan                             | ? New Policy:<br>Unanswered<br>Notes:            | Amended Polic<br>Yes | New Paragra Unanswered        |                          | aph: New Or Am<br>Yes | ended Site: Other (see I<br>Unanswered                  | <del></del>        |
| 3d - If your representation relates to a new, deleted or amende                          | ed site, did you submit t<br>Site Name: Land Eas |                      | didate Site? Yes              | (If "Yes", ple           | · ·                   | didate Site Name and re eference: Site Reference        | ,                  |
| 3e - Please set out your representation below: REPRESENTATIONS AGAINST ALLOCATION OF GYP | SY & TRAVELLER SIT                               | E AT LAND EAS        | T OF LLANGAN                  |                          |                       |   |                    |

TEST P1

The LDP has not been prepared in accordance with the Community Involvement Scheme, see below key points:

- The Emergency Services and Local Primary school have all confirmed that they have NOT been consulted on the proposed site MG9. The LEA confirmed they had not been consulted about the Gypsy site.
- Registered consultees have not been informed of the consultation stages.
- According to the Welsh Government's document 'Travelling to a better future' there is an onus on the LA to consult with its strategic partners in delivering Gypsy & Traveller sites. No consultation has taken place.
- Good practice (Welsh Government document 'Good Practice Design in designing Gypsy & Traveller sites') suggests that where Gypsy & Traveller sites are concerned the local community should be engaged as early as possible we believe that the Council has undertaken the minimum consultation in terms of the LDP and insufficient consultation with respect to the Gypsy & Traveller site in accordance with best practice.

TEST P2

- 1. The Sustainability Appraisal is flawed and contradictory the proposed sites do not meet with national policy in respect of sustainability. The allocation of Llangan is not consistent with previous Planning Rejections by the Council which considered sustainability (Bonvilston Sept 2011) and with similar determinations by the Planning Inspectorate (Pembroke Sept 2011).
- 2. The allocation of MG9 is not consistent with the proposed LDP policies.

TEST C1

The Land Use Plan (with regards to Gypsy & Traveller sites) does not relate to any strategy - The Housing Strategy is out dated and does not provide any structure for assessing Gypsy & Traveller needs or site location.

TESTC2

(ordered by Representation ID No.)

Representor ID and details: 4183/DP1 J E Williams

- 1. The Site allocation does not have regard to the following National Policy:
- -Welsh Government Circular (30/2007):
- The site is RURAL and is "UNSUSTAINABLE" as there are no local services (no shops, food and drink outlets, doctor, dentist, Library, rail services or any main settlement within 5km etc). Llangan and Fferm Goch both score 0 points for local services in the evidence based assessment 'Sustainable Settlements Appraisal'
- The site would not comply with a RURAL EXCEPTION POLICY as it advocates that all pitches are accommodated on a RURAL site including transient pitches which would not comply with TAN 2.
- Any business operated from the site would be in contradiction of RURAL EXCEPTION guidance.
- The site allocation does not take into account the "SCALE" of the resident community. Llangan has a population of less than 100 with 35 homes and this proposal nearly doubles the size of the Hamlet.
- Example of similar site. In 2007 an application of the Sustainability issue was applied by the Planning inspector in Pembroke where an appeal was refused solely on this basis.
- The VOG Council has refused an application recently in Bonvilston on the basis of Sustainability and services in this case were closer to the site than in the case of Llangan proposal.
- Designing Gypsy and Traveller Sites Good Practice Guide The site is too small; therefore cannot meet the needs identified in the LDP.
- -The site measures 7400 m2 and could only accommodate 14 pitches without infrastructure (quidance is 500m2 per pitch plus refuse area; office; play area; infrastructure (roads etc)
- The access road to the site does not meet the minimum requirements for emergency vehicles (3.7m it is actually 15m)
- The site access is poor and "unsafe" having extended walks (in excess of 800m to bus stop) along an unlit lane with no public footpath or street lighting.
- The proposal of 21 units on the site would restrict the ability of emergency vehicles to manoeuvre around the site.
- New sites grants are available (and cost should not be a material planning consideration).
- -The guidance requires that sites are:
- sustainable the Llangan site proposal is not
- equivalent to standards that would be expected for social housing in the settled community This would not meet the standards and this site would not have been considered appropriate for development for residential in either the current or proposed plans
- have the effect of encouraging and developing good relations between
- Gypsies & Travellers and the settled community the large scale of this proposal could mean that establishing good relations with the local community of Llangan would be unlikely and could also result in increased tensions in the community.
- based on WAG guidance of Design of Gypsy traveller sites the maximum number of pitches is 14, and the proposal at Llangan exceeds this number.
- Travelling to a Better Future
- Recommends that LA's engage with their Housing Association Partners to bring sites forward. The VOG Council has not done this.
- "Situating transit provision on residential Gypsy sites is not an option preferred by the Gypsy and Traveller community as this can lead to tensions among different family groups and make site management and maintenance very difficult." This creates a sense of "fear" within the settled Gypsy & Traveller community. The proposal is recommending that transient and permanent sites are co-located.
- Planning Policy Wales 2011
- The proposed site at Llangan is greenfield land, according to the definition of brownfield land set out in Figure 4 1 of PPW;
- it will not reduce the need to travel, due to the limited local service provision in close proximity to the site;
- offers very limited access to public transport facilities:
- is not large enough to provide ancillary facilities required to support a sustainable development as set out in paragraph 3.30 in accordance with Designing Gypsy and Travellers Sites Good Practice Guide;
- is located within a Special Landscape Area (SLA) and in close proximity to a Conservation Area. The assessment of the Llangan site incorrectly states that it is not within an SLA, so makes no reference to the sites proximity to the conservation area of Llangan. The location can be clearly seen from the conservation area.
- does not meet the identified needs of Gypsies and Travellers, in the Vale of Glamorgan (Fordham report 2008 evidence);
- does not promote sustainable access to employment, shopping, education, health, community, leisure and sports facilities;
- does not maximise opportunities for community development and social welfare:
- does not foster social inclusion due to the isolated location of the site; and
- does not contribute to improvements in health due to the isolation from services and facilities.

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2. MG2. The draft policy MG 2 actively discriminates the Gypsy community by excluding them from the wider housing programme and potentially abuses their human rights. Policy MG 2 should be revised to allow the VOG to identify appropriate sites in the same way as Affordable Housing.

#### TESTC3

- 1. The policy does not have due regard to the Wales Spatial Plan.
- The key theme of the Wales Spatial Plan is achieving sustainable development through focusing new development in areas which have good access to key services and facilities. As there are no services surrounding the site the allocation of MG9 is not consistent with the objectives of the Wales Spatial Plan. The Gypsy site proposal fails Soundness test Consistency C3 because the policy does not have due regard to the Wales Spatial Plan.

#### TESTC4

- 1. The allocation of this site does not have regard to the relevant Community Strategy in the following respects:
- "The diverse needs of local people are met through the provision of customer focused, accessible services and information". This cannot be achieved by the allocation of a non-accessible rural allocation.
- "Vale of Glamorgan residents and organisations respect the local environment and work together to meet the challenge of climate change". The allocation of MG9 places heavy emphasis on the use of the car to access the most basic facilities shops, health, education etc.
- "Older people are valued and empowered to remain independent, healthy and active. They have equality of opportunity and receive high quality services to meet their diverse needs"— All services are miles away and inaccessible to

the older community. The VERY POOR public transport system is located

1050m from the site and is in excess of the maximum distances as defined in

the proposed LDP and "Manual for Streets".

- "People of all ages are able to access coordinated learning opportunities and have the necessary skills to reach their full potential helping to remove barriers to employment"—There is no employment opportunity near to the site.
- The local primary school has confirmed that it is full and that its projections suggest that it doesn't have the capacity for such a large development (also consider the existing approval of 12 dwellings at Fferm Goch).
- The small local industrial unit has raised concerns in relation to the scale of the proposal.

#### TEST CE1

The Plan does not set out a coherent strategy in the following respects

- The Strategy makes the following statements:

The LDP will seek to provide a policy framework which: Manages the housing supply effectively in order to provide a range of good quality, affordable homes in sustainable locations

Reduces out commuting by providing opportunities for new housing, retail and employment development in accessible locations in the Vale of Glamorgan

The allocation of this rural site in open countryside does not meet this objective.

- The LDP also states its vision as being:
- "Our Vision for the Vale of Glamorgan is a place:

That is safe, clean and attractive, where individuals and communities have sustainable opportunities to improve their health, learning and skills, prosperity and wellbeing 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 sustainability of the area." The allocation of this site in policy MG9 does not meet these objectives being in a rural location with inadequate facilities and transport links.

- The Allocation of this site in policy MG9 does not comply with the following objectives of the LDP:
- -Objective 1: To sustain and further the development of sustainable communities within the Vale of Glamorgan, providing opportunities for living, learning, working and socialising for all. The site's location would clearly not meet this objective.
- Objective 2: To ensure that development within the Vale of Glamorgan makes a positive contribution towards reducing the impact of and mitigating the adverse effects of climate change. The allocation of this

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site will have entirely the opposite effect to this objective.

- Objective 3: To reduce the need for Vale of Glamorgan residents to travel to meet their daily needs and enabling them greater access to sustainable forms of transport. The allocation of this site will have entirely the opposite effect to this objective.
- Objective 4: To protect and enhance the Vale of Glamorgan's historic, built, and natural environment. The development of this site would not meet this objective: a planning refusal on an adjacent site in May 2002 stated "It is a proposal that would adversely affect the undeveloped rural character of the area"
- Objective 5: To maintain, enhance and promote community facilities and services in the Vale of Glamorgan The local primary school has not been consulted, had they been it would have been recognised that the school does not have capacity, nor is it projected to have the capacity.
- Objective 7: To provide the opportunity for people in the Vale of Glamorgan to meet their housing needs- States that development of housing should be in sustainable locations This is not. Furthermore, it brings into question POLICY MD12 which is discriminatory in that Gypsy & Traveller sites are treated differently from other housing allocations. An inclusive policy would see Gypsy & Traveller sites being assessed on the same basis as AFFORDABLE HOUSING and considered for ALL candidate residential sites in the LDP
- Objective 10: To ensure that development within the Vale of Glamorgan uses land effectively and efficiently and to promote the sustainable use and management of natural resources. The inappropriate use of finite resources can impact on the ability of future generations to fulfil their needs. The LDP through favouring the use of previously developed land and the sustainable use of natural resources of whatever kind and wherever they are located, will contribute to preserving their availability for future generations. This is agricultural land in the Special Landscaped Area.

#### TEST CE2

The strategies, policies and allocations are not realistic and appropriate having considered relevant alternatives and are not founded on robust evidence:

- 1. The allocation of Llangan is purely on the basis of site ownership by the Vale and does not meet the requirement of Policy MD12.
- 2. The Gypsy & Traveller site assessment (anecdotal) conflicts with other evidence based background papers; specifically the Sustainable Settlement Appraisal. The SSA states 0 points for public transport but the Gypsy & Traveller site assessment states that public transport facilities are good.
- 3. The Gypsy Traveller site assessment states "good highway access", yet the access falls considerably short of the minimum requirement for vehicle access the access lane is 2.5m wide, against a minimum requirement of 3.7m plus footpath of 1.2m.
- 4. The Gypsy Traveller site assessment does not reflect the current legal obligations of the VOG in respect of this site, yet the other site assessments highlight legal issues.
- 5. Several privately-owned sites were put forward as candidate sites for Gypsy & Traveller sites but were dismissed as they were not in Council ownership. Not being in council ownership should not be a reason to reject privately owned sites.
- 6. The key issue is that the site allocation does not reflect the identified need of the Gypsy & Traveller community as highlighted in the 2008 Fordham report.
- 7. The Gypsy Traveller site assessment suggests that Fferm Goch is the local settlement when Llangan is recognised in this and historic documents as the local settlement being only 150m from the proposed site. It appears that the council has also linking the site at Llangan to the Hamlet of Fferm Goch in order to increase the site assessment positive score.
- 8. The assessment makes no reference that the site is in a Special Landscape Area (SLA).
- 9. The assessment makes no reference that the site is adjacent to a Conservation Area, within the Conservation Management Plan for this area there is a specific requirement to protect the view from the edge of the conservation area over the proposed site. The proposed site is clearly visible form the conservation area.
- 10. The allocation of Fferm Goch as a Minor Rural Settlement is incorrect. The appraisal scored 9 points. 3 are for employment which puts this site on par with the major settlements such as Barry. This is on the basis of 4 light industrial buildings. A survey of these employers has confirmed that zero new jobs have become available in the last 9 years and that the units collectively employ fewer than 15 people with no intention to expand. Furthermore, one of the units has been empty and the development is not a popular industrial site.
- 11. Fferm Goch has a population of less than 100 (98)— of the 5 sites in the Vale of Glamorgan with a population of 98 only Fferm Goch is classified as a Minor Rural site (probably based on the 9 points). The remainder are classified as Hamlets and there is a presumption against development in Hamlets (or as a minimum the scale would need to be appropriate and tied to a Rural Exception policy). The guidance requires ALL sites of a population below 100 to be classified as a Hamlet Fferm Goch should be recategorised as a Hamlet.
- 12. The Council has undertaken a study (Fordham report 2008) where the message was extremely strong that the Gypsy & Traveller community wanted smaller sites located on the fringes of larger communities. The report confirmed that isolated, rural sites restricted access to Health, Education and welfare facilities that disadvantaged them and needs to be seen in the light of the above objectives. The following is a quote from the Fordham report:
- "Participants living on Shirenewton had three main criticisms: the site was too big, the distance from local amenities along with the lack of local transport,"

"This created many problems for the residents, especially the poorest: 'for a person like me on the bread line it's very tough. I can't afford to use the car', 'everything is a mile away, including the bus stop. It takes a long walk on a busy road to get to the shops and schools".

"The tables demonstrate that access to services such as local shops, health centres and education facilities from both sites is difficult by foot and by local transport systems. This difficulty was eased when participants used their cars, however the level of ease was lower for Roverway due to the difficult entry onto the main road".

"Participants reported that access to local amenities, health services and education was low for both sites by foot or by public transport: 'Everything is a mile away, including the bus stop. It takes a long walk on a busy road to get to the shops and schools".

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"It was thought that smaller sites would reduce the problem of on-site conflicts: 'they need smaller sites and not too many different families, otherwise when you have a row the whole site becomes a war zone"

"This affected the ability of the households interviewed to access local services such as shops, health centres and education facilities. It was reported that this problem mainly affected the women: men take the vehicles that the household own to work during the day, leaving the women without their own transport and often away from public transport routes"

"Participants did not specify where in Cardiff or the Vale of Glamorgan sites should be located. It was noted that sites should be on the outskirts of towns to enable access by foot to local services such as shops, the Launderette and health centres"

"While the focus of the survey was on accommodation requirements, the questionnaire also collected information on access to services, including health and education. Research has found that poor accommodation can prevent access to services and so cannot be seen in isolation."

"Participants living on sites felt that there were site restrictions that limited their work options. These were mainly associated with the location of the sites and lack of access to public transport rather than site regulations: 'no buses, no local transport. Bad access"

"Participants living on local authority sites reported that the lack of local public transport provision in the area affected their ability to send their children to school, access health services and work opportunities, and limited their ability to attend training and education courses"

"Participants were asked about where they would like future sites to be, but were not specific about locations within the County Boroughs, instead emphasising the importance of public transport to any new sites. Government draft guidance on site design stresses the importance of access to services and the promotion of integrated co-existence' between the site and surrounding community."

"The precise location, design and facilities of any new sites should be drawn up in consultation with Gypsies and Travellers to ensure that the additional provision meets their needs. The health and safety implications of a new site's location should be considered in finding a balance between offering sites in good locations and the additional land costs this would entail. The settled community neighbouring the sites should also be involved in the consultation from an early stage."

13. An independent highway study recently undertaken by Capita Symonds, surrounding the proposed site has concluded that:

"The 1km long lane itself is of poor horizontal alignment, with poor forward visibility and unsuitable for regular vehicular traffic. If the site is developed the lane itself would need major upgrading, which would certainly change its appearance within this rural environment."

"The village school is approximately 1km from the village and 900 metres from the proposed site. It is noted that the route does not offer any facilities for pedestrians, such that the only safe way for children to travel between the site and the school safely would be by vehicle. This route would also be potentially hazardous for cycle use for children, the elderly or infirm and could be potentially hazardous for all users other than by car."

"With regard to the appropriateness of the location for a traveller's site development in relation to transportation, it is difficult to refer to standard guidelines, as few relate to "rural highways", most highway design standards for residential development relate to urban areas. Hence, the advice contained within this report is based on best available information, acceptable highway standards for developments of similar size and transport needs of small communities. Welsh Government guidelines state sites should be situated in close proximity to transport links. The Llangan site would not appear to meet that criteria, being situated away from the main transport infrastructure, sites should also have ready access to schools, doctors and shops, against which requirements Llangan again appears to fail."

"With regards to the existing lane, it is generally considered that where there is direct access to dwellings, the previous standard for developments, Design Bulletin 32 offers guidance where it states that a desirable minimum carriageway width of 5.5 metres is appropriate, together with 2.0 metre wide footways on both sides. This will allow two way traffic at all times, and safe movement of pedestrians."

"Thus the lane itself should be widened to this minimum standard, which will require the removal of the existing hedge line on one or both sides of the lane and probable acquisition of land from the adjoining fields. This will of course change the environmental character of the area substantially, but is considered essential to cater for increased vehicle and pedestrian traffic"

14. There is complete inconsistency with the allocation of MG9 against the proposed policies.

#### TEST CE3

- 1. The VOG council make no reference as to how they are going to manage such a large site. The 21 unit site in Rover Way Cardiff has 3 full time Council staff allocated to it.
- 2. The current Housing Strategy expires April 2012 and makes no relevant reference as to how the Gypsy & Travelling Community will be monitored in terms of growth or need. Indeed, there is no strategy that underpins the Gypsy & Traveller community or housing at all.

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Representor ID and details: 4183/DP1 J E Williams

- 1. Policy MD12 (Gypsy & Traveller) is discriminatory. It offers no flexibility for the Council to bring forward sites that are sustainable / suitable for Gypsies & Travellers through the policies derived within the plan.

  2. MD12 should be redrafted to enable smaller, sustainable sites to be included within the Affordable Housing requirements and delivered through the Registered Social Landlord sector.
- 3. To argue that the Private Sector has been consulted to offer sites is not accepted. The private sector were not likely to volunteer sites for such a contentious use. The LDP should set clear strategies / policies to deliver sustainable sites for all members of the community; private; social and travelling. The current allocation does not meet this and could strongly be argued breeches the Human Rights of the Gypsy traveller community as it does not provide a suitable, sustainable site that meets the guidelines in the 2008 Fordham report.
- 3f Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)

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4b - If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -



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| Representor ID and details: 4184/DP1 Villagers of Colw   | inston & Other Intereste                      | ed Parties  |                              |                             |  |                                     |  |  |  |  |  |
|--|---|---|------------------------------|-----------------------------|--|-------------------------------------|--|--|--|--|--|
| Date Lodged     Status     Petition and No.     Supporting Evidence       02/04/2012     M     ✓     200     ✓               | Additional SA SEA                             |   | Rep format:<br>Comment form  | ·                           | it your comments to be ak at a hearing session | •                                   | n representations' or do on? Examination |  |  |  |  |
| 2a - Do you consider the LDP is Sound? Unsound   | 2b - If you think that the Procedural Tests - | 2b - If you think that the Plan is unsound and does not not meet one or more test(s) of soundness, please indicate which test(s) that it fails.  Procedural Tests - P1 - Unanswered P2 - Unanswered |                              |                             |  |                                     |  |  |  |  |  |
|  | Consistency Tests -                           | C1 - Yes  | C2 - Yes                     | C3 - Una                    | nswered C4 - Ur                                | answered                            |  |  |  |  |  |
|  | Coherence and Effect                          | iveness Tests - CE1   | - Yes                        | CE2 - Yes                   | CE3 - Unanswered                               | I CE4 - Unanswe                     | ered                                     |  |  |  |  |
| 3a - Which part of the Deposit Plan are you commenting on?   | Policy Number:                                | Paragraph   | n Number:                    | Proposal Map:               |  | Constraints Map Appen               |  |  |  |  |  |
|  | MG2(28)                                       |   |                              | MG2                         |  |                                     |  |  |  |  |  |
| 3b - Do you wish to see any changes made to the Deposit Pla  | n as a result of your rep                     | resentation? Yes  | (If                          | "No" or "Unanswer           | ed" - go to 3d)                                |                                     |  |  |  |  |  |
| 3c - What changes would like to see made to the Deposit Plan   | ? New Policy:<br>Unanswered                   | Amended Policy:<br>Yes  | New Paragraph:<br>Unanswered | Amended Parag<br>Unanswered | raph: New Or Amende<br>Yes                     | ed Site: Other (see I<br>Unanswered | <del></del>                              |  |  |  |  |
|  | Notes:  |   |                              |                             |  |                                     |  |  |  |  |  |
| 3d - If your representation relates to a new, deleted or amend   | •   | the site as a Candidate<br>ear of St David's Churc  |                              |                             | lease give the Candida<br>Site Refere          | te Site Name and reence: 2513/CS1   | ference if known)                        |  |  |  |  |
| 3e - Please set out your representation below: See supporting evidence   |   |   |                              |                             |  |                                     |  |  |  |  |  |
| 3f - Please outline the changes you wish to see made to the D<br>See supporting evidence                                     | Deposit Plan to make it                       | sound (if relevant)   |                              |                             |  |                                     |  |  |  |  |  |
| 4b - If you wish to speak, please confirm which part of your re To relay the findings of our detailed objections and put for |   |   | •                            | ey consider it be ned       | cessary to speak at the                        | hearing -                           |  |  |  |  |  |

(ordered by Representation ID No.)

| Representor ID and details: 4185/DP1 Mr Gareth Simps   | on  |  |   |
|--|---|--|---|
| Date Lodged     Status     Petition and No.     Supporting Evidence       02/04/2012     M     0   | Additional SA SEA   |  | our comments to be consiered by 'written representations' or do at a hearing session of Public examination? Written                 |
| 2a - Do you consider the LDP is Sound? Unsound   | 2b - If you think that the Plan is unsound and do Procedural Tests - P1 - Unanswered            | pes not not meet one or more test(s) of<br>P2 - Unanswered | soundness, please indicate which test(s) that it fails.   |
|  | Consistency Tests - C1 - Yes  | C2 - Yes C3 - Yes  | C4 - Yes  |
|  | Coherence and Effectiveness Tests - CE1 - U   | Jnanswered CE2 - Yes                                       | CE3 - Unanswered CE4 - Unanswered   |
| 3a - Which part of the Deposit Plan are you commenting on?   | Policy Number: Paragraph N  | Number: Proposal Map:                                      | Constraints Map Appendices:   |
|  | MG2(13)   | MG2(1 <mark>3)</mark>                                      |   |
| 3b - Do you wish to see any changes made to the Deposit Plar   | as a result of your representation? Yes   | (If "No" or "Unanswered                                    | "- go to 3d)  |
| 3c - What changes would like to see made to the Deposit Plan   |   | ew Paragraph: Amended Paragra<br>Inanswered Unanswered     | <u>New Or Amended Site:</u> Other (see Notes): Yes Unanswered   |
|  | Notes:  |  |   |
| 3d - If your representation relates to a new, deleted or amende  | ed site, did you submit the site as a Candidate Si<br>Site Name: Off St Athan Road              | ite? Yes (If "Yes", plea                                   | ase give the Candidate Site Name and reference if known) Site Reference: MG2(13)  |
| 3e - Please set out your representation below:<br>Ref MG2(13)  |   |  |   |
| <ol> <li>Loss of landscape- vista of Thaw Valley- one of few Va</li> <li>I live on Broadway/St Athan Road Junction- busy alreat pedestrian crossing over here is already 'blind' from St At</li> <li>Loss of PROW which allows the vista to be viewed.</li> <li>Ysgol Iolo Morgannwg, my children attend is overcrowd</li> <li>The site is a Special Landscape Area. This developme hillside.</li> </ol> | dy. Double yellow lines placed outside house in han turn.  ded, cannot copy with more children. |  | nt to this. The junction cannot cope with extra traffic. The lethian on to St Hilary and beyond- it will ruin the continuity of thi |
| 3f - Please outline the changes you wish to see made to the D<br>Removal from plan   | eposit Plan to make it sound (if relevant)  |  |   |
| 4b - If you wish to speak, please confirm which part of your re  | presentation you wish to speak to the inspector a   | about and why they consider it be nece                     | ssary to speak at the hearing -   |

(ordered by Representation ID No.)

| Representor ID and details: 4186/DP1 Mr Michael Lewis  |   |   |  |
|--|---|---|--|
| Date Lodged     Status     Petition and No.     Supporting Evidence       31/03/2012     M     0   | Additional SA SEA   | Rep format: 4a - do you want your comments you want to speak at a hearing s                                     | s to be consiered by 'written representations' or do ession of Public examination? |
| •  | 2b - If you think that the Plan is unsound and do Procedural Tests - P1 - Unanswered                                | es not not meet one or more test(s) of soundness, pl<br>P2 - Unanswered   | lease indicate which test(s) that it fails.  |
|  | Consistency Tests - C1 - Unanswered   | C2 - Unanswered C3 - Unanswered C4  | 4 - Unanswered   |
|  | Coherence and Effectiveness Tests - CE1 - U   | nanswered CE2 - Unanswered CE3 - Unans  | swered CE4 - Unanswered  |
| 3a - Which part of the Deposit Plan are you commenting on?   | Policy Number: Paragraph N  | umber: Proposal Map:  | Constraints Map Appendices:  |
|  | MG2(11)   |   |  |
| 3b - Do you wish to see any changes made to the Deposit Plan   | as a result of your representation? Unanswere   | ed (If "No" or "Unanswered" - go to 3d)   |  |
| 3c - What changes would like to see made to the Deposit Plan?  |   | ew Paragraph: Amended Paragraph: New Or Ar<br>nanswered Unanswered Unanswer                                     |  |
|  | Notes:  |   |  |
| 3d - If your representation relates to a new, deleted or amende  | d site, did you submit the site as a Candidate Sit<br>Site Name:  |   | andidate Site Name and reference if known)<br>Reference:                           |
| 3e - Please set out your representation below:  I would like to voice my concern regarding the proposal to high street. On a busy day when shopping, the market pla becomes almost impossible visitors will take their shoppin be the death nail in the coffin of the high street shops, pot | ce car park is often the only opt <mark>ion. Where will p</mark><br>g elsewhere, this coupled with competition from | eople park if this facility is lost? It is not easy to park the imminent opening of Waitrose (which will not be | currently even at the best of times and if parking                                 |
| 3f - Please outline the changes you wish to see made to the D  | eposit Plan to make it sound (if relevant)  |   |  |
| 4b. If you wish to speak please confirm which part of your rar   | proportation you wish to appare to the inspector of   | hout and why they consider it he people to appel  | at the hearing   |

(ordered by Representation ID No.)

| Representor I             | ID and d    | letails:    | 4187/DF         | P1 Rufus Waddingtor    | 1   |              |                |          |                    |            |  |   |                                       |   |
|---------------------------|-------------|-------------|-----------------|------------------------|---|--------------|----------------|----------|--------------------|------------|--|---|---------------------------------------|---|
| Date Lodged<br>01/04/2012 | Status<br>M | Petitio     | n and No.<br>28 | Supporting Evidence    | Additional SA SEA   |              |                |          | Rep form<br>Commer |            | ,  | your comments to be k at a hearing sessior            | ,                                     | en representations' or do tion? Examination |
| 2a - Do you co            | onsider th  | ne LDP is   | Sound?          |                        | 2b - If you think that t<br>Procedural Tests -<br>Consistency Tests - | P1 -<br>C1 - | Yes<br>Unanswe | ered     | P2 - \<br>C2 - \   | ′es<br>′es | c3 - Yes   | of soundness, please i<br>C4 - Ye<br>CE3 - Unanswered | ``<br>S                               | ´.  |
| 3a - Which pa             | rt of the   | Deposit I   | Plan are yo     | 9                      | Policy Number:<br>49  |              |                | agraph N | lumber:            | <u>F</u>   | Proposal Map: MG2 (ID 30); Rallocations table (pag<br>Supply Background F<br>2011) | Residential ge 145); Housing                          | Constraints Map                       | Appendices: Other - Not Listed              |
| 3b - Do you wi            | ish to se   | e any ch    | anges mad       | de to the Deposit Plan | as a result of your rep   | oresenta     | tion? Y        | es       |                    | (lf '"     | 'No" or "Unanswered  | d" - go to 3d)  |                                       |   |
| 3c - What cha             | nges wo     | uld like to | see mad         | e to the Deposit Plan? | New Policy:<br>Unanswered<br>Notes:                                   | Amer<br>Yes  | nded Polic     |          | ew Paragr          |            | Amended Paragra<br>Yes   | nph: New Or Amende<br>Yes                             | ed Site: Other (see<br>Unanswere      | <del></del>                                 |
| 3d - If your re           | presenta    | ation rela  | tes to a ne     | w, deleted or amende   | d site, did you submit<br>Site Name: The Gar                          |              |                |          |                    |            | (If "Yes", ple   | ase give the Candida<br>Site Refere                   | te Site Name and rence: ID30 in the d |   |
| 3e - Please s             | et out vo   | ur repres   | entation b      | elow:                  |   |              |                |          |                    |            |  |   |                                       |   |

REPRESENTATIONS ON VALE OF GLAMORGAN DRAFT DEPOSIT LDP RELATING TO THE ALLOCATION OF 40 HOUSES AT THE GARDEN EMPORIUM SITE. FFERM GOCH AND THE DESIGNATION OF FFERM GOCH AS A 'MINOR RURAL SETTLEMENT'.

#### Summary

- 1) The Garden Emporium site at Fferm Goch is a site with extant planning permission for 12 houses. The rationale for granting this planning permission on this site was overwhelmingly because it is a previouslydeveloped site, with derelict garden centre buildings on the site.
- 2) However, the proposed increase in draft LDP allocation, from 12 to 40 houses, is unacceptable. The principal justification for this increase appears to be the proposed new designation of Fferm Goch as a "Minor Rural Settlement". This designation is incorrect and totally inappropriate, for reasons set out below. Higher densities of development on this site (i.e. above the 12 houses permitted) - in particular for 42 and (after revisions) 24 houses - havebeen considered and rejected by the Council in the past. The issues that led to those rejections in particular that the site is unsustainable and a portion of the site is needed to protect a rare plant - have not changed. If this allocation is allowed there is a very real prospect that this level of housing is built - we are aware that the owners are already in pre-application discussions with the Council for 40 houses on this site, even though such discussions are inappropriately premature.
- 3) The extant planning permission includes conditions requiring the private houses to be livework units and a large portion of the site (approx 30%) to be set aside as a nature conservation area. If 40 houses were permitted on this site the developer would no doubt argue that neither of these conditions could be sustained. Other issues such as lack of public transport and lack of places at the local primary school cannot be satisfactorily resolved through condition or planning agreement.
- 4) For all these reasons, which are expanded on below, the allocation of the Garden Emporium site for 40 houses should not go forward in the draft LDP. The site should be allocated for 12 houses, in line with the extant planning permission and preserving the conditions on that planning permission requiring 1) 30% affordable housing and 2) the back portion of the site (approx 300/0 - edged in green on the attached approved plan) to be a habitat conservation area and excluded from this site altogether 3) the 8 private houses to be live-work units.
- 5) In addition, Fferm Goch should not be designated as a "Minor Rural Settlement". This was due to an incorrect "settlement scoring" of 9 which included 3 points allocated for "employment opportunities within settlement" on the basis of the nearby Westwinds industrial estate. These points should not have been allocated. 3 points puts this site on a par with towns in the Vale like Barry, which is entirely inappropriate. There are only 4 light industrial buildings on this site. A survey of these employers has confirmed that no new jobs have become available in the last 9 years and that the units collectively employ fewer than 15

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people with no intention to expand. Furthermore, one of the units has been empty and the development is not a popular industrial site.

Our representations in relation to each of the tests of 'soundness' are as follows:

TEST PI - It has not been prepared in accordance with the Delivery Agreement including the Community Involvement Scheme

The local community have not been involved in the decision to allocate this site for 40 houses. We understand that neither the school nor the LEA were consulted. We do not believe that Llangan Community Council was consulted at any previous stage in the draft LDP process.

TEST P2 - The plan and its policies have not been subjected to Sustainability Appraisal including Strategic Environmental Assessment

The Sustainability Appraisal of the Garden Emporium site is wrong in its assessment of the Garden Emporium site's ability to meet the Sustainability Appraisal's objectives because:

- 1. The site is incorrectly rated '++' (strongly contributes) as regards objective 1, which is "To provide the opportunity for people to meet their housing needs." Although this site falls within the Rural Vale, the Rural Vale is a very large area and there is no particular local specific need for this housing. As far as affordable housing is concerned, it is only proposed that the site provides the standard 35% affordable housing which means it is no different to better than any other site. The '++' rating should be reduced to '+' (contributes).
- 2. The site is incorrectly rated '+' (contributes) as regards objective 2, which is "To maintain, promote and enhance the range of local facilities". There is no suggestion that the proposed development will in any way enhance the local facilities. In fact it will place increased pressure on the following existing local facilities: the primary school, which has no spaces; the playground/open space at Fferm Goch, as we note there is no suggestion of on-site open space being provided on the Garden Emporium site (particularly given the high density of housing which 40 homes would involve and in fact on-site provision was not offered even for the extant planning permission for 12 houses); and the community hall, which already serves a large number of houses and is of a limited capacity. This' +' rating should be changed to a '--' ( strongly detracts) rating.
- 3. The site is incorrectly rated '++' (strongly contributes) as regards objective 8, which is "To use land effectively and efficiently". Although part of the site is 'brownfield' and has been previously developed as a garden centre, a large section at the rear of the site (approximately 30% of the entire site) has never been developed. It was this area which was identified as a habitat management area in the extant planning permission for 12 houses. The requirement for a habitat management area was in part due to the presence of a very rare species of plant on the site (Bithynian vetch). This rating should be reduced to a '+' (contributes) rating, to acknowledge the fact that while the development would reuse the developed part of the site, it would also use a currently undeveloped, greenfield, area.
- 4. The site is incorrectly rated '++' (strongly contributes) as regards objective 9, which is "To protect and enhance the built environment and natural environment". This is wrong for the reasons given in point 3 above. If the site was developed for 40 houses there would be no room whatsoever for any habitat management or other effective biodiversity area as has been required by the extant planning permission. This will mean the loss of a very rare plant species which has only been found in two other locations in the whole of Wales. This rating should therefore be reduced altogether to a '--' (strongly detracts) rating.
- 5. The site is incorrectly rated '0' (neutral) as regards objective 11, which is "To protect, enhance and promote the quality and character of the Vale of Glamorgan's culture and heritage." This is wrong for the same reasons as at points 3 and 4 above. The Council has resolved to protect the very rare plant species which has been added to its local biodiversity action plan. This resolution by the Council (which was made specifically in response to the survey which identified this plant on this site) indicates its recognition of the species' importance to the culture and heritage of the Vale of Glamorgan. This rating should therefore be reduced to a '--' (strongly detracts) rating.
- 6. The site is incorrectly rated '+' (contributes) rating as regards objective 12, which is, "To reduce the need to travel and enable the use of more sustainable modes of transport". This rating is wrong because although it will be possible to travel by foot or bicycle to the primary school and the community hall, every other service and local amenity including employment can only be accessed by private car. The bus service to the site is so poor that it does not even merit a rating on the Council's sustainable settlements score. This rating should therefore be reduced to a '- -' (strongly detracts) rating.

TEST C2 - It does not have regard to National Policy

- A) The proposed allocation of the Garden Emporium site for 40 houses fails to meet Planning Policy Wales (February 2011) ("PPW") in the following respects:
- 1. The Garden Emporium site is totally unsustainable. It is located in the Rural Vale, surrounded by open countryside and 7 miles from Cowbridge and 8 miles from Bridgend. Realistically anyone living in this location will rely on private cars to get to and from the site for work, shops, everything except the primary school, which, as stated below, is full.
- 2. The nearest corner shop is in Pencoed to which there is no public transport; otherwise it is necessary to drive to Cowbridge or Bridgend or one of the large supermarkets on the edge of Bridgend.

The current planning permission for the site is for 12 houses, of which at least 30% (i.e. 4) are to be affordable. There is a condition forming part of the planning permission (condition 10) which requires each of the 8 private units to be live-work units and requires that the business floor space of the live/work unit shall be finished ready for occupation before the residential floor space is occupied. The reason given for

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this condition is "In order to ensure a satisfactory and sustainable form of development which will support and enhance the local rural community and in order for the development to comply with policies ENV27, ENV29 and EMP2 of the UDP." It is apparent from reading documents associated with the planning permission that although the application originally proposed the live-work units and made much of them improving the sustainability of the site, at a later date the applicant asked the LP A not to impose this condition. However, the LP A insisted it was required.

There is no suggestion that the 40 houses now proposed for the site would be live-work units. Even if this condition was imposed this site would still be unsustainable as the residents would need to drive for everything except work. It also seems likely that they would need to make business-related journeys and of course, depending upon their business, additional car journeys could in fact be created by these businesses (for example, a hairdressers).

This is contrary to PPW (paragraph 4.6.2) which states, 'Development plans ... should secure a sustainable settlement pattern which meets the needs of the economy, the environment and health, while respecting local diversity and protecting the character and cultural identity of communities.'

2. The Garden Emporium site is very poorly served by public transport - there is only a very limited bus service to and from Fferm Goch (5 buses per day to Bridgend; 4 per day from Bridgend which go on to Cowbridge). There is no bus service to the nearest train station at Pencoed (3 miles away, along roads with no pedestrian footway). This is contrary to PPW (paragraph 4.6.4), which states, 'Local planning authorities should assess the extent to which their development plan settlement strategies and new development are consistent with minimising the need to travel and increasing accessibility by modes other than the private car. "Higher density development, including residential development, should be encouraged near public transport nodes or near corridors well served by public transport (or with the potential to be so served).'

This is added to by paragraph 4.6.7 PPW which stresses that, 'In rural areas the majority of new development should be located in those settlements which have relatively good accessibility by non-car modes.' This is emphasized again in paragraph 8.7.3 PPW which states, 'It is also expected that the proposed access to a development will reflect the likely travel patterns involved. It should ensure that people can reach the development, as far as practicable, by walking, cycling and public transport, as well as by car.'

3. The existing local infrastructure will not be able to serve a further 40 houses at the Garden Emporium site. There is very little local infrastructure available at this site, but two issues are relevant - the local primary school (Llangan primary school) and highways issues:

#### Llangan primary school

Llangan primary school is within walking distance of the site. However, this school is very small and is full. The Local Education Authority has told us that Llangan primary school's maximum capacity is 111 pupils, and the number on the roll as at September 2011 was 108 pupils. The admission number of new pupils each year is no more than 15. This is because several year groups are combined (i. e. two year groups being taught as a single class, in one classroom) and the LEA needs to comply with the requirement in its education plan to have no more than 30 children in each classroom. Although in some circumstances it might be appropriate to deal with this by seeking a s 1 06 contribution from the developers to increase the capacity of the school, in this case the school has neither the space nor the land to expand to take on more pupils.

Two classes are already being taught in terrapins located in the playground and the school only has a relatively small area of grass which has already been diminished as a result of building a new school hall and two classrooms a few years ago. It is noted that in the planning officer's report for the current 12-house planning permission the education authority thought that there was enough space in local primary school~ (it did not specify any in particular) to accommodate the children from 12 houses- 40 houses is very different. From speaking to the LEA, we understand that according to their formula for calculating the number of primary school places generated by new houses, 40 new houses would result in 15 primary age children needing places. There is therefore currently no possibility for the school to provide places for the primary-age children from this development who would have to be driven to other schools some distance away.

#### Highway safety issues

When Council considered the current planning permission the highways department was originally concerned about there being more than one exit from the site, when there were only 12 houses. The extant planning permission includes a condition (condition 20) that the site shall be served by no more than two means of access onto Ruthin Road - with the primary access to serve no more than 8 dwellings and the secondary access to serve no more than 4 dwellings. How many exits would be proposed for 40? This road is used heavily by traffic, particularly during peak times - many drivers, including a significant number of large lorries, use it as a short cut from the A48 to the M4. It is also the main pedestrian cycleway to Llangan primary school from Fferm Goch Heol Llidiard/St Mary Hill and is used on a daily basis by those residents for that purpose. Currently only a few single houses have driveways onto this road. Having an additional 40 houses here will increase the traffic considerably, at increased safety risk to existing drivers and pedestrians and cyclists.

This is therefore contrary to paragraph 4.6.8 of PPW which states, 'Development in the countryside should be located within and adjoining those settlements where it can be best accommodated in terms of infrastructure, access and habitat and landscape conservation.' It is also contrary to paragraph 9.2.9 of PPW which states, 'Local planning authorities should consider the following criteria in deciding which sites to allocate for housing in their development plans: ...

• the location of potential development sites and their accessibility to jobs, shops and services by modes other than the car, and the potential for improving such accessibility

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- the capacity of existing and potential infrastructure including public transport ... and social infrastructure (such as schools ... ), to absorb further development and the cost of adding further infrastructure ... "
- 4. The development of the Garden Emporium site cannot be described as infilling or a minor extension to Fferm Goch. It is located adjacent to Fferm Goch, but the proposed 40 houses are more than Fferm Goch and Heol Llidiard combined (which amount to 33 houses). It is totally out of scale for this area.

It also cannot be claimed to meet any "local need" for affordable housing. The Council's own background documents recognise that the need for affordable housing is greater in the larger settlements in the Vale, such as Barry. Section 3.9 of the draft LDP states that, 'The findings of the [Local Housing Market Assessment 2010] make clear that the area of greatest need is Barry followed by the coastal settlements of Rhoose, Llantwit Major and Penarth as well as the Rural and Eastern Vale." This statement is supported by the Council's 'Affordable Housing' background paper (November 2011), in which Table 2 in paragraph 3.7 specifies an identified need of 3.5 units of affordable housing per year in the Rural Vale. This is a very low number of units to be accommodated within a large area of land and there is no need for such a high concentration of units to be accommodated on the Garden Emporium site. In fact, the existing houses at Fferm Goch are sold at considerably less than the average house price in this area (i.e. the Rural Vale). No.3 Fferm Goch was sold in June 2011 for £180.000 and No.8 has been on the market for £185.000.

Notwithstanding these prices, these houses often remain on the market for some time – at least a year. Fferm Goch is private market housing which was originally Agricultural Settlement Houses (a form of Council housing) developed by the Welsh Land Society in 1939. Why do we need more houses at affordable prices in this location? There is no identified local need to be met.

We understand from speaking to a Council officer that the main reason the Council are prepared to consider 40 houses on this site is the need for more affordable housing in the Vale. While we have no problem with the principle of 35% of new housing being affordable, we do not think that this policy should be used to 'reverse engineer' such a huge increase in the total number of houses being proposed on this site. With the original planning permission 12 houses, 30% would have resulted in an entirely sensible allocation of 4 affordable houses. To invert this reasoning and specify a total of 40 houses in the hopes of raising the number of affordable houses from the existing planning permission - at the cost of an increase of 18 private houses (from 8 to 26). The detrimental impact this development will have on the local community is a disproportionate sacrifice to make for an additional 10 affordable houses.

The proposal for 40 houses on this site is therefore contrary to paragraph 4.6.8 of PPW which states, "Infilling or minor extensions to existing settlements may be acceptable, in particular where it meets a local need for affordable housing, but new building in the open countryside away from existing settlements or areas allocated for development in development plans must continue to be strictly controlled. All new development should respect the character of the surrounding area and should be of appropriate scale and design.

If 40 houses are built on the Garden Emporium site this will be significant overdevelopment of this site at a density which should not be permitted in this location. The following points are relevant:

- a) It is acknowledged and accepted that the site has existing planning permission for 12 houses; this is a brownfield site where there has been a number of failed garden centres and it was perhaps inevitable that it would eventually be developed for housing. The development of the site with 12 houses is accepted, although even with 12 houses there are still concerns about the impact these will have on the local school and highways.
- b) However, 40 houses will make the site crowded and out of keeping with the rural area. Fferm Goch has a particular and special history it was built by the Welsh Land Society in 1939 to promote employment in rural areas and in this case to provide social housing and a community for farm workers at the large farm across the road and the houses at Fferm Goch form 3 sides of a square with a large grass pitch and play area in the middle. There is no suggestion that the proposal for the Garden Emporium site would be designed in a similar way. Fferm Goch should not in any event be used as an excuse to set a "precedent" for this locality, where other housing consists of isolated dwellings.
- c) The previous planning history of the site is relevant the Council previously considered proposals for 42 and 24 houses and rejected both on grounds of over-development, of this site.

This is contrary to paragraph 9.2.12 ofPPW which states, 'Strong pressure for development may give rise to inappropriately high densities if not carefully controlled.' In paragraph 9.2.22 it states, 'In order to safeguard the character and appearance of the countryside, to reduce the need to travel by car and to economise on the provision of services, new houses in the countryside away from existing settlements recognised in development plans or from other areas allocated for development must be strictly controlled. Many parts of the countryside have isolated groups of dwellings. Sensitive filling-in of small gaps or minor extensions to such groups, in particular for affordable housing to meet local need, may be acceptable but much depends on the character of the surroundings, the pattern of development in the area and the accessibility to main towns and villages.' In paragraph 9.3.4 PPW states, 'In determining applications for new housing, local planning authorities should ensure that the proposed development does not damage an area's character and amenity.' The proposed development of this site with 40 houses would significantly damage the character of this area.

6. If 40 houses are built on the Garden Emporium Site, it will result in the loss of a rare plant species, Bithynian Vetch, which has been identified by the Council in its Local Biodiversity Action Plan.

The extant planning permission for the Garden Emporium site includes:

a) a condition (condition 9) that a significant proportion of the site (approx. 30% - being the whole of the back strip of the site edged green on the approved plan) shall have no buildings located on it and all

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properties shall be located at least 10 metres from this boundary within the development site; and

b) another condition (condition 12) that this area shall be designated as a habitat management area to be supported by a comprehensive habitat management plan. The plan is to pay particular regard to the areas where Bithynian vetch has been found and seek to maintain and conserve this species.

These conditions were imposed in particular to preserve the species Bithynian vetch. It is apparent from the planning officer's report associated with the current planning permission that Bithynian vetch was found on the site during the course of an ecological survey being carried out, at the request of the Countryside Council for Wales. The report states that Bithynian vetch is a rare species, included as vulnerable on the UK vascular plant red data list and endangered on the Welsh list. The report says that this species was previously unknown to occur in the Vale of Glamorgan and is known to occur on only 2 other sites in the whole of Wales. As a result, the Council held a special meeting to decide to protect this plant by placing it on the Council's 2002 Local Biodiversity Action Plan.

There is no suggestion in the draft LDP that this large part of the site - which the planning officer's report recognises is open land rather than previously-developed land - would not be open to development and it would seem difficult/impossible for a planning permission for 40 houses on this site to protect the same area as a "no-build" zone. The Proposals map includes this part of the site within the area proposed to be allocated for 40 houses. The fact that this open area of land at the back of the site would not be built on under the terms of the current planning permission was a material consideration for the planning officer in recommending approval of the planning application for 12 houses (see the planning officer's report, page 12).

The allocation of 40 houses is therefore contrary to PPW paragraph 5.2.8 which states, 'Local planning authorities must address biodiversity issues, in so far as they relate to land use planning in both development plans and development control decisions. Paragraph 5.2.2 of PPW recognises that, 'The Natural Environment and Rural Communities Act 2006 places a duty on every public authority, in exercising its functions, to have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity.' The extant planning permission allowed for the preservation of this rare plant by allocating a significant portion of the site to be a no-build zone - a habitat conservation area. This area will not be possible if 40 houses are built.

B) The proposed designation of Fferm Goch as a "Minor Rural Settlement" also fails to meet PPW because it is plainly not a sustainable settlement and has been incorrectly assessed by the Council. This incorrect designation (which is considered in detail in Test CE2 below) infringes the following paragraphs of PPW: 4,6.2, 4.6.4, 4.6.7, 4.6.8, 8.7.3, 9.2.9, 9.2.12, 9.2.22 and 9.3.4 (all as cited above). If it were identified as a Minor Rural Settlement, Fferm Goch would be at risk of future residential development being allowed in this location through policy MG7 of the draft LDP. Fferm Goch is not a location where new development should routinely be permitted since it would infringe all the sustainability principles for development in rural locations.

TEST C3 - It does not have regard to the Wales Spatial Plan (wSP)

The Wales Spatial Plan update 2008 states at paragraph 1.4 that, 'It is a principle of the Wales Spatial Plan that development should be sustainable. Sustainable development is about improving wellbeing and quality of life by integrating social, economic and environmental objectives in the context of more efficient use of natural resources.' The Garden Emporium Site is a totally unsustainable site for reasons given above (Test C2).

TEST C4 - It does not have regard to the relevant Community Strategy

The Community Strategy for the Vale 2011-21 sets out 10 priority outcomes. The allocation of the Garden Emporium for 40 houses fails to have regard to the following of these priorities:

- "2. The diverse needs of local people are met through the provision of customer focused, accessible services and information." This priority is not met because the Garden Emporium site is so far from shops, health services, local amenities and workplaces as well as having poor public transport.
- "3. Vale residents and organisations respect the local environment and work together to meet the challenge of climate change." This priority is not met because the Garden Emporium site will require all its residents to travel by car to access every local service save the primary school (which does not have sufficient space for the children of 40 families, so primary school pupils will have to travel by car to other schools) "4. Older people are valued and empowered to remain independent, healthy and active.

They have equality of opportunity and receive high quality services to meet their diverse needs." This priority is not met because public transport to this site is very poor both in terms of timetabling and route, which greatly inhibits their chance of remaining independent.

Also, there are no local services available to them such as healthcare, library or other local amenities.

- "5. Children and Young people in the Vale are well informed and supported to access a broad range of quality services that enable them to take full advantage of the life opportunities available in their local communities and beyond." This priority is not met because the local primary school is unable to accommodate the projected increase in pupil numbers from 40 new homes. Children will need to travel to other primary schools. Public transport from this site is very poor. Children will need to travel by car to primary school and to all other activities and services including leisure activities.
- "6. People of all ages are able to access coordinated learning opportunities and have the necessary skills to reach their full potential, helping to remove barriers to employment." This priority is not met because

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there are no learning opportunities present near the site nor, more importantly, are there any employment opportunities near the site either.

"7. The underlying causes of deprivation are tackled and the regeneration of the Vale continues, opportunities for individuals. and businesses are developed and the quality of the built and natural environment is protected and enhanced." This priority is not met because the proposed allocation of 40 houses on the Garden Emporium will not protect and enhance the natural environment of the Vale: in order to develop 40 houses the entirety of the site will have to be developed, whereas the current planning permission requires the back third of the site to be allocated as a habitat management area. A key reason for this habitat management area was to preserve a very rare plant species growing on the site.

"10. Health inequalities are reduced and residents are able to access the necessary services, information and advice to improve their wellbeing and quality of life." This priority is not met because there are no local health services near the site. Such services can only be accessed by driving to one of the nearby towns.

TEST C5 - The Plan does not set out a coherent strategy from which its policies and allocations logically flow and, where cross boundary issues are relevant, it is not compatible with the development plans prepared by neighbouring authorities.

The draft LDP Strategy is stated (page 23) to comprise four key elements - one of these is 'Other sustainable settlements to accommodate further housing and associated development'.

This element of the draft LDP strategy is based on the designation of certain towns and villages within the Vale as "sustainable settlements". However, Fferm Goch is wrongly identified in the strategy as a "Minor Rural Settlement", for reasons set out under Test CE2 below.

The draft LDP at Section 5. 10 (page 25) states that minor rural settlements are those 'considered to have sufficient population, services and facilities to assimilate growth without it having a detrimental impact on their existing character and local environment.' Also, at Section 5.16 of the draft LDP (page 27), 'The types of services and facilities typically found within the minor rural settlements include places of worship, community halls, small-scale retail uses and formal recreational facilities. A number of the smaller rural settlements also provide small-scale local employment opportunities, either within or in close proximity to the settlements.'

Neither of these descriptions fit Fferm Goch - for reasons set out under Test CE2. The strategy base for the rest of the LDP policies is therefore wrong in this respect.

The draft LDP Strategy is stated to follow on from the Vision and Objectives set out in the draft LDP. The Vision is stated to be for the Vale of Glamorgan to be "a place:

- That is safe, clean and attractive, where individuals and communities have sustainable opportunities to improve their health, learning and skills, prosperity and wellbeing ... "

The proposed allocation of the Garden Emporium site will be contrary to this Vision, being unsustainable development in an area with very poor public transport where there are no employment prospects and allieaming, health and other facilities can only be accessed using the car.

The allocation of this site will also be contrary to the following Objectives set out in the draft LDP:

"Objective 1: To sustain and further the development of sustainable communities within the Vale of Glamorgan, providing opportunities for living, learning, working and socialising for all" - The proposed Garden Emporium site is in a wholly unsustainable location, as is the adjacent Fferm Goch.

"Objective 2: To ensure that development within the Vale of Glamorgan makes a positive contribution towards reducing the impact of and mitigating the adverse effects of climate change." - The effects of climate change will be increased if a further 40 houses are built in this location where people will have to use cars to meet their daily needs.

"Objective 3: To reduce the need for Vale of Glamorgan residents to travel to meet their daily needs and enabling them greater access to sustainable forms of transport" - Public transport at this site is very poor.

"Objective 4: To protect and enhance the Vale of Glamorgan's historic, built and natural environment" - The proposed development of the Garden Emporium site represents overdevelopment of this site, which is out of keeping with the rural area. It will also fail to preserve the back third of the site as a habitat conservation area, as proposed by the extant planning permission for 12 houses on the site.

"Objective 5: To maintain, enhance and promote community facilities and services in the Vale of Glamorgan" - The proposed development at the Garden Emporium site will place increased pressure on resources - in particular Llangan primary school which is full.

"Objective 7: To provide the opportunity for people in the Vale of Glamorgan to meet their housing !leeds." - There is no need for this housing at this location.

"Objective 10: To ensure that development within the Vale of Glamorgan uses land effectively and efficiently and to promote the sustainable use and management of natural resources." – If 40 houses are allowed to be built at the Garden Emporium site then the rear part of the Garden Emporium site, which is greenfield and has not previously been built on, will be.

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TEST 2 - The strategy, policies and allocations are not realistic and appropriate having considered the relevant alternatives and/or are not founded on a robust and credible evidence base.

1. Incorrect classification of Fferm Goch as a Minor Rural Settlement (Section 5.11 of the draft LDP):

Fferm Goch has been wrongly classified by the Council as a "Minor Rural Settlement" for the following reasons:

- a) In the Council's 'Sustainable Settlements Appraisal Review' Background paper (November 2011) ('the SSAR') -Fferm Goch should have been classified as being one of the rural, hamlets and isolated areas of the Vale of Glamorgan with an 'Anomaly Settlement' score. In paragraph 5.15 of the SSAR, the Council recognises that there are a number of settlements with relatively high scores which have been identified with anomaly scores because, for example, the settlement is located within walking distance of a one-off, high-scoring facility. Paragraph 5.15 says anomaly settlements have been identified by 'overriding' or 'limiting' factors such as:
- (i) a general limited range of services and facilities within the settlement,
- (ii) a low population (generally below 100), and/or
- (iv) the settlement being in an otherwise isolated or sensitive location.

All of these factors apply to Fferm Goch. Fferm Goch is a classic example of an anomaly settlement since it receives a full 3' score due to its proximity to a primary school. The employment score is wrong (see below), so its overall score should have been 6. It has a population of 98 (i.e. below 100). It is in an isolated location.

- b) It is the smallest of the "Minor Rural Settlements" with only 98 residents (nb Council say should have over 100) there are several other settlements with higher populations which are not classified as Minor Rural Settlements.
- c) Unlike all the other "Minor Rural Settlements" it is not recognised locally as a village it has no place sign of its own, only a street sign.
- d) it was not originally classified as a "Minor Rural Settlement" it seems to have been reclassified during the development plan process probably due to representations by the property developers who own the Garden Emporium (we note representations made by Winchester Properties on the draft preferred strategy in March 2009).
- e) The settlement scoring criteria for Fferm Goch is wrong in the SSAR Fferm Goch scores 3 for employment which is defined as meaning that there are employment opportunities on site. The only employment opportunity near Fferm Goch is Westwinds industrial estate.

This is a very small estate with only 4 light industrial buildings. A survey of these employers has confirmed that no new jobs have become available in the last 9 years and that the units collectively employ fewer than 15 people with no intention to expand.

Furthermore, one of the units has been empty and the development is not a popular industrial site. It cannot be right that this small industrial estate is classified as the same employment opportunity as those available in towns in the Vale, such as Barry, Penarth and Cowbridge. We believe Fferm Goch should score 0 for employment.

- f) Fferm Goch rightly does not have any designation as a settlement in the current UDP it is correctly classified along with other small hamlets as "open countryside". In the planning officer's report which considered the current planning permission it was "concluded that the development of the site for no more than 12 residential units, when taking into account the other material considerations would be sufficient to outweigh the local policy presumption against such development found in the Unitary Development Plan, subject to conditions and a Section 106 Legal Agreement requiring contributions to mitigate the impacts of the development" (page 22). The planning officer's report also noted, at page 12, that, "Categorising the site as brown field or previously developed land is a material consideration that does not, on its own, justify its suitability for residential development, however, the proposed amendments to the scheme concentrating development into the previously built up part of the site does have a bearing on the consequent policy position",
- g) If the list of other Minor Rural Settlements is considered, together with those which the Council decided were Anomaly Settlements or simply HamletslRural Areas, Fferm Goch stands out as an odd allocation we would strongly suggest it cannot be considered equal to any of the other Minor Rural Settlements, including nearby Graig Penllyn and Treoes, which are both substantial villages. It is much more similar to The Herberts, which the Council considered to be an Anomaly Settlement inspite of it having a primary school like Fferm Goch, although The Herberts scores for having a bus service and being much nearer to Cowbridge, whereas Fferm Goch does not. There are also villages which again are much more substantial than Fferm Goch which are not recognised as Minor Rural Settlements, including nearby Llangan and Welsh St Donats.
- h) The draft LDP at Section 5.19 (page 33) sets out the following 'common objectives' for the Minor Rural Settlements:
- Favour proposals which seek to protect and enhance the viability, accessibility or community value of existing village facilities and transport services.

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- Provide for an appropriate level, range and choice of housing, including affordable rural housing to meet local need.
- Encourage the diversification of the rural economy by favouring appropriate employment and tourism related developments.

Further, these objects are supported by Policy MG7 which at section 7.34 (page 83) states,

'New development however must always be of an appropriate scale, form and design that is sympathetic to and respects the existing character of the village and the range of services and facilities that are available. This will generally comprise infilling or limited small scale extensions to the minor rural settlements, in particular where they meet the need for local affordable housing.' Considering these statements as a whole it is apparent that Fferm Goch does not fit comfortably as a Minor Rural Settlement.

- i) If it were identified as a Minor Rural Settlement, Fferm Goch would be at risk of future residential development being allowed in this location through policy MG7 of the draft LDP. Fferm Goch is not a location where new development should routinely be permitted since it would infringe all the sustainability principles for development in rural locations. The only reason housing development has been permitted at the Garden Emporium site is because it is a brownfield site this is an exceptional site in this location.
- 2. Inappropriate allocation of 40 houses at the Garden Emporium site at Fferm Goch (policy MG2):

The allocation of 40 houses at the Garden Emporium site is inappropriate for the following reasons:

- a) A large part of the argument for allowing a huge increase in the number of houses proposed at the Garden Emporium site appears to be the classification of fferm Goch as a minor rural settlement, which is incorrect for the reasons stated above.
- b) The number of houses to be allocated at the Garden Emporium should reflect the extant planning permission for 12 houses. The draft LDP, Section 7.11 (page 75) states that, 'The number of units proposed for each identified site [which includes the Garden Emporium] is based on a density range between 25 and 30 units net per hectare or where they are available, planning application or pre-application details. Where site densities differ from these levels, this reflects local site circumstances or sensitivities.' In this case there is an existing planning permission for 12 units which should therefore have been the starting point for this site and there are good reasons why a higher density of units should not be permitted and has been consistently refused by the Council on planning applications considered to date (unsustainability, lack of local infrastructure and employment, very poor public transport and preservation of a rare plant).
- c) Policy MG8 (page 84) states 'In Minor Rural Settlements, a net residential density of 25 net dwellings per hectare will be required.' It then continues 'Lower density levels will be permitted where it can be demonstrated that:
- 1. Development at the prescribed densities would have an unacceptable impact on the character of the surrounding area;
- 2. Reduced densities are required ... to preserve a feature that would contribute to existing or future local amenity. '-

In relation to point 1, above, development of 40 houses would have an unacceptable impact on this area which with the exception of Fferm Goch consists of isolated and dispersed rural houses.

In relation to point 2. above, there is an identified rare plant on this site which would be preserved by the extant planning permission.

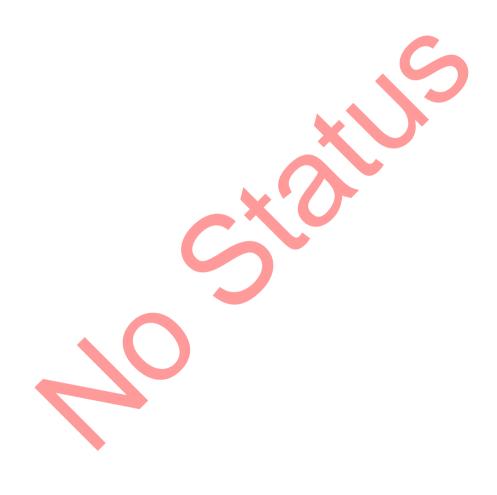
- 3f Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
  - a) Section 5.11 (page 26)- delete Fferm Goch from the list of Minor Rural Settlements
  - b) Policy MG2 (page 74)-amend the number of houses allocated to The Garden Emporium, Fferm Goch from 40 to 12
  - c) Residential allocations table (page 145)- amend number of dwellings at The Garden Empoorium, Fferm Goch from 40 to 12
  - d) Proposals map- amend to exclude back area of site MG2(30) identified as habitat area edged green on attached plan
  - e) Housing Supply Background Paper (November 2011) error in table 1 site no.30 The Garden Empoorium, Fferm Goch number of units should be 12, not 220.
- 4b If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing Paragraph 5.11 (designation of Fferm Goch as a minor rural settlement)

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Policy MG2 (allocation of the Garden Emporium Site, Fferm Goch for 40 houses)

I am concerned that my representations may be dismissed by the Council and I would like the opportunity to make sure they have been understood



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| Representor               | ID and d    | etails:    | 4187/D           | P2 Rufus Waddingto      | า   |                |                         |                              |                            |  |   |   |  |  |
|---------------------------|-------------|------------|------------------|-------------------------|---|----------------|-------------------------|------------------------------|----------------------------|--|---|---|--|--|
| Date Lodged<br>30/03/2012 | Status<br>M | Petition V | on and No.<br>82 | Supporting Evidence     | Additional SA SEA   |                |                         | Rep format:<br>Comment for   | ·                          | 4a - do you want your comments to be consiered by 'written representations' of you want to speak at a hearing session of Public examination? Written |   |   |  |  |
| 2a - Do you co            | onsider th  | ne LDP     | is Sound?        | Unsound                 | 2b - If you think that t<br>Procedural Tests -<br>Consistency Tests - | P1 - Yes       |                         | P2 - Yes                     |                            |  | ease indicate which test(s                            | ) that it fails.                              |  |  |
|                           |             |            |                  |                         | Coherence and Effec   | tiveness Test  | ts - CE1 -              | Yes                          | CE2 - Yes                  | CE3 - Yes  | CE4 - Yes   |   |  |  |
| 3a - Which pa             | rt of the I | Deposit    | Plan are y       | ou commenting on?       | Policy Number:<br>MG9. MD12   |                | Paragraph<br>6.49. 6.52 | Number:<br>2. 7.41. 7.44.    | Proposal Map:              | 0  | Constraints Map                                       | Appendices: Appendix 9 - Supporting Documents |  |  |
| 3b - Do you wi            | ish to see  | e any cl   | nanges ma        | de to the Deposit Plan  | as a result of your rep   | resentation?   | Yes                     | Ò                            | (If "No" or "Unansw        | vered" - go to 3d)   |   |   |  |  |
| 3c - What cha             | nges wo     | uld like   | to see mad       | le to the Deposit Plan? | New Policy: Unanswered Notes:   | Amended<br>Yes |                         | New Paragraph:<br>Unanswered | Amended Para<br>Unanswered | agraph: <u>New Or Ar</u><br>Yes  | nended Site: Other (see I<br>Unanswere                | <del></del>                                   |  |  |
| 3d - If your re           | presenta    | ition rela | ates to a ne     | ew, deleted or amende   | d site, did you submit<br>Site Name: Land ea                          |                |                         | Site? Yes                    | (If "Yes",                 |  | ndidate Site Name and re<br>Reference: Site reference | ,   |  |  |
| 30 Places of              | et out vo   | ur ronre   | sentation k      | pelow:                  |   |                |                         |                              |                            |  |   |   |  |  |

3e - Please set out your representation below:

REPRESENTATIONS AGAINST ALLOCATION OF GYPSY & TRAVELLER SITE AT LAND EAST OF LLANGAN

TEST P1

The LDP has not been prepared in accordance with the Community Involvement Scheme, see below key points:

- The Emergency Services and Local Primary school have all confirmed that they have NOT been consulted on the proposed site MG9. The LEA confirmed they had not been consulted about the Gypsy site.
- Registered consultees have not been informed of the consultation stages.
- According to the Welsh Government's document 'Travelling to a better future' there is an onus on the LA to consult with its strategic partners in delivering Gypsy & Traveller sites. No consultation has taken place.
- Good practice (Welsh Government document 'Good Practice Design in designing Gypsy & Traveller sites') suggests that where Gypsy & Traveller sites are concerned the local community should be engaged as early as possible we believe that the Council has undertaken the minimum consultation in terms of the LDP and insufficient consultation with respect to the Gypsy & Traveller site in accordance with best practice.

TEST P2

- 1. The Sustainability Appraisal is flawed and contradictory the proposed sites do not meet with national policy in respect of sustainability. The allocation of Llangan is not consistent with previous Planning Rejections by the Council which considered sustainability (Bonvilston Sept 2011) and with similar determinations by the Planning Inspectorate (Pembroke Sept 2011).
- 2. The allocation of MG9 is not consistent with the proposed LDP policies.

TEST C1

The Land Use Plan (with regards to Gypsy & Traveller sites) does not relate to any strategy - The Housing Strategy is out dated and does not provide any structure for assessing Gypsy & Traveller needs or site location.

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TESTC2

- 1. The Site allocation does not have regard to the following National Policy:
- -Welsh Government Circular (30/2007):
- The site is RURAL and is "UNSUSTAINABLE" as there are no local services (no shops, food and drink outlets, doctor, dentist, Library, rail services or any main settlement within 5km etc). Llangan and Fferm Goch both score 0 points for local services in the evidence based assessment 'Sustainable Settlements Appraisal'
- The site would not comply with a RURAL EXCEPTION POLICY as it advocates that all pitches are accommodated on a RURAL site including transient pitches which would not comply with TAN 2.
- Any business operated from the site would be in contradiction of RURAL EXCEPTION guidance.
- The site allocation does not take into account the "SCALE" of the resident community. Llangan has a population of less than 100 with 35 homes and this proposal nearly doubles the size of the Hamlet.
- Example of similar site. In 2007 an application of the Sustainability issue was applied by the Planning inspector in Pembroke where an appeal was refused solely on this basis.
- The VOG Council has refused an application recently in Bonvilston on the basis of Sustainability and services in this case were closer to the site than in the case of Llangan proposal.
- Designing Gypsy and Traveller Sites Good Practice Guide The site is too small; therefore cannot meet the needs identified in the LDP.
- -The site measures 7400 m2 and could only accommodate 14 pitches without infrastructure (guidance is 500m2 per pitch plus refuse area; office; play area; infrastructure (roads etc)
- The access road to the site does not meet the minimum requirements for emergency vehicles (3.7m it is actually 15m)
- The site access is poor and "unsafe" having extended walks (in excess of 800m to bus stop) along an unlit lane with no public footpath or street lighting.
- The proposal of 21 units on the site would restrict the ability of emergency vehicles to manoeuvre around the site.
- New sites grants are available (and cost should not be a material planning consideration).
- -The guidance requires that sites are:
- sustainable the Llangan site proposal is not
- equivalent to standards that would be expected for social housing in the settled community This would not meet the standards and this site would not have been considered appropriate for development for residential in either the current or proposed plans
- have the effect of encouraging and developing good relations between
- Gypsies & Travellers and the settled community the large scale of this proposal could mean that establishing good relations with the local community of Llangan would be unlikely and could also result in increased tensions in the community.
- based on WAG guidance of Design of Gypsy traveller sites the maximum number of pitches is 14, and the proposal at Llangan exceeds this number.
- Travelling to a Better Future
- Recommends that LA's engage with their Housing Association Partners to bring sites forward. The VOG Council has not done this.
- "Situating transit provision on residential Gypsy sites is not an option preferred by the Gypsy and Traveller community as this can lead to tensions among different family groups and make site management and maintenance very difficult." This creates a sense of "fear" within the settled Gypsy & Traveller community. The proposal is recommending that transient and permanent sites are co-located.
- Planning Policy Wales 2011
- The proposed site at Llangan is greenfield land, according to the definition of brownfield land set out in Figure 4 1 of PPW;
- it will not reduce the need to travel, due to the limited local service provision in close proximity to the site:
- offers very limited access to public transport facilities;
- is not large enough to provide ancillary facilities required to support a sustainable development as set out in paragraph 3.30 in accordance with Designing Gypsy and Travellers Sites Good Practice Guide;
- is located within a Special Landscape Area (SLA) and in close proximity to a Conservation Area. The assessment of the Llangan site incorrectly states that it is not within an SLA, so makes no reference to the sites proximity to the conservation area of Llangan. The location can be clearly seen from the conservation area.
- does not meet the identified needs of Gypsies and Travellers, in the Vale of Glamorgan (Fordham report 2008 evidence);
- does not promote sustainable access to employment, shopping, education, health, community, leisure and sports facilities;
- does not maximise opportunities for community development and social welfare;
- does not foster social inclusion due to the isolated location of the site; and

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- does not contribute to improvements in health due to the isolation from services and facilities.
- 2. MG2. The draft policy MG 2 actively discriminates the Gypsy community by excluding them from the wider housing programme and potentially abuses their human rights. Policy MG 2 should be revised to allow the VOG to identify appropriate sites in the same way as Affordable Housing.

#### TESTC3

- 1. The policy does not have due regard to the Wales Spatial Plan.
- The key theme of the Wales Spatial Plan is achieving sustainable development through focusing new development in areas which have good access to key services and facilities. As there are no services surrounding the site the allocation of MG9 is not consistent with the objectives of the Wales Spatial Plan. The Gypsy site proposal fails Soundness test Consistency C3 because the policy does not have due regard to the Wales Spatial Plan.

### TESTC4

- 1. The allocation of this site does not have regard to the relevant Community Strategy in the following respects:
- "The diverse needs of local people are met through the provision of customer focused, accessible services and information"- This cannot be achieved by the allocation of a non-accessible rural allocation.
- "Vale of Glamorgan residents and organisations respect the local environment and work together to meet the challenge of climate change" The allocation of MG9 places heavy emphasis on the use of the car to access the most basic facilities shops, health, education etc.
- "Older people are valued and empowered to remain independent, healthy and active. They have equality of opportunity and receive high quality services to meet their diverse needs"- All services are miles away and inaccessible to the older community. The VERY POOR public transport system is located 1050m from the site and is in excess of the maximum distances as defined in the proposed LDP and "Manual for Streets".
- "People of all ages are able to access coordinated learning opportunities and have the necessary skills to reach their full potential helping to remove barriers to employment"—There is no employment opportunity near to the site.

The local primary school has confirmed that it is full and that its projections suggest that it doesn't have the capacity for such a large development (also consider the existing approval of 12 dwellings at Fferm Goch).

- The small local industrial unit has raised concerns in relation to the scale of the proposal.

#### TEST CE1

The Plan does not set out a coherent strategy in the following respects

- The Strategy makes the following statements:

The LDP will seek to provide a policy framework which: Manages the housing supply effectively in order to provide a range of good quality, affordable homes in sustainable locations.

Reduces out commuting by providing opportunities for new housing, retail and employment development in accessible locations in the Vale of Glamorgan.

The allocation of this rural site in open countryside does not meet this objective.

- The LDP also states its vision as being:
- "Our Vision for the Vale of Glamorgan is a place:

That is safe, clean and attractive, where individuals and communities have sustainable opportunities to improve their health, learning and skills, prosperity and wellbeing 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 sustainability of the area." The allocation of this site in policy MG9 does not meet these objectives being in a rural location with inadequate facilities and transport links.

- The Allocation of this site in policy MG9 does not comply with the following objectives of the LDP:
- -Objective 1: To sustain and further the development of sustainable communities within the Vale of Glamorgan, providing opportunities for living, learning, working and socialising for all. The site's location would clearly not meet this objective.
- Objective 2: To ensure that development within the Vale of Glamorgan makes a positive contribution towards reducing the impact of and mitigating the adverse effects of climate change. The allocation of this site will have entirely the opposite effect to this objective.
- Objective 3: To reduce the need for Vale of Glamorgan residents to travel to meet their daily needs and enabling them greater access to sustainable forms of transport. The allocation of this site will have

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entirely the opposite effect to this objective.

- Objective 4: To protect and enhance the Vale of Glamorgan's historic, built, and natural environment. The development of this site would not meet this objective: a planning refusal on an adjacent site in May 2002 stated "It is a proposal that would adversely affect the undeveloped rural character of the area"
- Objective 5: To maintain, enhance and promote community facilities and services in the Vale of Glamorgan The local primary school has not been consulted, had they been it would have been recognised that the school does not have capacity, nor is it projected to have the capacity.
- Objective 7: To provide the opportunity for people in the Vale of Glamorgan to meet their housing needs- States that development of housing should be in sustainable locations This is not. Furthermore, it brings into question POLICY MD12 which is discriminatory in that Gypsy & Traveller sites are treated differently from other housing allocations. An inclusive policy would see Gypsy & Traveller sites being assessed on the same basis as AFFORDABLE HOUSING and considered for ALL candidate residential sites in the LDP
- Objective 10: To ensure that development within the Vale of Glamorgan uses land effectively and efficiently and to promote the sustainable use and management of natural resources. The inappropriate use of finite resources can impact on the ability of future generations to fulfil their needs. The LDP through favouring the use of previously developed land and the sustainable use of natural resources of whatever kind and wherever they are located, will contribute to preserving their availability for future generations. This is agricultural land in the Special Landscaped Area.

#### TEST CE2

The strategies, policies and allocations are not realistic and appropriate having considered relevant alternatives and are not founded on robust evidence:

- 1. The allocation of Llangan is purely on the basis of site ownership by the Vale and does not meet the requirement of Policy MD12.
- 2. The Gypsy & Traveller site assessment (anecdotal) conflicts with other evidence based background papers; specifically the Sustainable Settlement Appraisal. The SSA states 0 points for public transport but the Gypsy & Traveller site assessment states that public transport facilities are good.
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- 4. The Gypsy Traveller site assessment does not reflect the current legal obligations of the VOG in respect of this site, yet the other site assessments highlight legal issues.
- 5. Several privately-owned sites were put forward as candidate sites for Gypsy & Traveller sites but were dismissed as they were not in Council ownership. Not being in council ownership should not be a reason to reject privately owned sites.
- 6. The key issue is that the site allocation does not reflect the identified need of the Gypsy & Traveller community as highlighted in the 2008 Fordham report.
- 7. The Gypsy Traveller site assessment suggests that Fferm Goch is the local settlement when Llangan is recognised in this and historic documents as the local settlement being only 150m from the proposed site. It appears that the council has also linking the site at Llangan to the Hamlet of Fferm Goch in order to increase the site assessment positive score.
- 8. The assessment makes no reference that the site is in a Special Landscape Area (SLA).
- 9. The assessment makes no reference that the site is adjacent to a Conservation Area, within the Conservation Management Plan for this area there is a specific requirement to protect the view from the edge of the conservation area over the proposed site. The proposed site is clearly visible form the conservation area.
- 10. The allocation of Fferm Goch as a Minor Rural Settlement is incorrect. The appraisal scored 9 points. 3 are for employment which puts this site on par with the major settlements such as Barry. This is on the basis of 4 light industrial buildings. A survey of these employers has confirmed that zero new jobs have become available in the last 9 years and that the units collectively employ fewer than 15 people with no intention to expand. Furthermore, one of the units has been empty and the development is not a popular industrial site.
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- "Participants living on Shirenewton had three main criticisms: the site was too big, the distance from local amenities along with the lack of local transport,"

"This created many problems for the residents, especially the poorest: 'for a person like me on the bread line it's very tough. I can't afford to use the car', 'everything is a mile away, including the bus stop. It takes a long walk on a busy road to get to the shops and schools".

"The tables demonstrate that access to services such as local shops, health centres and education facilities from both sites is difficult by foot and by local transport systems. This difficulty was eased when participants used their cars, however the level of ease was lower for Roverway due to the difficult entry onto the main road".

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"It was thought that smaller sites would reduce the problem of on-site conflicts: 'they need smaller sites and not too many different families, otherwise when you have a row the whole site becomes a war zone"

"This affected the ability of the households interviewed to access local services such as shops, health centres and education facilities. It was reported that this problem mainly affected the women: men take the

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14. There is complete inconsistency with the allocation of MG9 against the proposed policies.

### TEST CE3

- 1. The VOG council make no reference as to how they are going to manage such a large site. The 21 unit site in Rover Way Cardiff has 3 full time Council staff allocated to it.
- 2. The current Housing Strategy expires April 2012 and makes no relevant reference as to how the Gypsy & Travelling Community will be monitored in terms of growth or need. Indeed, there is no strategy that underpins the Gypsy & Traveller community or housing at all.

### TEST CE4

- 1. Policy MD12 (Gypsy & Traveller) is discriminatory. It offers no flexibility for the Council to bring forward sites that are sustainable / suitable for Gypsies & Travellers through the policies derived within the plan.
- 2. MD12 should be redrafted to enable smaller, sustainable sites to be included within the Affordable Housing requirements and delivered through the Registered Social Landlord sector.

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- 3f Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
  - 1. Site MG 9 should be removed from the plan and an alternative site that has been assessed according to a relative sustainability appraisal is put in its place.
  - 2. Policy MD 12 should be amended so that it does not discriminate against the gypsy and traveller community. All sites during the plan should be assessed on a similar basis as Affordable Housing.
  - 3. Proposals Map should be amended to remove the site Land East of Llangan as the land allocated for a gypsy and traveller site.

4b - If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -



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|---|---|--|---------------------------------------|------------------------|--|---|
| Date Lodged     Status     Petition and No.     Supporting Evidence       30/03/2012     M     ✓     28 | Additional SA SEA   | Rep format:<br>Comment form                              | · · · · · · · · · · · · · · · · · · · |                        | pe consiered by 'writter<br>on of Public examination | n representations' or do on? Written          |
| •   | Procedural Tests - P1 -   | s unsound and does not not mee Yes P2 - Yes Yes C2 - Yes | t one or more test(s) of  C3 - Yes    | soundness, pleas       |  | that it fails.                                |
|   | Coherence and Effectiveness                                       |  | CE2 - Yes                             | CE3 - Yes              | CE4 - Yes  |   |
| , , ,   | Policy Number:<br>MD12. MG9                                       | Paragraph Number:<br>6.49. 6.52. 7.41. 7.44.             | Proposal Map:<br>MG9                  | )                      | Constraints Map Feb 2012                             | Appendices: Appendix 9 - Supporting Documents |
| 3b - Do you wish to see any changes made to the Deposit Plan  | as a result of your representat                                   | ion? Yes   | f "No" or "Unanswered                 | " - go to 3d)          |  |   |
| 3c - What changes would like to see made to the Deposit Plan?   | New Policy: Amen Unanswered Yes Notes:                            | ded Policy: <u>New Paragraph:</u><br>Unanswered          | Amended Paragrap<br>Unanswered        | oh: New Or Amen<br>Yes | ded Site: Other (see N<br>Unanswered                 | <del></del>                                   |
| 3d - If your representation relates to a new, deleted or amende   | d site, did you submit the site a<br>Site Name: Land East of Llar |  | (If "Yes", plea                       | · ·                    | date Site Name and reference: Site reference         | erence if known)<br>MG 9 / ID 22 Appendix 1   |

3e - Please set out your representation below:

REPRESENTATIONS AGAINST ALLOCATION OF GYPSY & TRAVELLER SITE AT LAND EAST OF LLANGAN

TEST P1

The LDP has not been prepared in accordance with the Community Involvement Scheme, see below key points:

- The Emergency Services and Local Primary school have all confirmed that they have NOT been consulted on the proposed site MG9. The LEA confirmed they had not been consulted about the Gypsy site.
- Registered consultees have not been informed of the consultation stages.
- According to the Welsh Government's document 'Travelling to a better future' there is an onus on the LA to consult with its strategic partners in delivering Gypsy & Traveller sites. No consultation has taken place.
- Good practice (Welsh Government document 'Good Practice Design in designing Gypsy & Traveller sites') suggests that where Gypsy & Traveller sites are concerned the local community should be engaged as early as possible we believe that the Council has undertaken the minimum consultation in terms of the LDP and insufficient consultation with respect to the Gypsy & Traveller site in accordance with best practice.

TEST P2

- 1. The Sustainability Appraisal is flawed and contradictory the proposed sites do not meet with national policy in respect of sustainability. The allocation of Llangan is not consistent with previous Planning Rejections by the Council which considered sustainability (Bonvilston Sept 2011) and with similar determinations by the Planning Inspectorate (Pembroke Sept 2011).
- 2. The allocation of MG9 is not consistent with the proposed LDP policies.

TEST C1

The Land Use Plan (with regards to Gypsy & Traveller sites) does not relate to any strategy - The Housing Strategy is out dated and does not provide any structure for assessing Gypsy & Traveller needs or site location.

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TESTC2

- 1. The Site allocation does not have regard to the following National Policy:
- -Welsh Government Circular (30/2007):
- The site is RURAL and is "UNSUSTAINABLE" as there are no local services (no shops, food and drink outlets, doctor, dentist, Library, rail services or any main settlement within 5km etc). Llangan and Fferm Goch both score 0 points for local services in the evidence based assessment 'Sustainable Settlements Appraisal'
- The site would not comply with a RURAL EXCEPTION POLICY as it advocates that all pitches are accommodated on a RURAL site including transient pitches which would not comply with TAN 2.
- Any business operated from the site would be in contradiction of RURAL EXCEPTION guidance.
- The site allocation does not take into account the "SCALE" of the resident community. Llangan has a population of less than 100 with 35 homes and this proposal nearly doubles the size of the Hamlet.
- Example of similar site. In 2007 an application of the Sustainability issue was applied by the Planning inspector in Pembroke where an appeal was refused solely on this basis.
- The VOG Council has refused an application recently in Bonvilston on the basis of Sustainability and services in this case were closer to the site than in the case of Llangan proposal.
- Designing Gypsy and Traveller Sites Good Practice Guide The site is too small: therefore cannot meet the needs identified in the LDP.
- -The site measures 7400 m2 and could only accommodate 14 pitches without infrastructure (quidance is 500m2 per pitch plus refuse area; office; play area; infrastructure (roads etc)
- The access road to the site does not meet the minimum requirements for emergency vehicles (3.7m it is actually 15m)
- The site access is poor and "unsafe" having extended walks (in excess of 800m to bus stop) along an unlit lane with no public footpath or street lighting.
- The proposal of 21 units on the site would restrict the ability of emergency vehicles to manoeuvre around the site.
- New sites grants are available (and cost should not be a material planning consideration).
- -The guidance requires that sites are:
- sustainable the Llangan site proposal is not
- equivalent to standards that would be expected for social housing in the settled community This would not meet the standards and this site would not have been considered appropriate for development for residential in either the current or proposed plans
- have the effect of encouraging and developing good relations between
- Gypsies & Travellers and the settled community the large scale of this proposal could mean that establishing good relations with the local community of Llangan would be unlikely and could also result in increased tensions in the community.
- based on WAG guidance of Design of Gypsy traveller sites the maximum number of pitches is 14, and the proposal at Llangan exceeds this number.
- Travelling to a Better Future
- Recommends that LA's engage with their Housing Association Partners to bring sites forward. The VOG Council has not done this.
- "Situating transit provision on residential Gypsy sites is not an option preferred by the Gypsy and Traveller community as this can lead to tensions among different family groups and make site management and maintenance very difficult." This creates a sense of "fear" within the settled Gypsy & Traveller community. The proposal is recommending that transient and permanent sites are co-located.
- Planning Policy Wales 2011
- The proposed site at Llangan is greenfield land, according to the definition of brownfield land set out in Figure 4.1 of PPW:
- it will not reduce the need to travel, due to the limited local service provision in close proximity to the site;
- offers very limited access to public transport facilities;
- is not large enough to provide ancillary facilities required to support a sustainable development as set out in paragraph 3.30 in accordance with Designing Gypsy and Travellers Sites Good Practice Guide;
- is located within a Special Landscape Area (SLA) and in close proximity to a Conservation Area. The assessment of the Llangan site incorrectly states that it is not within an SLA, so makes no reference to the sites proximity to the conservation area of Llangan. The location can be clearly seen from the conservation area.
- does not meet the identified needs of Gypsies and Travellers, in the Vale of Glamorgan (Fordham report 2008 evidence):
- does not promote sustainable access to employment, shopping, education, health, community, leisure and sports facilities;
- does not maximise opportunities for community development and social welfare;

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- does not foster social inclusion due to the isolated location of the site: and
- does not contribute to improvements in health due to the isolation from services and facilities.
- 2. MG2. The draft policy MG 2 actively discriminates the Gypsy community by excluding them from the wider housing programme and potentially abuses their human rights. Policy MG 2 should be revised to allow the VOG to identify appropriate sites in the same way as Affordable Housing.

#### TESTC3

- 1. The policy does not have due regard to the Wales Spatial Plan.
- The key theme of the Wales Spatial Plan is achieving sustainable development through focusing new development in areas which have good access to key services and facilities. As there are no services surrounding the site the allocation of MG9 is not consistent with the objectives of the Wales Spatial Plan. The Gypsy site proposal fails Soundness test Consistency C3 because the policy does not have due regard to the Wales Spatial Plan.

### TESTC4

- 1. The allocation of this site does not have regard to the relevant Community Strategy in the following respects:
- "The diverse needs of local people are met through the provision of customer focused, accessible services and information". This cannot be achieved by the allocation of a non-accessible rural allocation.
- "Vale of Glamorgan residents and organisations respect the local environment and work together to meet the challenge of climate change"- The allocation of MG9 places heavy emphasis on the use of the car to access the most basic facilities shops, health, education etc.
- "Older people are valued and empowered to remain independent, healthy and active. They have equality of opportunity and receive high quality services to meet their diverse needs"— All services are miles away and inaccessible to

the older community. The VERY POOR public transport system is located

1050m from the site and is in excess of the maximum distances as defined in

the proposed LDP and "Manual for Streets".

- "People of all ages are able to access coordinated learning opportunities and have the necessary skills to reach their full potential helping to remove barriers to employment"—There is no employment opportunity near to the site.
- The local primary school has confirmed that it is full and that its projections suggest that it doesn't have the capacity for such a large development (also consider the existing approval of 12 dwellings at Fferm Goch).
- The small local industrial unit has raised concerns in relation to the scale of the proposal.

### TEST CE1

The Plan does not set out a coherent strategy in the following respects

- The Strategy makes the following statements:

The LDP will seek to provide a policy framework which: Manages the housing supply effectively in order to provide a range of good quality, affordable homes in sustainable locations

Reduces out commuting by providing opportunities for new housing, retail and employment development in accessible locations in the Vale of Glamorgan

The allocation of this rural site in open countryside does not meet this objective.

- The LDP also states its vision as being:
- "Our Vision for the Vale of Glamorgan is a place:

That is safe, clean and attractive, where individuals and communities have sustainable opportunities to improve their health, learning and skills, prosperity and wellbeing 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 sustainability of the area." The allocation of this site in policy MG9 does not meet these objectives being in a rural location with inadequate facilities and transport links.

- The Allocation of this site in policy MG9 does not comply with the following objectives of the LDP:
- -Objective 1: To sustain and further the development of sustainable communities within the Vale of Glamorgan, providing opportunities for living, learning, working and socialising for all. The site's location

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would clearly not meet this objective.

Objective 2: To ensure that development within the Vale of Glamorgan makes a positive contribution towards reducing the impact of and mitigating the adverse effects of climate change. - The allocation of this site will have entirely the opposite effect to this objective.

- Objective 3: To reduce the need for Vale of Glamorgan residents to travel to meet their daily needs and enabling them greater access to sustainable forms of transport. The allocation of this site will have entirely the opposite effect to this objective.
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#### TEST CE3

- 1. The VOG council make no reference as to how they are going to manage such a large site. The 21 unit site in Rover Way Cardiff has 3 full time Council staff allocated to it.
- 2. The current Housing Strategy expires April 2012 and makes no relevant reference as to how the Gypsy & Travelling Community will be monitored in terms of growth or need. Indeed, there is no strategy that underpins the Gypsy & Traveller community or housing at all.

(ordered by Representation ID No.)

Representor ID and details: 4187/DP3 Rufus Waddington

TEST CE4

- 1. Policy MD12 (Gypsy & Traveller) is discriminatory. It offers no flexibility for the Council to bring forward sites that are sustainable / suitable for Gypsies & Travellers through the policies derived within the plan.
- 2. MD12 should be redrafted to enable smaller, sustainable sites to be included within the Affordable Housing requirements and delivered through the Registered Social Landlord sector.
- 3f Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)
  - 1. Site MG 9 should be removed from the plan and an alternative site that has been assessed according to a relative sustainability appraisal is put in its place.
  - 2. Policy MD 12 should be amended so that it does not discriminate against the gypsy and traveller community. All sites during the plan should be assessed on a similar basis as Affordable Housing.
  - 3. Proposals Map should be amended to remove the site Land East of Llangan as the land allocated for a gypsy and traveller site.
- 4b If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -

| Representor ID and details: 4188/DP1 Ms Claire Fawcet   | :  |   |   |
|---|--|---|---|
| Date Lodged     Status     Petition and No.     Supporting Evidence       02/04/2012     M     0  |  |   | ments to be consiered by 'written representations' or do<br>iring session of Public examination?                |
| 2a - Do you consider the LDP is Sound? Unanswered   | 2b - If you think that the Plan is unsound and doe<br>Procedural Tests - P1 - Unanswered<br>Consistency Tests - C1 - Unanswered<br>Coherence and Effectiveness Tests - CE1 - Unanswered                          | P2 - Unanswered C2 - Unanswered C3 - Unanswered   | .,,   |
| 3a - Which part of the Deposit Plan are you commenting on?  | Policy Number: Paragraph Nu<br>MG2(27)   | umber: Proposal Map:  | Constraints Map Appendices:   |
| 3b - Do you wish to see any changes made to the Deposit Plan  | as a result of your representation? Unanswere  | ed (If "No" or "Unanswered" - go to   | 3d)   |
| 3c - What changes would like to see made to the Deposit Plan?   |  |   | Or Amended Site: Other (see Notes):  Unanswered  Unanswered   |
| 3d - If your representation relates to a new, deleted or amende   | d site, did you submit the site as a Candidate Site Site Name:   | e? Unanswered (If "Yes", please give t  | the Candidate Site Name and reference if known)<br>Site Reference:  |
| 3e - Please set out your representation below: Proposed Development at Court Close Aberthin, Cowbride   | ge MG2 (27)  |   |   |
| In principle I do not necessarily object to new houses beir   | g built in the village, but the transport infrastructu   | re is totally inadequate to support such a deve   | olopment.   |
| To gain access to the site you must travel along Whitefiel Two members of my family have been involved in accider that section of the A4222 too dangerous for the provision that road will only exacerbate the situation. There will also number of vehicles using Pen-y-Lan will also increase, ca | its that were not their fault, due to spee <mark>ding traffi</mark> c<br>of a pedestrian crossin <mark>g nea</mark> r the bus stop by Mae<br>o be an increase in t <mark>raffic throug</mark> h the village caus | c through the village of Aberthin on the A4222.<br>es Lloi. This access is already inadequate for<br>sed by the development, on the A4222 created | Less than 9 months ago a highways inspector deemed current traffic, and the resulting increase in traffic along |
| This whole situation needs review even now, and the introvillage, and traffic lights access to Whitefields Farm Lane  |  | opment would make the situation critical. As a  | minimum there should be a 20 mph speed limit in the   |
| I am extremely concerned about the safety of the access   | to this development.   |   |   |
| 3f - Please outline the changes you wish to see made to the D   | eposit Plan to make it sound (if relevant)   |   |   |
| 4b - If you wish to speak, please confirm which part of your rep  |  | pout and why they consider it be necessary to   | speak at the hearing -  |

(ordered by Representation ID No.)

| Representor  | ID and d    | etails:                 | 4189/DI                | P1 Mr Stephen Peard    | ce  |          |                              |            |   |          |                  |            |  |             |                               |  |
|--|-------------|-------------------------|------------------------|------------------------|---|----------|------------------------------|------------|---|----------|------------------|------------|--|-------------|-------------------------------|--|
| Date Lodged<br>30/03/2012                                    | Status<br>M | Petitio                 | on and No.<br>0        | Supporting Evidence    | Additional SA SEA   |          |                              |            | Rep format:<br>Comment for  |          | •                | •          |  |             | •                             | n representations' or do on? Examination |
| 2a - Do you consider the LDP is Sound? Unsound               |             |                         |                        |                        | 2b - If you think that the Plan is unsound and does not not meet one or more test(s) of soundness, please indicate which test(s) that it fails.  Procedural Tests - P1 - Unanswered P2 - Unanswered |          |                              |            |   |          |                  |            |  |             |                               |  |
|  |             |                         |                        |                        | Consistency Tests -   | C1 -     | Unanswe                      | ered       | C2 - Unan   | swer     | ed C3 - Unar     | nswere     | d C4 -   | Unanswe     | ered                          |  |
|  |             |                         |                        |                        | Coherence and Effect  | tiveness | Tests -                      | CE1 -      | Unanswered  | CE       | 2 - Yes          | CE         | 3 - Unanswe  | red C       | CE4 - Unanswe                 | ered                                     |
| 3a - Which part of the Deposit Plan are you commenting on?   |             | Policy Number:          |                        | <u>Par</u>             | agraph  | Number:  | Pro                          | posal Map: |   |          | Constr           | raints Map | Appendices:  |             |                               |  |
|  |             |                         |                        |                        |   |          |                              |            |   |          | MG2(13)          |            |  |             |                               |  |
| 3b - Do you w  | ish to see  | e any ch                | anges ma               | de to the Deposit Plan | as a result of your rep   | resentat | ion? Y                       | es         | (   | If "No   | o" or "Unanswere | ed" - go   | to 3d)   |             |                               |  |
| 3c - What changes would like to see made to the Deposit Plan |             | le to the Deposit Plan? | New Policy: Unanswered |                        | ded Polic<br>swered   |          | New Paragraph:<br>Unanswered |            | Amended Paragra<br>Unanswered   |          | lew Or Ame       | nded Site  | Other (see Note of the Contract of the Contrac | <del></del> |                               |  |
|  |             |                         |                        |                        | Notes:  |          |                              |            | , in the second |          |                  |            |  |             |                               |  |
| 3d - If your re  | presenta    | tion rela               | ntes to a ne           | ew, deleted or amende  | d site, did you submit<br>Site Name: Land to v  |          |                              |            |   | to e     |                  | •          |  |             | Name and ref<br>2446/CS1, 244 | ference if known)<br>46/CS2              |
| 20 Planca  | ot out vo   | ur ropro                | contation k            |                        |   |          |                              |            |   | <b>7</b> |                  |            |  |             |                               |  |

- 3e Please set out your representation below:
  - 1. This document sets out my representation in respect of the Deposit Local Development plan. It should be read in conjunction with my completed LDP representation form.

### Background

- 2. The background to this representation is that I have lived in my current address in Brookfleld Park for more than 25 years. The house that we occupy adjoins the proposed development site set out in MG2 (13). The location is immediately adjacent to the sewage pumping station taking sewage to the sewage farm on the opposite side of the valley.
- 3. Both our children were educated in Cowbridge at Primary and Secondary level and we have contributed to the life of the Town through work in the Town Hall and through connections with sport.
- 4. The news that the site was to be developed came as a shock given the evident landscape value and in our eyes its value as a source of amenity, biodiversity and wildlife in the area.
- 5. The vast majority of people who will be affected by the proposed development had not heard of the proposal and were surprised that the candidate sites had been proposed by others as long ago as 2007. Whilst the Council had made contact with developers, it had failed to establish any effective link with the people most likely to be affected. This seems at odds with the Welsh Assembly Government's desire that the LDP process would be one of engagement and consensus. The engagement strategy set out in the LDP failed to reach those most directly affected by the proposal and concentrated on high level considerations and not the relevant local details.
- 6. The LDP contents, in particular the scant specific details available about the site assessment, demonstrated a desire to promote the development of this site by ignoring the clear value of the site to the locality and the people who live in and visit the area. The concerns below support this assertion.

### Objections

7. Landscape area status. The status of the area under question seems to have been changed by the council simply to facilitate the development without any consideration to why the area was designated as a Special Landscape area in the first place. The 2008 reports entitled Designation of Special Landscape areas and Designation of Landscape character areas and available under the heading of Background Papers (not Superseded

Background papers) on the LDP web site clearly designate the area.

8. The reference source for this and many other assessment documents in LANDMAP and the CCW site clearly shows the site within areas of importance for a range of reasons. In the assessments for Landscape

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Representor ID and details: 4189/DP1 Mr Stephen Pearce

features such as habitats, visual and sensory (scenic quality, integrity, character and rarity) and historic aspects

- 9. In addition it clearly identifies development as the major threat to the landscape and its character.
- 10. The 2008 reports confirm this assessment
- 11. The conclusion to be drawn stems from the following facts (as presented in the LDP and background papers)
- a. The previous LDP identified it as a special landscape area
- b. The Area was classified as a Special Landscape area and a landscape character area.
- c. The Landmap commentary and commentary in the 2008 reports confirms this.
- d. The landscape has not changed.
- e. The change has been the desire to develop the site resulting n the change of status.
- 12. On 1st March 2012, planning application ref 2012/00031/FUL was discussed in Planning Committee. Planning permission was refused for this second storey conversion because:-

The proposed conversion would substantially alter the character of the building, resulting in a significant increase in the mass, bulk and visual prominence of an ancillary outbuilding that would result in the loss of its rural character. As such the proposed extension is considered to be contrary to points iii) and iv) of Policies ENV8 — Small Scale Rural Conversion and ENV4 — Special Landscape Areas of the Vale of Glamorgan UDP 1996-2011.

The comparison between this decision and the proposed development is stark. Both developments in a Special Landscape area (as defined by the Council). One proposes a second storey conversion and is refused. Another proposes 100 buildings and is promoted by the Council. Both are in conflict with the stated objectives to protect the nature of the countryside.

- 13. Environmental sustainability assessment: Using the Council's methodology associated with Step 2 of the Assessment process, the conclusion I have reached is that the development should not go ahead. But this crucial part of the assessment has not been shared with those most affected. The superficial stage 3 assessment (see below), coupled with the absence of a Stage 2 assessment point towards the conclusion that the imperative was to development not the sustainability either in Environmental or Locality terms. (I would contrast the report for the planning application at para 12 above and the scant comments associated with the assessment)
- 14. Biodiversity. There is a lack of hard data about the biodiversity in the area under question. It adjoins the low River Thaw valley where a range of important species have been reliably reported. The Council's Biodiversity report and report on the identification of site of interest for nature conservation are based on a sample of the areas concerned and provides sufficient information to suggest that this area is important in biodiversity terms. This needed consideration in Stage 2 of the assessment. No demonstration has been made of the application of stage 2. The only reference is to the outcome for sites rejected at that stage.
- 15. Sustainability. There are a number of issues that challenge the proposal's sustainability and which are missed or inadequately covered in the Stage 3 Sustainability assessment for Mg 2(13). Details are given in paras 14, 15, 16, 17 and 18 below. The failure to make reference and demonstrate that the process has been diligently and professionally applied calls into question the basis for the decision to include the site. An alternative assessment is attached (app 1).
- 16. Vehicular access: Access through Windmill Lane and Bessant Close is not feasible as the former is too narrow and the latter is not available. This leaves one access point on the St Athan Road that will require major works to realign the road further impacting negatively on the landscape. This leaves 100 houses with only on exit from their location.
- 17. Schools: Information from Parents and other sources suggest that the local schools are at capacity. There are no plans under Policy MG10 to increase the Educational capacity in Cowbridge. Given the current austerity measures under which local authorities are placed, it is difficult to see that the funds would be available. Moreover, where the additional capacity would be placed is not clear to residents since two sites in Cowbridge that were used for Education are now earmarked for residential development.
- 18. Town infrastructure: The Vale of Glamorgan District Centres Study FINAL REPORT sets out some limitations in the Town's infrastructure most especially about car parking and congestion.

"Both the business and visitor surveys found that car parking in Cowbridge was a problem. The business survey ranked parking and congestion as the main problems in Cowbridge."



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Representor ID and details: 4189/DP1 Mr Stephen Pearce

"Negative aspects of Cowbridge as a business location (Q18) indicated the car parking was the main concern followed by congestion, cost of rents and low footfall."

"The main access problem is the limited availability of parking in the centre"

The sustainability assessment contained in the LDP documents clearly indicates that Car would be the main transport from the proposed development as it is too far from Town and the Hills would deter the use of bicycles. Given the loss of the Cattle Market area for car parking, the situation would only get worse. The additional car parking at the Waitrose store will help but the constraints of the High Street. lack of rear access for delivery lorries and increased traffic will make the situation worse and impact negatively on Cowbridge and its value as a Tourist centre.

- 19. Transport: Reference is made to the availability of Bus transport but it is clear Cowbridge lacks the rail links and modern Bus station like Llantwit Major. There is a stated desire in the LDP to develop the Cowbridge Bus stops near the Town hall, but the site constraints are significant and it is likely to impact on the availability of car parking (already a major issue recognised in the Council's retail centres report).
- 20. In addition in January, Councils in Wales were told that the Local Transport Services Grant (LTSG) would be cut by 27%. Operators are unsure if they must plan for a reported reduction of 25% in the Bus Service operators Grant. No mention of this confirmed reduction (LTSG) in local Bus funding can be seen in the LDP. It is clearly an outcome of the austerity programme and given the level of reduction in funding is likely to have a major impact on the Bus services in Cowbridge. Clearly the Vale of Glamorgan knew about the reductions since Environment Director Rob Grant and Leader Gordon Kemp were both quoted in the Press.
- 21. The LDP does not consider the Vales Council's ability to meet its obligations in a climate of austerity (the reductions outlined in para 20 being one symptom). This issue must be crucial for the viability of the plan not least that it is reported that there is likely to be some restrictions on the conditions associated with some development that can be placed on the developer and the Council maybe required to cover the cost.
- 22. Sewage capacity: The previous LDP contained the following comment:-

Page 96, para 4.4.42 and 4.4.43 .In relation to Site 17- The Limes, and Site 18- River Walk

'Welsh Water has indicated that the Cowbridge Sewage Treatment Works is at capacity and that this may cause a problem for the development of the site. In addition, the Environment Agency has advised that a greenfield run off restriction may be required."

The initial consultation report Nov 2011 contains the following reply from Welsh Water:-

"Obviously, water and sewerage infrastructure is a vital commodity for nearly all types of development and any improvements to our assets to meet future development proposals would need to align with our 5 year rolling programme of Capital Improvements. We realise your Plan will have a longer horizon but water companies are governed by a Regulatory 5 year Plan. Where development proposals would create the need for additional infrastructure, in advance of regulatory improvement, then we would expect developers to meet this cost. This approach is re-enforced by Planning Policy Wales Chapter 12."

"We would be more than pleased to assist you in formulating water and sewerage infrastructure Policies as well as assessing (in confidence) any initial development proposals you may wish to consider prior to publication of formal consultation."

The sustainability of the Sewage system, and its ability to manage an increase in housing, was a matter for concern at the Darren Farm planning Inquiry.

The sustainability assessment has not considered this aspect despite the previous comment and the reply from Welsh Water.

Living close to the Sewage Pumping station has involved a range of disadvantages not least the occasional smell which extends well beyond the limited exclusion planned in the development. The pumping equipment has failed regularly and the pipeline to the Sewage Treatment works has blocked requiring dawn to dusk (and beyond) pumping outside our house on many occasions. This leads me to question whether the infrastructure is fit for purpose currently without the additional burden of developments in Cowbridge.

23. Previous Planning Inquiry comments: Planning applications have been made to develop this site previously and turned down. The key feature has been the impact on the landscape and access in an area where such a feature is regarded so highly by many organisations and people.

In 2003 an appeal was heard, associated with a proposal to develop land between the A48 and the Llantwit major Road in Cowbridge. Whilst some of the aspects of the Appeal and the arguments made are relevant only to the specific site, there are relevant comments about aspects of Cowbridge as a settlement and similarities between the subject site and the proposed MG 2(13) development. They are set out below:-

Para 4.6 The Darren Farm site was not designated as a Special Landscape

(ordered by Representation ID No.)

Representor ID and details: 4189/DP1 Mr Stephen Pearce

area and had never been so designated. (Clearly this does not apply to the MG2 (13) site).

The Council's case-

- 4.33 Cowbridge is a thriving Town that is able to sustain local services and facilities without the need for development of the appeals site. It serves the population and the rural hinterland and has a lower proportion of commercial vacancies in its centre than any other recognised centre in the Vale of Glamorgan.
- 4.38 A further example of relevance to sustainability is that the Bus service to Cowbridge is limited and it has no train service...

#### Inspector's comments

12.41 ... Cowbridge does not have a significant employment base and around 75% of people commute away by car to work areas such as Cardiff.

Whilst these comments were made in 2003, it can be argued that Cowbridge remains a thriving Town without the need for development. It indeed has a low employment base with the vast majority, probably well in excess of the 75% quoted working away from Cowbridge. Any additional housing will then exacerbate the use of Cars and the associated greenhouse gas emissions.

### Concluding remarks

- 24. The candidate site should be excluded from the LDP on the grounds that it failed both sustainability assessments (stage 2 and 3) when those assessments are carried out using evidence plainly available.
- 25. The one overriding principle in the plan is the generation of housing provision (social and otherwise). The linkage between housing and employment is umbilical. In the past, the ability to generate houses has not been matched by its ability to generate employment The plan is overoptimistic about the ability and numbers of jobs likely to come from developments in St Athan and the question about where the occupants of the houses will find employment.
- 3f Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)

Have candidate site removed and include as a green wedge to prevent further development considerations.

- 4b If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -
  - 1. All the points set out in my representation.
  - 2. The particular points make are supported by an evidence base which needs an explanation at the hearing and the inspector needs to hear and see the depth of local feeling on the subject.



(ordered by Representation ID No.)

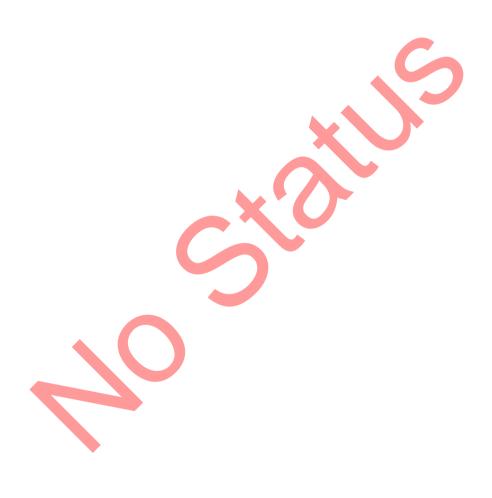
| Representor ID and details: 4190/DP1 Richard May, Davi  | d Clements Ecology Ltd   |                                |
|---|--|--------------------------------|
| Date Lodged     Status     Petition and No.     Supporting Evidence       27/03/2012     M     □     0     □  | Additional SA SEA Rep format: 4a - do you want your comments to be consiered by 'written representation' you want to speak at a hearing session of Public examination?   | s' or do                       |
| ,   | 2b - If you think that the Plan is unsound and does not not meet one or more test(s) of soundness, please indicate which test(s) that it fails.  Procedural Tests - P1 - Unanswered P2 - Unanswered  Consistency Tests - C1 - Unanswered C2 - Unanswered C3 - Unanswered C4 - Unanswered  Coherence and Effectiveness Tests - CE1 - Unanswered CE2 - Unanswered CE3 - Unanswered CE4 - Unanswered  |                                |
| 3a - Which part of the Deposit Plan are you commenting on?  | Policy Number: Proposal Map: Constraints Map Appendices  | <u></u>                        |
| 3b - Do you wish to see any changes made to the Deposit Plan  | as a result of your representation? Unanswered (If "No" or "Unanswered" - go to 3d)  |                                |
| 3c - What changes would like to see made to the Deposit Plan?   | New Policy: Amended Policy: Unanswered Unans |                                |
| •   | d site, did you submit the site as a Candidate Site? Unanswered (If "Yes", please give the Candidate Site Name and reference if known Site Name:   | 1)                             |
| acceptable in terms of enhancement (if disappointing- give TANS) protection ('maintenance' in the LDP's terms') for s space- despite all the legal and policy protection offered to appreciate that the LDP mustn't replicate national policy be Part 1 of Policy MD6 refers to 'important biodiversity feature the WG adopted SINC criteria/UKBAP priority habitat defin |  | V and<br>their loft<br>ites! I |
| Paragraph 6.27 refers to the identification of national and I known ancient/semi-natural woodland and PAW sites.  | ocal priority habitats on the constraints map. These are not identified on the map- instead, nationally and locally designated sites are shown ale   | ong with                       |
| Part 1 of Policy MD6 refers to biodiversity features 'including as being of 'biodiversity' interest.  | ng geological features'. Geological features are not, by definition, biodiversity features. Again, para 6.27 refers to 'Regionally Important Geological features'.   | cal Sites'                     |
| Policy MD6 seems to have lost the reference to features of  | f importance for ecological connectivity. The habs regs explicitly require the LDP to provide for this.  |                                |
| Policy MG23 states that 'where the benefits of a developm will be 'assessed in accordance with Policy MD6'. By asse   | ent outweigh the importance of the SINC, mitigation will be required to compensate for the adverse impact on the designation' and that develop<br>ssing it against MD6, it means that SINCs will receive no protection from minor commercial and householder applications.   | oments                         |
|   | dentification of SINCs. As SINCs are identified on the proposals map and listed in Appendix 3 (para 7.96), there is presumably no way to identification value will, I guess, still need to be considered under the provision in TAN 5 and Policy MD6 which protect any 'habitats' that are important   | fy new                         |
| Paragraph 7.97 refers to 'the Council's Biodiversity and De states an intention to publish SPG on biodiversity so I gue   | evelopment Supplementary Planning Guidance (August 2010)'. This adopted guidance was published with reference to the adopted UDP. Appe ss that the current SPG will be fully revised?  | ndix 2                         |

3f - Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)

(ordered by Representation ID No.)

Representor ID and details: 4190/DP1 Richard May, David Clements Ecology Ltd

4b - If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -



| Representor ID and deta              | ails: 4191/DP1 Mr A.Williams  |   |                                   |                               |                                       |                               |  |                           |
|--------------------------------------|---|---|-----------------------------------|-------------------------------|---------------------------------------|-------------------------------|--|---------------------------|
| Date Lodged Status I<br>30/03/2012 M | Petition and No. Supporting Evidence  | Additional SA SEA                       |                                   | Rep format:<br>Comment form   | · · · · · · · · · · · · · · · · · · · |                               | be consiered by 'writter<br>sion of Public examination | •                         |
| 2a - Do you consider the             | LDP is Sound? Unanswered  | •                                       | e Plan is unsound and<br>P1 - Yes | does not not meet<br>P2 - Yes | one or more test(s) of                | soundness, pleas              | se indicate which test(s)                              | that it fails.            |
|                                      |   | Consistency Tests -                     | C1 - Yes                          | C2 - Unansv                   | wered C3 - Unansv                     | wered C4 -                    | Yes  |                           |
|                                      |   | Coherence and Effecti                   | veness Tests - CE1                | · Yes                         | CE2 - Yes                             | CE3 - Yes                     | CE4 - Yes  |                           |
| 3a - Which part of the De            | posit Plan are you commenting on?   | Policy Number:                          | Paragraph                         | Number:                       | Proposal Map:                         |                               | Constraints Map  | Appendices:               |
|                                      |   | MG2(4). MG12(12). M                     | MG2(7)                            |                               |                                       |                               |  |                           |
| 3b - Do you wish to see a            | any changes made to the Deposit Plan  | as a result of your rep                 | resentation? Yes                  | (If                           | "No" or "Unanswered"                  | - go to 3d)                   |  |                           |
| 3c - What changes would              | I like to see made to the Deposit Plan  | ? New Policy:<br>Unanswered             |                                   | New Paragraph:<br>Unanswered  | Amended Paragrap<br>Unanswered        | h: New Or Amer<br>Yes         | nded Site: Other (see N<br>Unanswered                  | <del></del>               |
|                                      |   | Notes:                                  |                                   |                               |                                       |                               |  |                           |
| 3d - If your representation          | on relates to a new, deleted or amende  | ed site, did you submit t<br>Site Name: | he site as a Candidate            | Site? Yes                     | (If "Yes", pleas                      | se give the Candi<br>Site Ref | idate Site Name and ref                                | erence if known)          |
| 3e - Please set out your             | representation below:   |   |                                   |                               |                                       |                               |  |                           |
|                                      | nanges you wish to see made to the D the people of the Vale for their views.    | •                                       | ,                                 | swimming pools, b             | oowling alley, cinema, g              | ood changing fac              | cilities for all sports peop                           | ole in the Vale.          |
| Build the new town                   | in Llandow which was planned 20 yrs   | ago.                                    |                                   |                               |                                       |                               |  |                           |
| 4b - If you wish to speak            | s, please confirm which part of your rep  | presentation you wish to                | speak to the inspecto             | r about and why the           | ey consider it be neces               | sary to speak at              | the hearing -  |                           |
|                                      | ealt with the amount of traffic which wi<br>road from Weycock Cross to the M4 i |   |                                   | ich will be generate          | ed with the building of a             | all the houses and            | d factorys along this roa                              | d will cause no amount of |

| Representor ID and details: 4192/DP1 Mr Kyle Carnell   |  |                                    |                                   |   |                                  |  |                               |
|--|--|------------------------------------|-----------------------------------|---|----------------------------------|--|-------------------------------|
| Date Lodged     Status     Petition and No.     Supporting Evidence       30/03/2012     M     □     0     □   | Additional SA SEA  |                                    | Rep format:<br>Letter             | ,   | ,                                | pe consiered by 'writte<br>ion of Public examinati | n representations' or do ion? |
| 2a - Do you consider the LDP is Sound? Unanswered  | 2b - If you think that the Procedural Tests - Consistency Tests - Coherence and Effect | P1 - Unanswered<br>C1 - Unanswered | P2 - Unan                         | et one or more test(s) o<br>swered<br>swered C3 - Unans<br>CE2 - Unanswered | swered C4 - U                    | ,  | ,                             |
| 3a - Which part of the Deposit Plan are you commenting on?   | Policy Number:<br>MG2(16)  | <u>Paragrap</u>                    | oh Number:                        | Proposal Map:   | )                                | Constraints Map                                    | Appendices:                   |
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| 3d - If your representation relates to a new, deleted or amende  | ed site, did you submit<br>Site Name:  | he site as a Candidate             | e Site? Unanswe                   | ered (If "Yes", plea  | ase give the Candid<br>Site Refe | date Site Name and re<br>erence:                   | eference if known)            |
| 3e - Please set out your representation below: I wish to protest at the plans to build 430 houses on land  | at Fort Rd, Lavernock.   |                                    |                                   |   |                                  |  |                               |
| The following has not been considered by the planners ar   | nd if they had they wou  | d realise that the point           | ts a <mark>re i</mark> nsurmounta | ible  |                                  |  |                               |
| 1) 430 = 860 to 1200+ extra cars trying to exit Penarth on 2) 430 = erosion of green belt blurring boundaries and ne 3) 430 = environmental impact on nature reserve and nat 4) 430 = excavating toxic sites, with disregard for archaec 5) 430 = flooding exasperated at Lavernock Road once fig. | gating the unique chara<br>ural habitat.<br>ological sensitivity on re                 | acter of Penarth & Sull            |                                   |   |                                  |  |                               |
| The list is endless.   |  |                                    |                                   |   |                                  |  |                               |
| Please don't build here.   |  |                                    |                                   |   |                                  |  |                               |
| 3f - Please outline the changes you wish to see made to the D  | eposit Plan to make it   | sound (if relevant)                |                                   |   |                                  |  |                               |
| 4b - If you wish to speak, please confirm which part of your rep   | oresentation you wish t  | o speak to the inspect             | or about and why t                | hey consider it be nece   | ssary to speak at th             | <br>he hearing -                                   |                               |

| Representor ID and details: 4192/DP2 Mr Kyle Carnell   |  |  |   |  |  |  |  |  |  |
|--|--|--|---|--|--|--|--|--|--|
| Date LodgedStatusPetition and No.Supporting Evidence30/03/2012M0   | Additional SA SEA  |  | s to be consiered by 'written representations' or do session of Public examination? Written |  |  |  |  |  |  |
| 2a - Do you consider the LDP is Sound? Unsound   | 2b - If you think that the Plan is unsound and does not not meet one or more test(s) of soundness, please indicate which test(s) that it fails.  Procedural Tests - P1 - Yes P2 - Unanswered |  |   |  |  |  |  |  |  |
|  | Consistency Tests - C1 - Yes   | C2 - Unanswered C3 - Unanswered C  | 4 - Unanswered  |  |  |  |  |  |  |
|  | Coherence and Effectiveness Tests - CE1  | Unanswered CE2 - Yes CE3 - Unan  | swered CE4 - Yes  |  |  |  |  |  |  |
| 3a - Which part of the Deposit Plan are you commenting on?   | Policy Number: Paragraph   | Number: Proposal Map:  | Constraints Map Appendices:   |  |  |  |  |  |  |
|  | MG2(16)  |  |   |  |  |  |  |  |  |
| 3b - Do you wish to see any changes made to the Deposit Plan   | as a result of your representation? Yes  | (If "No" or "Unanswered" - go to 3d)                                     |   |  |  |  |  |  |  |
| 3c - What changes would like to see made to the Deposit Plan   |  | New Paragraph: Amended Paragraph: New Or A Unanswered Unanswered Unanswe | nmended Site: Other (see Notes): red Unanswered   |  |  |  |  |  |  |
|  | Notes:   |  |   |  |  |  |  |  |  |
| 3d - If your representation relates to a new, deleted or amende  | ed site, did you submit the site as a Candidate<br>Site Name:  |  | andidate Site Name and reference if known) Reference:                                       |  |  |  |  |  |  |
| 3e - Please set out your representation below: The proposal to site 450 dwellings on the land at Fort Rd, Namely:- Transport inc. no alternative public transport wh Environmenta:- vastly increased carbon footprint due to | nich will increase traffic on alrea <mark>dy</mark> vastly conge   |  |   |  |  |  |  |  |  |
| 3f - Please outline the changes you wish to see made to the D  Delete the proposed development from the Deposit Plan   | ·  |  |   |  |  |  |  |  |  |
|  |  |  |   |  |  |  |  |  |  |

| Representor  | ID and               | details:            | 4193/D                | P1 Ms Fiona Martyn   |   |   |                                  |                                    |  |                                     |                            |
|--|----------------------|---------------------|-----------------------|--|---|---|----------------------------------|------------------------------------|--|-------------------------------------|----------------------------|
| Date Lodged<br>30/03/2012                                    |                      | Petitio             | on and No.            | Supporting Evidence  | Additional SA SEA                             |   | Rep format:<br>Email             |                                    | your comments to be k at a hearing session | •                                   | representations' or do on? |
| 2a - Do you o  | onsider t            | the LDP             | is Sound?             |  | 2b - If you think that the Procedural Tests - | ne Plan is unsound and<br>P1 - Unanswered | l does not not mee<br>P2 - Unans | et one or more test(s) o<br>swered | f soundness, please i                      | ndicate which test(s)               | that it fails.             |
|  |                      |                     |                       |  | Consistency Tests -                           | C1 - Unanswered                           | C2 - Unans                       | swered C3 - Unan                   | swered C4 - Un                             | answered                            |                            |
|  |                      |                     |                       |  | Coherence and Effect                          | iveness Tests - CE1                       | - Unanswered                     | CE2 - Unanswered                   | CE3 - Unanswered                           | CE4 - Unanswe                       | ered                       |
| 3a - Which pa  | art of the           | Deposit             | Plan are y            | ou commenting on?  | Policy Number:                                | <u>Paragrap</u>                           | h Number:                        | Proposal Map:                      | 2  | Constraints Map                     | Appendices:                |
|  |                      |                     |                       |  | MG2(33)                                       |   |                                  |                                    |  |                                     |                            |
| 3b - Do you v  | ish to se            | ee any cl           | hanges ma             | de to the Deposit Plan   | as a result of your rep                       | resentation? Unansv                       | wered (I                         | If "No" or "Unanswered             | d" - go to 3d)                             |                                     |                            |
| 3c - What changes would like to see made to the Deposit Plan |                      |                     |                       | de to the Deposit Plan?  | New Policy:<br>Unanswered                     | Amended Policy:<br>Unanswered             | New Paragraph:<br>Unanswered     | Amended Paragra Unanswered         | ph: New Or Amende Unanswered               | ed Site: Other (see N<br>Unanswered | <del></del>                |
|  |                      |                     |                       |  | Notes:  |   |                                  |                                    |  |                                     |                            |
| 3d - If your re  | epresent             | ation rela          | ates to a n           | ew, deleted or amende  | d site, did you submit t<br>Site Name:        | he site as a Candidate                    | Site? Unanswe                    | ered (If "Yes", ple                | ase give the Candidate                     |                                     | erence if known)           |
| 3e - Please s  | set out yo           | our repre           | esentation            | below:   |   |   |                                  |                                    |  |                                     |                            |
| I have li  | ved at Ti            | nkinswo             | od for the            | past 47 years and have   | been very pleased to                          | be a member of the St                     | . Nicholas small c               | ommunity.                          |  |                                     |                            |
| 'false' h<br>agriculti                                       | edge wa<br>ural land | s added<br>and sure | about ten ely the cou | ed development of hous<br>years ago to make it lo<br>ncil must see that gree<br>olas, I think not. | ok as though that was                         | the end of the village.                   | If this proposed de              | evelopment goes ahead              | d it will change St. Nic                   | cholas and not for the              | better. The land is top    |
| 3f - Please o  | utline the           | e change            | es you wish           | n to see made to the De  | eposit Plan to make it s                      | sound (if relevant)                       |                                  |                                    |  |                                     |                            |
| 4b - If you w  | ish to sp            | eak, plea           | ase confirm           | n which part of your rep   | resentation you wish to                       | o speak to the inspecto                   | or about and why t               | hey consider it be nece            | essary to speak at the                     | hearing -                           |                            |

(ordered by Representation ID No.)

| Representor ID and details: 4194/DP1 Mr Kevin Fox   |   |                      |  |                            |                   |  | _   |
|---|---|----------------------|--|----------------------------|-------------------|--|---|
| Date Lodged     Status     Petition and No.     Supporting Evidence       02/04/2012     M     0        | Additional SA SEA   |                      | Rep format:<br>Comment for                     |                            | •                 | o be consiered by 'writter<br>ssion of Public examinati  | •   |
| 2a - Do you consider the LDP is Sound? Unsound  | 2b - If you think that the Procedural Tests - Consistency Tests - | P1 - Yes             | d and does not not med<br>P2 - Yes<br>C2 - Yes | et one or more test(s) o   |                   | ase indicate which test(s  | that it fails.                                |
|   | Coherence and Effective   |                      |  | CE2 - Yes                  | CE3 - Yes         | CE4 - Yes  |   |
| 3a - Which part of the Deposit Plan are you commenting on?  | Policy Number:<br>MG9. MD12. MG2                                  |                      | agraph Number:<br>9. 6.52. 7.41. 7.44.         | Proposal Map:<br>MG9       | )                 | Constraints Map Feb 2012   | Appendices: Appendix 9 - Supporting Documents |
| 3b - Do you wish to see any changes made to the Deposit Plan  | as a result of your repr  | esentation? Y        | es (   | If "No" or "Unanswered     | d" - go to 3d)    |  |   |
| 3c - What changes would like to see made to the Deposit Plan?   | New Policy: Unanswered Notes:                                     | Amended Polic<br>Yes | y: New Paragraph:<br>Unanswered                | Amended Paragra Unanswered | ph: New Or Amo    | ended Site: Other (see Note of the Control of the C | <del></del>                                   |
| 3d - If your representation relates to a new, deleted or amende   | ed site, did you submit th<br>Site Name: Land East                |                      | didate Site? Yes                               | (If "Yes", ple             | · ·               | didate Site Name and reteference: Site reference   | ,   |
| 3e - Please set out your representation below: The proposed Gypsy traveller site would be situated on a | areenfield area close to  | the Hamlet of L      | angan and would place                          | an unaccentable press      | sure on the local | infrastructure and service   | ae  |

This proposal is against both local and national policy, in terms of development and does not meet the identified needs of the gypsy and traveller community (listed in the Council's own report – Fordham report)

I do not support this unfair proposal, the Council should seek to find smaller, more suitable, sustainable sites where transient and permanent pitches are not co-located. The new sites should meet the needs of the gypsy traveller community and take into consideration Special Landscape Area (SLA) and Conservation Areas and the local environment.

REPRESENTATIONS AGAINST ALLOCATION OF GYPSY & TRAVELLER SITE AT LAND EAST OF LLANGAN

TEST P1

The LDP has not been prepared in accordance with the Community Involvement Scheme, see below key points:

- The Emergency Services and Local Primary school have all confirmed that they have NOT been consulted on the proposed site MG9. The LEA confirmed they had not been consulted about the Gypsy site.
- Registered consultees have not been informed of the consultation stages.
- According to the Welsh Government's document 'Travelling to a better future' there is an onus on the LA to consult with its strategic partners in delivering Gypsy & Traveller sites. No consultation has taken place.
- Good practice (Welsh Government document 'Good Practice Design in designing Gypsy & Traveller sites') suggests that where Gypsy & Traveller sites are concerned the local community should be engaged as early as possible — we believe that the Council has undertaken the minimum consultation in terms of the LDP and insufficient consultation with respect to the Gypsy & Traveller site in accordance with best practice.

TEST P2

1. The Sustainability Appraisal is flawed and contradictory — the proposed sites do not meet with national policy in respect of sustainability. The allocation of Llangan is not consistent with previous Planning Rejections by the Council which considered sustainability (Bonvilston Sept 2011) and with similar determinations by the Planning Inspectorate (Pembroke Sept 2011).

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2. The allocation of MG9 is not consistent with the proposed LDP policies.

#### TEST C1

The Land Use Plan (with regards to Gypsy & Traveller sites) does not relate to any strategy - The Housing Strategy is out dated and does not provide any structure for assessing Gypsy & Traveller needs or site location.

#### TESTC2

- 1. The Site allocation does not have regard to the following National Policy:
- -Welsh Government Circular (30/2007):
- The site is RURAL and is "UNSUSTAINABLE" as there are no local services (no shops, food and drink outlets, doctor, dentist, Library, rail services or any main settlement within 5km etc). Llangan and Fferm Goch both score 0 points for local services in the evidence based assessment 'Sustainable Settlements Appraisal'
- The site would not comply with a RURAL EXCEPTION POLICY as it advocates that all pitches are accommodated on a RURAL site including transient pitches which would not comply with TAN 2.
- Any business operated from the site would be in contradiction of RURAL EXCEPTION guidance.
- The site allocation does not take into account the "SCALE" of the resident community. Llangan has a population of less than 100 with 35 homes and this proposal nearly doubles the size of the Hamlet.
- Example of similar site. In 2007 an application of the Sustainability issue was applied by the Planning inspector in Pembroke where an appeal was refused solely on this basis.
- The VOG Council has refused an application recently in Bonvilston on the basis of Sustainability and services in this case were closer to the site than in the case of Llangan proposal.
- Designing Gypsy and Traveller Sites Good Practice Guide The site is too small; therefore cannot meet the needs identified in the LDP.
- -The site measures 7400 m2 and could only accommodate 14 pitches without infrastructure (guidance is 500m2 per pitch plus refuse area; office; play area; infrastructure (roads etc)
- The access road to the site does not meet the minimum requirements for emergency vehicles (3.7m it is actually 15m)
- The site access is poor and "unsafe" having extended walks (in excess of 800m to bus stop) along an unlit lane with no public footpath or street lighting.
- The proposal of 21 units on the site would restrict the ability of emergency vehicles to manoeuvre around the site.
- New sites grants are available (and cost should not be a material planning consideration).
- -The guidance requires that sites are:
- sustainable the Llangan site proposal is not
- equivalent to standards that would be expected for social housing in the settled community This would not meet the standards and this site would not have been considered appropriate for development for residential in either the current or proposed plans
- have the effect of encouraging and developing good relations between
- Gypsies & Travellers and the settled community the large scale of this proposal could mean that establishing good relations with the local community of Llangan would be unlikely and could also result in increased tensions in the community.
- based on WAG guidance of Design of Gypsy traveller sites the maximum number of pitches is 14, and the proposal at Llangan exceeds this number.
- Travelling to a Better Future
- Recommends that LA's engage with their Housing Association Partners to bring sites forward. The VOG Council has not done this.
- "Situating transit provision on residential Gypsy sites is not an option preferred by the Gypsy and Traveller community as this can lead to tensions among different family groups and make site management and maintenance very difficult." This creates a sense of "fear" within the settled Gypsy & Traveller community. The proposal is recommending that transient and permanent sites are co-located.
- Planning Policy Wales 2011
- The proposed site at Llangan is greenfield land, according to the definition of brownfield land set out in Figure 4 1 of PPW;
- it will not reduce the need to travel, due to the limited local service provision in close proximity to the site;

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- offers very limited access to public transport facilities:
- is not large enough to provide ancillary facilities required to support a sustainable development as set out in paragraph 3.30 in accordance with Designing Gypsy and Travellers Sites Good Practice Guide;
- is located within a Special Landscape Area (SLA) and in close proximity to a Conservation Area. The assessment of the Llangan site incorrectly states that it is not within an SLA, so makes no reference to the sites proximity to the conservation area of Llangan. The location can be clearly seen from the conservation area.
- does not meet the identified needs of Gypsies and Travellers, in the Vale of Glamorgan (Fordham report 2008 evidence):
- does not promote sustainable access to employment, shopping, education, health, community, leisure and sports facilities:
- does not maximise opportunities for community development and social welfare:
- does not foster social inclusion due to the isolated location of the site: and
- does not contribute to improvements in health due to the isolation from services and facilities.
- 2. MG2. The draft policy MG 2 actively discriminates the Gypsy community by excluding them from the wider housing programme and potentially abuses their human rights. Policy MG 2 should be revised to allow the VOG to identify appropriate sites in the same way as Affordable Housing.

### TESTC3

- 1. The policy does not have due regard to the Wales Spatial Plan.
- The key theme of the Wales Spatial Plan is achieving sustainable development through focusing new development in areas which have good access to key services and facilities. As there are no services surrounding the site the allocation of MG9 is not consistent with the objectives of the Wales Spatial Plan. The Gypsy site proposal fails Soundness test Consistency C3 because the policy does not have due regard to the Wales Spatial Plan.

### TESTC4

- 1. The allocation of this site does not have regard to the relevant Community Strategy in the following respects:
- "The diverse needs of local people are met through the provision of customer focused, accessible services and information"- This cannot be achieved by the allocation of a non-accessible rural allocation.
- "Vale of Glamorgan residents and organisations respect the local environment and work together to meet the challenge of climate change". The allocation of MG9 places heavy emphasis on the use of the car to access the most basic facilities — shops, health, education etc.
- "Older people are valued and empowered to remain independent, healthy and active. They have equality of opportunity and receive high quality services to meet their diverse needs" All services are miles away and inaccessible to

the older community. The VERY POOR public transport system is located

1050m from the site and is in excess of the maximum distances as defined in

the proposed LDP and "Manual for Streets".

- "People of all ages are able to access coordinated learning opportunities and have the necessary skills to reach their full potential helping to remove barriers to employment"—There is no employment opportunity near to the site.

The local primary school has confirmed that it is full and that its projections suggest that it doesn't have the capacity for such a large development (also consider the existing approval of 12 dwellings at Fferm

- The small local industrial unit has raised concerns in relation to the scale of the proposal

#### TEST CE1

The Plan does not set out a coherent strategy in the following respects

- The Strategy makes the following statements:

The LDP will seek to provide a policy framework which: Manages the housing supply effectively in order to provide a range of good quality, affordable homes in sustainable locations

Reduces out commuting by providing opportunities for new housing, retail and employment development in accessible locations in the Vale of Glamorgan

The allocation of this rural site in open countryside does not meet this objective.

- The LDP also states its vision as being:

"Our Vision for the Vale of Glamorgan is a place:

That is safe, clean and attractive, where individuals and communities have sustainable opportunities to improve their health, learning and skills, prosperity and wellbeing and

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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 sustainability of the area." The allocation of this site in policy MG9 does not meet these objectives being in a rural location with inadequate facilities and transport links.

- The Allocation of this site in policy MG9 does not comply with the following objectives of the LDP:
- -Objective 1: To sustain and further the development of sustainable communities within the Vale of Glamorgan, providing opportunities for living, learning, working and socialising for all. The site's location would clearly not meet this objective.
- Objective 2: To ensure that development within the Vale of Glamorgan makes a positive contribution towards reducing the impact of and mitigating the adverse effects of climate change. The allocation of this site will have entirely the opposite effect to this objective.
- Objective 3: To reduce the need for Vale of Glamorgan residents to travel to meet their daily needs and enabling them greater access to sustainable forms of transport. The allocation of this site will have entirely the opposite effect to this objective.
- Objective 4: To protect and enhance the Vale of Glamorgan's historic, built, and natural environment. The development of this site would not meet this objective: a planning refusal on an adjacent site in May 2002 stated "It is a proposal that would adversely affect the undeveloped rural character of the area"
- Objective 5: To maintain, enhance and promote community facilities and services in the Vale of Glamorgan The local primary school has not been consulted, had they been it would have been recognised that the school does not have capacity, nor is it projected to have the capacity.
- Objective 7: To provide the opportunity for people in the Vale of Glamorgan to meet their housing needs- States that development of housing should be in sustainable locations This is not. Furthermore, it brings into question POLICY MD12 which is discriminatory in that Gypsy & Traveller sites are treated differently from other housing allocations. An inclusive policy would see Gypsy & Traveller sites being assessed on the same basis as AFFORDABLE HOUSING and considered for ALL candidate residential sites in the LDP
- Objective 10: To ensure that development within the Vale of Glamorgan uses land effectively and efficiently and to promote the sustainable use and management of natural resources. The inappropriate use of finite resources can impact on the ability of future generations to fulfil their needs. The LDP through favouring the use of previously developed land and the sustainable use of natural resources of whatever kind and wherever they are located, will contribute to preserving their availability for future generations. This is agricultural land in the Special Landscaped Area.

#### TEST CE2

The strategies, policies and allocations are not realistic and appropriate having considered relevant alternatives and are not founded on robust evidence:

- 1. The allocation of Llangan is purely on the basis of site ownership by the Vale and does not meet the requirement of Policy MD12.
- 2. The Gypsy & Traveller site assessment (anecdotal) conflicts with other evidence based background papers; specifically the Sustainable Settlement Appraisal. The SSA states 0 points for public transport but the Gypsy & Traveller site assessment states that public transport facilities are good.
- 3. The Gypsy Traveller site assessment states "good highway access", yet the access falls considerably short of the minimum requirement for vehicle access the access lane is 2.5m wide, against a minimum requirement of 3.7m plus footpath of 1.2m.
- 4. The Gypsy Traveller site assessment does not reflect the current legal obligations of the VOG in respect of this site, yet the other site assessments highlight legal issues.
- 5. Several privately-owned sites were put forward as candidate sites for Gypsy & Traveller sites but were dismissed as they were not in Council ownership. Not being in council ownership should not be a reason to reject privately owned sites.
- 6. The key issue is that the site allocation does not reflect the identified need of the Gyosy & Traveller community as highlighted in the 2008 Fordham report.
- 7. The Gypsy Traveller site assessment suggests that Fferm Goch is the local settlement when Llangan is recognised in this and historic documents as the local settlement being only 150m from the proposed site. It appears that the council has also linking the site at Llangan to the Hamlet of Fferm Goch in order to increase the site assessment positive score.
- 8. The assessment makes no reference that the site is in a Special Landscape Area (SLA).
- 9. The assessment makes no reference that the site is adjacent to a Conservation Area, within the Conservation Management Plan for this area there is a specific requirement to protect the view from the edge of the conservation area over the proposed site. The proposed site is clearly visible form the conservation area.
- 10. The allocation of Fferm Goch as a Minor Rural Settlement is incorrect. The appraisal scored 9 points. 3 are for employment which puts this site on par with the major settlements such as Barry. This is on the basis of 4 light industrial buildings. A survey of these employers has confirmed that zero new jobs have become available in the last 9 years and that the units collectively employ fewer than 15 people with no intention to expand. Furthermore, one of the units has been empty and the development is not a popular industrial site.
- 11. Fferm Goch has a population of less than 100 (98)— of the 5 sites in the Vale of Glamorgan with a population of 98 only Fferm Goch is classified as a Minor Rural site (probably based on the 9 points). The remainder are classified as Hamlets and there is a presumption against development in Hamlets (or as a minimum the scale would need to be appropriate and tied to a Rural Exception policy). The guidance requires ALL sites of a population below 100 to be classified as a Hamlet Fferm Goch should be recategorised as a Hamlet.
- 12. The Council has undertaken a study (Fordham report 2008) where the message was extremely strong that the Gypsy & Traveller community wanted smaller sites located on the fringes of larger communities. The report confirmed that isolated, rural sites restricted access to Health, Education and welfare facilities that disadvantaged them and needs to be seen in the light of the above objectives. The following is a quote from the Fordham report:
- "Participants living on Shirenewton had three main criticisms: the site was too big, the distance from local amenities along with the lack of local transport,"

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"This created many problems for the residents, especially the poorest: 'for a person like me on the bread line it's very tough. I can't afford to use the car', 'everything is a mile away, including the bus stop. It takes a long walk on a busy road to get to the shops and schools".

"The tables demonstrate that access to services such as local shops, health centres and education facilities from both sites is difficult by foot and by local transport systems. This difficulty was eased when participants used their cars, however the level of ease was lower for Roverway due to the difficult entry onto the main road".

"Participants reported that access to local amenities, health services and education was low for both sites by foot or by public transport: 'Everything is a mile away, including the bus stop. It takes a long walk on a busy road to get to the shops and schools".

"It was thought that smaller sites would reduce the problem of on-site conflicts: 'they need smaller sites and not too many different families, otherwise when you have a row the whole site becomes a war zone"

"This affected the ability of the households interviewed to access local services such as shops, health centres and education facilities. It was reported that this problem mainly affected the women: men take the vehicles that the household own to work during the day, leaving the women without their own transport and often away from public transport routes"

"Participants did not specify where in Cardiff or the Vale of Glamorgan sites should be located. It was noted that sites should be on the outskirts of towns to enable access by foot to local services such as shops, the Launderette and health centres"

"While the focus of the survey was on accommodation requirements, the questionnaire also collected information on access to services, including health and education. Research has found that poor accommodation can prevent access to services and so cannot be seen in isolation."

"Participants living on sites felt that there were site restrictions that limited their work options. These were mainly associated with the location of the sites and lack of access to public transport rather than site regulations: 'no buses, no local transport. Bad access"

"Participants living on local authority sites reported that the lack of local public transport provision in the area affected their ability to send their children to school, access health services and work opportunities, and limited their ability to attend training and education courses"

"Participants were asked about where they would like future sites to be, but were not specific about locations within the County Boroughs, instead emphasising the importance of public transport to any new sites. Government draft guidance on site design stresses the importance of access to services and the promotion of integrated co-existence' between the site and surrounding community."

"The precise location, design and facilities of any new sites should be drawn up in consultation with Gypsies and Travellers to ensure that the additional provision meets their needs. The health and safety implications of a new site's location should be considered in finding a balance between offering sites in good locations and the additional land costs this would entail. The settled community neighbouring the sites should also be involved in the consultation from an early stage."

13. An independent highway study recently undertaken by Capita Symonds, surrounding the proposed site has concluded that:

"The 1km long lane itself is of poor horizontal alignment, with poor forward visibility and unsuitable for regular vehicular traffic. If the site is developed the lane itself would need major upgrading, which would certainly change its appearance within this rural environment."

"The village school is approximately 1km from the village and 900 metres from the proposed site. It is noted that the route does not offer any facilities for pedestrians, such that the only safe way for children to travel between the site and the school safely would be by vehicle. This route would also be potentially hazardous for cycle use for children, the elderly or infirm and could be potentially hazardous for all users other than by car."

"With regard to the appropriateness of the location for a traveller's site development in relation to transportation, it is difficult to refer to standard guidelines, as few relate to "rural highways", most highway design standards for residential development relate to urban areas. Hence, the advice contained within this report is based on best available information, acceptable highway standards for developments of similar size and transport needs of small communities. Welsh Government guidelines state sites should be situated in close proximity to transport links. The Llangan site would not appear to meet that criteria, being situated away from the main transport infrastructure, sites should also have ready access to schools, doctors and shops, against which requirements Llangan again appears to fail."

"With regards to the existing lane, it is generally considered that where there is direct access to dwellings, the previous standard for developments, Design Bulletin 32 offers guidance where it states that a desirable minimum carriageway width of 5.5 metres is appropriate, together with 2.0 metre wide footways on both sides. This will allow two way traffic at all times, and safe movement of pedestrians."

"Thus the lane itself should be widened to this minimum standard, which will require the removal of the existing hedge line on one or both sides of the lane and probable acquisition of land from the adjoining fields. This will of course change the environmental character of the area substantially, but is considered essential to cater for increased vehicle and pedestrian traffic"

14. There is complete inconsistency with the allocation of MG9 against the proposed policies.

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### TEST CE3

- 1. The VOG council make no reference as to how they are going to manage such a large site. The 21 unit site in Rover Way Cardiff has 3 full time Council staff allocated to it.
- 2. The current Housing Strategy expires April 2012 and makes no relevant reference as to how the Gypsy & Travelling Community will be monitored in terms of growth or need. Indeed, there is no strategy that underpins the Gypsy & Traveller community or housing at all.

### TEST CE4

- 1. Policy MD12 (Gypsy & Traveller) is discriminatory. It offers no flexibility for the Council to bring forward sites that are sustainable / suitable for Gypsies & Travellers through the policies derived within the plan.

  2. MD12 should be redrafted to enable smaller, sustainable sites to be included within the Affordable Housing requirements and delivered through the Registered Social Landlord sector.
- 3. To argue that the Private Sector has been consulted to offer sites is not accepted. The private sector were not likely to volunteer sites for such a contentious use. The LDP should set clear strategies / policies to deliver sustainable sites for all members of the community; private; social and travelling. The current allocation does not meet this and could strongly be argued breeches the Human Rights of the Gypsy traveller community as it does not provide a suitable, sustainable site that meets the guidelines in the 2008 Fordham report.
- 3f Please outline the changes you wish to see made to the Deposit Plan to make it sound (if relevant)

The proposed Gypsy traveller site at Llangan (Policy MG9) should be removed from the LDP draft plan. The VOG should identify an alternative site that has been assessed according to a relative sustainability appraisal that considers the real situation in the local area and meets the requirements of the Gypsy community as listed in the 2008 Fordham report.

Policy MD12 should be amended so that it does not discriminate against the Gypsy and Traveller community. All sites during the plan should be assessed on a similar basis as Affordable Housing.

4b - If you wish to speak, please confirm which part of your representation you wish to speak to the inspector about and why they consider it be necessary to speak at the hearing -

